

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 Gregory’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. 1-4, 25-27 in the Statement of Material Facts Not in Dispute are true and correct. Additionally, the “fact” on p. 12 of the section entitled “Erroneous Allegations Contained in Plaintiffs’ Amended Complaint” are true and correct. That Exhibits 6, 8-14, 16-22, 24, 26, 28-32, and 43, 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.

5. That all OCPD officers are required to comply with the policies, procedures, and rules contained in the OCPD Operations Manual.

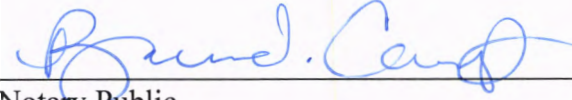
FURTHER AFFIANT SAYETH NOT.

DATED THIS 25 DAY OF September, 2020.



William J. Citty, Former Chief
Oklahoma City Police Department

This instrument was acknowledged before me on the 25th day of September, 2020,
by William J. Citty, Former Chief of OCPD.



Notary Public

My Commission Expires: 07/20/2021
Commission Number: 17006677

