

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

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4 JANNIE LIGONS, SHANDAYREON HILL, )  
TABATHA BARNES, TERRI MORRIS, )  
5 SYRITA BOWEN, CARLA JOHNSON, )  
KALA LYLES, )

6 Plaintiffs, )

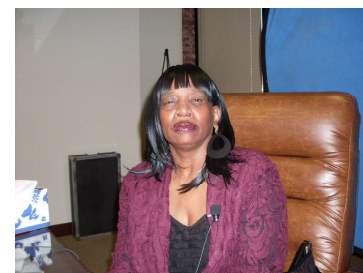
7 vs. ) No.  
) CIV-16-184-HE

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

11 Defendants. )

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14 VIDEOTAPED DEPOSITION OF JANNIE LIGONS  
15 TAKEN ON BEHALF OF THE DEFENDANTS  
16 IN OKLAHOMA CITY, OKLAHOMA  
17 ON DECEMBER 14, 2018

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19 REPORTED BY: KAREN B. JOHNSON, CSR

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1 Q I know you testified in criminal matters  
2 that relate to the Holtzclaw assault of you, other  
3 than that, have you testified in court?

4 A No, ma'am.

5 Q Okay. Do you recall how many times you  
6 testified in court as it relates to Daniel  
7 Holtzclaw?

8 A Twice.

9 Q Okay. Did you testify truthfully on those  
10 occasions?

11 A Yes, ma'am.

12 Q Have you listened to your testimony on  
13 those -- either of those two occasions, have you  
14 listened to it --

15 A No.

16 Q -- since then? Have you read it?

17 A No.

18 Q Prior to you in this case, there have been  
19 other depositions taken, some of the ladies that  
20 have filed the lawsuit, one, at least, of an  
21 officer, of my client in particular, have you read  
22 any of the depositions that have been taken in this  
23 case?

24 A No.

25 Q Did you do anything to prepare for your

1 deposition today?

2 A Talked to my attorneys.

3 Q Okay. Other than that, and I don't want  
4 to -- I don't want to know anything about what you  
5 discussed with your attorneys. Other than talking  
6 with your attorneys, what have you -- have you done  
7 anything else to prepare for your deposition?

8 A No.

9 Q Who were -- who are the attorneys you're  
10 referring to when you say you talked with your  
11 attorneys?

12 A Melvin Hall, Benjamin Crump and Damarion.

13 Q Were -- was there at any time someone  
14 other than those people you just identified and you,  
15 was there anyone else present during your  
16 discussions with your attorneys?

17 A No.

18 Q I notice there was, I believe, a lady you  
19 walked in the building with.

20 A She wasn't available at that time.

21 Q Okay.

22 A That's my daughter-in-law's mom. She's  
23 here to support me.

24 Q Okay. What's her name?

25 A Renee.

1 I'm sorry, I'm going out of chronological order, did  
2 you call 911 downtown or did you just --

3 A My daughter did all that.

4 Q Okay. So you don't know what number got  
5 called?

6 A I do, I was -- I was right there, I could  
7 hear on the voice, she was talking to a police  
8 officer, I know it wasn't 911.

9 Q I'm sorry?

10 A It wasn't 911.

11 Q Okay. At some point you talked to your  
12 cousin?

13 A Anthony Carter.

14 Q And what did Anthony Carter tell you?

15 A No, rephrase that, I called Anthony  
16 Carter's mom.

17 Q Correct.

18 A And then she called her son.

19 Q And what did she tell you he said?

20 A I -- I can't remember.

21 Q Okay. There were several questions asked  
22 you about the lawsuit that you filed, did you ever  
23 read the first amended complaint filed on your  
24 behalf? I'm going to hand you a copy of it because  
25 it wouldn't be fair to ask you questions without

1 letting you see it. As soon as I find my pen, I'm  
2 going to mark it Defendant's Exhibit 3.

3 (Defendant's Exhibit Number 3 marked for  
4 identification and made part of the  
5 record)

6 MR. SMITH: Damario, that's her copy.

7 Q (By Mr. Smith) Have you ever seen that  
8 document before, ma'am?

9 A I can't remember.

10 Q Okay. If you'll see, you're listed as  
11 Number 1 as the plaintiff, Jannie Ligons, do you see  
12 your name there?

13 A Yes, I do.

14 Q Okay. And if you'll turn to Paragraph 41  
15 and 42, please, and I'm sorry, I've lost on my cheat  
16 sheet what page number that is, it is 18 and 19.  
17 And I -- as I promised -- sorry.

18 MR. CRUMP: You wanted 19, sir?

19 MR. SMITH: Starting at 18.

20 MR. CRUMP: Okay.

21 MR. SOLOMON-SIMMONS: Did you want her to  
22 read all of 18, Page 18?

23 MR. SMITH: Starting at the bottom,  
24 Paragraph 41, I'm sorry, I thought I made that  
25 clear, I apologize.

1 (Witness reviews document)

2 THE WITNESS: Okay.

3 Q (By Mr. Smith) And I'm just -- I'm not  
4 going to ask you about A and B, I told you I wasn't  
5 going to ask you about the assault, I'm just telling  
6 you that's where it is.

7 A Okay.

8 Q What I want to really talk about is -- is  
9 42, but if you want to read Paragraph 41 because it  
10 does talk about you in 41.

11 A I mean, what you want me to --

12 Q Have you read Paragraph 42, ma'am?

13 A Uh-huh, correct.

14 Q Do you believe that to be a true  
15 statement?

16 A No.

17 Q Okay. Have you ever read Sergeant  
18 Carter's report of your -- of the phone call from  
19 his mother and what he told his mother?

20 A No, I can't remember that.

21 Q Okay. Did you know he wrote a police  
22 report?

23 A I can't remember.

24 Q Okay.

25 (Defendant's Exhibit Number 4 marked for

1 identification and made part of the  
2 record)

3 Q (By Mr. Smith) Well, let me hand you  
4 what's going to be marked as Defendant's Exhibit 4.  
5 I'm sorry, I'm losing numbers and stickers. Why  
6 don't I just give you a bunch and you can pass them  
7 through.

8 A Okay.

9 Q Have you read it now, ma'am?

10 A Not all of it.

11 Q Well, what I'm really interested in is the  
12 first three paragraphs and the first line of the  
13 fourth paragraph, but you can read it all if you'd  
14 like.

15 (Witness reviews document)

16 THE WITNESS: Okay.

17 Q (By Mr. Smith) Do you see that he  
18 reported that he told his mom to have you call 911  
19 and have an officer meet you at the Springlake  
20 station?

21 A I see that.

22 Q You didn't do that, did you?

23 MR. SOLOMON-SIMMONS: Object to form.

24 THE WITNESS: I don't remember, I don't  
25 remember.

1 Page 26.

2 A Uh-huh.

3 Q Talks about there was a conspiracy between  
4 Bennett, Gregory, Citty, and John and Jane Doe. Do  
5 you know who Rocky Gregory is?

6 A No.

7 Q Do you have any evidence that he conspired  
8 with anybody?

9 A No.

10 Q Do you have any evidence that Chief Citty  
11 conspired with anybody?

12 A No.

13 Q Okay. Page 28, you see that's brought  
14 against all defendants there, the subheading of that  
15 paragraph?

16 MR. CRUMP: Talking about at the bottom?

17 MR. SMITH: Yes, sir, Mr. Crump, it's --

18 THE WITNESS: At the bottom?

19 MR. CRUMP: Uh-huh. Yeah, thank you.

20 Q (By Mr. Smith) Do you see that, ma'am, it  
21 says, "As to all defendants"?

22 A Uh-huh, yes.

23 Q Do you have any evidence that a detective  
24 is a supervisor?

25 A Could you repeat that?



1 Q Do you have any evidence that Detective  
2 Gregory is a -- was a or is a supervisor?

3 A No.

4 Q Okay. Talk about Page 30, as to all  
5 defendants' ratification, were you aware that  
6 Detective Gregory arrested Holtzclaw?

7 A No.

8 (Defendant's Exhibit Number 7 marked for  
9 identification and made part of the  
10 record)

11 Q (By Mr. Smith) Going to hand you what's  
12 been marked as Defendant's Exhibit 7.

13 MR. SMITH: There's multiple copies.

14 MR. SOLOMON-SIMMONS: Okay.

15 MR. HALL: Is it Exhibit 7?

16 MR. SMITH: Yes, sir.

17 Q (By Mr. Smith) Have you seen that before,  
18 ma'am?

19 A No.

20 MR. SMITH: If you will look, and I'll  
21 point again, Counselor, I don't mean to do anything  
22 other than show you where I'm asking her about, it's  
23 the second full paragraph in the middle.

24 MR. CRUMP: Okay.

25 Q (By Mr. Smith) Where it says, "It was at

1 that time I advised AR Holtzclaw he was under  
2 arrest," do you see that?

3 A Yes, sir.

4 Q Does that sound like he ratified his  
5 actions?

6 MR. CRUMP: If you don't know.

7 THE WITNESS: I don't know.

8 Q (By Mr. Smith) What do you mean you don't  
9 know, he arrested him for those actions; right?

10 MR. SOLOMON-SIMMONS: Object to form.

11 THE WITNESS: I don't know.

12 Q (By Mr. Smith) Okay. Do you have any  
13 evidence to dispute the fact that Rocky Gregory says  
14 he arrested Holtzclaw?

15 A I don't know.

16 Q Do you know of any evidence that you have  
17 personally, not what your lawyers have, not what any  
18 other person has, what you personally have that  
19 disputes that Rocky Gregory says, I arrested  
20 Holtzclaw?

21 A I don't know.

22 Q Okay. I'm asking what you know, ma'am.  
23 You don't know if you have any evidence?

24 A Do I have any evidence?

25 Q Yes, ma'am, that's all I'm asking, I'm not

1 asking about anybody on your side of the table, I'm  
2 just asking about you, do you know of any evidence?

3 MR. SOLOMON-SIMMONS: Object to form.

4 THE WITNESS: I can't answer that.

5 Q (By Mr. Smith) Okay. Why can't you  
6 answer that, ma'am?

7 A Do I have any evidence?

8 Q Yes, ma'am, just you.

9 A No.

10 Q Okay. Thank you.

11 (Defendant's Exhibit Number 8 marked for  
12 identification and made part of the  
13 record)

14 Q (By Mr. Smith) Going to hand you what's  
15 been marked as Defendant's Exhibit Number 8. Here's  
16 three more, hopefully that's enough. I've got one  
17 left over. Have you ever seen that document before,  
18 ma'am?

19 A I don't remember.

20 Q Okay. For the record, Defendant's Exhibit  
21 Number 8 is a document entitled Predetermination  
22 Hearing Notice dated October 24, 2014, to Holtzclaw  
23 from Johnny Kuhlman, Deputy Chief, do you see that,  
24 ma'am?

25 A Yes.

1 Q Let me -- huh? So -- so you did tell  
2 Mr. Eldridge that?

3 A I don't -- I don't remember.

4 Q Okay. Okay.

5 A Wasn't asking stuff like that.

6 Q You have a relative by the name of Anthony  
7 Carter?

8 A Correct.

9 Q And he's a police officer?

10 A Correct.

11 Q Do you respect him?

12 A Yes.

13 Q All right. Is it true that when he was  
14 contacted by your family members, his advice to you  
15 was to call 911 that evening?

16 A I don't remember that.

17 Q You don't remember if Mr. Carter told you  
18 after the event, when your daughter was seeking  
19 advice, to call 911?

20 MR. SOLOMON-SIMMONS: Object to form.

21 THE WITNESS: I don't remember, no, I  
22 don't remember that, I don't.

23 Q (By Mr. Johnson) Okay. And in any event,  
24 you did not call 911 after this occurred; correct?

25 A Correct.

1 Q Okay. And can I ask you why that was?

2 A Because I went to the police station.

3 Q Okay. And then --

4 A I didn't have to call 911.

5 Q What's that? I'm just asking if there was  
6 a reason, I'm not saying whether you should have or  
7 shouldn't have, I'm just asking about if there was a  
8 reason why you didn't call 911?

9 A Because I went to the police station, I  
10 didn't have to call 911, I saw police on the street,  
11 so I stopped.

12 Q Okay. Had you ever seen those police  
13 officers before?

14 A Not to my knowledge.

15 Q Okay. Have you ever accused anyone of  
16 sexually abusing you before this case?

17 A No.

18 Q Have you ever been sexually abused?

19 A No.

20 Q Okay. Have -- you were asked and denied  
21 that you had ever been convicted of a felony  
22 earlier, have you ever been convicted of a  
23 misdemeanor?

24 A Yes.

25 Q Okay. Please summarize what misdemeanors