

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

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| TABATHA BARNES, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No. CIV-16-184-HE |
| |) | |
| THE CITY OF OKLAHOMA CITY, |) | |
| a municipal corporation, et al., |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS THE CITY OF OKLAHOMA CITY’S AND WILLIAM CITY’S
FINAL EXHIBIT LIST**

COME NOW, the Defendants, The City of Oklahoma City and William City, by and through their counsel, and pursuant to this Court’s Scheduling Order submits their Final List of Exhibits to be used in the trial of this case.

EXHIBITS EXPECTED TO BE USED:

| No. | Exhibit | Objection | Rule Relied Upon |
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| 1. | All reports authored by Rocky Gregory in criminal investigation of Maurice Martinez, OCPD Case No. 11-004507 | | |
| 2. | Information filed in <i>State v. Martinez</i> , CF-2011-2327 including attached affidavit of Defendant Gregory | | |
| 3. | 08/31/11 Amended Information in <i>State v. Martinez</i> , CF-2011-2327 | | |
| 4. | Judgment and Sentence in <i>State v. Martinez</i> , CF-2011-2328 | | |
| 5. | 06/24/11 Pre-Determination Hearing Notice to Martinez | | |
| 6. | 07/25/11 Martinez’s Resignation Letter | | |
| 7. | Information in <i>State v. Downing</i> , CM-14-0615 | | |

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| 8. | Judgment and Sentence in State v. Downing, CM-2014-615 and CM-2015-739 | | |
| 9. | 08/02/13 Letter from David Prater re: Darnell Armstrong | | |
| 10. | OCPD Procedure 150.0-150.17 – Use of Force Investigations | | |
| 11. | OCPD Procedure 160.40 – Screening Committee | | |
| 12. | 05/12/12 OCPD Case No. 12-38964, IA Case No. 12-274 – Holtzclaw Use of Force Against BF | | |
| 13. | Information and all Amended Informations with probable cause affidavits attached in <i>State v. Holtzclaw</i> , CF-2014-5869 | | |
| 14. | <p>All Investigative Records in the following cases, including, but not limited to photographs taken of scenes, AVL of Holtzclaw’s vehicle, dispatch tapes, records of Holtzclaw’s communication with other OCPD units, emails between Wenzel, Bacy, Joe Hill, and Detectives Gregory and Davis, recordings of interviews with victims if any, all police reports, all audio and/or video recordings, emails from all victims:</p> <ul style="list-style-type: none"> • 14-083072 (A. Gardner) • 14-066583 (C. Johnson) • 14-068786 (C. Raines) • 14-066183 (F. Mathis) • 14-049050 (J. Ligons) • 14-076818 (K. Lyles) • 14-085523 (R. Copeland) • 14-070895 (R. Grate) • 14-078745 (S. Hill) • 14-066104 (S. Ellis) • 14-083092 (S. Brown) • 14-068166 (T. Barnes) • 14-041539 (T. Morris) | | |

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| 15. | Tape and Transcript of Interview of Holtzclaw on 06/18/14 | | |
| 16. | 12/31/14 Jester Memo to Chief City re Pre-Determination Hearing – Officer Daniel Holtzclaw | | |
| 17. | 09/08/11 Memo from Kuhlman re OCPD Call Out Procedures | | |
| 18. | Photographic Admonition Form and Photo Line Up shown to Terry Morris by Detective Higginbottom | | |
| 19. | 06/04/14 Brian Taylor Report re 14-44803, Lydia Opal Smith – impersonator case including all other reports | | |
| 20. | Video of encounter between Holtzclaw and Ligons | | |
| 21. | 10/24/14 Pre-Determination Notice Memo to Holtzclaw from Kuhlman | | |
| 22. | 01/08/15 Termination Letter to Holtzclaw from Chief City | | |
| 23. | OCPD Policy 665.0-665.10 – Personnel and Recruitment | | |
| 24. | OCPD Procedure 424.0-424.50 – Recruiting and Employment of Sworn Personnel | | |
| 25. | OCPD Policy 670.0-670.10 – Training and Recruit Training | | |
| 26. | OCPD Policy 670.30 – In-Service Training | | |
| 27. | OCPD Procedure 436.0 – In-Service Training | | |
| 28. | OCPD Procedure 436.05 – Attendance | | |
| 29. | OCPD Policy 030.0 – Review | | |
| 30. | OCPD Procedure 113.0 – Issuance of Policies, Procedures and Rules; OCPD Procedure 113.10 – Responsibility; OCPD Procedure 113.20 – Distribution of the Operations Manual; OCPD Procedure 113.30 – Update of Operations Manual (Procedures 113.0-113.30), rev. 05/13 | | |
| 31. | OCPD Rule 100.0 – Compliance with Policies, rev. 04/11 | | |

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| 32. | OCPD Rule 105.0 – Condition of Manual, rev. 02/13 | | |
| 33. | 01/15/07 CALEA Assessment Report | | |
| 34. | 03/17/07 CALEA Assessment Letter | | |
| 35. | 03/27/10 CALEA Assessment Letter | | |
| 36. | 03/23/13 CALEA Assessment Letter | | |
| 37. | OCPD Procedure 230.0 – Arrest Procedure | | |
| 38. | OCPD Policy 554.0-554.60 – Use of Force | | |
| 39. | OCPD Policy 105.0 – Mission Statement | | |
| 40. | OCPD Policy 110.0 – Primary Objective | | |
| 41. | OCPD Policy 205.0-205.15 0 Standard of Conduct, Law Enforcement Code of Ethics, Oath of Office | | |
| 42. | OCPD Policy 220.0 – Respect for Constitutional Rights | | |
| 43. | OCPD Policies 285.0-258.10 – Allegations of Employee Misconduct Objectives of Personnel Investigations | | |
| 44. | OCPD Policy 287.0 – Discipline | | |
| 45. | OCPD Procedure 143.0 – Complaints Against Police Employees | | |
| 46. | OCPD Procedures 150.0-150.18 – Use of Force Investigations | | |
| 47. | OCPD Procedures 170.0-170.70 – Discipline | | |
| 48. | OCPD Procedures 103.0-103.42 – Non-Discrimination/Harassment | | |
| 49. | OCPD Rule 115.0 – Neglect of Duty | | |
| 50. | OCPD Rule 120.0 – Truthfulness/Cooperation | | |
| 51. | OCPD Rule 125.0 – Duty to Report Misconduct | | |
| 52. | OCPD Rule 348.0 – Use of Force | | |
| 53. | OCPD Rule 470.0 – Constitutional Rights | | |

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| 54. | Pre-Employment File of Holtzclaw, including but not limited to: application questionnaire, applicant investigation report, 07/05/11 Report of Allan Dupis LPC-CPI, 07/10/11 OCPD Polygraph Report of Cecil Frymire, 07/19/11 Confidential Final Report of Rowe & Dupis MMPI, Assessment Board Questions with notes | | |
| 55. | Syllabus of Recruit Class No. 128, | | |
| 56. | Training Outline for Criminal Investigations/Sexual Assaults | | |
| 57. | Training Outline for Civil Liability | | |
| 58. | Training Outline for Arrest | | |
| 59. | Training Outline for Probable Cause | | |
| 60. | Syllabus from Recruit Class 116 | | |
| 61. | 06/03/14 Terri Morris Refusal to Prosecute | | |
| 62. | 04/11/14 OCPD Springlake Division Day Shift Line-Up | | |
| 63. | 05/20/14 OCPD Springlake Division Day Shift Line-Up | | |
| 64. | 05/21/14 OCPD Springlake Division Day Shift Line-Up | | |
| 65. | OCPD Procedure 670.20 – Field Training and Evaluation Program | | |
| 66. | Ten Month Probation Board Reports re Daniel Holtzclaw | | |
| 67. | OCPD Procedures 431.0 – 431.10 – Recruit Training and Major Grades | | |
| 68. | OCPD 434.0-434.10 – Field Training Officer | | |
| 69. | OCPD Procedure 160.20 – Probation Review Board | | |
| 70. | 05/01/13 Incident Detail Report re: Armstrong, OCPD Incident No. 13-35649 | | |
| 71. | Maiden Third Party Affidavit | | |
| 72. | Griffin Third Party Affidavit | | |
| 73. | Video – Interview of Ms. Griffin | | |
| 74. | Video – Interview of Ms. Maiden | | |
| 75. | Photo representation by Campbell of hobble on Armstrong | | |

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| 76. | 06/26/13 Report of Investigation by Medical Examiner re Armstrong | | |
| 77. | Supervisor's Follow-up Investigation Report by Bennett and his Use of Force Report, including Holtzclaw's Standard Supplemental Reports re 13-093984 | | |
| 78. | Audio – 911 Call from Presbyterian Hospital – Campbell's Request for Supervisor | | |
| 79. | 03/17/14 Arthur Gregory Report, 14-21185 | | |
| 80. | 03/31/14 Holtzclaw Certificate of Completion of 2014 Non-Supervisory Employees – Policy Prohibiting Discrimination and Sexual Harassment | | |
| 81. | 2012 City of Oklahoma City Personnel Policies | | |
| 82. | 2013 Holtzclaw Sexual Harassment Training Test Results | | |
| 83. | 2012-2014 Holtzclaw Training History/In-Service | | |
| 84. | Judgment and Sentence re State v. Holtzclaw, CF-2014-5869 | | |
| 85. | Campbell Notice of Tort Claim | | |
| 86. | Campbell Medical Records regarding the "Use of Force" by Holtzclaw | | |
| 87. | Campbell Handwritten Note on back of business card | | |
| 88. | 11/05/13 Campbell Incident Report | | |
| 89. | Plaintiff Barnes Responses to Defendants' Interrogatories and to Defendants' Second Set of Interrogatories | | |
| 90. | Plaintiff Morris' Responses to Defendants' Interrogatories and to Defendant's Second Set of Interrogatories | | |
| 91. | Plaintiff Johnson's Responses to Defendants' Interrogatories and to Defendant's Second Set of Interrogatories | | |
| 92. | Plaintiff Lyles' Responses to Defendants' Interrogatories and to Defendant's Second Set of Interrogatories | | |

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| 93. | Plaintiff Ligons' Responses to Defendants' Interrogatories and to Defendant's Second Set of Interrogatories | | |
| 94. | Plaintiff Hill's Responses to Defendants' Interrogatories and to Defendant's Second Set of Interrogatories | | |
| 95. | Training Outline for Major Crimes for Recruit Classes 116 and 128 | | |
| 96. | Training Outline for Use of Force for Recruit Classes 116 and 128 | | |
| 97. | All AVL for 06/18/14 Second Shift Springlake Patrol Vehicles | | |
| 98. | Body worn camera footage of Ms. Ligons and Officer J. DeSpain on 04/11/19 | | |
| 99. | Campbell's Facebook posts re Holtzclaw | | |
| 100. | OCPD Investigations into the complaints of sexual assaults by OCPD officers from January 1, 2011 through October 2014 | | |
| 101. | OCPD Policy 670.30 – In Service Training | | |
| 102. | AVL of OCPD cars on 05/20/14 and 05/21/14 | | |
| 103. | OCPD Procedure 436.0 – In Service Training | | |
| 104. | Warrants for Ms. Ligons from traffic citations given as a result of an accident on 04/11/19 | | |
| 105. | All exhibits listed by other Defendants not otherwise objected to by these Defendants | | |
| 106. | All exhibits listed by Plaintiffs not otherwise objected to by these Defendants | | |

EXHIBITS WHICH MAY BE USED:

| No. | Exhibit | Objection | Rule Relied Upon |
|------|---|-----------|------------------|
| 107. | All documents contained within OCPD Criminal and Administrative Investigation Files into death of Darnell Armstrong | | |

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| 108. | Administrative Investigation Report of Citizen Complaint against Holtzclaw by Lt. A. Gregory, OCPD Report No. 14-21185 | | |
| 109. | OCPD Procedure 148.0 – Early Intervention Program | | |
| 110. | OCPD’s Early Intervention Program Memos and Reports Involving Holtzclaw, Second Quarter 2013 | | |
| 111. | OCPD’s Early Intervention Program Memos and Reports Involving Holtzclaw Third Quarter 2013 | | |
| 112. | OCPD’s Early Intervention Program Memos and Reports Involving Holtzclaw, Annual 2013 | | |
| 113. | OCPD’s Early Intervention Program Memos and Reports involving Holtzclaw, First Quarter 2014 | | |
| 114. | All OCPD Use of Force Investigations of Defendant Holtzclaw | | |

Respectfully Submitted,

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MUNICIPAL COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April 2021, I electronically transmitted the attached Defendant City's and City's Final Exhibit List to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Melvin Hall, mhall@riggsabney.com; Damario Solomon-Simmons, dsimmons@riggsabney.com; Benjamin Crump, bcrump@parkscrump.com; and Kymberli Heckenkemper, heckenkemper@riggsabney.com, Attorneys for Plaintiffs Morris, Johnson, Lyles, Ligons and Hill; Cody E. Gilbert, gilberlawok@gmail.com, Attorney for Plaintiff Barnes; and James L. Hankins, jameshankins@ocdw.com, Attorney for Defendant Holtzclaw.

/s/ Richard N. Mann