

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 CITT, BRIAN BENNETT, ROCKY)
10 GREGORY, JOHN AND JANE DOES, all)
in their individual capacity,)

11 Defendants.)

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

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19 REPORTED BY: KAREN B. JOHNSON, CSR

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1 person.

2 Q Okay.

3 A You know, that I've seen at court like and
4 then they stare at me and, you know, do -- and
5 that -- and that bothers me.

6 Q The person that you saw at court that you
7 thought you also saw at Subway that you thought was
8 associated with Holtzclaw, did that person say
9 anything or confront you in Subway?

10 A No, they just stare.

11 Q Okay. What's your date of birth?

12 A 10-29, 1991.

13 Q So you're 27 years old?

14 A Yes.

15 Q Did you do anything to prepare for your
16 deposition today?

17 A No.

18 Q I notice you were present during a
19 deposition last week, do you remember that?

20 A Yes.

21 Q Whose deposition were you here for?

22 A I believe it was Kala.

23 Q Kala Lyles?

24 A Yeah.

25 Q Are you friends with her?

1 those dates?

2 A Yes.

3 Q Do you know what Gregory supposedly did to
4 further this conspiracy?

5 A No.

6 Q All right. Do you know what Chief Citty
7 supposedly did to further this conspiracy?

8 A I don't know.

9 Q Paragraph 68 doesn't name you, does it?

10 A No.

11 Q Between December 2013 and June 18, 2014,
12 you knew Holtzclaw had sexually assaulted somebody,
13 didn't you?

14 A Between June 2000 -- no.

15 Q I said between December 20th, 2013, and
16 June 18, 2014, you knew Holtzclaw had sexually
17 assaulted someone, didn't you?

18 MR. JOHNSON: Objection; asked and
19 answered.

20 THE WITNESS: Me.

21 Q (By Mr. Smith) Correct.

22 A Yeah.

23 Q Why aren't you named as part of this
24 conspiracy?

25 A I don't know.

1 MR. HALL: Object as to form.

2 MR. SMITH: Did you get her answer?

3 COURT REPORTER: Yes.

4 MR. SMITH: Thank you.

5 Q (By Mr. Smith) Paragraph -- I mean, excuse
6 me, Page 28, "Fifth cause of action, 4th and 14
7 Amendment, failure to supervise." Do you know
8 whether a detective in the OCPD is a supervisor?

9 A No, I don't know.

10 Q Page 30, "Sixth cause of action, 4th and
11 14th Amendment, municipal liability ratification."
12 Do you know what ratification means?

13 A No.

14 Q And then it says "as to all defendants,"
15 do you see that?

16 A Uh-huh.

17 Q Is that a yes, sorry?

18 A Yes.

19 Q Okay. Ratification means I approve of
20 your actions. Okay?

21 A Uh-huh, yes.

22 Q Do you have any evidence that Bill Citty
23 approved of Holtzclaw's actions?

24 A Do I have any proof?

25 Q Yes, ma'am.

1 A I don't know, no.

2 Q Do you have any evidence that Rocky
3 Gregory approved of Holtzclaw's actions?

4 A I don't know.

5 Q Okay. I don't know that we're done with 8
6 yet, I would just keep it there. Since I am out of
7 order, I'm going with 11.

8 (Defendant's Exhibit Number 11 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 Number 11, ask
13 you if you've ever seen that document?

14 A No.

15 MR. SMITH: Mr. Johnson, this is the
16 predetermination hearing notification.

17 MR. JOHNSON: Thank you.

18 Q (By Mr. Smith) If you'll look at
19 Allegations 1 through 5, in this pre -- do you see
20 that --

21 A Yes.

22 Q -- the OCPD charged Holtzclaw with
23 assaulting you?

24 A Yes.

25 Q Does that sound like they're ratifying his