

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

(1) TABATHA BARNES, et al., )  
 )  
 Plaintiffs, )  
 )  
 -vs- )  
 )  
 (1) CITY OF OKLAHOMA CITY, a )  
 municipal corporation, et al., )  
 )  
 Defendants. )

CONDENSED

No. CIV-16-184-HE



\* \* \* \* \*

DEPOSITION OF DEMETRIA MICHELLE CAMPBELL

TAKEN ON BEHALF OF THE DEFENDANTS

IN OKLAHOMA CITY, OKLAHOMA

ON FEBRUARY 15, 2018

COMMENCING AT 9:01 A.M.

\* \* \* \* \*

REPORTED BY: BETH A. MCGINLEY, CSR, RPR

instaScript  
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Demetria Michelle Campbell  
2/15/2018

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1 A I exited my vehicle.  
 2 Q Okay.  
 3 A Walking into the food place. While going, I saw  
 4 him approaching with a flashlight shining and just  
 5 yelling, "Hey, you. Hey, you."  
 6 Q Okay.  
 7 A I didn't know who he was talking to. I  
 8 continued to walk to the building. By the time I reached  
 9 for the handle, he had rounded the corner, snatched me.  
 10 Q Okay. Do you recall the -- the name of the  
 11 restaurant that you're referring to?  
 12 A TJ's Fish.  
 13 Q Okay. At that time, November 5th, 2013, would  
 14 you say you were generally familiar with streets and  
 15 directions in the Oklahoma City area?  
 16 A Yes.  
 17 Q Okay. And how was that, just from having lived  
 18 here for a few years?  
 19 A Yes.  
 20 Q Okay. Do you recall a time frame that's -- that  
 21 this was -- this incident began occurring?  
 22 A I would say between 7:00 p.m., 8:30.  
 23 Q Okay.  
 24 A Because it was dark.  
 25 Q Okay. And that was going to be my next

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1 question: Was it dark?  
 2 A (Moved head up and down).  
 3 Q Is that a yes?  
 4 A Yes.  
 5 Q Okay. You said he was holding a flashlight,  
 6 turned on, so I presumed it must have been dark.  
 7 A Yes.  
 8 Q Okay. You mentioned some of the things that he  
 9 did. One of the things you said, "He was perverted."  
 10 Could you explain -- and I'm sorry to make you have to  
 11 discuss this, but I do have to ask you: Could you explain  
 12 what you mean when you say, "He was perverted"?  
 13 A Well, he had me against the wall. He had an  
 14 erection.  
 15 Q Okay. I'm going to ask some specific questions  
 16 about that. When you say you were "against the wall,"  
 17 were you face against -- was your -- you know, the front  
 18 of your body facing the wall?  
 19 A Yes.  
 20 Q Okay. Do you recall what you were wearing on  
 21 that occasion?  
 22 A Yes.  
 23 Q What were you wearing?  
 24 A Jeans.  
 25 Q Okay.

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1 A A burgundy shirt.  
 2 Q Okay.  
 3 MR. MUMINA: Is that all you were wearing?  
 4 THE WITNESS: No.  
 5 MR. MUMINA: Okay. Explain fully what you were  
 6 wearing.  
 7 A I, also, had on a black jacket.  
 8 Q (By Ms. Gooch) Okay. So I take it, from your  
 9 answer, you felt what, you -- you say, was an erection; is  
 10 that correct?  
 11 A Yes.  
 12 Q Okay. So you didn't see an -- is it -- is it  
 13 fair to say, you did not observe an erection?  
 14 MR. MUMINA: No, I'm going to object to that.  
 15 I...  
 16 Q (By Ms. Gooch) You --  
 17 MR. MUMINA: "Observe."  
 18 MS. GOOCH: Okay.  
 19 Q (By Ms. Gooch) You can answer the question, to  
 20 the best that you can. Did you observe Mr. Holtzclaw have  
 21 an erection, on this occasion, with your own eyes?  
 22 A I felt it.  
 23 Q Okay. Where, on your body, did you feel it?  
 24 A My butt.  
 25 Q Okay. Do you have -- how long did you feel this

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1 on you? A matter of seconds?  
 2 A No. I'd say a couple of minutes.  
 3 Q Okay. You -- again, I know this is -- this is  
 4 uncomfortable for me to discuss and I -- I apologize for  
 5 it.  
 6 If I understand you correctly, you're saying you  
 7 felt, what you believe was an erection from Mr. Holtzclaw,  
 8 on your -- on your bottom area, for two minutes; is that  
 9 what you're telling me?  
 10 A I'm telling you I felt an erection --  
 11 Q Okay.  
 12 A -- on my butt for approximately two minutes or  
 13 so.  
 14 Q Okay. When -- what happened when you no longer  
 15 felt it? Had he turned you around, had he -- try to  
 16 explain for me, please, what had -- when it stopped,  
 17 what's the next thing that occurred?  
 18 A He took me by my arm and ordered me to get on  
 19 the ground.  
 20 Q Okay. And did you do that?  
 21 A No.  
 22 Q Okay.  
 23 A I told him I couldn't.  
 24 Q Okay. What -- and why couldn't you?  
 25 A I have a bad knee.