

AFFIDAVIT OF (FORMER) CHIEF OF POLICE WILLIAM J. CITY

COUNTY OF OKLAHOMA)
) SS.
STATE OF OKLAHOMA)

Affiant, Chief William J. City, being first sworn upon his oath, states:

1. That I was the Police Chief of the City of Oklahoma City Police Department from October 24, 2003, until I retired in May 2019. That I had been employed by the City and assigned to its police department since 1977 as a police officer until I retired.

2. That I personally reviewed the Statement of Material Facts Not in Dispute detailed in my brief in support of my Motion for Summary Judgment to be filed in the case of *Tabatha Barnes, et al. v. The City of Oklahoma City, et al.*, United States District Court for the Western District of Oklahoma, Case No. CIV-16-184-HE, and the exhibits referred therein.

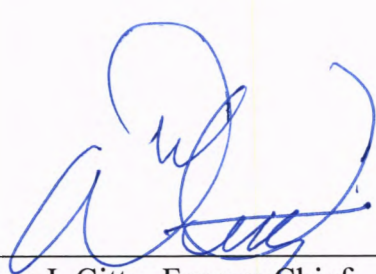
3. That Facts Nos. 1-32, including Facts in footnotes 7 on p. 7 and 9 on p. 11, in the Statement of Material Facts Not in Dispute are true and correct. Additionally, Exhibits 3-25, 27-30, 32-47, and 53-57 are true and correct copies of the OCPD policies, procedures, rules, training records and outlines, police reports and records concerning the investigation of an officer's (who later was determined to be Daniel Holtzclaw) sexual assaults of certain females.

4. That I was unaware of Ms. Campbell's initial complaint that Holtzclaw physically assaulted her or her later claim that he sexually assaulted her until she filed her lawsuit on July 31, 2015, in Oklahoma County District Court in *Campbell v. City of Oklahoma City, et al.*, CJ-2015-4217.

5. That all OCPD officers are required to comply with the Policies, Procedures, and Rules contained in the OCPD Operations Manual.

FURTHER AFFIANT SAYETH NOT.

DATED THIS 25 DAY OF September, 2020.



William J. City, Former Chief
Oklahoma City Police Department

This instrument was acknowledged before me on the 25th day of September 2020, by William J. City, Former Chief of OCPD.



Notary Public

My Commission Expires: 07/20/2021
Commission Number: 17000677

