

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

3

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. )

12

13

14 VIDEOTAPED DEPOSITION OF ROCKY GREGORY  
15 TAKEN ON BEHALF OF THE DEFENDANTS  
16 IN OKLAHOMA CITY, OKLAHOMA  
17 ON JANUARY 17, 2019

18

19 REPORTED BY: KAREN B. JOHNSON, CSR

20

21

22

23

24

25



1 bit, and I don't think we'll have you here all day;  
2 is that fair enough?

3 A Fair enough.

4 Q Can you describe your current employment?

5 A I'm with the homicide unit with the  
6 Oklahoma City Police Department.

7 Q And as a member of the homicide unit, what  
8 do you do?

9 A I investigate suspicious deaths, suicides,  
10 homicides.

11 Q And was that a promotion into the homicide  
12 unit from your previous position with the Oklahoma  
13 City Police Department?

14 A It was just a transfer, not a promotion.

15 Q Did it come with an -- did it come with an  
16 increase in pay?

17 A No.

18 Q Okay. When were you transferred to the  
19 homicide division, what year?

20 A 2015.

21 Q Was that by your request?

22 A Yes.

23 Q Why did you want to switch into the  
24 homicide division?

25 A I had been in sex crimes for seven and a

1 half years and I just wanted a change and that's  
2 mainly it.

3 Q Okay. Now I want to back up a little, and  
4 I don't want to go through high school and all those  
5 things in detail, but can you just summarize your  
6 education, your formal education from the date you  
7 graduated high school, or the year, up until you  
8 started with the Oklahoma City Police Department?

9 A Okay. I graduated in '94, I have a  
10 bachelor's degree, which I finished up in '99 and  
11 then I got on the police department in 2000.

12 Q Where did you obtain your bachelor's  
13 degree?

14 A Northeastern State University.

15 Q Did you attend any other colleges or  
16 universities?

17 A I did Northwestern, I did a year and a  
18 half there, I took some classes through OU and also  
19 OSU.

20 Q Okay. And what was your reason for  
21 attending different colleges and universities?

22 A Well, my first year and a half, like I  
23 said, was at Northwestern, I transferred over, and  
24 it was just -- it was just going to be easier, it  
25 was just the types of classes they offered fit my

1 her, but I didn't have her to talk to, so I wanted  
2 to find out more in-depth, I mean, he was a rookie  
3 officer and I wanted to ask him more questions on  
4 it, which some of it might help me in trying to  
5 investigate it, location, go over the days, maybe  
6 that something was misunderstood.

7 Q Were you thinking Holtzclaw did it at  
8 the -- let's take the time period that you're  
9 talking to Thomas, did you have Holtzclaw in your  
10 mind as a suspect?

11 A No.

12 Q Did you have any suspects in mind?

13 A No.

14 Q What about Sellers, wasn't he having sex  
15 with prostitutes prior to this on duty?

16 MR. SMITH: Object to the form. You can  
17 answer if you understand it.

18 THE WITNESS: There -- there was the  
19 allegation on that, the thing is we didn't have  
20 enough -- I didn't have enough information to be  
21 like, they're a suspect, they're a suspect, I didn't  
22 know if we had -- and sometimes we used to work as  
23 sex crimes, somebody posing as a police officer,  
24 that was too early in the investigation to be just  
25 like, I have suspect A, suspect B.

1 the A, it's vehicle locator, automated vehicle  
2 locator maybe, and that's -- that's the GPS.

3 Q Is that what you had reviewed?

4 A That's the GPS you're in reference to.

5 Q Okay. What's VARUNA?

6 A VARUNA is just -- it's a database where we  
7 put in reports and then also like contact  
8 information.

9 Q And then what's CIU?

10 A That's who we run, like we get ahold of  
11 ladies in CIU, crime information unit, and then they  
12 just run a person for warrants.

13 Q Okay. So going back to you're with  
14 Morris, you've run the AVL from May 20th or 21st,  
15 and how do we get to the date of May 8th?

16 A Well, on that day?

17 Q Who suggests that date, her or you? Yeah.

18 A No, it -- I don't think I suggested,  
19 she -- she stayed adamant on -- on her dates. The  
20 reason it came up with May 8th --

21 Q Let me stop you there.

22 A Okay.

23 Q Go ahead. I'm sorry to cut you off.

24 A The reason that I -- it's okay. I went  
25 back, she was describing Holtzclaw as -- as her

1 assailant, I mean, just the physical characteristics  
2 and things like that. So in doing so, I went back  
3 to May 8th, that was the last officer we knew that  
4 actually had contact with her, and so that's where  
5 we came up with the May 8th.

6 Q Okay. So you -- either you and/or the law  
7 enforcement department, you and/or the OCPD came up  
8 with the May 8th date -- strike that.

9 Let me say that again. Is it fair to say  
10 that you and/or the Oklahoma City Police Department  
11 came up with the May 8th date?

12 A That -- that's correct, yes.

13 Q Okay. And now you say that she described  
14 Holtzclaw physically, what did she describe that  
15 suggested it was Holtzclaw?

16 A She had been doing it throughout, from the  
17 first, from May 24th with Thomas and then when she  
18 described later on, on my second interview, and then  
19 also the third interview with her. I believe with  
20 her, it was six -- you know, gave a height, 6'1,"  
21 6'2," want to say stocky or muscular, I don't  
22 remember her verbiage, darker hair, and then she  
23 spoke about the skin being -- I don't know if she  
24 said -- I'd have to look at the notes, kind of  
25 getting the girls mixed up, and I want to say she

1 Q Were you present when Terri Morris pointed  
2 out Holtzclaw in a lineup?

3 A I was several yards away, we usually bring  
4 in somebody else that's not familiar with the case,  
5 so they can show the lineup, so it wouldn't be  
6 skewed, you know, pick out this person.

7 Q Do you know who that was in this case?

8 A Yeah, his name is --

9 Q Do you know?

10 A Yes, it's Danny Higginbottom, he's another  
11 detective in assaults.

12 Q Okay. Okay. Was that a lineup of real  
13 people or a photo array?

14 MR. SMITH: Object to the form. You can  
15 answer if you understand it.

16 THE WITNESS: Yeah, rephrase that.

17 Q (By Mr. Johnson) I'm sorry, describe the  
18 makeup, was the lineup photographs or people or  
19 what?

20 A They were photographs of people.

21 Q Okay. Okay. Was Sergeant Sellers in the  
22 lineup?

23 A I want to say he was, it's been a long  
24 time since I saw that. I -- what I remember about  
25 the lineup is this, originally, I know Lieutenant

1 Muzny had put together a lineup, and I wanted to  
2 show Terri the lineup the first time I talked with  
3 her, but she refused to even look. That lineup was  
4 used, I believe it's going to be the same one, it  
5 was used on the second time, gave the lineup to  
6 Detective Higginbottom, I stepped away, he shows her  
7 the lineup. During that time and because of the  
8 process, we knew that the last two people that --  
9 the police officers would have been like Jeff  
10 Sellers and Daniel Holtzclaw, the other four people  
11 in a six person lineup, they were random officers.

12 Q Okay. And can you describe what you  
13 recall about Terri picking out Daniel Holtzclaw,  
14 anything you remember?

15 A Well, just going off of what Higginbottom  
16 relayed to me, she said initial -- initially picked  
17 out Holtzclaw, but she also made a comment, there  
18 was a Officer Dutton, just a random officer we  
19 picked out, and she said that it was his hair, that  
20 it was like the dark color that she recalled. In  
21 the photo lineup we explain --

22 Q In fact --

23 A We explain to them, you know, don't pay  
24 attention to hair, you know, hair length,  
25 everything, photographs change from what they, you



1           A       Yeah, I want to say yes, of course,  
2       because it was going to have definitely the two  
3       officers, the last two that she came in contact  
4       with, Holtzclaw and Sellers, because that's the only  
5       two that we knew had even seen her, but we -- now  
6       we're looking clear back in April, and so that was  
7       at the time -- and I guess you could even say it was  
8       either to see if -- if they had anything to do with  
9       it or just to clear their name, too.

10          Q       So, and you had mentioned that, to clear  
11       their name, and so if somebody needs their name  
12       cleared, they're sort of a suspect; correct?

13                   MS. GOOCH: Object to the form.

14                   THE WITNESS: Well, and I see where you're  
15       going, it's a yes and no. I wouldn't have said that  
16       Holtzclaw and Sellers, neither one of them, was a  
17       suspect. I understand why I'm putting them in  
18       there. I wouldn't have said -- the Sellers part,  
19       his -- the description given really didn't quite  
20       match up to Jeff Sellers.

21          Q       (By Mr. Solomon-Simmons) Now, what  
22       does -- what does Jeff Sellers look like?

23          A       Oh, he's -- I would say he's probably six  
24       foot, I mean, he's changed, so I'm sitting here  
25       thinking about him right now, last time I saw him.

1 He's pudgy, he's not muscular, he's pale white,  
2 short hair, I mean, he's not the description of  
3 Holtzclaw.

4 Q He's the opposite of the description that  
5 Ms. Morris gave?

6 A Yeah, yeah, it didn't -- it didn't really  
7 match up with him.

8 Q Right.

9 A But also because of his background at the  
10 time, you know, we just couldn't just be like skip  
11 over him. So like I said, we didn't have like a  
12 suspect A, suspect B at that time, but it was -- I'm  
13 like, well, we have somebody that is saying an  
14 officer, these are our last two officers. So I  
15 wouldn't have called him a suspect at that time, and  
16 I don't think most people would put them, so if we  
17 did our reports, we wouldn't have said suspect  
18 Holtzclaw, suspect Sellers, we would put an involved  
19 party, that's how we would describe them at that  
20 point.

21 Q So at the point of you knew at least by  
22 June 2nd or June 3rd that Daniel Holtzclaw was an  
23 involved party in this investigation of Terri  
24 Morris' assault; correct?

25 A An involved party, yeah, I mean, yeah, I

1 guess.

2 Q Because the fact is, Terri Morris'  
3 description of Daniel Holtzclaw is pretty accurate;  
4 correct?

5 A It -- there was some stuff that was off, I  
6 mean, like she gave, you know, like the 40s in age,  
7 there's some discrepancies, but at the same time, I  
8 felt like -- I felt like there was a lot we needed  
9 to look at, we couldn't just discount. Now, keep in  
10 mind, there are muscular 6'1" officers out there.

11 Q Sure. But none of them had had contact  
12 with Terri Morris in May?

13 A That's correct, that's correct.

14 Q And to be fair to Terri Morris, we can  
15 look at the reports, she actually said 30s, 40s, I'm  
16 not sure; correct?

17 A That's correct, yes, she did.

18 Q And she actually said he was a dark  
19 skinned white male; correct?

20 A That's correct.

21 Q She didn't say he was dark like I'm dark;  
22 right?

23 A That's correct.

24 Q And obviously, she also stated he was  
25 clean shaven?

1 A Yes.

2 Q And Daniel Holtzclaw is clean shaven?

3 A Yes.

4 Q Has black hair?

5 A Yes.

6 Q He has black hair?

7 A Yes.

8 Q All right. So when you put together your  
9 lineup, did you include Daniel Holtzclaw in your  
10 original lineup?

11 A Muzny did, Muzny did.

12 Q You thought that was a good inclusion;  
13 correct?

14 A Well, at the time, to only show -- that  
15 was the only people we could put in there. And that  
16 was because, just like you say, it was the last two  
17 people that came in contact. Now, Terri stuck to  
18 her guns, she's like, it's May 20th, 21st, she kept  
19 saying six days off, but I mean, pinpointing it down  
20 from what Mr. Thomas had said, and then actually  
21 with me clear through, she had in her head it was  
22 May 20th, 21st. Well, the May 8th time was so far  
23 off, I mean, that's -- I mean, we couldn't -- we  
24 couldn't take away that it was Holtzclaw or Sellers,  
25 and that's the reason he was definitely in there.

1 there's going to be times, yes, if they're a person  
2 of interest, we do, we'll dig into -- like now is a  
3 big deal with social media, a lot of our  
4 investigations, we start digging in that way, can  
5 learn a lot about a person that way. It just  
6 depend -- it depends on what level a person of  
7 interest. Like they just know somebody that might  
8 know somebody that might know somebody, well, then  
9 we wouldn't dig in on that. But if they're like  
10 that could be a suspect or somebody like legit, then  
11 we would probably start digging in at that point.

12 Q So at any point between May 24th to June  
13 17th of 2014, was there any investigation or looking  
14 into Daniel Holtzclaw's background by you?

15 A Background, no, no, had no -- yeah -- no.

16 Q Did you call and ask about Daniel  
17 Holtzclaw to anyone within the police department,  
18 during this time period, May 24, 2014, to June 17,  
19 2014?

20 A No, I knew -- well, we had already --  
21 Holtzclaw appeared to be fairly clean, I know that  
22 Sellers with that, with the prostitution thing,  
23 there was -- there was that heavy background, why  
24 his name, some people kept focusing in on. He had a  
25 pretty good rep as far as like what we knew going in

1 to like, say, the Ligons case, nothing pointed to  
2 anything that would send up a red flare.

3 Q So can you tell me what specifically you  
4 did to ascertain that Daniel Holtzclaw had a, quote,  
5 pretty clean background?

6 A I'm trying to think if we spoke with his  
7 captain and kind of would know the troops, I'm kind  
8 of getting confused on my time period. Got to  
9 remember, after June 3rd, June 3rd is when Terri  
10 ended the investigation, she -- that was it, as soon  
11 as she signed that thing, I really can't do anything  
12 more. Because we had no -- at that very second she  
13 signed that, I had no suspect, no nothing, she  
14 wouldn't look at anything, so the 3rd to the 18th,  
15 there was nothing done.

16 Now, I spent the majority of the time from  
17 the 27th to the 3rd just simply trying to hunt her  
18 down. Now, I did try to go back on and focus on  
19 what she was telling me about the area, stuff like  
20 that. As far as like looking at Holtzclaw or  
21 Sellers along those lines, they weren't developed  
22 enough as a suspect.

23 THE VIDEOGRAPHER: Off the record.

24 (Break taken from 3:46 to 3:47)

25 THE VIDEOGRAPHER: We're back on the

1 like that. Now, as far as like being a police  
2 officer, she felt safer, I know when I talked to her  
3 on the third time, but I think she would have signed  
4 the refusal. She just didn't have the mental  
5 stability to go through a sexual assault  
6 investigation, I -- I really felt that way about  
7 Terri, so it didn't matter officer or not with her.

8 Q So if I understand your testimony, when  
9 Terri signed that refusal to prosecute on the 3rd of  
10 June, 2014, nothing else was done related to finding  
11 her potential assailant until after June 18th; is  
12 that correct?

13 A Yeah, we had no victim.

14 Q Is that normal practice, that if the  
15 victim says, I don't want to participate anymore on  
16 a rape, potential rape, that you just stop  
17 investigating, is that how it normally works?

18 A Right, you -- you have to have a victim.  
19 It's not like domestic violence, okay, with a victim  
20 of sexual assault, if they don't want to go through  
21 with investigation, then we will not -- the D.A.'s  
22 office, no one will take charges, you have to have  
23 them be able to go through with the charges.

24 Q What about from an administrative  
25 department level, there wouldn't be any mechanism to

1 make sure that there's not an employee, an Oklahoma  
2 City Police Department officer, assaulting  
3 individuals?

4 A Well, and that -- that's where I came into  
5 play, trying to see what we had. With what Terri  
6 not cooperating at all, if what the information she  
7 gave, you know, in lying, she didn't give me an  
8 officer name, she didn't give me nothing about  
9 Holtzclaw or Sellers or any other officer, she gave  
10 me the wrong location, that's what the fail-safe  
11 was, was what I was doing. That's why I -- when I  
12 went and talked with Terri and I was begging her to  
13 try to talk with me, that's what I was trying to do,  
14 I wanted to make sure, I wanted to make sure that we  
15 didn't have an officer, I wanted to hear her story,  
16 she just wouldn't tell me, so that's the fail-safe.  
17 But without her cooperation, even just a little bit,  
18 there's nothing we could do.

19 Q Did you guys pull the AVL data of Officer  
20 Sellers at the same time you pulled AVL data on  
21 Officer Holtzclaw?

22 A Yeah, the 20th, 21st, the time period that  
23 she -- she gave, yes.

24 Q How did you realize that Officer Sellers  
25 had contact with Terri back in April of '14?



1           A       Going back just to look at whoever ran  
2 her, just the record, that's how we came, same --  
3 same way we come in contact with, it could have been  
4 on VARUNA or through CIU of just her being ran.  
5 There's a list, anybody pulls up her name one way or  
6 the other, there will be a list, and that's how we  
7 came up with those two.

8           Q       Do you know when Captain -- do you know  
9 who Captain Bacy is?

10          A       Yes.

11          Q       Do you know when he became aware of the  
12 investigation related to Terri Morris' case?

13          A       I would assume it was the 27th, but --

14          Q       27th -- May 27, 2014?

15          A       Yeah, but I don't know that for sure.

16          Q       Why would you assume that?

17          A       Because there's an officer report, because  
18 there was an officer report, we wasn't called out,  
19 Bacy is over Muzny and over Ramos. I didn't have  
20 any conversation with Bacy for a little bit, he knew  
21 I was working on it, we were running on it and  
22 trying to find her. So that's -- I just assumed the  
23 27th, just working these types of cases before.

24          Q       Are you aware if anyone was disciplined  
25 for not responding to the scene on May 24th, 2014,

1 one time for a short period. And they all said they  
2 didn't see anything, nothing big, I mean, they  
3 really didn't have much to say about him.

4 Q What did Arthur Gregory, his supervisor,  
5 what did he -- what did he say about Daniel  
6 Holtzclaw when you interviewed him?

7 A He didn't really say a whole lot about  
8 him. He was a loner. He spoke with the troops.

9 Q He spoke with the troops?

10 A Yeah, like the -- he would interact with  
11 them, talk with them, but he was still a loner, and  
12 that's kind of what we saw out there with all these  
13 stops and everything that he did over time. He  
14 would do -- he would go work mainly on his own.

15 Like when I was on the streets, I had a  
16 crew, we ran around together, things like that. He  
17 wasn't that type of guy. He was more of a I want --  
18 he's going to go off, do his own thing, traffic  
19 stops, go to jail on his own, that type of guy, so  
20 that type of officer.

21 Q So Arthur Gregory said he was a loner, he  
22 spoke to the troops, and what else did Arthur  
23 Gregory say about Daniel Holtzclaw?

24 A He said he didn't have any complaints from  
25 females. He said once in a while, you know, maybe

1 he might have a complaint from like a gangbanger or  
2 something like that or somebody, but never a female,  
3 it wasn't -- he really didn't hardly have any  
4 complaints to say about him.

5 Q Can you think of anything else that Arthur  
6 Gregory, Lieutenant Gregory, said about -- said to  
7 you about Daniel Holtzclaw during your  
8 conversations? Did you specifically ask him did he  
9 have complaints from females?

10 A Uh-huh.

11 Q Is that a yes?

12 A Yes.

13 Q And Lieutenant Gregory said no?

14 A Correct.

15 Q Would it have made a difference to you if  
16 Detective -- Officer Holtzclaw had a complaint from  
17 females?

18 A Of course, I'd like to know what type of  
19 complaint, if it's a sexual complaint, I would have  
20 went and, of course, talked to that female. That's  
21 kind of what the basis was, but he said he didn't  
22 have anything, so.

23 Q What about any complaints from individuals  
24 saying that Officer Holtzclaw placed them in the car  
25 and drive them around for no apparent reason?

1 A I never heard that at all.

2 Q If you had had a complaint like that,  
3 would that have been a concern for you?

4 A Driving them around for no reason?

5 Q Yes.

6 A On a female?

7 Q Yes.

8 A Yes, I would have, I would have wanted to  
9 talk with her, yeah.

10 Q Why is that?

11 A Well, I'd -- I'd want to know what the  
12 circumstances were. You know, driving around, well,  
13 just knowing what I knew, you know, when he was  
14 driving a female around for no reason, he was taking  
15 them to a spot to rape them or do something.

16 Now, I never came across anybody that said  
17 that they were just driven around and that was odd.  
18 A lot of the nos I got really didn't -- well, I  
19 didn't necessarily mention Holtzclaw in general, but  
20 I -- I didn't get any complaints that way. And I --  
21 I spoke with most -- I mean, my half of the year or  
22 however you want to put it was victims, and I never  
23 had a complaint like that.

24 Q Did you have any complaints or any  
25 information that Officer Holtzclaw would drive

1 female individuals he had arrested or taken in  
2 custody who were females without calling and giving  
3 the proper notification to dispatch?

4 A Well, yeah, I mean, these women, that was  
5 commonplace among these 11, I mean, of doing stuff  
6 like that here and there, depends on the victim, he  
7 would do that.

8 Q While you were investigating Officer  
9 Holtzclaw, if you had had a -- if you had known  
10 about that sort of complaint of driving a female in  
11 the car alone without providing proper notification  
12 to dispatch, would that have concerned you?

13 A Yes, I would have wanted to talk to her.

14 Q Why?

15 A For that simple reason of just it's a  
16 female, we have all these victims, obviously, and  
17 I'd want to -- I'd want to hear her version of the  
18 story, I mean, did she think something else is going  
19 to go on, you know, was she afraid, did he tell her  
20 what he was doing. See, not every time, not  
21 everything Holtzclaw was doing was a sexual act, it  
22 wasn't -- every traffic stop wasn't a rape, anything  
23 like that. It was the opportunity.

24 Now, in listening to a female talk about  
25 that, I would perk up to that because that's

1 something I would want to know, is it one of those  
2 situations or maybe it was a misunderstanding, I --  
3 I don't know. I wouldn't know until I talked with  
4 her, but I would want to talk with her.

5 Q What do you mean when you say it's a  
6 opportunity?

7 A He -- okay, so like with Terri, the  
8 opportunity for him to assault her, he drives her  
9 around the corner, he had the opportunity to hold  
10 the whole crack pipe thing over her head, thinking  
11 she's going to go to jail, and then he takes  
12 advantage of her, and he -- he rapes her, you know.

13 With Shardayreon Hill, you know, he's  
14 alone in a room with her, yeah, she's high, she's  
15 desperate, she wants out of the charges, he assaults  
16 her. He starts stalking her on Facebook, she knows  
17 that she wants out of trouble, he goes to her house,  
18 he whips out his penis, he's wanting sexual favors  
19 to get out, he's looking for opportunity.

20 With Tabitha Barnes, he's holding those  
21 tickets over her head and he wants sexual favors, he  
22 wants to see her breasts, he wants to touch her  
23 breasts, he is basically harassing her, going in her  
24 house, I mean, it's just -- it's a -- he was a power  
25 rapist, that's what he was.

1 Q And in your experience, did you consider  
2 that Holtzclaw was escalating his activities and his  
3 boldness with each passing victim?

4 A Oh, hands down. So with the way like Kim  
5 and I split, calling up all the women, okay, I took  
6 the early part of, you know, '13 and '14. Kim had  
7 the last part. You could tell the progression and  
8 that's what we see with predators, anyway, they get  
9 comfortable, so Kim had more victims because there  
10 at the end, she had that last part, he was ramping  
11 it up, just like that last night, there was three  
12 victims.

13 Q And in your experience, do rapists  
14 sometimes start off with just violence, non-sexual,  
15 and it just continues to grow? You used the term  
16 "power rapist."

17 A Well, that's kind of two different  
18 questions there.

19 Q Absolutely. My question is, in your  
20 experience, have you seen rapists start off abusing  
21 women just physically and then escalating to other  
22 sexual assaults, et cetera?

23 A A lot of the time, and most of the time,  
24 it just doesn't go straight to rape. It could be a  
25 sexual battery, you know, grabbing their buttocks,

1 maybe just --

2 Q Pressing his -- pressing his penis against  
3 her back side?

4 A Yes, uh-huh. You know, it could be a  
5 peeping tom, however it is, and then they just --  
6 they want the bigger thrill or however it is. Some  
7 guys escalate faster than others, and in this one,  
8 we really saw it within that time period, I mean, he  
9 really ramped it up. And some guys can be a peeping  
10 tom for years and years and years and they might  
11 just kind of hover around there. But a lot of them,  
12 if they feel more comfortable, they'll just push the  
13 issue, rapists, child molesters, same thing.

14 Q What causes individuals like Daniel  
15 Holtzclaw, rapists, to feel more comfortable, to  
16 feel like, oh, I can do more now than I did last  
17 time?

18 A Because they got by with it, that's the  
19 deal. They feel more boldened, you know, they got  
20 by with it, I'm going to push the issue this time,  
21 oh, I get a bigger high on this one, you know, they  
22 just keep on going.

23 MR. SMITH: Are you getting close to a  
24 wrap-up point?

25 MR. SOLOMON-SIMMONS: No, sir.