

IN THE DISTRICT COURT, IN AND FOR OKLAHOMA COUNTY, STATE OF OKLAHOMA

State of Oklahoma



PLAINTIFF,

VS.

FILED IN DISTRICT COURT
INFORMATION
OKLAHOMA COUNTY

DANIEL K HOLTZCLAW

DEFENDANT.

NOV 19 2014

TIM RHODES
COURT CLERK
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IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA, COMES NOW
DAVID W. PRATER THE DULY ELECTED, QUALIFIED AND ACTING DISTRICT ATTORNEY IN
AND FOR OKLAHOMA COUNTY, DISTRICT NO. 7, STATE OF OKLAHOMA, AND ON HIS OFFICIAL OATH INFORMS THE
DISTRICT COURT THAT

COUNT 1 : ON OR ABOUT THE 27TH DAY OF FEBRUARY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND FELT THE BODY OR PRIVATE PARTS OF T.B., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF T.B., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BARE BREASTS OF T.B. WITH HIS HAND WITHOUT HER CONSENT AFTER DANIEL K. HOLTZCLAW HAD DETAINED HER, CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 2 : ON OR ABOUT THE 14TH DAY OF MARCH, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED C.R. , TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021(A)(2) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 3 : ON OR ABOUT THE 25TH DAY OF MARCH, 2014, A.D., THE CRIME OF BURGLARY IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, BROKE AND ENTERED THE DWELLING HOUSE OF T.B. LOCATED AT 1530 N.E. 15TH STREET, OKLAHOMA CITY, WHILE TERRY WAYNE WILLIAMS WAS INSIDE THE HOUSE, BY THE DEFENDANT OPENING A CLOSED DOOR AND WITH THE INTENT TO COMMIT EITHER STALKING, PROCURING LEWD EXHIBITION AND/OR SOME OTHER SEXUAL ASSAULT ON T.B., ALL IN VIOLATION OF TITLE 21, SECTION 1431 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 4 : ON OR ABOUT THE 25TH DAY OF MARCH, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY DIRECTED, PROCURED, AND/OR COUNSELED T.B., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K.

DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING R.G. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF R.G., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST R.G.'S. WILL AND WITHOUT R.G.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 10 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE S.E., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH S.E., BY FORCING S.E. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF S.E., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA

COUNT 11 : ON OR ABOUT THE 7TH DAY OF MAY, 2014, A.D., THE CRIME OF RAPE IN THE FIRST DEGREE WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, KNOWINGLY AND BY MEANS OF FORCE, OR THREATS OF FORCE, ACCOMPANIED BY APPARENT POWER OF EXECUTION THEREOF TO S.E., ACCOMPLISHED SEXUAL INTERCOURSE WITH S.E., TO-WIT: BY DANIEL K. HOLTZCLAW HAVING SEXUAL INTERCOURSE BY FORCING S.E. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE VAGINA OF S.E., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, AGAINST S.E.'S WILL AND WITHOUT S.E.'S CONSENT, CONTRARY TO THE PROVISIONS OF SECTION 1111 AND 1114 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

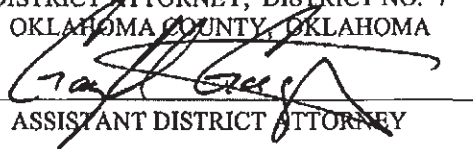
COUNT 12 : ON OR ABOUT THE 8TH DAY OF MAY, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE T.M., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH T.M., BY FORCING T.M. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF T.M., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

COUNT 13 : ON OR ABOUT THE 26TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF C.J., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF C.J., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE BREASTS OF C.J. WITH HIS HAND AND UNDER HER CLOTHING, WITHOUT HER CONSENT, AFTER DANIEL K. HOLTZCLAW HAD DETAINED C.J., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.

- COUNT 14 : ON OR ABOUT THE 26TH DAY OF MAY, 2014, A.D., THE CRIME OF SEXUAL BATTERY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, KNOWINGLY AND INTENTIONALLY TOUCHED AND/OR FELT THE BODY OR PRIVATE PARTS OF C.J., IN A LEWD AND LASCIVIOUS MANNER AND IN A MANNER CALCULATED TO AROUSE AND EXCITE SEXUAL INTERESTS AND WITHOUT THE CONSENT OF C.J., TO-WIT: BY DANIEL K. HOLTZCLAW TOUCHING THE VAGINA AND PUBIC AREA OF C.J. WITH HIS HAND UNDER THE CLOTHES, WITHOUT HER CONSENT, AND AFTER THE DEFENDANT HAD DETAINED C.J., CONTRARY TO THE PROVISIONS OF SECTION 1123(B) OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.
- COUNT 15 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY EXPOSED, DIRECTED, PROCURED, AND/OR COUNSELED J.L., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 16 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WHO WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE J.L, BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH J.L., BY FORCING J.L. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF J.L., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA.
- COUNT 17 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF FORCIBLE ORAL SODOMY WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY, UNLAWFULLY, AND FELONIOUSLY COMMITTED THE DETESTABLE AND ABOMINABLE CRIME AGAINST NATURE WITH ONE K.L., BY HAVING UNNATURAL CARNAL COPULATION BY MOUTH WITH K.L., BY FORCING K.L. TO ALLOW DANIEL K. HOLTZCLAW TO PLACE HIS PENIS IN THE MOUTH OF K.L., WHILE BEING THREATENED WITH ARREST AND/OR PHYSICAL HARM, EITHER EXPRESSLY OR IMPLIED, IF SHE DID NOT COMPLY, CONTRARY TO THE PROVISIONS OF SECTION 888 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 18 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN OKLAHOMA CITY POLICE OFFICER, WILLFULLY AND LEWDLY EXPOSED, DIRECTED, PROCURED, AND/OR COUNSELED K.L., TO EXPOSE HER BARE BREASTS TO THE VIEW OF DANIEL K. HOLTZCLAW FOR THE PURPOSE OF SEXUAL STIMULATION OF DANIEL K. HOLTZCLAW, CONTRARY TO THE PROVISIONS OF SECTION 1021 OF TITLE 21 OF THE OKLAHOMA STATUTES, AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF OKLAHOMA
- COUNT 19 : ON OR ABOUT THE 18TH DAY OF JUNE, 2014, A.D., THE CRIME OF PROCURING LEWD EXHIBITION WAS FELONIOUSLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA, BY DANIEL K. HOLTZCLAW, WHO, WHILE ACTING UNDER THE AUTHORITY OF AN

DAVID W. PRATER
DISTRICT ATTORNEY, DISTRICT NO. 7
OKLAHOMA COUNTY, OKLAHOMA

BY



ASSISTANT DISTRICT ATTORNEY