

INFORMATION

3rd Amended

Case#:

CF14005869

IN THE DISTRICT COURT, IN AND FOR OKLAHOMA COUNTY, STATE OF OKLAHOMA

State of Oklahoma
VS.



PLAINTIFF,

FILED IN DISTRICT COURT
INFORMATION
OKLAHOMA COUNTY

DANIEL K HOLTZCLAW

DEFENDANT.

NOV 19 2014

TIM RHODES
COURT CLERK
18

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA, COMES NOW
DAVID W. PRATER THE DULY ELECTED, QUALIFIED AND ACTING DISTRICT ATTORNEY IN
AND FOR OKLAHOMA COUNTY, DISTRICT NO. 7, STATE OF OKLAHOMA, AND ON HIS OFFICIAL OATH INFORMS THE
DISTRICT COURT THAT

COUNT 1 : ON OR ABOUT THE 27TH DAY OF FEBRUARY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF T.B., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF T.B., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BARE BREASTS OF T.B. WITH HIS HAND WITHOUT HER CONSENT AFTER DANIEL K. HOLTZCLAW HAD DETAINED HER, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 2 : ON OR ABOUT THE 14TH DAY OF MARCH, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED C.R. , TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 3 : ON OR ABOUT THE 25TH DAY OF MARCH, 2014, A.D., THE CRIME OF BURGLARY IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, BROKE AND ENTERED THE DWELLING HOUSE OF T.B. LOCATED AT 1530 N.E. 15TH STREET, OKLAHOMA CITY, WHILE TERRY WAYNE WILLIAMS WAS INSIDE THE HOUSE, BY THE DEFENDANT OPENING A CLOSED DOOR AND WITH THE INTENT TO COMMIT EITHER STALKING, PROCURING LEWD EXHIBITION AND/OR SOME OTHER SEXUAL ASSAULT ON T.B., ALL IN VIOLATION OF TITLE 21, SECTION 1431 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 4 : ON OR ABOUT THE 25TH DAY OF MARCH, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED T.B., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K.

Report Date and Time: 11/19/2014 12:27

SKS

DEFENDANT CITY'S EXHIBIT 51 CIV-16-184-HE

INFORMATION

HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 5 : ON OR ABOUT THE 25TH DAY OF MARCH, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED T.B., TO EXPOSE HER BARE VAGINA TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 6 : ON OR ABOUT THE 26TH DAY OF MARCH, 2014, A.D., THE CRIME OF STALKING WAS UNLAWFULLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, MALICIOUSLY, AND/OR REPEATEDLY FRIGHTENED, INTIMIDATED, THREATENED, HARASSED, AND/OR MOLESTED T.B., HEREBY CAUSING T.B. TO FEEL FRIGHTENED, INTIMIDATED, THREATENED, HARASSED, AND/OR MOLESTED, BY AGAIN APPEARING AT HER HOUSE FOLLOWING TWO PRIOR SEXUAL ASSAULTS AND THREATENING T.B., BY EXPRESSED OR IMPLIED THREATS, WITH FUTURE SEXUAL ASSAULTS, FUTURE ARREST FOR OUTSTANDING WARRANTS, AND/OR PHYSICAL HARM, CONTRARY TO THE PROVISIONS OF SECTION 1173 OF TITLE 21 OF THE OKLAHOMA STATUTES AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 7 : ON OR ABOUT THE 14TH DAY OF APRIL, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF F.M., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF F.M., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BREASTS OF F.M. WITH HIS HAND AND OVER HER CLOTHING, WIHTOUT HER CONSENT, AND AFTER DANIEL K. HOLTZCLAW HAD DETAINED F.M., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 8 : ON OR ABOUT THE 24TH DAY OF APRIL, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE R.G., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH R.G., BY FORCING R.G. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF R.G., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 9 : ON OR ABOUT THE 24TH DAY OF APRIL, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, KNOWINGLY, AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION, THEREOF TO R.G., ACCOMPLISHED SEXUAL INTERCOURSE WITH R.G., TO-WIT: BY

INFORMATION

DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING R.G. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF R.G., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST R.G.'S. WILL AND WITHOUT R.G.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 10 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE S.E., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH S.E., BY FORCING S.E.. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF S.E., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA

COUNT 11 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, KNOWINGLY AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION THEREOF TO S.E., ACCOMPLISHED SEXUAL INTERCOURSE WITH S.E., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING S.E.. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF S.E., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST S.E.'S WILL AND WITHOUT S.E.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 12 : ON OR ABOUT THE 8TH DAY OF MAY, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE T.M., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH T.M., BY FORCING T.M.. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF T.M., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 13 : ON OR ABOUT THE 26TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF C.J., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF C.J., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BREASTS OF C.J. WITH HIS HAND AND UNDER HER CLOTHING, WIHTOUT HER CONSENT, AFTER DANIEL K. HOLTZCLAW HAD DETAINED C.J., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

INFORMATION

- COUNT 14 : ON OR ABOUT THE 26TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF C.J., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF C.J., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE VAGINA AND PUBIC AREA OF C.J. WITH HIS HAND UNDER THE CLOTHES, WITHOUT HER CONSENT, AND AFTER THE DEFENDANT HAD DETAINED C.J., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.
- COUNT 15 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY EXPOSED, DIRECTED, PROCURED, AND/OR COUNSELED J.L., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 16 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE J.L, BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH J.L., BY FORCING J.L. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF J.L., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.
- COUNT 17 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE K.L., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH K.L., BY FORCING K.L. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF K.L., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 18 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY EXPOSED, DIRECTED, PROCURED, AND/OR COUNSELED K.L., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 19 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN

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OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY EXPOSED, DIRECTED, PROCURED, AND/OR COUNSELED K.L., TO EXPOSE HER VAGINA TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA

COUNT 20 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, KNOWINGLY AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION THEREOF TO K.L., ACCOMPLISHED SEXUAL INTERCOURSE WITH K.L., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING K.L. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF K.L., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST K.L.'S WILL AND WITHOUT K.L.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 21 : ON OR ABOUT THE 20TH DAY OF DECEMBER, 2013, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF S.H., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS, TO-WIT: BY DANIEL K. HOLTZCLAW, WHILE ACTING AS AN EMPLOYED OKLAHOMA CITY POLICE OFFICER, TOUCHING THE BREAST OF S.H. OVER HER HOSPITAL GOWN WITH HIS HAND, WHILE S.H. WAS UNDER ARREST AND UNDER THE LEGAL CUSTODY, SUPERVISION, OR AUTHORITY OF THE OKLAHOMA CITY POLICE DEPARTMENT AND/OR DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 22 : ON OR ABOUT THE 20TH DAY OF DECEMBER, 2013, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF S.H., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS, TO-WIT: BY DANIEL K. HOLTZCLAW, WHILE ACTING AS AN EMPLOYED OKLAHOMA CITY POLICE OFFICER, TOUCHING THE BREAST OF S.H. OVER HER HOSPITAL GOWN WITH HIS HAND, WHILE S.H. WAS UNDER ARREST AND UNDER THE LEGAL CUSTODY, SUPERVISION, OR AUTHORITY OF THE OKLAHOMA CITY POLICE DEPARTMENT AND/OR DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 23 : ON OR ABOUT THE 20TH DAY OF DECEMBER, 2013, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF S.H., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS, TO-WIT: BY DANIEL K. HOLTZCLAW, WHILE ACTING AS AN EMPLOYED OKLAHOMA CITY POLICE OFFICER, TOUCHING THE BREAST OF S.H. OVER HER HOSPITAL GOWN WITH HIS HAND, WHILE S.H. WAS UNDER ARREST AND UNDER THE LEGAL CUSTODY,

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SUPERVISION, OR AUTHORITY OF THE OKLAHOMA CITY POLICE DEPARTMENT AND/OR DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

- COUNT 24 : ON OR ABOUT THE 20TH DAY OF DECEMBER, 2013, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING AS AN EMPLOYED OKLAHOMA CITY POLICE OFFICER AND WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE S.H., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH S.H., BY DANIEL K. HOLTZCLAW PLACING HIS PENIS IN THE MOUTH OF S.H., WHILE SHE WAS UNDER ARREST AND UNDER THE LEGAL CUSTODY, SUPERVISION, OR AUTHORITY OF THE OKLAHOMA CITY POLICE DEPARTMENT AND/OR DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 25 : ON OR ABOUT THE 20TH DAY OF DECEMBER, 2013, A.D, THE CRIME OF RAPE IN THE SECOND DEGREE BY INSTRUMENTATION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WILLFULLY AND KNOWINGLY, ACCOMPLISHED RAPE IN THE SECOND DEGREE BY INSTRUMENTATION ON THE PERSON OF S.H. IN THAT CERTAIN HUMAN BODY PARTS WERE USED, SPECIFICALLY: BY DANIEL K. HOLTZCLAW, WHILE ACTING AS AN EMPLOYED OKLAHOMA CITY POLICE OFFICER AND WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, PLACED HIS FINGERS INTO THE VAGINA OF S.H. WHILE SHE WAS UNDER ARREST AND UNDER THE CUSTODY, SUPERVISION, OR AUTHORITY OF THE OKLAHOMA CITY POLICE DEPARTMENT AND/OR DANIEL K. HOLTZCLAW, IN THE CARNAL KNOWLEDGE OF S.H., AND THAT PENETRATION OF THE VAGINA OCCURRED, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 26 : ON OR ABOUT OR BETWEEN THE 9TH DAY OF JANUARY, 2014 AND THE 31ST DAY OF JANUARY, 2014, A.D., THE CRIME OF INDECENT EXPOSURE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE AT A PLACE WHERE THERE WAS SOMEONE TO BE OFFENDED OR ANNOYED THEREBY, WILLFULLY AND LEWDLY EXPOSED HIS PENIS TO S.H., CONTRARY TO THE PROVISIONS OF SECTION 1021 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 27 : ON OR ABOUT THE 21ST DAY OF MAY, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE S.B., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH S.B., BY FORCING S.B. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF S.B., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.
- COUNT 28 : ON OR ABOUT THE 21ST DAY OF MAY, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, KNOWINGLY, AND BY MEANS OF

INFORMATION

FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION, THEREOF TO S.B., ACCOMPLISHED SEXUAL INTERCOURSE WITH S.B., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING S.B. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF S.B., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST S.B.'S WILL AND WITHOUT S.B.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 29 : ON OR ABOUT THE 25TH DAY OF APRIL, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, KNOWINGLY, AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION, THEREOF TO R.C., ACCOMPLISHED SEXUAL INTERCOURSE WITH R.C., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING R.C. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF R.C., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST R.C.'S WILL AND WITHOUT R.C.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 30 : ON OR ABOUT THE 17TH DAY OF JUNE, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF A.G., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF A.G., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BREASTS OF A.G. WITH HIS HAND, WITHOUT HER CONSENT, AND AFTER DANIEL K. HOLTZCLAW HAD DETAINED A.G., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 31 : ON OR ABOUT THE 17TH DAY OF JUNE, 2014, A.D, THE CRIME OF RAPE IN THE SECOND DEGREE BY INSTRUMENTATION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WILLFULLY AND KNOWINGLY, ACCOMPANIED BY APPARENT POWER OF EXECUTION, ACCOMPLISHED RAPE IN THE SECOND DEGREE BY INSTRUMENTATION ON THE PERSON OF A.G. IN THAT CERTAIN HUMAN BODY PARTS WERE USED, SPECIFICALLY: BY PUTTING HIS FINGER IN THE VAGINA OF A.G. WHILE A.G. WAS BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED IF SHE DID NOT COMPLY, BY DANIEL K. HOLTZCLAW, AGAINST A.G.'S WILL AND WITHOUT HER CONSENT, AND THAT PENETRATION OF THE VAGINA OCCURRED, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA

COUNT 32 : ON OR ABOUT THE 17TH DAY OF JUNE, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, KNOWINGLY, AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION, THEREOF TO A.G., ACCOMPLISHED SEXUAL INTERCOURSE WITH A.G., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING A.G. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF A.G., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR

INFORMATION

IMPLIED, IF SHE DID NOT COMPLY, AGAINST A.G.'S. WILL AND WITHOUT A.G.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 33 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF S.E., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF S.E., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BARE BREASTS OF S.E. WITH HIS HANDS WITHOUT HER CONSENT AFTER DANIEL K. HOLTZCLAW HAD DETAINED HER, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 34 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF S.E., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF S.E., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE VAGINA AND/OR VAGINA AREA OF S.E. WITH HIS HAND UNDER THE CLOTHES, WITHOUT HER CONSENT, AND AFTER THE DEFENDANT HAD DETAINED S.E., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 35 : ON OR ABOUT THE 8TH DAY OF MAY, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED T.M., TO EXPOSE HER VAGINA TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 36 : ON OR ABOUT THE 8TH DAY OF MAY, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED T.M., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

INFORMATION

DAVID W. PRATER

DISTRICT ATTORNEY, DISTRICT NO. 7
OKLAHOMA COUNTY, OKLAHOMA

BY


ASSISTANT DISTRICT ATTORNEY

INFORMATION

I HAVE EXAMINED THE FACTS IN THIS CASE AND RECOMMEND THAT A WARRANT DO ISSUE, (22 O.S.: 231).

DAVID W. PRATER

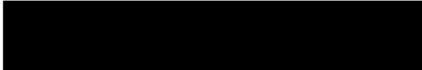
DISTRICT ATTORNEY, DISTRICT NO. 7
OKLAHOMA COUNTY, OKLAHOMA

BY


ASSISTANT DISTRICT ATTORNEY

NAME OF WITNESSES

CYNTHIA ELISE ADCOX



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JAMES ANTHONY ANDERSON



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1131 W SHERIDAN AVENUE- PROBATION & PAROLE
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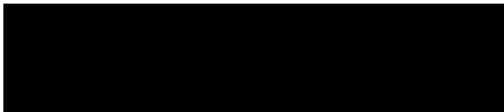
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ZAFAR CHAUDHRY


MELODIE SHERNA COLEMAN


TONY COLEMAN ATTY


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MARY COPELAND
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JOHN COPELAND
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NIMESH PATEL



OCPD SHARRI PETEET
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ALAN SALMON
OK STATE BUREAU OF INVESTIGATION

BLAKE SCHWEITZER

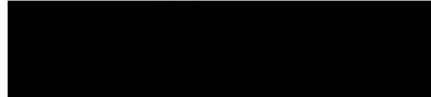


OCPD AMY SCOTT

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JONAYE STAFFORD

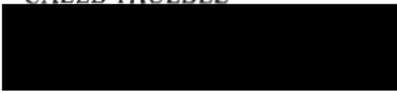


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TAMMY LYNN SUMMERS



CALEB TAULBEE



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DNA TESTING ELAINE TAYLOR
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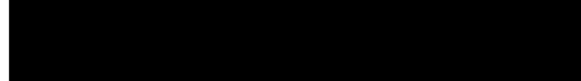
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ASHLEY ZECKER

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Report Date and Time: 11/19/2014 12:27