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AFFIDAVIT OF (FORMER) CHIEF OF POLICE WILLIAM J. CITTY

COUNTY OF OKLAHOMA)
) SS.
STATE OF OKLAHOMA)

Affiant, Chief William J. Citty, being first sworn upon his oath, states:

- 1. That I was the Police Chief of the City of Oklahoma City Police Department from October 24, 2003 until I retired in May, 2019. That I had been employed by the City and assigned to its police department since 1977 as a police officer until I retired.
- 2. That I personally reviewed the Statement of Material Facts Not in Dispute in Defendant City's Motion for Summary Judgment and Brief in Support to be filed in the case of *Tabatha Barnes, et al. v. Holtzclaw, et al.*, United States District Court for the Western District of Oklahoma, Case No. CIV-16-0184-HE, and the exhibits referred therein.
- 3. That Facts Nos. 1-6 in the Statement of Materia Facts Not in Dispute are true and correct. Additionally, the Facts contained in the section entitled "Investigation into Sexual Assaults" numbers 1, 5-6 are true and correct. Further, the Facts contained in the section entitled, "City's Hiring and Training of Police Officers" numbers 4, 6-7, and 9-13 are true and correct. That Exhibits 5-6, 10-18, 21-24, 26-27, 29-51, 57-73, and 89-91 are true and correct copies of the OCPD policies, procedures, rules, training records, and training outlines, police reports or records concerning the investigation of an officer's (who later was determined to be Daniel Holtzclaw) assault of certain females.
- 4. That Exhibit 52, is a true and correct excerpt of the January 2007 Assessment Report of the Commission on Accreditation of Law Enforcement Agencies.
- 5. That Exhibit 53 is a true and correct copy of the March 2007, March 2010, March 2013, and March 2020 accreditation letters.

DEFENDANT'S
EXHIBIT

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6. That all OCPD officers are required to comply with the policies, procedures, and rules contained in the OCPD Operations Manual. FURTHER AFFIANT SAYETH NOT. DATED THIS Z DAY OF William J. Citty, Former Chief Oklahoma City Police Department This instrument was acknowledged before me on the _____ by William J. Citty, Former Chief of OCPD. Notary Public My Commission Expires: (2) Commission Number: # 17006677
EXP. 07/20/21