May 18, 2023

Report on the Investigation into the Death of Lopamudra Desai

New York Executive Law Section 70-b (Section 70-b) authorizes 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, including an off-duty police officer. When OSI does not seek charges, Section 70-b requires issuance of a public report. This is the public report of OSI's investigation into the death of Lopamudra Desai, which was caused by Police Officer Vasiliki Georganes, a member of the New York City Police Department (NYPD).[1]

On May 23, 2021, at 3:20 p.m.,[2] at the intersection of Corporal Kennedy Street and 43rd Avenue in Queens County, PO Georganes, who was off-duty and driving her personal car, struck Ms. Desai as she crossed the street, causing her death. After a full evaluation of the facts and the law, OSI will not seek charges against PO Georganes because we conclude that a prosecutor would not be able to prove beyond a reasonable doubt that PO Georganes committed a crime when she caused Ms. Desai's death.

FACTS

The Intersection

The collision occurred when PO Georganes was making a left turn from Corporal Kennedy Street southbound onto 43rd Avenue eastbound. Ms. Desai was walking northbound in the eastern pedestrian crosswalk and was about halfway across when PO Georganes struck her.

The intersection of Corporal Kennedy Street and 43rd Avenue is in a residential neighborhood. Corporal Kennedy Street is a two-way road which runs north-south; 43rd Avenue is two-way road which runs east-west. The intersection has stop signs and pedestrian crosswalks. Corporal Kennedy Street has an unposted speed limit of 25 miles per hour (mph) and 43rd Avenue has a posted speed limit of 25 mph. The weather conditions on the date of the incident were clear and dry, with abundant sunshine. See below, Figures 1 and 2.

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[1] PO Georganes has worked as an NYPD officer since January 2007. She is assigned to the 101st Precinct.
[2] All times are approximate, unless otherwise stated.

Figure 1. Intersection of Corporal Kennedy Street and 43rd Avenue, facing south along Corporal. Kennedy.
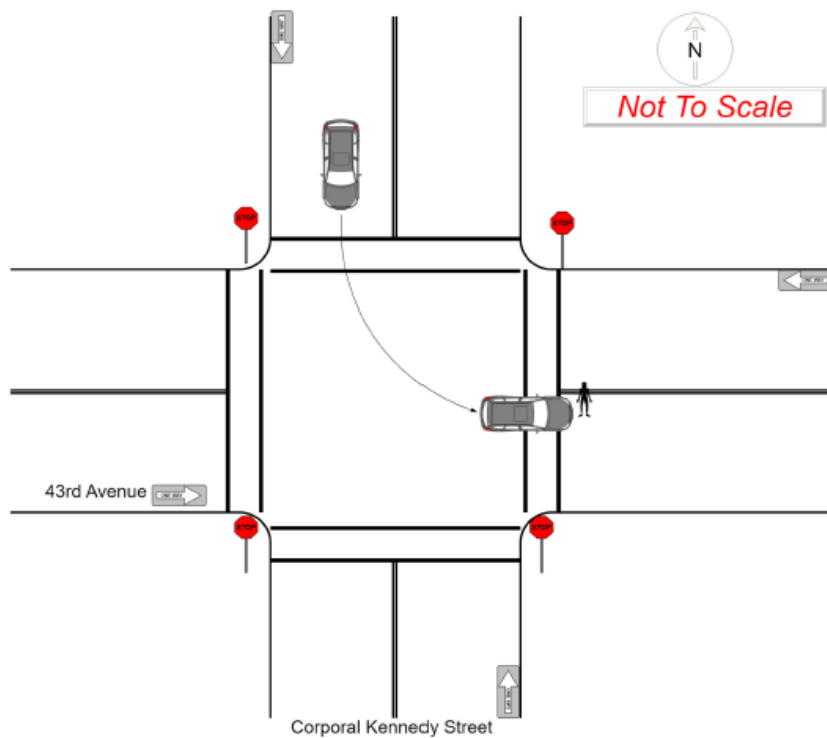

Figure 2. A diagram of the intersection created by Collision Investigation Squad Detective Randal McFarland. PO Georganes's car is shown making a left turn from Corporal Kennedy Street to 43rd Avenue and Ms. Desai is shown as the figure in the crosswalk near the center of 43rd Avenue.

Video

Video surveillance from the residents of 209-20 43rd Avenue, obtained by Detective. F. Passarella of the Highway District Collision Investigation Squad (CIS) captured the collision.

The surveillance camera is focused on the front door of the residence and has no audio, but it shows Ms. Desai arrive at the intersection and begin crossing the street in the vicinity of the easternmost crosswalk. The video shows PO Georganes turn into the intersection and strike Ms. Desai as she was halfway through the crosswalk. Immediately following the collision PO Georganes exited her car and approached the body of Ms. Desai, crouching over her, in what appears to be an attempt to render aid. (Civilian Doorbell Camera Footage)

911 Calls

The incident was reported to 911 by four callers. The first 911 call was placed at 3:20 p.m. by C.R.[3] who said she was at the corner of 43rd Avenue and Corporal Kennedy Street and that a woman who had been struck by a car was lying in the street, had fluid coming out of her head, and was being looked at by a nurse and the person who struck her. C.R. said the car was a Chevy Traverse.

The second call was placed at 3:23 p.m. by a person who identified themselves as an "ICU nurse" and requested medical assistance.

The third call was placed at 3:23 p.m. by PO Georganes, who said she had been in an accident at the intersection of 43rd Avenue and Corporal Kennedy Street and had struck a woman. She identified herself as on off-duty police officer. She said the woman who had been struck needed immediate medical attention. PO Georganes provided the color, make and model of her car, a 2020 Gray Chevy Traverse.

The fourth call was placed at 3:25 p.m. by V.G., who said he saw a person lying in front of a car near the intersection of Corporal Kennedy Street and 43rd Avenue. V.G. said he was unsure what happened but that someone may need assistance.

Medical Attention and Cause of Death

Ms. Desai was moved to New York Presbyterian Queens Hospital and pronounced dead on May 25, 201 at 6:36 p.m.

No autopsy of the decedent was conducted.[4] The death certificate for Ms. Desai, dated May 26, 2021, states the cause of death as multiple injuries, how the injury occurred as pedestrian struck by a vehicle, and the manner of death as accident.

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[3] Civilians' initials are used to maintain anonymity.
[4] Members of Ms. Desai's family chose not to have an autopsy.

Police Arrival/Post Accident Investigation

According to OSI investigation, officers from the 111th Precinct responded to the scene. Sergeant J. Gill and PO B. Gallart were the first officers on scene, arriving 3:30 p.m.[5] Ms. Desai had already been removed and transported to Queens Presbyterian Hospital. According to a report written by CIS and reviewed by OSI, Sgt. Gill spoke to PO Georganes, who said she was on her way to work and was driving south on Corporal Kennedy Street. She said she came to a complete stop at the intersection[6] and struck Ms. Desai while making a left turn onto 43rd Avenue and she did not know where Ms. Desai had come from. According to the report, Sgt. Gill did not smell any alcohol on PO Georgenes's breath and she did not exhibit any signs of being impaired. At 4:09 p.m. Sgt. Gill called Highway CIS Unit #3 and requested they respond to the scene.

According to OSI's investigation at 4:34 p.m. Highway CIS Lieutenant Marchlewski responded to New York Presbyterian Queens Hospital. Detective McFarland was the first member of Highway CIS to arrive on the scene, at 5:25 p.m.

At 5:40 p.m., more than two hours after the incident, PO M. Fasano of Highway CIS arrived on scene and administered three field sobriety tests (FSTs) to PO Georganes: an eye examination (a horizontal gaze nystagmus test, or "follow my finger"), a walk and turn test, and a one leg stand test. According to PO Fasano's report, PO Georganes passed the three tests without exhibiting signs of impairment. PO Georganes also consented to take a Preliminary Breath Test (PBT) and a Drager drug test, which PO Fasano administered.[7] The tests were conducted at 6:00 p.m. PO Georganes registered a .000[8] on the PBT, the results of the Drager drug test were negative.[9]

PO Georganes consented to a download of her car's Event Data Recorder (EDR) [10] which showed no recorded events for the vehicle.[11]

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[5] Neither officer activated body worn camera (BWC).
[6] OSI is not able to discern from the Ring Video whether PO Georganes came to a stop at the intersection.
[7] A preliminary breath test and a Drager test are commonly administered by law enforcement to determine whether a driver was intoxicated or impaired. A preliminary breath test, or PBT, is a test performed roadside in which the subject blows into a mouthpiece; the device measures and records the level of alcohol in the breath. A Drager test is performed on oral fluid samples for the presence of drugs, including amphetamines, designer amphetamines, opiates, cocaine and metabolites, benzodiazepines, cannabinoids, and methadone.
[8] The legal limit for blood alcohol concentration level in New York is 0.08.
[9] Results of the PBT and Drager Drug Test and the FST notes can be found in Exhibit 1.
[10] When activated, EDRs will preserve data, including speed, from the seconds before and during and event. In general terms, activation requires a collision severe enough to trigger a vehicle's airbags, or an equivalent event. The event in the present case does not appear to have been severe enough to activate the EDR in PO Georganes's car. Detective Randal McFarland of CIS reviewed the EDR data on the scene at 7:38 p.m. using Bosch crash data retrieval software and determined that the EDR preserved no data relating to the incident.
[11] EDR data can be found in Exhibit 2.

OSI interviewed Detective Randal McFarland of Highway CIS who said that he interviewed PO Georganes at the scene of the accident. PO Georganes said she was traveling south on Corporal Kennedy Street and came to a complete stop at the intersection of 43rd Avenue. She checked for oncoming vehicular and pedestrian traffic and then made a left turn onto 43rd Avenue. PO Georganes said she does not know where Ms. Desai was before or during the accident. When she heard and felt her car hit something, the front end of her vehicle had passed the eastern crosswalk. She immediately stopped and got out of her car. She saw a pedestrian lying in front of her car and approached them to see if she could assist. There were no other cars when she made the left turn. She did not recall the speed she was traveling but did recall looking straight ahead when making the turn. She said she was not on any medications and had not consumed any alcohol or illicit drugs on the day of the accident. She said she had not received any calls, was not using a GPS application on her phone, or otherwise looking at her phone immediately prior to the accident.

Detective McFarland said PO Georganes consented to a search of her iPhone's call and text message history. A review by Detective McFarland showed she had not made, sent, or received any calls or texts around the time of the accident with the exception of a call made to 911.[12] Det. McFarland said that PO Georganes didn't appear to be intoxicated and was alert and cooperative with investigators when he interacted with her at 5:25 p.m.

OSI interviewed Queens ADA Hugh McCann who said he responded to the scene and was present and observed PO Georganes while she participated in field sobriety testing. He said that he briefly spoke with PO Georganes at around 6:00 p.m. He said she did not appear impaired and allowed him to review her call and text history, which revealed no relevant calls or texts.

OSI interviewed PO K. Long of the Highway District Collision Technician Group, who examined the crash site utilizing Total WorkStation,[13] which captured videos and images of the accident area. PO Long said that based on the data he collected and on-scene observations, the location of the damage to the car, and his viewing of the video, that Ms. Desai was in the crosswalk and north of the double yellow line when she was struck. PO Long said he determined PO Georganes struck Ms. Desai while making a left turn onto 43rd Avenue (eastbound), the collision was on the east side of the intersection, the car sustained damage to the hood and front grill, there were no skid marks on the street, there were no apparent mechanical issues with the car, the car's speed was not computed, and PO Georganes' vision was not blocked. Two photographs taken by PO Long are below, Figures 3 and 4.

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[12] T-Mobile call detail records confirmed that no calls or messages were sent or received on PO Georganes's personal cell phone between 2:13 pm and 4:19 pm on May 23, 2021.
[13] Total Work Station is an electronic, optical instrument used in surveying and can be used to reconstruct accident and crime scenes with computer technology.

Figure 3. Photograph taken by PO Long of Highway District Collision Technician Group after the incident, showing the intersection of Corporal Kennedy Street and 43rd Avenue, facing southeast, showing what would have been PO Georganes's point of view as she made a left turn onto 43rd Avenue.

Figure 4. Photo taken by PO Long of Highway District Collision Technician Group showing the damage to PO Georganes's car due to the collision.

No eyewitnesses were identified.

Interview of PO Georganes

OSI interviewed PO Georganes in the presence of her attorney Craig Hayes. PO Georganes told OSI that on May 23, 2021, she was at Jones Beach in the morning. At around 1:00 p.m., she drove home to Bayside, Queens to get ready for work. That day, her shift at the 101st Precinct started at 4:00 p.m. Her commute to work is about 30 minutes and she usually leaves home around 3:00 p.m. when she works evenings. That day, she left her house at 3:15 p.m., and took one of the routes she usually uses to drive to work.[14] She said she remembers driving on Corporal Kennedy Street and making several full stops at the intersections before 43rd Avenue. At the intersection of Corporal Kennedy Street and 43rd Avenue, she came to a full stop, looked both ways, saw there were no cars or pedestrians, and proceeded. She believes she was driving no more than 10 miles per hour when she made the left turn onto 43rd Avenue. As she was making the turn, she heard a noise and saw that she hit a pedestrian. She immediately hit the brakes, came to a full stop, and got out of her car. She approached the pedestrian, an elderly woman, and asked if she was okay

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[14] PO Georganes said she usually drives on either Corporal Kennedy Street or Bell Boulevard to access the highways.

7

but received no response. She saw that the woman was bleeding but appeared to be breathing. She asked a nearby pedestrian to call 911. A second pedestrian, who identified herself as a nurse, approached the scene and told PO Georganes to not move the body. PO Georganes called 911 to request an ambulance to the location more quickly. 10 to 15 minutes later, an ambulance, the Fire Department, and NYPD arrived. NYPD officers approached PO Georganes and briefly spoke with her. She agreed to an FST, to drug and alcohol testing, and consented to a search of her phone and a download of event data from her car. She told the NYPD officers she had not consumed alcohol or drugs that day, was not on her phone immediately before the accident, and was not distracted by anything.

LEGAL ANALYSIS

Under Penal Law 125.10, "A person is guilty of criminally negligent homicide when, with criminal negligence, he causes the death of another person."

"Criminal negligence" is defined in Penal Law Section 15.05(4): "A person acts with criminal negligence with respect to a result or to a circumstance described by a statute defining an offense when he fails to perceive a substantial and unjustifiable risk that such result will occur or that such circumstance exists. The risk must be of such nature and degree that the failure to perceive it constitutes a gross deviation from the standard of care that a reasonable person would observe in the situation."

In a series of decisions, the New York Court of Appeals has required prosecutors to establish "criminal negligence" in vehicular homicide cases with evidence not clearly implied in the statutory definition. Under these decisions, proof of the defendant's failure to perceive a risk is not sufficient to convict him or her of criminally negligent homicide, even if the failure is a "gross deviation" from a reasonable standard of care. In addition, the prosecutor must prove that the defendant committed an "additional affirmative act" or engaged in "risk-creating behavior" amounting to "seriously blameworthy carelessness." People v Cabrera, 10 NY3d 370 (2008); People v Boutin, 75 NY2d 692 (1990).

In Cabrera, the Court reversed a conviction of criminally negligent homicide based on the defendant driver's excessive speed, saying "it takes some additional affirmative act by the defendant to transform speeding into dangerous speeding; conduct by which the defendant exhibits the kind of seriously blameworthy carelessness whose seriousness would be apparent to anyone who shares the community's general sense of right and wrong." Cabrera, 10 NY3d at 377, citing Boutin, 75 NY2d at 696 (internal quotation marks omitted). The Court continued:

> "Thus, in the cases where we have considered the evidence sufficient to establish criminally negligent homicide, the defendant has engaged in some other 'risk-creating' behavior in addition to driving faster than the posted speed limit (*compare* People v Haney, 30 NY2d 328 [defendant was speeding on city street and failed to

8

stop at red light before killing pedestrian crossing street with green light in her favor]; People v Soto, 44 NY2d 683 [defendant, who was speeding and drag racing on city street, struck and killed driver stopped at red light]; People v Ricardo B., 73 NY2d 228 [defendant was drag racing at between 70 and 90 miles per hour on a busy metropolitan street, ran a red light and struck vehicle crossing intersection with light in its favor]; People v Loughlin, 76 NY2d 804, 807 [intoxicated defendant was speeding on obstructed street under construction in residential neighborhood in Queens]; People v Maker, 79 NY2d 978, 980 [intoxicated defendant drove at speeds of 50 to 100 miles per hour in 35 miles per hour zone in Manhattan, disobeying several traffic signals]; People v Harris, 81 NY2d 850, 851-852 ['defendant, while legally intoxicated, drove his motor vehicle in the dark of night from a public highway into an unfamiliar farmer's field, accelerated at times to a speed approximating 50 miles per hour, intermittently operated the vehicle without headlights, and suddenly and forcefully drove through a hedgerow of small trees and shrubs, not knowing what obstacles and dangers lurked on the other side']; People v Ladd, 89 NY2d 893, 894-895 [intoxicated defendant driving on wrong side of a foggy road at 4:30 A.M.], *with* People v Perry, 123 AD2d 492, 493 [4th Dept 1986], affd 70 NY2d 626 [no criminal negligence present where defendant was driving approximately 80 miles per hour in a 55 miles per hour zone 'on a rural road, on a dark night,' struck a utility pole, and killed two passengers; defendant's 'conduct . . . d(id) not constitute a gross deviation from the ordinary standard of care held by those who share the community's general sense of right and wrong' (citations omitted)]). The question [is whether the conduct] constituted 'not only a failure to perceive a risk of death, but also some serious blameworthiness in the conduct that caused it' (Boutin, 75 NY2d at 696)."

Cabrera, at 377-378, emphasis added.

In People v Badke, 21 Misc3d 471, (Suffolk Co. Ct. 2008), the court examined the sufficiency of the evidence presented to the Grand Jury for the charge of criminally negligent homicide. The evidence was that defendant drove at excessive speed with passengers in his car, collided with another vehicle, and caused the deaths of three passengers. The court dismissed the criminally negligent homicide charges as legally insufficient, stating, "criminal negligence requires some additional affirmative act by the defendant to transform speeding into dangerous speeding, that is, conduct by which the defendant exhibits the kind of seriously blameworthy carelessness whose seriousness would be apparent to anyone who shares the community's general sense of right and wrong." 21 Misc3d at 476.

The evidence does not show that PO Georganes was speeding or took the turn at an unsafe speed. There were no tire marks or braking marks on the road, and the collision did not trigger a response from the EDR, which suggests she was not speeding at the time of the collision.

Driving while impaired by drugs or alcohol could be deemed "risk-creating behavior" or "seriously blameworthy carelessness" for purposes of proving criminally negligent homicide, but the evidence does not show that PO Georganes was impaired. PO Georganes consented to field sobriety tests, which she passed, a PBT test, which showed her BAC was .000%, and a Drager drug test, which was negative. In addition, the witnesses who saw and spoke to PO Georganes after the collision say they did not see signs of impairment.

In addition, there is no evidence PO Georganes was using her cell phone, and no evidence that she was driving distracted.

Therefore, based on the facts and the law, OSI does not believe a prosecutor could prove beyond a reasonable doubt that PO Georganes committed criminally negligent homicide, and as a result will not present this case to a grand jury for consideration of criminal charges.

RECOMMENDATION

OAG recommends NYPD hold officers to the same standards as civilians and breath-test them as quickly as practicable after a serious motor vehicle collision.

PO Georganes was not asked to take a portable breath test until nearly two and a half hours after the collision. NYPD's Patrol Guide Section 217.02 requires that, if a police officer is involved in a collision which results in death, the patrol supervisor should administer the breath test if he is qualified to do so; if not qualified, the patrol supervisor should request a qualified Highway Unit officer to administer the PBT. Here, Sgt. Gill, the patrol supervisor who arrived at the scene first, did not call for CIS until nearly 40 minutes after the collision had occurred. PO Fasano, from CIS, who did not arrive on scene until two hours after the collision, administered the PBT.

In the state of New York slightly more than 30% of fatal car crashes are alcohol-related. In accordance with NYPD's Patrol Guide section 217.02 civilian drivers are breath-tested on scene close in time to the collision even if they do not exhibit signs of impairment or intoxication. This same standard should be applied to off-duty (or on-duty) police officers involved in motor vehicle incidents, especially collisions that have resulted in death.

Alcohol is metabolized in the body at an average rate of 0.015g/100mL/hour, which means the average person's blood alcohol level falls by 0.015 per hour. For men, this is a rate of about one standard drink per hour. Consequently, the delay of two and a half hours in administering a PBT to PO Georganes could have had a significant effect on the results of the testing.

OAG therefore recommends that all patrol supervisors be trained in the administration of the PBT and field sobriety tests so that any on-duty or off-duty police officer (or any civilian)

involved in a motor vehicle collision can be tested on scene as soon as practicable to determine with greater accuracy whether they were operating a vehicle while impaired by alcohol.

Dated: May 18, 2023

EXHIBIT 1

ORAL FLUID SAMPLE COLLECTION

Subjects must be observed for a minimum period of 10 minutes prior to the collection of Oral Fluid Samples

Consent Given per form?   ☑ Yes ☐ No
Refused?   ☐ Yes ☑ No

Cartridge Control Number   0522-008

Dräger DrugTest 5000 Results:

COC . . . . ☐ Positive ☑ Negative ☐ Invalid
OPI . . . . ☐ Positive ☑ Negative ☐ Invalid
BZO . . . . ☐ Positive ☑ Negative ☐ Invalid
THC-5 . . . . ☐ Positive ☑ Negative ☐ Invalid
AMP . . . . ☐ Positive ☑ Negative ☐ Invalid
MET . . . . ☐ Positive ☑ Negative ☐ Invalid
MTD . . . . ☐ Positive ☑ Negative ☐ Invalid

PRELIMINARY BREATH TEST

The subject shall be observed for at least 15 minutes prior to the collection of the breath sample, during which period the subject must not have ingested alcoholic beverages or other fluids, regurgitated, vomited, eaten, or smoked, or have placed anything in his/her mouth.

Actual Time the 15 Minutes Observation Period Began

1740

PBT Serial Number

ARMD- 0008

PBT Reading	Date	Time
.000	05/27/21	1806

Officer's Signature/Shield

PO   27751

Subject Arrested?   ☐ Yes ☑ No

STANDARDIZED FIELD SOBRIETY TEST NOTES
PD 383-141 (Rev. 02-20)

Subject's Name

GEORGANES VASILIKI

DOB	Sex	Date
10/05/77	F	05/23/21

Officer Name	Shield No.
PO FASANO	27751

Location of Testing (specify)

Inside 42-41 CORONA KENNEDY

CIS Case Number (if applicable)

721-13

Notes

No IMPAIRMENT

NUMBER 1: HORIZONTAL GAZE NYSTAGMUS TEST

Have subject remove glasses (if applicable). Position stimulus approximately 12-15 inches in front of subject's nose, slightly above eye level.

Glasses   ☐ Yes ☑ No   Equal Pupils   ☑ Yes ☐ No
Contacts   ☐ Yes ☑ No   Resting Nystagmus   ☐ Yes ☑ No
if Yes, ☐ Hard ☐ Soft   Equal Tracking   ☑ Yes ☐ No

(enter Yes or No)	Left	Right
Lack of Smooth Pursuit	NO	NO
Distinct & Sustained Nystagmus @ Max Dev.	NO	NO
Onset of Nystagmus prior to 45 degrees	NO	NO

Vertical Gaze Nystagmus ☐ Yes ☑ No

Instruction Stage

- Place your left foot on the line **DEMONSTRATE**
- Place your right foot on the line ahead of the left foot, with the heel of your right foot against the toe of the left foot **DEMONSTRATE**
- Place your arms down at your sides **DEMONSTRATE**
- Keep this position until I tell you to begin. Do not start to walk until told to do so.
- Do you understand the instructions so far?

Walking Stage

- When I tell you to start, take nine heel-to-toe steps on the line, turn, and take nine heel-to-toe steps back. **DEMONSTRATE 3 STEPS**
- When you turn, keep the front foot on the line, and turn by taking a series of small steps with the other foot like this **DEMONSTRATE TURN AND 3 STEPS**
- While you are walking, keep your arms at your sides, watch your feet at all times, and count your steps out loud
- Once you start walking, don't stop until you have completed the test.
- Do you understand the instructions?
- Begin, and count your first step from the heel-to-toe position as "one."
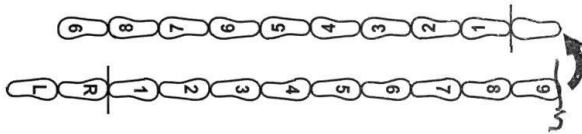
Cannot Keep Balance		Starts Too Soon	
		1st Nine	2nd Nine
Stops Walking		✓	
Misses Heel-To-Toe *(more than ½")*			
Steps Off Line			
Uses Arms to Balance *(more than 6")*			
Actual Steps Taken			
Describe Turn			

Describe Turn: *Proper*

Cannot Do Test *(explain)*:

Instruction Stage

- Stand with your feet together with your arms down at your sides, like this **DEMONSTRATE**
- Do not start to perform the test until I tell you to do so.
- Do you understand the instructions so far?

Balance and Counting Stage

- When I tell you to start, raise one leg, either leg approximately 6 inches off of the ground, keeping your raised foot parallel to the ground. **DEMONSTRATE**
- Keep both legs straight and arms at your side.
- While holding that position, count out loud in the following manner "one thousand and one, one thousand and two, one thousand and three" and so on until told to stop.
- Keep both legs straight, and keep watching the raised foot.
- Do you understand?
- Go ahead and begin the test

Time test for 30 seconds. If the subject puts their foot down, instruct them to pick up the foot again, and continue counting from the point at which the foot touched the ground.
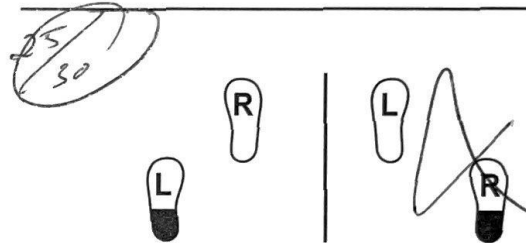
STAND ON EITHER FOOT FOR THE TEST

L *(on ground)*		R *(on ground)*
	Sways While Balancing *(Side to side, back to front)*	
	Uses Arms to Balance *(Raises arms more than 6" from their side)*	
	Hopping	
	Puts Foot Down	

If Subject Can Not Perform Test, Explain

Dräger

Dräger DrugTest 5000

```
Serial number    ARHK-0041
Version no.       02.02.00
                  02.04.00
System test            OK
. . . . . . . . . . . . . . . . . . . .
Kit                7-panel
                  ARPA-0721
Use by             2022-05
. . . . . . . . . . . . . . . . . . . .
Test no.              125
Date           05/23/2021
Time               18:00

Operator             - - -
. . . . . . . . . . . . . . . . . . . .
Last name:
                  GEORGANES
First name:
                   VASILIKI
Date of birth:
                 10-05-1977
Officer name:
                  PO FASANO
Officer ID:
                    954795
Time of stop:
                      1521
Time collection:
                      1759
Location:
        42-41 CORPORAL KENNE
Case #:

. . . . . . . . . . . . . . . . . . . .
COC              Negative
OPI              Negative
BZO              Negative
THC-5            Negative
AMP              Negative
MET              Negative
MTD              Negative

. . . . . . . . . . . . . . . . . . . .
```

(signature)

```
_____
Signature - operator
```

Dräger

Dräger Mobile Printer
. . . .
```
Location

. . . . . . . . . . . . . . . . . . . .
Alcotest 7510
Device-No.  :    ARMD-0008
Printer-No.:     ARHM-0149
Rec.Ref.Nr.:           46
Sample-No.  :          35
MM.DD.YYYY     hh:mm:ss
05.23.2021     18:06:56
. . . . . . . . . . . . . . . . . . . .
Surname:
```

GEORGANES

```
First Name(s):
```

VASILIKI

```
Date of Birth:
```

_10 / 05 / 77_

```
Operator:
```

PO FASANO

```
. . . . . . . . . . . . . . . . . . . .
      Subject Analysis



      0.000 g/210L

. . . . . . . . . . . . . . . . . . . .
Signature
```

(signature)

```
. . . . . . . . . . . . . . . . . . . .
```

CONSENT TO SUBMIT

ORAL FLUID SAMPLES

(08/15)

I, ___GEORGANES, VASILIKI___ , ___10/05/77___ of
(Print Name)   (Date of Birth)

___38-40 211 ST BAYSIDE NY 11361___
(Address)

give consent to the New York City Police Department to take oral fluid samples and I understand that I have a right to refuse. I understand that my oral fluid will thereafter be submitted for analysis. I am giving my consent knowingly, voluntarily, intelligently and without threats or promises of any kind.

Vasiliki Georganes
(Signature of Consenter)

___1753___   ___05/23/21___
(Time and Date)

Member of the Service Witness, Rank/Name (Print)	Tax No.	Shield No.	Command
PO FASANO	954795	2777	413
Signature of Member of the Service Witness			Date
			05/23/21

EXHIBIT 2

IMPORTANT NOTICE: Robert Bosch LLC and the manufacturers whose vehicles are accessible using the CDR System urge end users to use the latest production release of the Crash Data Retrieval system software when viewing, printing or exporting any retrieved data from within the CDR program. Using the latest version of the CDR software is the best way to ensure that retrieved data has been translated using the most current information provided by the manufacturers of the vehicles supported by this product.

CDR File Information

User Entered VIN	1GNEVHKW7LJ246704
User	950861
Case Number	721-13
EDR Data Imaging Date	05/23/2021
Crash Date	05/23/2021
Filename	1GNEVHKW7LJ246704_ACM.CDRX
Saved on	Sunday, May 23 2021 at 19:38:17
Imaged with CDR version	Crash Data Retrieval Tool 21.0.2
Imaged with Software Licensed to (Company Name)	New York City Police
Reported with CDR version	Crash Data Retrieval Tool 21.0.2
Reported with Software Licensed to (Company Name)	New York City Police
EDR Device Type	Airbag Control Module
Event(s) recovered	None

Comments

This download is being conducted with written consent from the owner.

Data Limitations

Recorded Crash Events:
There are two types of recorded crash events for Front, Side, and Rear (FSR) Events. The first is the Non-Deployment Event. A Non-Deployment Event records data but does not deploy the air bag(s). The minimum SDM Recorded Vehicle Velocity Change, that is needed to record a Non-Deployment Event, is five MPH [8 km/h]. A Non-Deployment Event contains Pre-Crash and Crash data. The oldest Non-Deployment event can be overwritten by a Deployment Event, if all three records are full and the Non-Deployment Event is not locked. A Non-Deployment Event can be overwritten by a more recent Non-Deployment Event if all three records are full and the Non-Deployment is older than approximately 250 ignition cycles. Also, a Non-Deployment event can be recorded if one of the following occurs without the Deployment of any of the frontal air bags, side air bags, pretensioners, or roll bars:
        -Head Rest Deployment
        -Battery Cut-Off Deployment
The second type of SDM recorded crash event for FSR Events is the Deployment Event. It also may contain Pre-Crash and Crash data. Deployment Events cannot be overwritten or cleared by the SDM.
Rollover Events contains Pre-Crash and Crash data. Rollover event follow the same rules as FSR Deployment events.
The SDM can store up to three Events.
There are two types of PedPro crash events. The first is the Non-Deployment PedPro Event. A Non-Deployment PedPro Event records data but does not deploy anything. A Non-Deployment PedPro Event may contain Pre-Crash and Crash data. The second type of PedPro recorded crash event is the Deployment PedPro Event. It also may contain Pre-Crash and Crash data. Deployment Events cannot be overwritten or cleared by the SDM.
The SDM can store up to two PedPro Events.

Data:
For FSR Events, SDM Recorded Vehicle Velocity Change reflects the change in velocity that the sensing system experienced during the recorded portion of the event. SDM Recorded Vehicle Velocity Change is the change in velocity during the recording time and is not the speed the vehicle was traveling before the event and is also not the Barrier Equivalent Velocity. For Deployment and Non-Deployment Events, the SDM will record up to 300 milliseconds of data after time zero. The SDM will also record up to 300 milliseconds of Vehicle Acceleration data after time zero.
For Rollover Events, the SDM may record Lateral Acceleration, Vertical Acceleration, and Roll Rate data, if the SDM is rollover capable. This data reflects what the sensing system experienced during the recorded portion of the event. For Rollover Deployment Events, the SDM will record up to 700 milliseconds of data before the Deployment criteria is met and 290 milliseconds after the Deployment criteria is met.
-Time between events is recorded in 10 msec intervals and is displayed in seconds for a maximum time of 655.33 seconds. The counter measures the time from the start of one event to the start of the next event, if both events occur within the same ignition cycle.
-The Maximum SDM Recorded Vehicle Velocity Change may occur between the recorded 10 millisecond sample points of the SDM Recorded Vehicle Velocity Change.
-If the SDM Recorded Vehicle Velocity Change data exceeds the max output range of -127 km/h then the exceeded values will be displayed with an offset of a +256 km/h. If the SDM Recorded Vehicle Velocity Change data exceeds the max output range of +126 km/h then the exceeded values will be displayed with an offset of a -256 km/h.
-Event Recording Complete will indicate if data from the recorded event has been fully written to the SDM memory or if it has been interrupted and not fully written.
-SDM Recorded Vehicle Speed accuracy can be affected by various factors, including but not limited to the following:
        -Significant changes in the tire's rolling radius
        -Final drive axle ratio changes
        -Wheel lockup and wheel slip
-Brake Switch Circuit Status indicates the open/closed state of the brake switch circuit or the commanded state of the brake lamps.
-Pre-Crash data is recorded asynchronously. The 0.5 second Pre-crash data value (most recent recorded data point) is the data point last sampled

before Time Zero. That is to say, the last data point may have been captured just before Time Zero but no more than 0.5 second before Time Zero. All subsequent Pre-crash data values are referenced from this data point.
-Pre-Crash Electronic Data Validity Check Status indicates "Data Invalid" if:
        -The SDM receives a message with an "invalid" flag from the module sending the pre-crash data
-Pre-Crash Electronic Data Validity Check Status indicates "Data Not Available" if:
        -No data is received from the module sending the pre-crash data
-For diesel powered vehicles, the data displayed as Throttle Position (%) is actually the data for the Air Inlet Flap Position. This is not the same as the throttle position for a gasoline powered engine.
-Belt Switch Circuit Status indicates the status of the seat belt switch circuit.
-The ignition cycle counter will increment when the power mode cycles from OFF/Accessory to RUN. Applying and removing of battery power to the module will not increment the ignition cycle counter.
-Ignition Cycles Since DTCs Were Last Cleared can record a maximum value of 253 cycles and can only be reset by a scan tool.
-Dynamic Deployment Event Counters tracks the number of Deployment events that have occurred during the SDM's lifetime.
-Dynamic Event Counters tracks the number of qualified events (either Deployments, Non-deploy, or Rollover events) that have occurred during the SDM's lifetime.
-For Deployment Events, DTC B0052 (Deployment commanded) shall be recorded with the remainder of the data for this event even though it occurred after Event Enable.
-For frontal Deployment Events, only the highest severity event is reported. For example, Stage 2 severity events include Pretensioner severity and Stage 1 severity.
-Once a firing loop has been commanded to be deployed, it will not be commanded to be deployed again during the same ignition cycle. Firing loop times for subsequent deployment type events, during the same ignition cycle, will record the deployment times as N/A.
-The airbag control module may continue to function after the vehicle has been turned off or to accessory, for a set period of time, this is called Prolongation. However, all other vehicle modules may have their functions shut down during Prolongation. For example, if the SIR warning lamp is commanded on by the airbag control module, during Prolongation, and is recorded in the EDR as being commanded on, the actual state of the warning lamp would be off to an observer since the vehicle display cluster would have been in the off state. Vehicle pre-event and system data may be recorded in the EDR as their commanded state, default state, or data invalid state.
-A Concurrent Event is when two events are happening nearly simultaneously. The "Concurrent Event Flag Set" parameter will indicate "Yes" if one event begins, but before that event is qualified, another event begins and is qualified.
A Non-Deployment event typically becomes qualified if that event exceeds the 5 MPH (8 km/h) delta V recording threshold and the event has concluded. A deployment event (FSR or Rollover) becomes qualified when a deployment has been commanded for that event.
Example of a Concurrent Event:
A Rollover event begins. Before the Rollover event is qualified, a Non-Deployment event begins and is qualified. Sometime after the Non-Deployment event is qualified, the Rollover event is qualified. The Non-Deployment event will be recorded in the first open record even though the Rollover event enabled before the Non-Deployment event. The Rollover event will be recorded in the next open record. The "Concurrent Event Flag Set" parameter will indicate "Yes" for the Rollover event. The "Time Between Events" parameter will indicate the time from the start of the Rollover event to the start of the Non-Deployment event.
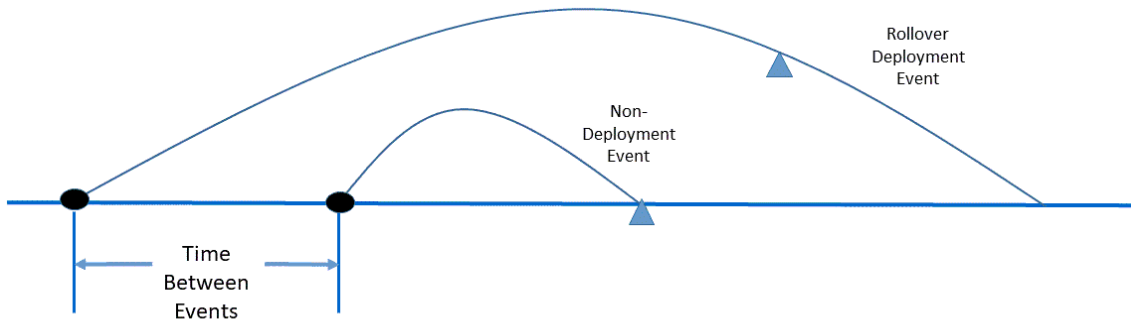
Event Recor #1	Event Record #2
Event Record Type = Non − Deployment	Event Record Type = Rollover
Concurrent Event Flag = No	Concurrent Event Flag = Yes
Time Between Events = NA	Time Between Events = XX seconds

-The GM parameter name is displayed in parentheses after the NHTSA Part 563 parameter name.
-All data should be examined in conjunction with other available physical evidence from the vehicle and scene.

Data Source:
All SDM recorded data is measured, calculated, and stored internally, except for the following:
-Vehicle Status Data (Pre-Crash) is transmitted by the Body Control Module, via the vehicle's communication network.
-The Belt Switch Circuit is wired directly to the SDM.

Data Element Sign Convention:
The following table provides an explanation of the sign notation for data elements that may be included in this CDR report. Directional references to

sign notation are all from the perspective of the driver when seated in the vehicle facing the direction of forward vehicle travel.

Data Element Name	Positive Sign Notation Indicates
Longitudinal Acceleration	Forward
Longitudinal Velocity Change	Forward
Lateral Acceleration	Left to Right
Lateral Velocity Change	Left to Right
Vertical Acceleration	Downward
Roll Rate	Clockwise Rotation

Hexadecimal Data:
Data that the vehicle manufacturer has specified for data retrieval is shown in the hexadecimal data section of the CDR report. The hexadecimal data section of the CDR report may contain data that is not translated by the CDR program. The control module contains additional data that is not retrievable by the CDR tool.

01059_SDM40-delphi_r010

System Status at Time of Retrieval

ESS # 1 Traceability Data, Component Identifier	AU
ESS # 1 Traceability Data, Part Number/Broadcast Code	8264
ESS # 1 Traceability Data, Supplier Code	D
ESS # 1 Traceability Data, Traceability Number	P209910F3
ESS # 1 Verification Data	13,518,264
ESS # 2 Traceability Data, Component Identifier	AT
ESS # 2 Traceability Data, Part Number/Broadcast Code	8264
ESS # 2 Traceability Data, Supplier Code	D
ESS # 2 Traceability Data, Traceability Number	P463894F3
ESS # 2 Verification Data	13,518,264
ESS # 3 Traceability Data, Component Identifier	AH
ESS # 3 Traceability Data, Part Number/Broadcast Code	4198
ESS # 3 Traceability Data, Supplier Code	D
ESS # 3 Traceability Data, Traceability Number	A828DA000
ESS # 3 Verification Data	13,514,198
ESS # 4 Traceability Data, Component Identifier	AJ
ESS # 4 Traceability Data, Part Number/Broadcast Code	4198
ESS # 4 Traceability Data, Supplier Code	D
ESS # 4 Traceability Data, Traceability Number	A36CF0C80
ESS # 4 Verification Data	13,514,198
ESS # 5 Traceability Data, Traceability Number	A968FA000
ESS # 5 Traceability Data, Component Identifier	DA
ESS # 5 Traceability Data, Part Number/Broadcast Code	4198
ESS # 5 Traceability Data, Supplier Code	D
ESS # 5 Verification Data	13,514,198
ESS # 6 Traceability Data, Component Identifier	DB
ESS # 6 Traceability Data, Part Number/Broadcast Code	4198
ESS # 6 Traceability Data, Supplier Code	D
ESS # 6 Traceability Data, Traceability Number	A7F6CA000
ESS # 6 Verification Data	13,514,198
ESS # 7 Traceability Data, Component Identifier	
ESS # 7 Traceability Data, Part Number/Broadcast Code	0000
ESS # 7 Traceability Data, Supplier Code	D
ESS # 7 Traceability Data, Traceability Number	A00000000
ESS # 7 Verification Data	0
ESS # 8 Traceability Data, Component Identifier	
ESS # 8 Traceability Data, Part Number/Broadcast Code	0000
ESS # 8 Traceability Data, Supplier Code	D
ESS # 8 Traceability Data, Traceability Number	A00000000
ESS # 8 Verification Data	0
AOS Data Key	0
SDM Primary Key Definition (Key 1-2)	11
SDM Primary Key Definition (Key 3-4)	80
Dynamic Deployment Event Counter	0
Multi-Event, Number of Events (Dynamic Event Counter)	0
Dynamic OnStar Notification Event Counter	0
Driver Frontal Stage 2 Commanded after Event End for Event Record #1	No
Passenger Frontal Stage 2 Commanded after Event End for Event Record #1	No
Driver Frontal Stage 2 Commanded after Event End for Event Record #2	No
Passenger Frontal Stage 2 Commanded after Event End for Event Record #2	No
Driver Frontal Stage 2 Commanded after Event End for Event Record #3	No
Passenger Frontal Stage 2 Commanded after Event End for Event Record #3	No
Longitudinal Accelerometer Range (g)	113
Lateral Accelerometer Range (g)	113
Dynamic PedPro Deploy Event Counter	0
Dynamic PedPro Event Counter	0
Vehicle Identification Number (VIN)	1GNEVHKW7LJ246704
System Type	Delphi SDM40 with integrated IMU
Ignition Cycle, Download (Ignition Cycles at Investigation)	2,795

Hexadecimal Data

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DPID $11
FF 0F 04 00 3F 0E 41

DPID $15
01 02 03 04 05 06 07

DPID $16
08 09 0A 0D 0E 00 00

DPID $17
00 00 00 00 22 00 00

DPID $1F
01 01 02 02 00 00 00

DPID $20
00 00 00 00 00 00 00

DPID $30
00 B4 00 00 00 00 00

DPID $32
13 FF 0A EB 00 00 00

DPID $51
0B 00 00 00 00 00 00

DID $01
41 55 38 32 36 34 44 50 32 30 39 39 31 30 46 33

DID $02
00 CE 45 B8

DID $03
41 54 38 32 36 34 44 50 34 36 33 38 39 34 46 33

DID $04
00 CE 45 B8

DID $05
41 48 34 31 39 38 44 41 38 32 38 44 41 30 30 30

DID $06
00 CE 35 D6

DID $07
41 4A 34 31 39 38 44 41 33 36 43 46 30 43 38 30

DID $08
00 CE 35 D6

DID $09
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DID $0A
00 CE 35 D6

DID $0B
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DID $0C
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1980    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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0870    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
0880    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
0890    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
0900    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
0910    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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0930    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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0980    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
0990    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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1010    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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1080    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
1090    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
1100    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
1110    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
1120    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
1130    FF  FF  FF  FF  FF  FF  FF  FF  FF  FF
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DID $B3
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DID $B4
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DID $B7
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