

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-

) CASE NO. CIV-16-184-HE

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

Defendants.)

VIDEOTAPED DEPOSITION OF

ARTHUR GREGORY

TAKEN ON BEHALF OF THE PLAINTIFFS

IN OKLAHOMA CITY, OKLAHOMA

ON FEBRUARY 28, 2019

REPORTED BY: TRENA K. BLOYE, CSR

1 starting with 110 through 113.20.

2 Q If you would just take a moment to look on the
3 first page at procedure 111 and just take a moment to
4 read that to yourself and let me know when you're ready
5 for me to talk to you about it.

6 (The witness reviewed the document.)

7 A Okay.

8 Q All right. So procedure 111, which is at the
9 bottom of Plaintiff's 3 it states, "The performance of
10 each employee will be formally evaluated annually at
11 least 30 days prior to the employee's pay anniversary."
12 Is that your understanding of how the evaluations that
13 you were responsible to complete?

14 A According to procedure, yes.

15 Q Okay. Now, in order for you to ensure your
16 subordinates, while you were lieutenant, were adhering
17 to policies you would have to have some level of
18 awareness of their work activities; correct?

19 A Yes.

20 Q And how would you ascertain your subordinates'
21 work activities?

22 A For me personally, I am a proactive supervisor,
23 I'm out in the field stopping by on different calls,
24 traffic stops, reviewing their reports, reviewing their
25 activity usually on a monthly basis, talking to them

1 about their goals and objectives that they want to
2 accomplish throughout their career.

3 Q Now, when you say you're reviewing the
4 activity, what do you mean? How would you review their
5 activity?

6 A We have an activity tracker that we can pull
7 reports from.

8 Q And what's the activity tracker? Does it have
9 a name?

10 A It tracks -- it's just activity tracker. It
11 just tracks information that's inputted from the
12 officers through their activity sheets. Number of
13 calls, traffic stops, tickets written, things like that.

14 Q Do you also review their AVL data?

15 A No.

16 Q What about their Varuna usage?

17 A No.

18 Q Now, as a lieutenant during this time period,
19 2013, 2014, did you have the authority to discipline
20 your subordinates?

21 MR. SMITH: Objection. Asked and
22 answered. Go ahead.

23 A No.

24 Q (BY MR. SMITH) Did you have the authority to
25 recommend discipline of your subordinates?

1 Q (BY MR. SMITH) Okay. Do you think that, based
2 on the version that Lt. Bennett said or wrote that
3 Ms. Campbell gave him and the version that Mr. Holtzclaw
4 wrote, do you think that this is a good synopsis that
5 Lt. Bennett put together?

6 MS. GOOCH: Object to form.

7 MR. SMITH: Same objection.

8 A Lt. Bennett is a very thorough supervisor and
9 responsible. He -- reading the information you gave me
10 and looking at this synopsis it appears to paint a
11 picture of the incident that happened that night.

12 Q (BY MR. SOLOMON-SIMMONS) Would agree it paints
13 a picture from the perspective completely from Officer
14 Holtzclaw's perspective?

15 MS. GOOCH: Object to the form.

16 MR. SMITH: Same objection.

17 A I can't testify to that because I didn't write
18 the synopsis.

19 Q (BY MR. SMITH) Well, but based on what
20 Lt. Bennett wrote that he said that Campbell said to
21 him, you read that; correct?

22 A Yes.

23 Q And you also read what Officer Holtzclaw wrote
24 about the incident with Ms. Campbell; correct?

25 A Yes.

1 Q So based on those two documents you have read,
2 and now you have read Lt. Bennett's supervisory
3 narrative, which you testified is a synopsis of what
4 happened, my question is, is this an accurate, complete
5 synopsis in your opinion?

6 MS. GOOCH: Object to form.

7 MR. SMITH: Same objection.

8 A Of the facts he had at the time, yes.

9 Q (BY MR. SMITH) Okay. And why do you say that?

10 A Because it -- he's obviously done an interview
11 with the subject. I have to assume he's read Officer
12 Holtzclaw's report. They seem to have similar facts in
13 all of them.

14 Q Okay. Can you identify what in Lt. Bennett's
15 supervisory narrative is also identified in what
16 Lt. Bennett said Ms. Campbell told him?

17 MR. SMITH: Object to the form.

18 MS. GOOCH: Same objection.

19 A On page 027 Officer Holtzclaw approached
20 Ms. Campbell. She made the same statement.

21 Q (BY MR. SOLOMON-SIMMONS) Okay. Anything else
22 you can identify?

23 A I'd have -- honestly, no, because I didn't do
24 the interviews. Just reading it, like I said, she gives
25 the basic thing. She was at this location, this officer

1 approached her and this officer placed her in the back
2 seat of a scout car. The synopsis states the same
3 thing.

4 Q (BY MR. SMITH) Okay. So what I'm asking you
5 if you can identify anything else that Lt. Bennett's
6 supervisor narrative that comes from the narrative that
7 Ms. Campbell gave Lt. Bennett, according to Lt. Bennett?

8 MS. GOOCH: Object to the form.

9 MR. SMITH: Same objection.

10 A I'm still not really understanding. The
11 synopsis is just that it is a supervisor taking
12 information from different sources and putting it in a
13 narrative form and painting a picture.

14 Q (BY MR. SOLOMON-SIMMONS) Okay. Are you able to
15 identify in this supervisory narrative information that
16 comes directly from Officer Holtzclaw's report?

17 MR. SMITH: Object to the form.

18 MS. GOOCH: Same objection.

19 A Yes.

20 Q (BY MR. SOLOMON-SIMMONS) Would you agree that
21 over -- strike that.

22 Would you agree that there are several passages
23 in Lt. Bennett's supervisory narrative that is verbatim,
24 identical to what Officer Holtzclaw wrote in his report?

25 MR. SMITH: Object to the form.

1 MS. GOOCH: Objection.

2 A I would have to go back and, again, do a
3 side-by-side comparison.

4 Q (BY MR. SOLOMON-SIMMONS) Would you like to do
5 that?

6 A Do you have something in particular you want me
7 to see?

8 Q Well, does Lt. Bennett's supervisory narrative
9 anywhere state that Officer Holtzclaw was aggressive
10 towards her.

11 (The witness reviewed the document.)

12 A Okay. Would you repeat the question again?

13 Q Do you see anywhere in Lieutenant Bennett's
14 narrative, supervisor narrative where he identifies that
15 Ms. Campbell informed him Holtzclaw was talking very
16 aggressive to her?

17 MR. SMITH: Object to the form.

18 MS. GOOCH: Same objection.

19 A I don't think in that particular situation
20 you're talking about now.

21 Q (BY MR. SOLOMON-SIMMONS) Okay. Do you see in
22 Lt. Bennett's supervisory narrative where he identifies
23 that Ms. Campbell said that Holtzclaw pushed her against
24 the wall face first while handcuffing her?

25 A I believe that information is in here.

1 Q Okay. Can you point it out?

2 A Stabilized her against the exterior wall of the
3 business while he handcuffed her. He placed her in a
4 position where she was facing the wall and placed her
5 against the wall in a standing position.

6 Q Is that the same thing as what Ms. Campbell
7 says he pushed her into a wall face first?

8 A Again, this is his narrative. It's his
9 synopsis of the events. It's not a verbatim account.
10 Her account is in this packet for people to read. If
11 they want to know what she said specifically they can
12 turn to the subject interview and they can read that.

13 Q Let me ask you that. Why is it she --
14 shouldn't she have had a written report herself, a
15 written statement?

16 MS. GOOCH: Object to the form.

17 A The -- her statement is here. She gave it to
18 Lt. Bennett verbally and he recorded it and wrote it
19 down.

20 Q (BY MR. SOLOMON-SIMMONS) He recorded it?

21 A Well, he recorded it on paper. He wrote it
22 down.

23 Q Okay. But as a crime -- a potential victim
24 shouldn't she have the right to write her own narrative?

25 MS. GOOCH: Object to form.

1 MR. SMITH: Same objection.

2 A A victim of what?

3 Q (BY MR. SOLOMON-SIMMONS) Well, she made a
4 complaint against an officer; correct?

5 A For use of force, yes.

6 Q But she made a complaint against an officer;
7 right?

8 MR. SMITH: Object to the form.

9 A Again, I don't know what the complaint was. I
10 wasn't a part of this.

11 Q (BY MR. SOLOMON-SIMMONS) I thought you said
12 you -- strike that.

13 Now, you just testified that Lt. Bennett's
14 supervisory narrative is not supposed to be a verbatim,
15 but a synopsis; correct?

16 A It was not a verbatim of what the subject said.

17 Q Okay. But can you identify areas of
18 Lt. Bennett's supervisory narrative that is verbatim of
19 Mr. Holtzclaw's report?

20 MR. SMITH: Object to the form.

21 MS. GOOCH: Same objection.

22 A I don't know. I literally would have to take
23 the report apart and look at -- he's got information in
24 there that is coming from Officer Holtzclaw's report.

25 Q (BY MR. SOLOMON-SIMMONS) Okay. Go back to

1 Lt. Bennett's supervisory narrative.

2 A Okay.

3 Q Do you see in there where Lt. Bennett documents
4 that Ms. Campbell stated she had injuries to her
5 forehead, lip, and face when she was pushed up against
6 the wall?

7 A Okay. What was the question again? I'm sorry.

8 Q Can you identify in lieutenant's narrative,
9 supervisory narrative where he identified or outlined or
10 documented that Campbell stated she had injuries to her
11 forehead, lip and face when she was pushed up against
12 the wall?

13 A No, it doesn't appear to be.

14 Q Can you identify in Lt. Bennett's supervisory
15 narrative where he outlines or documents that Campbell
16 told him she was so scared she urinated in her pants?

17 A In his supervisor's narrative?

18 Q Correct.

19 A I don't believe that's there.

20 Q Do you think that's a significant fact?

21 A The fact is recorded in her interview.

22 Q I'm saying to be inside of the supervisory
23 narrative.

24 A The narrative and the report are all one
25 package. They are one piece. It's not a separate

1 entity and it's not reviewed separately. It's reviewed
2 as a packet.

3 So you take the information that you have and
4 you combine it, and that's what you make -- the chief
5 and them make a determination, the Use of Force
6 Screening Committee makes a determination on the
7 officer's action based on the packet as a whole. You
8 can't take a piece out of this and separate it from the
9 whole and it be worth anything. It's not -- it doesn't
10 stand and its own. It has to be reviewed as a packet.
11 And the information that you're talking about is -- is
12 in the packet. That information is recorded.

13 Q That's not my question, though, sir. I'm
14 asking you, do you think that's a significant fact that
15 should have been placed inside Lt. Bennett's supervisory
16 narrative that she felt like she was so scared that she
17 urinated in her pants?

18 MR. SMITH: Object to the form.

19 MS. GOOCH: Same objection.

20 A It was significant enough that he noted it in
21 her interview and it's documented in the packet.

22 Q (BY MR. SOLOMON-SIMMONS) Okay.

23 A I am not going to interject my personal
24 feelings on how Lt. Bennett should conduct a use of
25 force interview or what he should put in his narrative.

1 He's an extremely capable lieutenant and very thorough
2 in his job.

3 Q Do you -- as a captain are you okay with your
4 lieutenants that you -- that you supervised when you
5 were a captain over Springlake just taking verbatim the
6 reports from their -- their subordinates and placing
7 that information into their supervisory narrative.

8 MR. SMITH: Object to form.

9 MS. GOOCH: Same objection.

10 A It would be on a case-by-case basis.

11 Q (BY MR. SOLOMON-SIMMONS) On this case, the
12 Campbell case now that you have read Mr. Holtzclaw's
13 report and you have read Lt. Bennett's supplemental
14 narrative and you see the places where it's verbatim, do
15 you think that's appropriate?

16 MR. SMITH: Object to the form.

17 A I don't think it's inappropriate.

18 Q (BY MR. SOLOMON-SIMMONS) Why not?

19 A It's a synopsis of what happened.

20 Q Is a synopsis when you take someone else's
21 point of verbatim? Is that a synopsis?

22 MR. SMITH: Objection.

23 A It's a synopsis of what happened and her
24 statement is in here as a matter of record.

25 Q (BY MR. SOLOMON-SIMMONS) Well, we're talking

1 specifically about the supervisory narrative. That's
2 it.

3 A Okay. Well, I can't, because this is a packet.
4 This is -- the supervisor's narrative is not a piece of
5 this puzzle that stands on its own. It cannot. It has
6 to be reviewed with other information that the
7 supervisor at the time, which was Lt. Bennett, gathered
8 and put together in that packet. It has to be reviewed
9 that way. It cannot be reviewed on its own because
10 it's -- it's not a standalone document.

11 Q (BY MR. SOLOMON-SIMMONS) All right. But I have
12 the opportunity and the right to ask you specific
13 questions about specific pieces of information.

14 A Yes, sir.

15 Q So I'm asking you specifically about
16 Lt. Bennett's narrative.

17 A I can't testify as to his thought process in
18 putting the narrative together.

19 Q Okay. I'm not asking you to testify to his
20 thought process. I'm asking you. You've been a
21 captain, you've supervised lieutenants. I'm asking you,
22 do you find it appropriate for lieutenants, if they were
23 underneath your supervision, to take verbatim from the
24 officer's report and make that the basis of their
25 supervisory narrative?

1 MR. SMITH: Object to the form.

2 MS. GOOCH: Same objection.

3 A Again, I'm not going to look at what he puts in
4 that report as verbatim for making my decision on what
5 I'm reading. I'm going to read the whole packet as a
6 whole. I'm going to read the officer's report myself.

7 Q (BY MR. SOLOMON-SIMMONS) What does synopsis
8 mean to you? Maybe we have -- yeah, what does synopsis
9 between to you? What's the definition that you work
10 with?

11 A An overview of -- of what happened.

12 Q Does an overview require that it has both
13 perspectives combined together?

14 A It is -- it is an overview of what happened.
15 Every supervisor writes their narrative differently.

16 Q Okay. So I'm trying to understand you or
17 someone who supervises supervisors; correct?

18 A Yes.

19 Q And so do you expect your supervisors to
20 provide you just a point of view of the officer? Is
21 that appropriate to you?

22 MR. SMITH: Object to the form.

23 MS. GOOCH: Same objection.

24 A Again, this is not the officer's opinion
25 because I have the subject's interview here and I can

1 read it for myself.

2 MR. SOLOMON-SIMMONS: Will you read back
3 the question? I may be -- he's not understanding my
4 question. Will you read it back for me?

5 THE REPORTER: Question, "And so do you
6 expect your supervisors to provide you just a point of
7 view of the officer? Is that appropriate to you?"

8 MR. SMITH: Object to form.

9 MS. GOOCH: Same objection.

10 A It's not inappropriate. The narrative that he
11 wrote is his synopsis of what happened with this event.

12 Q (BY MR. SOLOMON-SIMMONS) I'm asking you in
13 general as a supervisor.

14 A It's a case-by-case basis. If I feel like
15 there needs to be more information I might redirect it
16 back to the supervisor and ask for more information.
17 But, again, the packet as a whole has that information
18 in it and I have the opportunity to read that and make a
19 determination on what I'm seeing.

20 Q How are you guys -- are you trained how to
21 write a supervisory narrative?

22 A It's just part of report writing. It's taking
23 information and putting it down in written form.

24 Q But are you trained specifically on how to
25 write a supervisory narrative related to a use of force

1 I don't have names.

2 Q You don't remember anybody that you consulted
3 with regarding the EIP program?

4 A Not specifically, no.

5 Q Okay. But, again, did you have any formal
6 training from the department itself on how to properly
7 manage and review the EIP program?

8 A The supervisor's school that I attended.

9 Q The one in 2010?

10 A Right.

11 Q And so after 2010 you did not receive any
12 additional training related to the EIP program; is that
13 correct?

14 A No.

15 Q Is that correct?

16 A Right.

17 Q Okay. So just walk me -- when the officer
18 shows up -- if I was your subordinate and I show up on a
19 EIP program, you see my name there, what happens from
20 there?

21 A Again, I review the incidents that are attached
22 to the EIP, read over the -- the information, whatever
23 is attached there, whatever information I have
24 concerning those case numbers or incidents and just
25 basically look for any type of patterns or information

1 that I feel like needs to be addressed.

2 Q Now, how would you get the information related
3 to the specific incidents that are listed on the EIP?

4 A It came from Professional Standards.

5 Q Would you get the use of force investigation
6 report or packet?

7 A I don't think we got the packet. I think what
8 we got was the case numbers.

9 Q Okay. So then once you got the case numbers
10 what would you do?

11 A If those uses of force were ones that I worked
12 I obviously had them. If they were worked by another
13 supervisor I'd ask that supervisor for the information
14 that they had on that use of force.

15 Q Okay. And do you recall doing that with
16 Mr. Holtzclaw?

17 A Doing an EIP?

18 Q Yes.

19 A Yes.

20 Q And do you recall asking other supervisors if
21 they had additional information you needed to review?

22 A I can't remember specifics, but if it was not a
23 use of force or an incident that I worked, I would have
24 had to ask another supervisor for that or maybe gone
25 back to Professional Standards and ask them to send me a

1 copy of the packet.

2 Q All right. But the document that you actually
3 see initially just contained -- are you saying it just
4 contains the actual case number of the use of force?

5 A Yes.

6 Q And did it contain any other additional
7 information?

8 A I don't remember. It seems like it had the
9 case number, the dates probably, probably the
10 supervisors that were involved with it, different names
11 and things like that. It's been a while since I've done
12 one. I would have to look at it to give you specifics.

13 Q Is it a requirement that you would need to seek
14 out additional information outside of what was provided
15 to you by the EIP program?

16 A No. The information that's provided that
17 triggered the EIP is the information I would review.

18 Q So was there any requirement for you to then
19 try to get additional information outside of what was
20 provided to you by the EIP program?

21 A I'm not understanding your --

22 Q I understand -- my understanding from you is
23 when you received the packet from EIP it contains a list
24 of cases, use of force incidents with some information.

25 A Well, use of force or whatever else triggers

1 that EIP, yes.

2 Q Sure. At that point, that is what you can
3 utilize to review to consider if there is a pattern; is
4 that correct?

5 A Yes.

6 Q You don't have -- you don't -- you're not
7 required to go and try to track down additional
8 information?

9 A No.

10 Q My question is, did you -- would you go and
11 track down additional information?

12 A Again, within the context of what we're talking
13 about on all EIPs I did, no. The information I needed
14 was there. I reviewed that information and completed
15 the packet.

16 Q Okay. When you did your -- I'm talking again
17 about the EIP program. When you looked at these cases
18 of one of your subordinates like Mr. Holtzclaw, what did
19 you do once you made your analysis, what was the next
20 step?

21 A Send it through the chain of command.

22 Q And what would your analysis consist of? Like
23 what would you have to say --

24 MR. SMITH: Object to the form.

25 Q (BY MR. SOLOMON-SIMMONS) -- or write?

1 A Just a generalized overview of -- of those
2 incidents and did I see any type of a pattern that
3 should cause any type of concern.

4 Q Can you ever recall deciding over your six
5 years of supervising officers that you saw a pattern
6 that caused you some concern?

7 A No.

8 (Plaintiff's Exhibit 8 was marked for
9 identification and made a part of the
10 record.)

11 MR. SMITH: Thank you, sir. You can keep
12 the original exhibit.

13 MR. SOLOMON-SIMMONS: Did I put 9?

14 MR. SMITH: You did on mine.

15 MR. SOLOMON-SIMMONS: It's 8. It's
16 actually 8.

17 MR. SMITH: So it's 8?

18 MR. SOLOMON-SIMMONS: It's 8, yes.

19 MR. SMITH: But you also gave -- is that
20 the same or is that different?

21 MR. SOLOMON-SIMMONS: It's the same.

22 THE WITNESS: It's the same.

23 MR. SMITH: All right. Sorry. It's
24 obviously getting late.

25 Q (BY MR. SOLOMON-SIMMONS) Have you seen this

1 document before --

2 A Yes.

3 Q -- Capt. Gregory? Can you identify it for the
4 record?

5 A Part of the police operations manual procedure
6 140 -- I assume we're looking at 148.0.

7 Q Yes, sir.

8 A Early Intervention Program.

9 Q Will you turn to the second page of that
10 document down at the bottom where it says 148.30. Do
11 you see that?

12 A Yes, sir.

13 Q So I'm just gonna read it. It says, "Once an
14 employee is identified for possible intervention the
15 employee's supervisor and the next higher ranking
16 authority will complete an analysis of the documents
17 provided in the EIP report and, if necessary, an
18 investigative file is maintained in the office of
19 Professional Standards. Do you see that?

20 A Yes.

21 Q Okay. And that's what you were describing
22 today; right?

23 A Yes.

24 Q Number 1 says, "Consider that the analysis of
25 the facts should, No. 1, consider the totality of the

1 circumstances surrounding each incident and/or
2 complaint." Do you see that?

3 A Yes, sir.

4 Q How would you consider the totality of the
5 circumstances if you only reviewed the information
6 provided by the EIP program?

7 MR. SMITH: Object to the form.

8 A Well, the information is there. I guess I
9 don't understand what you're asking. If I have access
10 and it's my use of force especially, I know the
11 circumstances surrounding it. If not, I've read the
12 information based on the information that's in the EIP.

13 Q (BY MR. SOLOMON-SIMMONS) Okay. But would --
14 well, never mind. And then No. 2 it says, "Determine if
15 there are any similarities among the incidents." You
16 have already discussed that; correct?

17 A I believe so, yes.

18 Q No. 3, "Consider other possible indicators of
19 stress such as unusual amount of sick leave, tardiness,
20 personal problems." How would you do that?

21 A Since I was his supervisor I would know of any
22 unusual amount of sick leave that might be used or
23 tardiness. For the most part, personal problems, unless
24 I just go and sit down and talk with an officer, unless
25 I see a pattern here that raises a need for me to go and

1 say is there something going on at home, I'm not going
2 to broach that subject for the most part.

3 Q In your six years did you ever have one of your
4 officers that you felt the need to talk to them about
5 anything in relation to the information contained in the
6 EIP program?

7 A Talk to them in what way?

8 Q About an issue that you discovered or a trend
9 you saw within the EIP program?

10 A No.

11 Q So just to be clear, from your perspective --
12 strike that.

13 How often would you consult this procedure,
14 policy 148.30, in your review of the EIP program?

15 A I'm not sure if I'm clear on what you're
16 asking.

17 Q Sure. I'm sorry. Bad question.

18 When you would prepare to review the EIP
19 program would you go back and look at 148.3 and look at
20 the criteria that you were supposed to be utilizing in
21 your analysis?

22 A Went when I first started completing them, yes.

23 Q Okay.

24 A As I went on I became familiar with what I
25 needed to do.

1 MR. SMITH: Object to the form.

2 A I don't know.

3 Q (BY MR. SOLOMON-SIMMONS) Okay.

4 A I don't know that I have an opinion. Like I
5 said, he's Caucasian. He didn't seem any more tan or
6 less tan than anyone else.

7 Q Okay. And obviously you would consider him to
8 be a male.

9 A Yes.

10 Q In your opinion as your subordinate was
11 Mr. Holtzclaw, did he follow -- strike that.

12 Was Mr. Holtzclaw good about following OCPD
13 policies and procedures in your opinion?

14 A To the best of my knowledge, yes.

15 Q And you would have the best -- you would be the
16 best person to know if he followed policies and
17 procedures; correct?

18 A Yes.

19 Q And why is that?

20 A For the time that he worked for me I was
21 directly responsible for him.

22 Q Do you have any complaints about how
23 Mr. Holtzclaw conducted his police work underneath your
24 leadership?

25 A That's such a broad question there is no way to

1 answer it. I would get calls, not specifically on
2 Mr. Holtzclaw, but, again, like we talked, I believe, at
3 the beginning of the discussion, this officer was
4 driving too fast. This officer stopped me because I'm
5 black. This officer didn't have any right to stop me.
6 And did Daniel generate some of those? On occasion, but
7 I don't have specifics.

8 Q Did you keep a file on Mr. Holtzclaw when you
9 received these type of complaints?

10 A Not on those type of complaints, no.

11 Q Okay. Why not?

12 A Because I handled them at that level. When
13 they would call and talk about it I would ask questions,
14 direct the conversation, and come to a solution with the
15 person on the phone --

16 Q Okay.

17 A -- that they were okay with.

18 Q So did Mr. Holtzclaw, did you receive calls
19 that he -- people complained that he pulled them over
20 because they were African American?

21 A I don't have any specifics on that, no.

22 Q Can you think of any calls that you can
23 recall -- strike that.

24 Can you think of any calls that you received on
25 Mr. Holtzclaw that you had to respond to from a citizen?