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

(1) TABATHA BARNES, et al.,)	
)	
Plaintiffs,)	
)	
-vs-)	No. CIV-16-184-HE
)	
(1) CITY OF OKLAHOMA CITY, a)	
municipal corporation, et al.,)	
)	
Defendants.)	

* * * * *

DEPOSITION OF DEMETRIA MICHELLE CAMPBELL

TAKEN ON BEHALF OF THE DEFENDANTS

IN OKLAHOMA CITY, OKLAHOMA

ON FEBRUARY 15, 2018

COMMENCING AT 9:01 A.M.

* * * * *

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REPORTED BY: BETH A. MCGINLEY, CSR, RPR

1 daughter." I said, "I did not need this. I'm going to my
2 car" -- I said, "from my car to the building, he runs up
3 on me, snatches me up, has me up against the wall,
4 handcuffs me." I said, "And it all could have been
5 avoided had he listened."

6 Q Okay.

7 A I said, "He wouldn't listen to me."

8 He said, "What do you mean 'he wouldn't
9 listen?'" He said, "What are you -- were you trying to
10 tell him something?"

11 And I said, "Yes, I was asking him if he would
12 just tell me who he thought I was. I told him that I
13 could have proven to him that I was not the individual."
14 I said, "But he wouldn't hear that. He wouldn't let me
15 explain to him anything. He wouldn't let me" -- I said,
16 "He wouldn't explain to me, he wouldn't listen, he
17 just" -- I said, "He was hateful." I said, "And I don't
18 deserve that. He was hateful, he was" -- I said, "He's
19 prejudiced against" -- I said, "He made me feel like
20 trash." I said, "He was perverted."

21 I said, "And I didn't need this." I said, "My
22 life has been hectic, I don't need him and this type of
23 behavior." I said, "If he had said from the beginning --
24 I had my license, I had proof of insurance." I said, "In
25 my purse, I even have the title to the car." I said, "But

1 he wouldn't explain and he wouldn't allow me to explain."

2 He said, "I need more detail, from you, what
3 happened." I told him in detail what happened. I said,
4 "He was perverted while I was against the wall." I said,
5 "He slammed my head against the wall as hard as he could."
6 I said, "He was angry." I said, "And the one mistake that
7 Oklahoma City has made is hiring him as an officer. He
8 does not deserve to be called one of Oklahoma City's
9 finest." I said, "He is hateful."

10 He said, "How do you know?" I said, "You could
11 see it in his eyes." I said, "He was almost like a
12 ravaged animal." I said, "He -- he wouldn't listen at
13 all." I said, "I don't know" -- I said, "I really didn't
14 believe he was an officer because of his behavior." I
15 said, "It's -- it's unacceptable behavior." I said, "And
16 if Oklahoma City knows, like I know, they would get him
17 off of the force because I'm afraid of what he may do to
18 the next black person."

19 He said, "Ms. Campbell, how do you know that he
20 was prejudiced?" I said, "His eyes." I said, "He looked
21 at me as though I were trash," I said, "as though I were a
22 nobody." And I said, "I'm sure what he thought was that
23 he had grabbed an uneducated black woman, someone that he
24 could bully and push around and do whatever," I said, "and
25 I honestly believe he had other intentions for me." I

1 vehicle --

2 **A** Yes.

3 **Q** -- was his reason?

4 Okay. So when you were with him during that
5 period of time, whether you were outside the car, inside
6 the car, or both, did he ever talk to you about your
7 vehicle, the tags or the title, or anything like that?

8 **A** No.

9 **MS. GOOCH:** Object to the form.

10 **Q (By Ms. D'Antonio)** Did he ever ask you if you --
11 if the vehicle belonged to you?

12 **A** No.

13 **Q** Any questions that you can recall, from Officer
14 Holtzclaw, that would indicate that he was trying to find
15 out whether or not you had stole the vehicle that you were
16 driving?

17 **A** No.

18 **Q** I'd like to draw your attention to what we --
19 we'll call it Plaintiff's Exhibit 1 -- well, Demetria
20 Campbell Plaintiff's Exhibit 1. We can call it that. I
21 want you to take a look at that. It's a two-page
22 document. I want you to take a look at that document and
23 tell me if you recognize it.

24 **A** Yes.

25 **Q** And, of course, it's a copy, correct?

1 **A** Yes.

2 **Q** And tell, for the Court, what this document
3 represents.

4 **A** It's the card that Lieutenant Bennett gave me at
5 the hospital.

6 **Q** And I noticed there's two pages. What is the
7 second page?

8 **A** On the back of it, I wrote the officer's name
9 and what happened and where.

10 **Q** Okay. So that is your handwriting, correct?

11 **A** Yes.

12 **Q** And when was that handwriting placed on this
13 business card?

14 **A** At the hospital, the night that I had spoken
15 with Dr. -- with Lieutenant Bennett.

16 **Q** Okay. So on November 5th, 2013?

17 **A** Yes.

18 **MS. D'ANTONIO:** Okay. I'd like to offer this as
19 an exhibit.

20 **Q** **(By Ms. D'Antonio)** When you were talking to
21 Lieutenant Bennett, did he state to you that he was going
22 to follow-up with you on the questioning that he had
23 conducted that night?

24 **A** Yes.

25 **Q** Okay. How did he say that? What exactly did he

1 hospital?

2 **A** Yes.

3 **Q** What did you tell him?

4 **A** I told him that I had enough on my plate to deal
5 with, that I did not need that incident added to it, that
6 my daughter was there, had just been brought in and that
7 they had just told us that the cancer had made it to her
8 brain and that she may not even leave the hospital.

9 **Q** Okay. So -- and I asked you if anyone contacted
10 you from the Oklahoma City Police Department regarding
11 your statements with Lieutenant Brian Bennett, but did
12 anyone call you from the DA's office?

13 **A** No.

14 **Q** Anyone send you any correspondence from the DA's
15 office in reference to that incident?

16 **A** No.

17 **Q** And one more question. When you were talking
18 with Lieutenant Brian Bennett, at any time did he ask you
19 for a physical description of the officer that you had
20 made contact with on November 5th, 2013?

21 **A** No.

22 **Q** So when you gave Holtzclaw's name to him, was he
23 satisfied with that or did he go further and ask you for
24 more physical indicators about who he was?

25 **MS. GOOCH:** Object to the form.

1 MS. D'ANTONIO: Thank you.

2 MR. SOLOMON-SIMMONS: Thank you, sir.

3 MR. SMITH: You're welcome. Don't try the stare
4 down.

5 MR. SOLOMON-SIMMONS: You are funny.

6 MR. SMITH: What?

7 MR. SOLOMON-SIMMONS: I said you are funny, sir.

8 MR. SMITH: Okay. Glad you think so.

9 Q (By Mr. Smith) Have you ever seen those, ma'am?

10 A Yes.

11 Q Okay. And for the record, what are they?

12 A Medical records.

13 Q Okay. Did you ever tell anybody, on the night
14 of this incident, at the hospital, that Daniel Holtzclaw
15 perverted you?

16 A Yes.

17 Q Who did you tell at the hospital?

18 A Lieutenant Brian Bennett.

19 Q Okay. When I meant from the hospital -- and
20 that was a poorly-worded question.

21 Did you tell anybody employed by the hospital
22 that Daniel Holtzclaw perverted himself?

23 A No.

24 Q Okay. So is that why it's not in these medical
25 records?

1 **A** Yes.

2 **Q** Okay. Why did you not tell the doctors, the
3 nurses, the technicians, the reception lady, at the
4 hospital, that Daniel Holtzclaw perverted himself?

5 **MR. SOLOMON-SIMMONS:** Object to form.

6 **A** I was ashamed. I felt degraded.

7 **Q** **(By Mr. Smith)** Okay.

8 **A** I felt nasty. And I didn't feel that I needed
9 to disclose it to everyone, already feeling as bad as I
10 was. I had enough on my plate, as I said before. I did
11 not want to discuss it with everyone because it wasn't
12 everyone's business.

13 **Q** Okay. So you didn't need medical treatment for
14 it?

15 **A** No.

16 **Q** Okay.

17 **A** Not at that time.

18 **Q** Have you ever disclosed it to any medical
19 provider?

20 **A** Yes.

21 **Q** Which ones?

22 **A** My personal doctor.

23 **Q** And what is the personal doctor's name?

24 **A** Akram Abraham.

25 **Q** Okay. Do you know when you did that? Because

1 immediately afterwards. There's one for 11/11/13?

2 **A** (Moved head up and down).

3 **Q** And I don't even think it -- it talks about this
4 incident. But I have to refresh my memory.

5 Okay, I apologize, it is there. The incident is
6 there, but it doesn't say anything about a sexual assault,
7 correct?

8 **A** Correct.

9 **Q** And there's also one about 11/29 that talks
10 about this incident, correct? Four pages on or so -- five
11 pages on. 11/23 -- 11/29/2013, "The patient is a
12 43-year-old female who presents with headaches since the
13 time she was assaulted by a police officer in Oklahoma
14 City." Do you see that, ma'am?

15 **A** I'm looking.

16 **Q** It's five pages in, I believe.

17 **A** Okay, yes.

18 **Q** It doesn't say anything about any perversion or
19 sexual assault or anything, does it?

20 **A** No.

21 **Q** Okay. Do you recall, then, when you did talk --
22 tell this doctor that you were sexually assaulted?

23 **A** Yes.

24 **Q** When?

25 **A** The 11th.

1 **MS. GOOCH:** I'm sorry?

2 **THE WITNESS:** The 11th.

3 **Q** **(By Mr. Smith)** On the 11th?

4 **A** Yes.

5 **Q** It's just not in the record?

6 **A** Not in detail.

7 **Q** It doesn't say "sexual," at all, does it?

8 **A** No.

9 **Q** It doesn't say "perversion"?

10 **A** No.

11 **Q** It doesn't say any of the words you've used
12 today?

13 **A** No.

14 **Q** It doesn't say about "erection"?

15 **A** No.

16 **Q** But you say you told him that?

17 **A** Yes.

18 **Q** Okay. I'm going to hand you what's been marked
19 as Defendants' Exhibit...

20 **THE REPORTER:** 4;.

21 **Q** **(By Mr. Smith)** ...4, if I could ever find it.
22 I'm sure I've hidden them from me.

23 I'll ask you if you've ever seen this document
24 before, ma'am. It is the use of force report done by
25 Lieutenant Bennett.

1 **MR. SOLOMON-SIMMONS:** Thank you, sir.

2 **MR. SMITH:** You bet.

3 **A** Okay.

4 **Q** **(By Mr. Smith)** I -- I think you're going to say
5 that's not what you told him, but I would like for you to
6 read the entire thing. It's actually the first two pages.
7 And I'm going to give you an -- I'm going to ask you about
8 it, so I'm just saying that's his report, okay? And I
9 will ask you if that's what you told him or if that's
10 correct or incorrect, and you'll have your chance, all
11 right?

12 **A** Okay. Okay.

13 **Q** Okay. And just for the record, there's more
14 than four page- -- two pages here. If you want to read
15 the whole document, you can read the whole document. I'm
16 telling you that the first two pages are what is --
17 supposedly, what you told Lieutenant Bennett, and the next
18 pages are what Holtzclaw told him. If you want to read
19 the whole thing, please do. I don't want you to say that
20 I didn't give you the opportunity.

21 **MS. D'ANTONIO:** And I just want the record to
22 reflect that the witness has testified she's never seen
23 this document before, so lack of personal knowledge.

24 So answer the questions the best you can.

25 **MR. SMITH:** And I appreciate that, ma'am.

1 **MS. D'ANTONIO:** You can tell him when you're
2 done.

3 **A** I'm -- I'm done.

4 **Q** **(By Mr. Smith)** Okay. First of all, it's five
5 pages, not four. I apologize.

6 **A** Uh-huh.

7 **Q** Okay. The first two purport to be what you told
8 Lieutenant Bennett. And I understand you've never seen
9 that document before today, until I just gave it to you.
10 Do you agree with what -- that that's what you told
11 Lieutenant Bennett, what's reported in there on the first
12 two pages?

13 **A** Not all of that. Not all of that.

14 **Q** Okay. So some of it is what you told him?

15 **A** Yes.

16 **Q** Okay. Can you tell me what it is that you did
17 tell him, or is it easier to go and say what you didn't
18 tell him?

19 **A** I did tell him that Holtzclaw had me against the
20 wall.

21 **Q** Okay.

22 **A** That he was perverted while he had me against
23 the wall.

24 **Q** Okay.

25 **A** I told him that he would not explain why he had

1 me, that he would not allow me to ask questions, that
2 there was no conversation about why he had me against the
3 wall. I also explained to him that he was rude, racist,
4 that he was prejudiced, that I -- hateful -- that he was
5 perverted, I say again. There was -- let me just find
6 another portion, please.

7 Q Take your time, ma'am.

8 A The hospital called.

9 Q Okay. What -- what paragraph are you referring
10 to --

11 A The first.

12 Q -- what page?

13 A First page, first paragraph.

14 Q Okay, thank you.

15 A It -- it says where -- "Mrs. Campbell was being
16 in the ER and wanting to speak to a supervisor"?

17 Q Yes, ma'am.

18 A The hospital called and requested.

19 Q Okay.

20 A I did not.

21 Q Okay. Did you ask the hospital to have --

22 A No.

23 Q Okay.

24 A I did not tell him that -- it's the second
25 paragraph.

1 Q Okay.

2 A Second sentence. I did not tell him that I
3 thought he used unnecessary force by placing me against
4 the wall. I told him that he placed me against the wall
5 and that he was aggressive.

6 Q Okay.

7 A I told him that he was perverted, that --
8 there's so much in here that I didn't say, but...

9 Q Okay. Well, let's talk about -- you keep saying
10 the word "perverted." Is that the word you used?

11 A "Perverted."

12 Q That was the word you told him?

13 A Yes --

14 Q Okay.

15 A -- "perverted."

16 Q All right. And I understand that he summarized
17 some of the things that you said in the second paragraph,
18 at least that's my take on it. Is that a correct
19 assumption, that he's summarizing some of the things that
20 you have told him about?

21 MS. D'ANTONIO: I'm going to object to
22 speculation.

23 Q (By Mr. Smith) Ma'am, you can answer it.

24 A Oh, I'm sorry. Repeat that, please.

25 Q Well, we can do it the hard way and I can go

1 **A** No.

2 **Q** Okay. Were you aware that Ms. D'Antonio filed a
3 tort claim on your behalf?

4 **A** Yes.

5 **Q** You've seen that document?

6 **A** Yes.

7 **Q** Okay. If I could get the sticker off...

8 (Off-the-record discussion between the court
9 reporter and Mr. Smith.)

10 **MR. SMITH:** I'm going to mark this one as 5.

11 And by the way, while I'm thinking of it, I got
12 Dr. Abraham's records from Dr. Abraham, not from you.

13 **MS. D'ANTONIO:** Not from me. Thank you.

14 **MR. SMITH:** And I apologize. I'd thought of it
15 earlier and I just couldn't come to a break, and I
16 apologize.

17 **MR. SOLOMON-SIMMONS:** Thank you.

18 **Q** **(By Mr. Smith)** I've handed you what's been
19 marked as Defendants' Exhibit No. 5, and ask you if you've
20 seen that document before.

21 **MR. HALL:** Thank you.

22 **A** Yes.

23 **Q** **(By Mr. Smith)** On Page 2 -- and this is Page 2
24 of the exhibit and Page 2 typed, even -- do you see where
25 it says, under paragraph marked "A", your claim?

1 **A** Yes.

2 **Q** Ma'am?

3 **A** Yes.

4 **Q** Okay. The second paragraph, it -- it explains
5 what your claim is or the facts of it?

6 **A** Yes.

7 **Q** Does it say that Daniel Holtzclaw was perverted
8 towards you at any time?

9 **A** Which part of the paragraph are you referring
10 to?

11 **Q** All of the second paragraph.

12 **A** Okay. Now, your question again, please?

13 **Q** Does it ever say in there that Daniel Holtzclaw
14 was perverted towards you?

15 **A** No.

16 **Q** Okay. Without telling me attorney-client
17 privilege, do you have any explanation why it doesn't say
18 that?

19 **MS. D'ANTONIO:** I'm going to object to
20 attorney-client privilege. Don't answer that.

21 **Q** **(By Mr. Smith)** I'm going to hand you what's been
22 marked as Defendants' Exhibit 6, if I can get the label
23 off. Ask you if you've ever seen that document before.

24 **MR. SOLOMON-SIMMONS:** Thank you.

25 **MR. SMITH:** You're welcome.