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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

JANNIE LIGONS, SHANDAYREON HILL,)
TABATHA BARNES, TERRI MORRIS,)
SYRITA BOWEN, CARLA JOHNSON,)
KALA LYLES,)

Plaintiffs,)

vs.)

CITY OF OKLAHOMA CITY, a municipal)
corporation, DANIEL HOLTZCLAW,)
BILL CITTYY, BRIAN BENNETT, ROCKY)
GREGORY, JOHN AND JANE DOES, all)
in their individual capacity,)

Defendants.)

) No.
) CIV-16-184-HE



VIDEOTAPED DEPOSITION OF BRIAN BENNETT
TAKEN ON BEHALF OF THE PLAINTIFFS
IN OKLAHOMA CITY, OKLAHOMA
ON SEPTEMBER 19, 2018

REPORTED BY: KAREN B. JOHNSON, CSR

Brian BENNETT

September 19, 2018

Page 82

1 Perversion by Merriam-Webster."

2 Q Do you consider Merriam-Webster to be a
3 credible source for definition of words?

4 MS. GOOCH: Object to the form.

5 MS. KATZ: Same objection.

6 THE WITNESS: You mean the dictionary?

7 Q (By Mr. Solomon-Simmons) Yes.

8 A Yes.

9 Q Okay. And could you read the definition
10 of perversion that Merriam-Webster gives us?

11 A "Perversion, noun, per-ver-sion.
12 Definition of perversion, one, the action of
13 perverting, the condition of being perverted, but
14 the definition" -- all right. "The condition of
15 being perverted," all one word, out of the
16 dictionary, "being perverted. Number 2, a perverted
17 form, especially an aberrant sexual practice or
18 interest especially when habitual."

19 Q Is that a -- a working definition that you
20 could agree to when we use the term "perverted"?

21 A We could agree to the definition.

22 Q Okay. That's all -- okay. It is your
23 testimony, sir, that Mrs. Campbell did not -- strike
24 that.

25 Are you saying Mrs. Campbell did not tell

Brian BENNETT

September 19, 2018

Page 83

1 you that Mr. -- that Daniel Holtzclaw was perverted?

2 A Yes, that's exactly what I'm saying, she
3 did not tell me that.

4 Q Okay. Did she tell you that she felt
5 Daniel Holtzclaw was prejudiced?

6 A No, she did not.

7 Q Okay. Did she tell you that she felt like
8 Daniel Holtzclaw treated her like trash because she
9 was a black woman?

10 A No.

11 Q Did she say anything about being black?

12 A Well, she told me that she was black when
13 I asked her, and when I spoke with her, she appeared
14 to be black.

15 Q Is there anything else about Mrs. Campbell
16 that stood out to you just when you saw her?

17 A I guess I don't understand what you're
18 referring to.

19 Q Any other physical characteristics of
20 Mrs. Campbell that you noticed upon first looking at
21 her? I'm sure when you first saw her, you saw that
22 she was black, right, or appeared to be black?

23 A Yes, yeah.

24 Q Any other physical characteristics of
25 Mrs. Campbell when you first saw her that you noted

Brian BENNETT

September 19, 2018

Page 97

1 A Review reports?

2 Q Yeah, like the incident report for the
3 stolen vehicle.

4 A Oh, I don't believe I did.

5 Q Okay.

6 A At that time, the only report that should
7 have been available would have been the original
8 report taken by the officer that reported the car
9 stolen.

10 Q What infor -- what information did you
11 receive when you receive -- when you got the call
12 from dispatch, what did they tell you?

13 A Well, there was a call generated through
14 the dispatch system about Mrs. Campbell being at the
15 hospital, and I was notified about it, and -- and I
16 went from there.

17 Q Did you actually speak to someone about
18 Mrs. Campbell's desire to make a complaint?

19 A I'm not 100 percent sure, but I think
20 dispatch called me on the phone to tell me there was
21 a call holding that requested a supervisor.

22 Q Okay. Do you recall the name of the
23 dispatch individual you spoke with?

24 A They rotate every two hours, 24 hours a
25 day, that's -- I don't, no, sir, I don't know.

Brian BENNETT

September 19, 2018

Page 98

1 Q Sure. Do you recall specifically what
2 that individual said to you?

3 A I don't remember the specifics, I remember
4 the gist of the conversation.

5 Q What was the gist of it?

6 A That there's a person at OU Medical Center
7 that wants to talk to a supervisor.

8 Q Did they say what they wanted to talk to a
9 supervisor about?

10 A I believe that those comments were on the
11 call. Again, I'm not 100 percent sure, I would have
12 to review the CAD call to be certain. But I believe
13 that the comments on the CAD call were that they had
14 interaction with an officer previously in the
15 afternoon at 23rd and Martin Luther King and that
16 the CAD call indicated that the officer in question
17 was Daniel Holtzclaw.

18 Q Okay. Is it your practice when you
19 receive a complaint on a officer, to talk to that
20 officer first?

21 A Practice, I guess, not necessarily. In
22 this situation, I had no idea what had happened, so
23 I wanted to ask him, what happened, at least that
24 way I had a working framework or understanding of
25 what we were even talking about at that point.