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

ADAIRA GARDNER, individually, )  
 )  
Plaintiff, )  
 )  
vs. ) No.  
 ) CIV-16-0349-HE  
 )  
DANIEL HOLTZCLAW, et al., )  
 )  
Defendants. )



VIDEOTAPED DEPOSITION OF JOHNNY KUHLMAN  
TAKEN ON BEHALF OF THE PLAINTIFF  
IN OKLAHOMA CITY, OKLAHOMA  
ON SEPTEMBER 19, 2019

REPORTED BY: KAREN B. JOHNSON, CSR

Johnny Kuhlman

September 19, 2019

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1 Q Would that have been about June 18th?

2 A If that's the day she reported it, then  
3 the answer is yes.

4 Q Who else besides Daniel Holtzclaw was  
5 interviewed that day?

6 A I believe Ms. Ligons was interviewed that  
7 day.

8 Q So we have Jannie Ligons, we have Daniel  
9 Holtzclaw, do we have anybody else?

10 A I'm not aware of anybody else, I don't  
11 know if there was or not.

12 Q Are you aware that Daniel Holtzclaw didn't  
13 have his AVL on at the time that Jannie Ligons was  
14 pulled over?

15 A Yes.

16 Q How did you come to the conclusion, even  
17 as a group, let me ask you about that, who was in  
18 that group?

19 A When I say group, myself and Major Wenzel  
20 and I think Captain Bacy was probably in and out at  
21 the time.

22 Q So who came up with the idea to interview  
23 Daniel Holtzclaw?

24 A Once again, as I recall, we asked the  
25 subject we spoke about earlier, Joe Hill, to track

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1 everybody that left Springlake, because they got off  
2 at 2:00 is when they end their shift, and we asked  
3 him to track everybody that left Springlake in a  
4 police car.

5 Obviously the first thing we asked was,  
6 was there AVL activity at 50th and Lincoln, the  
7 answer was no. Then we asked to track everybody  
8 that left Springlake to see if anybody went by 50th  
9 and Lincoln, and there's several officers that went  
10 up Lincoln but never stopped, and then it came down  
11 to who didn't have their AVL on that got off, and  
12 Daniel Holtzclaw had -- did not, had turned off his  
13 AVL before he left Springlake, so, therefore, there  
14 was no way to track him when he left.

15 Q You're talking to Joe Hill about that --  
16 about who had left Springlake, how did you -- how  
17 did you reduce it down to the Springlake Division?

18 A Because that's -- that's very close to the  
19 Springlake station, and that's Springlake Division.

20 Q Now, as you're sitting there trying to  
21 identify all possible suspects and all possible  
22 theories, is it possible that another officer from  
23 another division could have been a part of that?

24 A Absolutely.

25 Q Could have been Santa Fe Division?