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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.

) No.  
) CIV-16-184-HE

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

Defendants. )



VIDEOTAPED DEPOSITION OF KALA LYLES  
TAKEN ON BEHALF OF THE DEFENDANTS  
IN OKLAHOMA CITY, OKLAHOMA  
ON DECEMBER 13, 2018

REPORTED BY: KAREN B. JOHNSON, CSR

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1 answer, ma'am. And I haven't been asking the other  
2 plaintiffs this question and I probably should have,  
3 do you know anything about Oklahoma City Police  
4 Department training?

5 A No.

6 Q Do you know anything about law enforcement  
7 training?

8 A No.

9 Q Okay. Let's go to the second cause of  
10 action, which is on Page 24, Paragraph 55, please,  
11 ma'am.

12 MR. HALL: I got it for you. Paragraph  
13 55. Starts right there.

14 Q (By Mr. Smith) And you can read it all,  
15 I'm not trying to tell you you can't, but you see  
16 one of the defendants there is Chief Bill Citty in  
17 that -- in that cause of action. Was Chief Bill  
18 Citty present when Holtzclaw --

19 A I don't know.

20 Q Was there any other male present when  
21 Holtzclaw was doing to you what you said he did?

22 A Oh, no.

23 Q Okay. Do you know why you sued Chief Bill  
24 Citty?

25 A Other than me getting raped.

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1 Q Right. But he didn't rape you; right?

2 A He was lieutenant over him. The  
3 lieutenant over him; right?

4 Q Well, he was the chief over him, he wasn't  
5 the lieutenant over him.

6 A That part.

7 Q Okay. And are you doing it just because  
8 he's his boss?

9 A I'm doing it for my justice.

10 Q I understand that. But are you suing Bill  
11 Citty because he's the boss or was the boss of  
12 Holtzclaw?

13 A Yeah, yeah, you can say that, yes.

14 Q Okay. Well, let's talk about what Chief  
15 Bill Citty did. Well, let's go all the way through  
16 the amended complaint and do it in order. If you  
17 look at your third cause of action, your third cause  
18 of action, Paragraph 25.

19 MR. HALL: You said Paragraph 25, you mean  
20 page?

21 MR. SMITH: I did, but I didn't mean it,  
22 thank you.

23 Q (By Mr. Smith) Page 25, paragraph starting  
24 at 60.

25 MR. SMITH: Thank you, Melvin.

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1 Q (By Mr. Smith) Again, listed as defendant  
2 is Chief Citty, was he present on June 17th when  
3 Holtzclaw raped you?

4 A No.

5 Q Okay. Did he use any -- has he ever used  
6 any force on you; Chief Citty?

7 A No.

8 Q Okay. Next page, conspiracy, conspiracy  
9 to interfere with 4th and 14th Amendment rights, do  
10 you see that, ma'am, it's on Page 26 starting on  
11 Paragraph 66?

12 MR. SMITH: I think I got that one right,  
13 Melvin.

14 MR. HALL: There it is right there.

15 THE WITNESS: Now, what was the question  
16 you asking me?

17 Q (By Mr. Smith) What evidence do you have  
18 personally, you, nobody else, you, that Chief Citty  
19 entered a conspiracy with anybody to cover up for  
20 Holtzclaw or whatever?

21 A Nothing that I know of.

22 Q Okay. What evidence do you have that --  
23 you see on Paragraph 68, you've listed Detective  
24 Gregory as one of the conspirators, what evidence do  
25 you have that Rocky Gregory entered into any

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1 Q (By Mr. Smith) I'm sorry, I thought you  
2 were looking for it. As to all defendants, do  
3 you -- do you know what ratification means, ma'am,  
4 and I'm not trying to be smart, not trying to be  
5 insulting, do you know what ratification means?

6 A No, what is it?

7 Q It means he approved of the actions.

8 A Hum. Okay.

9 Q Do you think Bill Citty approved of  
10 Holtzclaw's actions?

11 A I have no idea.

12 Q Okay. Well, how about Rocky Gregory, do  
13 you think he approved it?

14 A I have no idea.

15 Q I showed you where he arrested him, didn't  
16 I?

17 A Uh-huh.

18 Q Does that sound like -- I'm sorry, is that  
19 a yes or a no?

20 A Yes.

21 Q Does that sound like he approved of the  
22 actions?

23 A I have no idea still.

24 Q Okay. Let's go to the last cause of  
25 action, Paragraph 91, Page 31, failure to train. I

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1 Q (By Mr. Smith) Show me anything that shows  
2 that you sued the FOP. Do you have a document, do  
3 you have a lawsuit, do you have a --

4 MR. HALL: Object as to form.

5 Q (By Mr. Smith) -- a docket sheet showing  
6 you sued the FOP?

7 MR. HALL: Can you answer?

8 THE WITNESS: No. I thought I already  
9 answered.

10 Q (By Mr. Smith) I never heard your answer.  
11 What was the answer?

12 MR. HALL: She said no.

13 MR. SMITH: Thank you.

14 (Defendant's Exhibit Number 8 marked for  
15 identification and made part of the  
16 record)

17 MR. SMITH: Okay. Defendant's 8,  
18 Mr. Johnson, is the January 8th, 2015 letter, Chief  
19 Citty to Holtzclaw, I introduced it the last time,  
20 would you like a copy at the break?

21 MR. JOHNSON: No, thank you, we have it.

22 MR. SMITH: Okay.

23 Q (By Mr. Smith) Have you ever seen that  
24 letter, ma'am?

25 A No.

1 Q That's the letter in which Chief Bill  
2 Citty fired Holtzclaw, okay?

3 A Uh-huh.

4 Q Do you see the second paragraph starts  
5 out, "Your offenses committed against women in our  
6 community constitute the greatest abuse of police  
7 authority I've witnessed in my 37 years as a member  
8 of this agency," do you see that?

9 A Uh-huh, yes.

10 Q Does that sound like he ratified the acts  
11 of Holtzclaw?

12 A I guess.

13 Q You think that's ratification?

14 A Yeah.

15 Q Okay.

16 MR. SMITH: Mr. Johnson, if you'll give me  
17 two minutes, I promise, I want to talk to my  
18 co-counsel, I think I'm done. I'm not going to take  
19 the extended break.

20 MR. JOHNSON: Thank you very much.

21 THE VIDEOGRAPHER: Off the record.

22 (Discussion off the record)

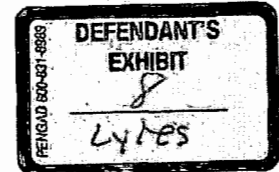
23 THE VIDEOGRAPHER: Back on.

24 MR. HALL: He's going to be asking you  
25 some questions on camera.



The City of  
**OKLAHOMA CITY**  
POLICE DEPARTMENT  
William Citty  
Chief of Police

January 8, 2015



TO: Daniel Holtzclaw, Officer  
Springlake Division

SUBJECT: Termination

On October 27, 2014, you received a Predetermination Hearing Notice containing 29 allegations of misconduct against you. In response to the hearing notice, you declined to select one of the three options delineated in department procedures. I directed the Predetermination Hearing to proceed under option number two, which is a hearing before the affected bureau deputy chief. That Board convened on December 11, 2014 and again on December 23, 2014, to hear evidence and provide you with an opportunity to respond to the allegations. You choose not to participate, but attended both hearings as an observer. As a result of the evidence presented at the hearing, I am sustaining the allegations.

Your offenses committed against women in our community constitute the greatest abuse of police authority I have witnessed in my 37 years as a member of this agency. These violations more than warrant your termination from the Oklahoma City Police Department.

Your termination is effective January 8, 2015. Contact Police Personnel for further information.

A handwritten signature in black ink, appearing to read "William Citty".

William Citty  
Chief of Police

pc: Deputy Chief Tom Jester  
Police Personnel  
Internal Affairs