



Office of the New York State Attorney General Lettla James

Office of Special Investigation

June 8, 2026

Report on the Investigation into the Death of Samuel Williams

OVERVIEW

New York Executive Law Section 70-b directs the Attorney General's Office of Special Investigation (OSI) to investigate and, if warranted, to prosecute offenses arising from any incident in which the death of a person is caused by a police officer or a peace officer. When, as in this case, OSI does not seek charges against the officer, Section 70-b requires OSI to issue a public report describing its investigation. This is the public report of OSI's investigation of the death of Samuel Williams, who died after a motor vehicle collision with a New York City Police Department (NYPD) car driven by an NYPD officer.

On May 28, 2023, a group of twelve NYPD officers assigned to the Manhattan North Community Response Team (CRT) drove over the University Heights Bridge from the Bronx to Manhattan at around 5:45 p.m. They travelled in four unmarked police cars.

Samuel Williams drove a blue dirt bike in the opposite direction, toward the Bronx. He was the lead bike in a group of dirt bikes and all-terrain vehicles (ATVs) that were crossing the bridge from Manhattan into the Bronx.

Officer Hermes Rodriguez drove the police car directly in front of the car driven by Officer Raymond Perez. Officer Rodriguez turned his wheel to the left, angling his car into the opposite lanes of traffic in an attempt to slow down traffic and stop the dirt bikes. Officer Perez, the driver of the police car behind Officer Rodriguez, likewise turned his car into the opposite lanes of traffic. Mr. Williams went around Officer Rodriguez's car and collided with Officer Perez's car. The collision launched Mr. Williams over the hood of Officer Perez's car to the ground. Mr. Williams got up off the ground and hobbled toward the hood of a third police car. He was placed in handcuffs and arrested.

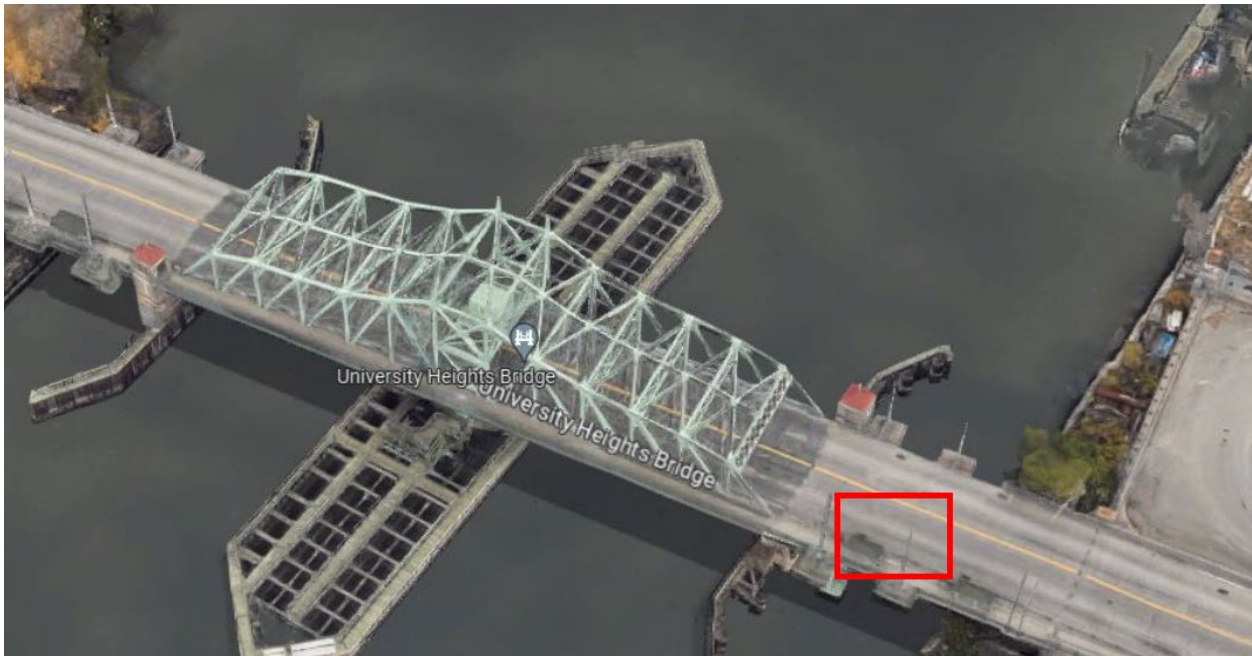
Mr. Williams was taken to St. Barnabas hospital with a broken leg and underwent surgery. He died the next day, May 29, 2023. An autopsy was performed, and the New York City Office of Chief Medical Examiner (OCME) determined that Mr. Williams died from complications from the collision and deemed his death an accident.

After a thorough investigation, OSI determines there is insufficient evidence to charge a police officer with a crime in connection with Mr. Williams's death and therefore closes the matter with the issuance of this report.

FACTS

The Scene

The collision occurred on the University Heights Bridge, which connects West 207th Street in Manhattan with Fordham Road in the Bronx over the Harlem River. There are two lanes of traffic into Manhattan and two lanes of traffic into the Bronx, separated by double yellow lines. There is a pedestrian walkway on the Bronx bound side separated from car traffic by a metal barrier and a fence.



Digital rendering of the University Heights Bridge prepared by the NYPD's Force Investigation Division. The red square marks the approximate location of the collision between Mr. Williams's dirt bike and the police car. Manhattan is to the left, and the Bronx is to the right.

Background of the Primary Police Officers Involved

Officer Raymond Perez drove the car that struck Mr. Williams. Officer Perez joined NYPD in 2020. He was assigned to the 33rd Precinct in Manhattan. In March of 2023, he was put on special assignment with Manhattan North CRT. Officer Perez had not been involved in an on-duty motor vehicle collision before this incident. NYPD determined that Officer Perez's actions on May 28, 2023, when he turned into oncoming traffic, were outside department guidelines.

Officer Hermes Rodriguez drove the second police car that caravaned across the University Heights Bridge. He joined NYPD in 2020 and was assigned to the 34th Precinct in Manhattan. He was assigned temporarily to Manhattan North CRT in January of 2023. Officer Rodriguez was involved in a prior on-duty motor vehicle accident in August of 2021 and was found at

fault after an internal review. On August 7, 2024, Officer Rodriguez was arrested by the New York County District Attorney's Office and pleaded guilty to misdemeanor charges stemming from an on-duty assault from June of 2023. Officer Rodriguez has resigned from NYPD.

Events Leading to the Collision

OSI interviewed Lieutenant Vincent Perez who was the commanding officer of Manhattan North CRT on May 28, 2023. Lt. Perez said that CRT is a specialized unit within NYPD, assigned to tackle various quality of life issues. Manhattan North CRT covers twelve precincts from 59th Street up to the Washington Heights and Inwood neighborhoods in Manhattan. CRT was assigned to address the proliferation of unregistered dirt bikes, ATVs, and mopeds in and around upper Manhattan. Lt. Perez said every Sunday his group of CRT officers would do a "rideout," patrolling upper Manhattan to stop and seize unregistered and/or illegal dirt bikes and mopeds. CRT used unmarked police cars equipped with lights and sirens. The officers wore a modified NYPD uniform of khaki pants and blue polo shirts with the NYPD logo on both arms, "NYPD Police" across the right chest area, and the officer's name, shield number, and a decal of a badge across the left chest.

Lt. Perez said on May 28, 2023, he supervised a group consisting of himself and eleven other officers who were in CRT uniform and in four unmarked police cars: Officers Arthenis Lopez Esteves, Brian Tineo, Christopher McGrath, Daniel Estevez, Franklin Garrido, Hermes Rodriguez, Jenna Ramos, Liam Kite, Marvin Jean-Baptiste, Raymond Perez, and Ryan Maldonado. OSI interviewed these officers.

Lt. Perez said he and his officers were doing a rideout in Manhattan when they were called into the Bronx by another group of CRT officers who radioed for assistance with a driver fleeing a car stop. The Manhattan North CRT officers caravaned into the Bronx across the University Heights Bridge. When they reached the Bronx side of the bridge, Lt. Perez heard over the police radio that the fleeing car had been found, unoccupied. Lt. Perez ordered his team to turn around and head back into Manhattan.

According to the officers and confirmed by BWC, Officer Kite drove the car first in line over the bridge back into Manhattan; Officer Maldonado was in the passenger seat and Officer Estevez was in the back seat. Officer Rodriguez drove the second police car; Officer Jean-Baptiste was in the passenger seat and Officer Lopez Estevez was in the back seat. Officer Perez drove the third car, with Officer Garrido in the passenger seat and Officer McGrath in the back seat. Lt. Perez drove the fourth car, with Officer Ramos in the front passenger seat and Officer Tineo in the back seat.

The officers said Manhattan bound traffic was heavy, and the traffic going into the Bronx was light.



Still from security video on the Manhattan side of the bridge showing heavy traffic into Manhattan and clear lanes headed into the Bronx.

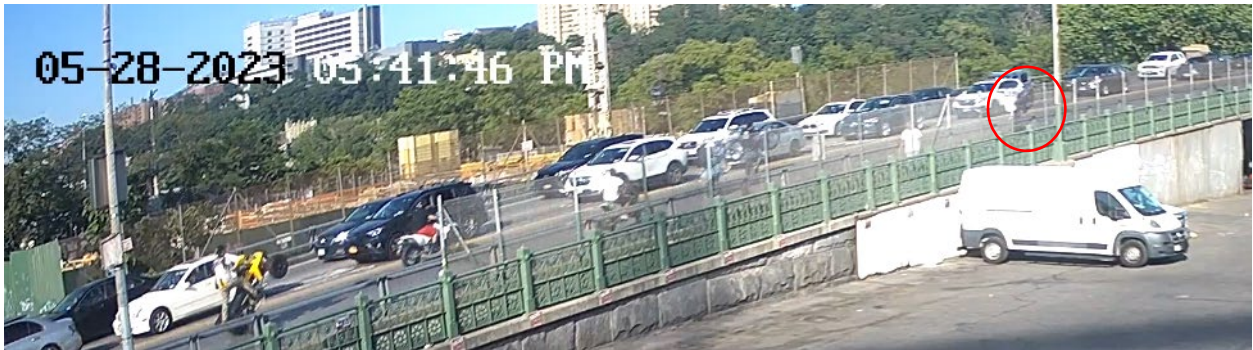
Officer Rodriguez's BWC video [here](#), shows that at 5:41 p.m. he drove his police car onto the University Heights Bridge. Officer Perez, the driver of the third police car, told OSI he was behind Officer Rodriguez's car.

According to security video [here](#), Mr. Williams rode a blue dirt bike in Manhattan along with six other dirt bikes and ATVs. Mr. Williams and the other dirt bikes and ATVs drove through a steady red light, halting traffic with the right of way, and entered the University Heights Bridge on the Manhattan side.

Security video from the Manhattan side of the University Heights Bridge [here](#), showed that Mr. Williams rode a blue dirt bike in the Bronx bound lanes of the bridge at 5:41 p.m. Mr. Williams rode in the front of a group of six other dirt bikes and ATVs. Mr. Williams popped a wheelie and the drivers of the other bikes followed suit.



Still from security video of the bridge showing Mr. Williams (circled) as he drove a dirt bike across the bridge and popped a wheelie.



Still from security video of the bridge showing Mr. Williams (circled) in the front of a line of dirt bikes and ATVs.

The Collision

Officer Kite told OSI he drove the first police car over the University Heights Bridge. He drove with the windows down and could hear a group of dirt bikes approaching. The dirt bikes and ATVs were weaving in and out of lanes and popping wheelies. Officer Kite turned on the car's police lights and then saw most of the ATVs and dirt bikes turn around to head back into Manhattan. Officer Kite said he followed an ATV into Manhattan but lost it in traffic.



Still from Officer Hermes Rodriguez's BWC showing Officer Kite's car (circled).

Officer Rodriguez drove the car behind Officer Kite. He told OSI that he too heard and then saw dirt bikes and ATVs crossing the bridge. Officer Rodriguez told OSI he saw Officer Kite's car turn into oncoming traffic in an attempt to block the dirt bikes and ATVs. This assertion is not supported by BWC nor is it supported by the account of Officer Kite. BWC shows that Officer Rodriguez turned his car left into Bronx bound traffic as the dirt bikes approached. At 17:41:58, Officer Rodriguez's BWC showed Mr. Williams through the front windshield as Officer Rodriguez made the left into oncoming traffic. Mr. Williams did not stop and drove past Officer Rodriguez's car in the left lane of Bronx bound traffic. In a compelled statement, Officer Lopez Estevez, who was seated in the back seat of the car driven by Officer Rodriguez, said he saw Mr. Williams pop a wheelie in the lanes heading into the Bronx, then come back to two wheels about three car lengths in front of the police car. Officer Lopez Estevez said that as Officer Rodriguez turned into the opposite lanes of traffic to slow the progress of the dirt bikes and ATVs, Mr. Williams accelerated.





Stills from Officer Rodriguez's BWC showing Mr. Williams riding past the police car at 17:41:59.

Officer Perez told OSI that he drove behind Officer Rodriguez's car. Officer Perez said that he heard and saw the dirt bikes and ATVs heading to the Bronx on the University Heights Bridge. Officer Perez said he saw Officer Rodriguez turn his car to the left to block the dirt bikes' path and slow down traffic. Officer Perez moved his car into the opposite lanes of traffic across the double yellow lines and ended up in the right lane of traffic on the Bronx bound side of the bridge. Officer Perez saw Mr. Williams drive around Officer Rodriguez's car. In a compelled statement, Officer McGrath who was in the back seat of the car driven by Officer Perez, said he saw Mr. Williams accelerate and pass the police car in front of them and then accelerate again as he approached their car, before crashing into it. Officer Perez's BWC video [here](#), showed that Mr. Williams was launched over the hood of Officer Perez's car. Mr. Williams's lower body struck and cracked the front windshield of Officer Perez's car.



Still from Officer Perez's BWC at the moment of impact.

In a compelled, recorded statement, Officer Garrido, who was in the front passenger seat of the car driven by Officer Perez, said he saw Mr. Williams swerve around the car driven by Officer Rodriguez, rev the bike, and then accelerate before colliding with the car driven by Officer Perez.

Lt. Perez said that his team had successfully used this tactic of positioning their cars to block traffic in the past to slow down and attempt to pin dirt bike and ATV riders. He said the officers were not trained by NYPD to do this maneuver.

OSI obtained the Automated Vehicle Location (AVL) information from Officer Perez's car. The AVL system determines and transmits the car's geographic location and records the speed of the car at intervals. For Officer Perez's car, the AVL showed that at 17:41:49, about 11 seconds before the collision with Mr. Williams, the car was travelling at 8.39 MPH. The next reading for Officer Perez's car was at 17:41:59, about a second before the collision, showing that the car was travelling at 12.35 MPH. There were no readings recorded after the collision.

After the Collision

According to BWC video, Officer Perez, Officer McGrath, and Officer Garrido left their car after the collision. Mr. Williams hopped on one leg away from the collision site before falling on the hood of the police car driven by Lt. Perez. Mr. Williams's right leg was visibly broken.





Stills from Officer Perez's BWC showing Mr. Williams hopping along the Bronx bound roadway and then falling onto the hood of the police car driven by Lt. Perez.

As recorded on BWC, Officer Perez handcuffed Mr. Williams, who was conscious and alert. Mr. Williams cried out in pain and asked the officers, "Why would you do that?" Mr. Williams said, "You almost took my life for a dirt bike. You didn't even give me chance to slow down or nothing."

Officer Perez's BWC showed a blue dirt bike pinned by Officer Perez's police car to the barrier separating the pedestrian walkway from Bronx bound traffic.



Still from Officer Perez's BWC showing Mr. Williams's bike pinned to the railing between the roadway and pedestrian walkway.



Photo of the damage to Officer Perez's police car.

According to Officer McGrath's BWC, an ambulance arrived at the bridge at 5:52 p.m. Mr. Williams was placed onto a stretcher and wheeled into the ambulance at 5:54 p.m. Mr. Williams was screaming in pain. He repeatedly asked the officers why they would do that and said the officers tried to kill him for a dirt bike. Officer McGrath rode in the ambulance with Mr. Williams. Officer McGrath asked Mr. Williams where he was coming from at 6:00 p.m. Mr. Williams replied, "I don't want to talk to no cop," and added an epithet. Officer McGrath said, "That's fine. I feel the same way." Mr. Williams said, "I wasn't trying to run or nothing and you just cut me off. Why would y'all do that?" The ambulance arrived at St. Barnabas hospital at 6:06 p.m.

Mr. Williams's Hospitalization

OSI reviewed Mr. Williams's medical records from St. Barnabas Hospital, which note that Mr. Williams was conscious when he came to the hospital and was able to tell hospital staff what had happened to him. He was taken to surgery to repair his leg. On May 29th at 5:00 a.m. Mr. Williams experienced respiratory distress and had to be intubated. He was bleeding internally

around the surgically repaired blood vessels in his leg. Mr. Williams’s heart stopped three times before he was pronounced dead at 10:22 a.m. on May 29, 2023.

Collision Investigation Squad

NYPD’s Collision Investigation Squad (CIS) responded to the University Heights Bridge after they were notified that Mr. Williams had died – a day after the collision. There were no security cameras on the bridge in the area of the collision. Using BWC, CIS prepared the diagram reproduced below showing the paths of Officer Perez’s car and Mr. Williams’s dirt bike.

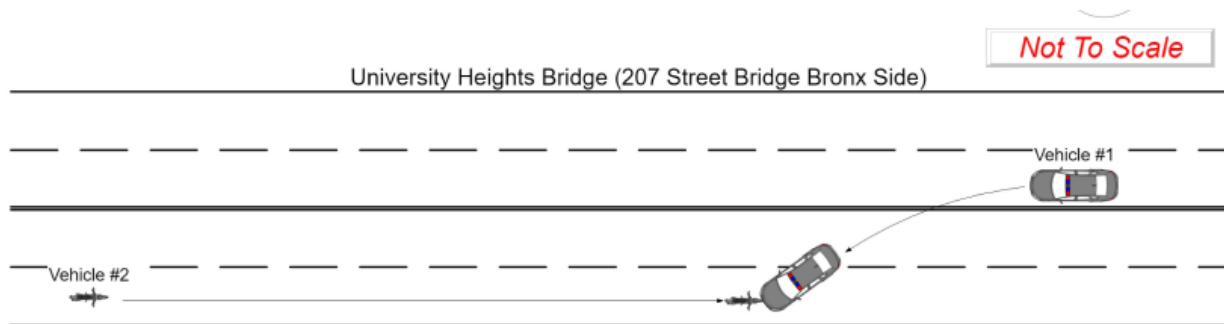


Diagram prepared by CIS showing the path of Vehicle #2, the dirt bike driven by Mr. Williams, and Vehicle #1, the police car driven by Officer Perez.

CIS also analyzed security footage from a business on the Manhattan side of the bridge, which showed Mr. Williams in the Bronx bound lanes before the collision, including when he lifted the front wheel of the dirt bike off the ground and rode on the back wheel. Analyzing two fixed points on the bridge along with the security video’s framerate, CIS determined that Mr. Williams was travelling at 26 MPH when he drove on one wheel in the middle of the bridge.

Medical Examination and Autopsy

OSI interviewed Dr. Avneesh Gupta of OCME and reviewed the autopsy report he prepared. Dr. Gupta determined that the cause of Mr. Williams’s death was “complications following blunt injuries to bilateral legs with fractures of right tibia and fibula and injuries to popliteal blood vessel” and deemed the manner of death to be “accident (motorcycle driver struck side of police vehicle).”

(According to the National Association of Medical Examiners’ “Guide for Manner of Death Classification” (2002), the manners of death are Natural, Accident, Suicide, Homicide, and Undetermined (or Could not be Determined). The Guide continues, at page 4, “Manner of death is circumstance-dependent, not autopsy-dependent.” The Guide defines “accident” this way, at page 6: “Accident applies when an injury or poisoning causes death and there is little or no evidence that the injury or poisoning occurred with intent to harm or cause death. In

essence, the fatal outcome was unintentional.” However, OSI’s findings of fact and conclusions of law take manner of death into account as only one of many factors.)

Dr. Christopher Milroy

OSI consulted with Dr. Christopher Milroy, a noted forensic pathologist who is not affiliated with any New York medical examiner’s office. Dr. Milroy reviewed Mr. Williams’s medical records, autopsy report, and videos of the incident. He prepared a report summarizing his findings, see exhibit 1. Dr. Milroy concluded that Mr. Williams’s death was due to “complications following blunt injuries to bilateral legs with fractures of right tibia and fibula and injuries to popliteal blood vessels.” He deemed the manner of death to be “accident.” Dr. Milroy also found that the medical treatment Mr. Williams received was “conventional” and did not contribute to his death. In short, Dr. Milroy concurred with the assessment of Dr. Gupta at OCME.

Accident Reconstruction

OSI engaged Lange Technical Services, Ltd. (Lange) to prepare a collision investigation report, see exhibit 2. Lange found that the NYPD vehicle moved from the eastbound lanes into the westbound lanes of traffic “in an attempt to prevent the forward progress of the westbound motorcycle causing the collision.” The speed of the NYPD car was not a factor in the collision. Lange noted that the AVL history of the NYPD car recorded its speed at 12.35 MPH prior to the collision, but that video evidence showed that the NYPD car was coming to a stop at the time of the collision, and “therefore the speed would most likely be less than 12.35 MPH at the time of impact.” Lange also found that Mr. Williams had dismounted from the motorcycle prior to impact. From the report: “possible reasons for the dismount could be Samuel Williams applied too much pressure to the front-brake lever, and the rear of the motorcycle began to rotate upwards ejecting Samuel Williams from the motorcycle seat; or it is possible that Samuel Williams jumped off the motorcycle prior to the impact.” However, because of factors that could not be established with the available evidence, such as the speed of the motorcycle at the time of impact and the exact speed of the NYPD car, Lange concluded there was insufficient evidence on which to base a reconstruction.

NYPD Guidelines and Training

At a June 21, 2022, press conference, then New York City Mayor Eric Adams and then Police Commissioner Keechant Sewell announced a crackdown on illegal dirt bikes, mopeds, and ATVs. According to an investigative report prepared by the New York City Department of Investigation (DOI) entitled “A Review of NYPD’s Community Response Team,” published in November of 2024, CRT was created to address this issue. In the report, DOI criticized NYPD for the lack of any clear, specialized guidance or directives for CRT concerning their mission,

practices, or how they were to achieve their purpose. CRT officers were expected to adhere to the guidelines that any regular NYPD officer follows.

NYPD officers are required to follow the procedures in the NYPD Patrol Guide (PG) on a myriad of topics, including vehicle pursuits. On May 23, 2023, the written policy regarding vehicle pursuits was PG 221-15, which defined a vehicle pursuit as “attempt by a uniformed member of the service operating an...emergency vehicle to stop a subject who is actively seeking to elude custody or apprehension while also operating a vehicle.” On initiating a vehicle pursuit, PG 221-15 directed that “Officers must assess factors such as the nature of the offense, time of day, weather conditions, and the capabilities of the department vehicle.” It directed officers to minimize risk to the public, the police, and the person being pursued. Certain tactics were expressly prohibited, such as ramming a vehicle, placing a moving department vehicle in a position to be struck by the pursued vehicle, and driving alongside the pursued vehicle. Roadblocks were prohibited unless specifically directed by a supervisor.

NYPD revised PG 221-15 effective February 1, 2025. Prior to the revision, an officer could initiate a vehicle pursuit of a person suspected of committing any crime or violation. The revision states that “vehicle pursuits are not authorized when the most serious offense committed, or suspected of being committed, is a traffic infraction, violation, or non-violent misdemeanor.”

In a January 6, 2026, press conference, NYPD Commissioner Jessica Tisch outlined the impact of NYPD’s change in vehicle pursuit policy: in 2025, vehicle pursuits dropped by more than 60 percent compared to 2024, fatalities linked to pursuits fell by 80 percent, and collisions fell by 50 percent.

LAW

Based on the law and the evidence, OSI concludes that there is insufficient evidence to prove beyond a reasonable doubt that Officer Perez committed a crime. As a result, OSI will not seek charges and closes the matter with this report.

To convict an officer for causing a death with his police car, while pursuing someone who violated the law, OSI’s analysis is that a prosecutor would need to prove beyond a reasonable doubt that the officer’s actions were not protected by Vehicle & Traffic Law Section (VTL) 1104, and that the officer was guilty of a crime that requires the mental state of recklessness; a crime requiring only the mental state of criminal negligence would not be chargeable against an officer pursuing a person suspected of having committed a crime.

Here, the officers observed Mr. Williams and others on the bridge commit the crime of reckless driving, a misdemeanor, and various traffic infractions. Reckless driving is defined in VTL 1212 as operating a vehicle “in a manner which interferes with the free and proper use of the

public highway [...], or unreasonably endangers users of the public highway [...]" Mr. Williams's dirt bike did not have a license plate or sideview mirrors, all traffic infractions for any motor vehicle or motorcycle that is lawfully operated on a roadway. However, according to VTL 2405, ATVs and dirt bikes can only be driven in New York on roads designated for their use. There are no such roads in New York City.

Under VTL 1104, "the driver of an authorized emergency vehicle, when involved in an emergency operation" (defined by VTL 114-B to include "pursuing an actual or suspected violator of the law") may "disregard regulations governing directions of movement or turning in specified directions." VTL 1104(e) states that "the foregoing provisions shall not relieve the driver of an authorized emergency vehicle from the duty to drive with due regard for the safety of all persons, nor shall such provisions protect the driver from the consequences of his reckless disregard for the safety of others." See *Anderson v Commack Fire Dist*, 39 NY3d 495, 498 (2023) (police officers responding to an emergency may disregard specific traffic laws "as long as specified safety precautions are observed and they do not act recklessly").

In *Saarinen v Kerr*, 84 NY2d 494 (1994), the Court of Appeals interpreted VTL 1104 to protect an officer even from civil liability in cases of negligence.

"[A] police officer's conduct in pursuing a suspected lawbreaker may not form the basis of civil liability to an injured bystander unless the officer acted in reckless disregard for the safety of others. This standard demands more than a showing of a lack of 'due care under the circumstances' – the showing typically associated with ordinary negligence claims. It requires evidence that 'the actor has intentionally done an act of an unreasonable character in disregard of a known or obvious risk that was so great as to make it highly probable that harm would follow' and has done so with conscious indifference to the outcome." *Saarinen* at 501.

The court pointed to the "grim calculus" of VTL 1104, permitting officers to go through red lights and to exceed speed limits, stating that these actions "will inevitably increase the risk of harm to innocent motorists and pedestrians." The court said limiting liability to cases of recklessness would be consistent with the legislative intent, as it would reduce "judicial second-guessing of the many split-second decisions that are made in the field under highly pressured conditions" and would reduce the risk that the threat of liability could "deter emergency personnel from acting decisively and taking calculated risks in order to save life or property." *Saarinen* at 502.

VTL 1104 by its terms is not stated to be a defense to crimes under the Penal Law, but OSI believes that courts would apply VTL 1104 to criminal cases, and that it would protect officers from liability in cases of criminal negligence. See *People v Emmi*, 146 Misc2d 399 (Cayuga Co Ct 1990).

The actions of the officers who drove the second and third CRT cars across the bridge on May 28, 2023, and into oncoming traffic were deeply troubling. Those actions presented a clear risk to life and limb, and in fact they caused the death of Samuel Williams. We found no evidence that NYPD ever permitted such maneuvers in such circumstances nor that it ever trained its officers to perform them. In fact, given the change in pursuit policy outlined above, the officers would not now be authorized to conduct even an ordinary pursuit of Mr. Williams, as Mr. Williams committed, at most, non-violent misdemeanors. However, after a thorough investigation, there is insufficient evidence for a prosecutor to prove beyond a reasonable doubt that Officer Perez committed a crime requiring criminal recklessness.

The evidence does not establish the speed of either vehicle. The AVL of Officer Perez's car showed that before the collision the car travelled at 12.35 MPH. As noted by Lange, the speed of the car at the time of the collision was most likely lower, as BWC video showed that Officer Perez was braking before impact. As for the dirt bike, NYPD CIS was able to determine the speed of the bike before Mr. Williams popped a wheelie because there were fixed cameras that captured the Manhattan side of the bridge. There were no fixed cameras that captured the impact location. The CRT officers who could see Mr. Williams said that Mr. Williams accelerated after he popped the wheelie and then accelerated again after he passed the first police car, driven by Officer Rodriguez, that made the turn into oncoming traffic. There is no evidence that contradicts the officers' assertions.

In addition, the evidence does not establish whether Mr. Williams had time to brake before the collision, nor whether in fact Mr. Williams actually accelerated, potentially contributing to the cause of the collision. BWC showed that Officer Kite turned on his police car's lights and that Officer Rodriguez turned his car into oncoming traffic, and that Mr. Williams continued around Officer Rodriguez's car. This was the point at which the officers said Mr. Williams accelerated, and there is no evidence to contradict their assertions. The physical evidence after the collision of the bike pinned up against the barrier, could be viewed as supporting the inference that Mr. Williams attempted to go around Officer Perez's car. As a result, there is a credible view of the evidence, sufficient to raise a reasonable doubt of Officer Perez's guilt, that Mr. Williams, attempting to flee the officers, accelerated to squeeze by Officer Perez's car, and, in so doing, significantly contributed to the cause of the collision.

The law and the evidence do not establish that Officer Perez was without fault. They do, however, mean that a prosecutor cannot meet the high burden to convict him of a crime at trial, by evidence proving guilt beyond a reasonable doubt. For these reasons, OSI will not seek criminal charges and closes the matter with the issuance of this report.

Dated: June 8, 2026

EXHIBIT 1

Dr Christopher Mark Milroy OBE

Forensic Pathologist

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Report of Christopher Mark Milroy OBE, MB, ChB, MD, LLB, BA, LLM, FRCPath, FFFLM, FRCPC, DMJ, Licenced Physician with the College of Physicians and Surgeons of Ontario, Registered Forensic Pathologist with the Ontario Forensic Pathology Service, Director of the Eastern Ontario Regional Forensic Pathology Unit, Ottawa and Full Professor in the Department of Pathology and Laboratory Medicine at Ottawa University.

This statement consists of 7 pages Date March 06, 2025

This report was prepared on the instructions of [REDACTED]
[REDACTED] Office of Special Investigation, Office of the New York State Attorney General

I confirm I have complied with my duty to the court to provide independent assistance by way of objective unbiased opinion; and that in the event my opinion changes on any material issue, I will inform my instructing lawyer, as soon as reasonably practicable and give reasons.

Re: Samuel WILLIAMS

Brief Curriculum Vitae

I qualified from the University of Liverpool, UK in 1983 (MBChB). In 1984 I commenced training in pathology after a year as a House Officer (internship) in medicine and surgery. In 1990 I became a member of the Royal College of Pathologists by examination in Histopathology (MRCPPath). I was appointed a Fellow in 1998 (FRCPath).

I gained the Diploma in Medical Jurisprudence (Pathology) in 1991 (DMJ). In 1994 I was awarded a Doctorate in Medicine (MD) by thesis in Forensic Pathology by the University of Liverpool. In 2004 I gained a law degree (LLB Hons) from the University of London. In 2005 I was made a Founding Fellow of the Faculty of Forensic and Legal Medicine of the United Kingdom Royal College of Physicians. In 2010 I was awarded a Bachelor of Arts degree (BA) in Philosophy by the University of London. In 2013 I gained a Masters in Law degree (LLM) from the University of London.

Following post-graduate training in Histopathology (Anatomical Pathology) in England in Liverpool, Bristol and at University College London, during which I passed the examination of membership (now Fellowship exam) of the Royal College of Pathologists in Histopathology, I commenced training in Forensic Pathology and was appointed Lecturer in Forensic Pathology at the University of Sheffield in 1990, being promoted to Senior Lecturer (Assistant Professor) and Honorary Consultant in Forensic Pathology at the University of Sheffield in 1991, becoming Reader (Associate Professor) in 1999 and (Full) Professor in 2000. I was on the UK Home Office Register of Forensic Pathologists from 1991 until

moving to Ottawa in September 2008 and am engaged full time as a Forensic Pathologist. In April 2006 the Department of Forensic Pathology was transferred to the Forensic Science Service, a UK Government owned company and established as the Department of Forensic Pathology and Legal Medicine and I became the Chief Forensic Pathologist of the Forensic Science Service, retaining my Chair in Forensic Pathology at the University of Sheffield and remained on the Home Office Register of Forensic Pathologists.

In September 2008 I moved to Ottawa to take up my current post. I am a Registered Forensic Pathologist with the Ontario Forensic Pathology Service (OFPS) and previously Director of the Eastern Ontario Regional Forensic Pathology Unit of the Ontario Forensic Pathology Service (OFPS). I chair the OFPS Credentials Committee. I am Deputy Chief in Anatomical Pathology of The Ottawa Hospital Division of Anatomical Pathology. I hold a Full Professorship at the University of Ottawa Department of Pathology and Laboratory Medicine.

Until May 2008 I was the UK Royal College of Pathologist's Chair of the panel of examiners in Forensic Pathology responsible for the exam of Membership (subsequently Fellowship) of the Royal College in Forensic Pathology, which is the main examination for specialist registration in Forensic Pathology in the UK, as well as for the Royal College's Diploma in Forensic Pathology. I was also an examiner for the Worshipful Society of Apothecaries of London, which also organises a Diploma examination in Forensic Pathology. In 2008 I became an examiner for the Royal College of Physicians and Surgeons of Canada in Forensic Pathology and on 1st January 2014 I became Chair of the examiners in Forensic Pathology. I stepped down as Chair, but remain an examiner I was awarded Founder Fellow status in Forensic Pathology by the Royal College of Physicians of Canada.

I am a member of the British Association in Forensic Medicine and was Honorary Secretary from 2000-2004. I maintain membership of other learned societies and regularly attend and present papers at national and international meetings including the American Association of Forensic Sciences (AAFS), of which I am a

Fellow and the National Association of Medical Examiners (NAME), of which I am a Fellow. I was previously on the Board of Directors of NAME and currently serve on the Board of AAFS.

I have published widely on topics in pathology and forensic pathology including chapters in the leading textbooks *Pathology of Trauma* (Arnold 3rd Edition 2000, Eds Mason and Purdue) and *Forensic Neuropathology* (Hodder Arnold 2005, Ed Whitwell). I was co-editor of the second edition of *Forensic Neuropathology* (CRC Press), published in 2021. I review papers for learned journals including specialist forensic journals and general journals such as the Lancet, British Medical Journal and the Journal of the Royal Society of Medicine. I was the Associate Editor of the Journal of Forensic and Legal Medicine and am the current Editor of Academic Forensic Pathology.

I was a member of the UK Home Office's Forensic Pathology Council and am a member of the Forensic Pathology Advisory Council of Ontario. I have acted as an external examiner for a number of Universities in the UK and Ireland for both undergraduate and postgraduate exams. I worked for the International Committee of the Red Cross on project "The Missing".

The University of Sheffield and its successor department with the Forensic Science Service provided a suspicious death service for the Yorkshire area of England, covering a population of nearly 5 million, and routine medico-legal autopsies for H.M. Coroner for South Yorkshire (West). In addition, the Department provided opinions on living patients who had injuries, including allegations of child abuse.

Ottawa houses the Eastern Ontario Forensic Pathology Unit, which covers Eastern Ontario (a population of 1.6 million) as well as providing a Forensic Pathology service for the Canadian Territory of Nunavut. I also act as a Consultant for the Bermuda Police Service and HM Coroner for Bermuda. As well as my duties based in Ottawa, I have been widely consulted by both the prosecution and defence throughout the UK and in Canada as well as other countries on matters related to Forensic Pathology. I regularly give evidence in homicide cases in the Superior Court of Ontario and the English Crown Court for

both prosecution and defence. I have given evidence in the English Court of Appeal and have prepared reports for the Ontario Court of Appeal, UK Courts Martial and the European Court of Human Rights. In 1998 I worked for the International Criminal Tribunal for the Former Yugoslavia in Bosnia, investigating war crimes.

I was an expert for the Office of the Chief Coroner of Ontario's review into the work of Charles Smith and an expert for the Inquiry into Pediatric Forensic Pathology in Ontario conducted by Mr Justice Goudge (The Goudge Report). I was made an Officer of the Order of the British Empire (OBE) in 2023 for services to Forensic Pathology

My full CV is available

MATERIALS

I have been provided with the following documents: -

Medical Examiner Files

Medical Records

Videos of incident

INSTRUCTIONS

I have been asked to review the materials provided and give an opinion on the death of Samuel E. Williams.

BACKGROUND

Samuel E. Williams was involved in a collision with a police vehicle on 05/28/2023. He was riding a motorcycle and was arrested. Emergency services were called to the scene of the incident and was taken to hospital. Initially he was conscious and able to give an account. He was taken to the OR. He had sustained comminuted fracturing of his tibia and fibula with an occluded popliteal artery. These were repaired and he had a fasciotomy for compartment syndrome. He was stable until the morning of 05/29/2025 when he required re-intubation due to respiratory distress and had arrhythmias leading to pulselessness at 0636.

He became critically acidotic with hyperbacardia and ultimately could not be resuscitated.

REPORT OF DR. AVNEESH GUPTA

The post-mortem examination was conducted by Dr. Gupta. Dr Gupta' report is comprehensive and reviewable.

The findings are detailed in his report and will only be summarized here as follows:

There were major injuries to the right tibia and fibula with injuries to the popliteal blood vessels. There was evidence of surgical repair. Contusions and abrasions were present to both lower extremities. Fat embolism was demonstrated on histology.

PHOTOGRAPHS AND RADIOGRAPHS

Photographs and radiographs of the autopsy confirm the findings in the autopsy report

OPINION

1. This man was involved in a vehicular collision with a police vehicle and was placed under police arrest.
2. In the collision he sustained major injuries to his right lower limb. These included fracturing of the tibia and fibula, damage to the vasculature and compartment syndrome. The complications of the injuries accounts for death.

3. The medical and surgical treatment was conventional and has not contributed to death.
4. Death was due to complications following blunt injuries to bilateral legs with fractures of right tibia and fibula and injuries to popliteal blood vessels.
5. The manner of death was accident.

A handwritten signature in black ink, appearing to read 'C M Milroy', with a long horizontal stroke extending to the right and a small loop at the end.

Signed Dr C M Milroy

EXHIBIT 2

LANGE TECHNICAL SERVICES, LTD.

Forensic Automotive Engineering
Claims Assistance Services

www.LangeTech.net

Collision Investigation Report

Lange Technical Services File No: 24384AGN08

On the matter of

New York State Attorney's Office

Investigation into the death of Samuel Williams

December 17, 2024

██████████
New York State Office of the Attorney General

The matter for which I was retained arises from an investigation into a motor vehicle collision with a motorcycle, causing leg injuries to the motorcycle operator. The leg injury later caused medical complications resulting in the death of the motorcycle operator.

On May 28, 2023, at 5:43 PM, an on-duty New York Police Officer Raymond Perez assigned to Critical Response Team Manhattan North was operating an unmarked New York City Police Department (NYPD) vehicle; 2012 Ford Fusion with New York state plate # ██████████, VIN: ██████████. The NYPD vehicle was traveling westbound on University Heights Bridge and entered the eastbound lanes in an attempt to stop a 2021 Yamaha YZ125 Motorcycle, VIN: ██████████ traveling eastbound on University Heights Bridge operated by the deceased Samuel Williams. The motorcycle then struck the front of the NYPD unmarked vehicle, causing leg injuries to Samuel Williams.

For my investigation, I utilized and relied upon the provided materials to identify and calculate the speed of the subject vehicle using traditional accident reconstruction formulas and methodologies. For the purposes of my analysis, I also relied upon video surveillance provided by the New York State Attorney General's Office; Office of Special Investigations:

- Body Worn Camera video Police Officer Raymond Perez 2023-05-28_1742-4.mp4
- Body Worn Camera video Police Officer Hermes Rodriguez 2023-05-28_1742-5.mp4

As part of my investigation, I generated or otherwise utilized the following in development of my opinions:

- NYPD Collision Investigation Squad case # 323-24 Preliminary Investigation worksheet with diagram
- NYPD Collision Investigation Speed Calculation Report
- New York City Police Department AVL History for vehicle [REDACTED] – PBMN

In brief, I am a Collision Reconstructionist employed by Lange Technical Services, Ltd. I perform collision-related investigations and analysis for Lange Technical Services. I am a retired detective from the New York City Police Department with 25 years of service and over 15 years of experience in advanced Collision Investigation and Accident Reconstruction. As a police officer, I investigated over 1,000 motor vehicle collisions and was an On-Scene Investigator or Lead Detective for over 750 serious/fatal motor vehicle collisions. Based on my experience, I was able to affect and enhance arrests for manslaughter, murder, homicide, criminally negligent homicide, vehicular assault, leaving the scene of a fatal collision, driving while intoxicated, and reckless endangerment. My expert testimony has been admitted by both Civil and Criminal Courts, as an expert in the field of collision investigations, collision reconstruction, and event data retrieval and analysis.

Following the review of the provided materials and analysis of the collected data, it is my opinion, to a reasonable degree of professional certainty, that the contributing factors leading to this collision is the NYPD vehicle traveling westbound did enter the eastbound lanes traveled by the motorcycle in an attempt to prevent the forward progress of the westbound motorcycle causing the collision. In my opinion, NYPD vehicle speed was not a factor in the collision. The speed of the motorcycle, prior to the collision, as calculated by Detective Long of NYPD CIS to be 26.8 mph. The Time Distance Formula is well documented, utilized, and accepted within the accident reconstruction field. This speed, however, was calculated over 500 feet prior to the collision. The speed of the motorcycle could have increased or decreased prior to the collision.

To calculate the speed of the motorcycle, at the time of the collision, there is an accident reconstruction formula that could be applied known as a motorcycle vault. There are several factors that need to be met in order to apply this formula. The first is the distance the motorcycle operator Samuel Williams traveled after the impact. Samuel Williams actually stood up and ran from the location where he came to rest. The second factor would be the angle that Samuel Williams would travel after being ejected from the motorcycle at impact.

After close inspection of the body-worn camera video of Police Officer (PO) Raymond Perez. The video shows, prior to the impact, Samuel Williams had already dismounted from the motorcycle. However, the reason for this is in question. Possible reasons for the dismount could be Samuel Williams applied too much pressure to the front-brake lever, and the rear of the motorcycle began to rotate upwards ejecting Samuel Williams from the motorcycle seat; or it is possible that Samuel Williams jumped off the motorcycle prior to the impact.

I have provided a screen shot from the video of Samuel Williams separated from the motorcycle prior to striking the windshield of the NYPD vehicle.




Figure 1: Screenshot from PO Raymond Perez's body worn camera video


There were no measurements taken at the time of the preliminary investigation scene, and available video evidence was insufficient to calculate the speed of the motorcycle at the time of the collision. The speed of the NYPD vehicle was shown to be 12.35 mph prior to the collision as seen in the New York City Police Department AVL History of vehicle [REDACTED]-PBMN below.

Furthermore, the NYPD vehicle was coming to a stop just prior to contact. The vehicle was in the process of decelerating, and therefore the speed would most likely be less than 12.35 mph at the time of the impact.

Executed:5/29/2023 12:06 Executed by:NYPDFINEST
[REDACTED]



New York City Police Department AVL History



Resource	Vehicle	Date/Time	Street	Parol Boro	Sector	Speed (mph)	Course
N/A	[REDACTED]	05/28/2023 17:40:29	W FORDHAM RD	BX	52A	9.19	NW
N/A	[REDACTED]	05/28/2023 17:40:39	231 W FORDHAM RD	BX	52A	14.23	SW
N/A	[REDACTED]	05/28/2023 17:41:03	254 W FORDHAM RD	BX	52A	9.19	SW
N/A	[REDACTED]	05/28/2023 17:41:13	268 W FORDHAM RD	BX	52A	0.00	
N/A	[REDACTED]	05/28/2023 17:41:24	281 W FORDHAM RD	BX	52A	20.80	W
N/A	[REDACTED]	05/28/2023 17:41:35	W FORDHAM RD	BX	52A	11.05	NW
N/A	[REDACTED]	05/28/2023 17:41:49	UNIVERSITY HEIGHTS BRG	BX	52A	8.39	NW
N/A	[REDACTED]	05/28/2023 17:41:59	UNIVERSITY HEIGHTS BRG	BX	52A	12.35	W

In brief, it is my opinion, based on the above analysis, available information, accuracy of the provided materials and to a reasonable degree of professional certainty, that there is insufficient

evidence from the scene of the collision and the video evidence of the collision. Several New York City Police Department vehicles were traveling Westbound on University Heights bridge and made a maneuver by swerving to the left, exiting the Westbound lanes and entering the Eastbound lanes in an effort to hinder the forward progress of the motorcycle operated by Samuel Williams. This maneuver contributed to Samuel Williams becoming separated from the saddle of the motorcycle before striking the windshield of the New York City Police Department vehicle [REDACTED]. The motorcycle continued Eastbound and came into contact with the right front portion of New York City Police Department vehicle [REDACTED].

As of this time, we are withholding additional reporting and analysis pending your request. We reserve the right to amend or modify this report when presented with previously unavailable or unknown facts or data. Please, contact the office at your convenience should questions remain, additional reporting be required, or further analysis deemed necessary.

LANGE TECHNICAL SERVICES, LTD.



Michael J. O'Connor
Collision Reconstructionist

MO/sl