

UNCUFF the Innocent · Daniel Holtzclaw case records

Deposition of Demetria Campbell, February 15, 2018 (Barnes v. City of Oklahoma City, No. CIV-16-184-HE): pages cited on this site

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1 **Q** Okay. So if you wanted to, right now, go work
2 as a CNA in some facility, would you be able to rely on
3 the license you had, back in the late '90s or early 2000s
4 at Colonial Manor, to get a job, or would you have to
5 relicense and retest? If you --

6 **A** I would have to relicense.

7 **Q** Okay. To your knowledge, was there any
8 disciplinary action taken on your license as a CNA while
9 you were at Colonial Manor?

10 **A** No.

11 **Q** Okay. What year did Chy'nequa pass away?

12 **A** 2014.

13 **Q** Where were you living in 2014?

14 **A** Hollis.

15 **Q** Okay. Was she living with you at that time?

16 **A** Yes.

17 **Q** How did she die?

18 **A** Diagnosed with cancer.

19 **Q** And is that, ultimately, what -- what caused her
20 to pass away?

21 **A** Yes.

22 **Q** Did you do anything to prepare for your
23 deposition today?

24 **A** No.

25 **Q** I'm going to ask you some more specific

1 **Q** Other than the lawsuit that you have filed
2 against the City of Oklahoma City, have you ever filed a
3 lawsuit against anyone else, ever, to the best of your
4 knowledge?

5 **A** There was, like I said, the car --

6 **Q** Oh, that's right, you mentioned that.

7 **A** -- accident.

8 **Q** Okay. Was that a lawsuit that you filed? Or
9 were you sued in that case?

10 **A** No, it was -- I filed.

11 **Q** Okay.

12 **A** A couple of accidents, basically.

13 **Q** A couple of car accidents?

14 **A** Yes.

15 **Q** Okay. When you say "a couple," so have you
16 filed two separate car-accident-related lawsuits?

17 **A** Yes.

18 **Q** Okay. You only had to give a deposition in one
19 of them?

20 **A** Yes.

21 **Q** What happened to each of the car wreck
22 accidents? Do you think -- did you settle -- settle them?

23 **A** Yes.

24 **Q** Okay. Do you recall what county those lawsuits
25 were filed in?

1 **A** Tarrant.

2 **Q** Is that -- where is that, in Texas?

3 **A** Ft. Worth, Texas.

4 **Q** Okay. Do you recall the year?

5 **A** 1995 --

6 **Q** Okay.

7 **A** -- for the first.

8 **Q** All right.

9 **A** And the second one was actually filed from
10 Hollis, but it was -- the accident was in Tarrant County.

11 **Q** Okay. And what year was that?

12 **A** '17, 2017.

13 **Q** Oh, so it's a -- it's an ongoing lawsuit?

14 **A** No.

15 **Q** Is it --

16 **A** I just settled.

17 **Q** Okay. All right. So just to make sure I'm
18 clear: The 2017 lawsuit is -- was -- was it filed in
19 Hollis or it was filed in Tarrant?

20 **A** It's, actually, not a lawsuit.

21 **Q** Okay.

22 **A** I'd obtained an attorney.

23 **Q** Okay.

24 **A** Later, just dismissed the attorney.

25 **Q** Okay.

1 **A** And he just did the settlement.

2 **Q** Okay. So you had a car wreck that -- and you
3 got a lawyer and you had some sort of resolution with an
4 insurance -- with an insurance company; is that correct?

5 **A** Yes.

6 **Q** Okay. So you didn't actually have a lawsuit on
7 that 2017 --

8 **A** Right.

9 **Q** Well, then, just generally, what was the inj- --
10 was there bodily injury to you as a result of this 2017 --

11 **A** Yes.

12 **Q** -- car wreck?

13 Okay. Where did the car wreck occur?

14 **A** Ft. Worth.

15 **Q** Okay. What -- how were you injured?

16 **A** My hips.

17 **Q** Okay. Were you hospitalized?

18 **A** No.

19 **Q** Okay. Good. All right. Any other lawsuits
20 that you can think of, that you have ever filed, other
21 than what we've already discussed?

22 **A** There was one for Taxotere or something.

23 **Q** Could you say that again?

24 **A** Taxotere.

25 **Q** Okay. What's that?

1 **A** A medication for cancer patients.

2 **Q** Okay. So I -- I'm not sure what you're talking
3 about. Can you explain a little bit more what you're --
4 what you're referring to. Did you file a lawsuit?

5 **A** Attorneys contacted me.

6 **Q** Okay.

7 **A** Said they'd obtained records that I'd been a
8 patient.

9 **Q** Okay.

10 **A** Asked if I would like to be a part of the suit
11 for medication that caused hair loss.

12 **Q** Okay.

13 **A** So we started research on it, to see if we
14 could. I told them I'm one of the fortunate and my hair
15 grew back --

16 **Q** Okay.

17 **A** -- so no need to sue, really.

18 **Q** Okay. So you did not sue in that -- you did not
19 participate in that lawsuit?

20 **A** No.

21 **Q** Okay. Any other lawsuits that you can think of,
22 that we haven't discussed, that you may have participated
23 in or filed?

24 **A** None that I can recollect.

25 **Q** Okay. What about -- have you ever been sued

1 before?

2 A Have I ever been sued... I can't recall ever
3 being sued.

4 Q Okay. You good to keep going? Do you need a
5 break?

6 A Oh, yeah, I'm fine.

7 Q Okay.

8 MS. GOOCH: Anybody sitting around the table
9 need a break for anything?

10 Q (By Ms. Gooch) Okay. I want to shift gears now
11 and let's talk about the incident, that we've not talked
12 about so far, that involves Holtzclaw on November 5th,
13 2013, okay?

14 A Okay.

15 Q My understanding is you were in Oklahoma City?

16 A Yes.

17 Q But, if I understand your background, at -- in
18 2013, you were actually living in Hollis; is that correct?

19 A Yes.

20 Q Okay. So why were you in Oklahoma City on
21 November 5th, 2013?

22 A My daughter, who, as I said, had been diagnosed
23 with cancer, had been air-vacked from Hollis to Oklahoma
24 City when she had been found unconscious, so I was here
25 taking care of my daughter.

1 **Q** Okay. And this is -- oh, gosh -- Chy'nequa?

2 **A** Yes.

3 **Q** Okay. I meant to look and see what -- do you,
4 off the top of your head, know what day of the week
5 November 5th, 2013, was?

6 **A** No.

7 **Q** Okay. I meant to look. I'll look at my
8 calendar here.

9 Okay. I'm looking at a calendar here and I'll
10 show it to you, because I'm -- I'm not trying to trick
11 you. November 5th, 2013, was a Tuesday. Does that sound
12 about right to you? I'm going to show you my calendar.
13 So there's the year 2013.

14 **A** Okay.

15 **Q** And when I scroll down here to Nov- -- to
16 November 5th, it shows -- on this calendar, it shows to be
17 a Tuesday. Does that sound right to you?

18 **A** The day of the incident, yes.

19 **Q** Yes, okay. On the day of the incident, how long
20 had you been up in Oklahoma City attending to your
21 daughter at the hospital?

22 **A** Overnight.

23 **Q** Okay. So you came up on Monday, November 4th?

24 **A** Yes.

25 **Q** Okay. What is -- if you recall, what was the

1 date that your daughter was found unconscious and
2 air-vacked to Oklahoma City? Was it Monday, November 4th?

3 A Yes.

4 Q Okay. Was her situation related to her cancer?

5 A Yes.

6 Q When you came up on November 4th, Monday, do you
7 remember where you stayed Monday night?

8 A In the hospital room.

9 Q Okay. All right. So that takes us to Tuesday,
10 November 5th, 2013, the day of the incident. I've read
11 your lawsuit, I've read some reports that relate to it,
12 but I would like for you to just tell me, in your own
13 words, the -- to, you know, explain to me, like I'm in
14 kindergarten, what occurred as it relates to your
15 interactions with Daniel Holtzclaw on November 5th, 2013.

16 MR. MUMINA: Counsel, let me just inquire. Are
17 you asking her for a narrative or are you going to ask
18 questions?

19 MS. GOOCH: I'm -- well, right now, I'm asking
20 her for a narrative, if she's okay explaining to me what
21 occurred. I'm -- I will have specific questions, I'm
22 sure, but -- are you okay with that?

23 MR. MUMINA: Well, no, I'm not. I mean, I think
24 you need to ask some questions.

25 MS. GOOCH: Okay.

1 **Q** (By Ms. Gooch) Do you recall what occurred on
2 November 5th, 2013?

3 **A** Yes.

4 **Q** Okay. Please tell me.

5 **A** I left to get food for my daughter.

6 **Q** I'm sorry, you left, what?

7 **A** To get food.

8 **Q** Oh, to get food?

9 **A** For my daughter.

10 **Q** Okay.

11 **A** While going to the food place to get the food,
12 Officer Holtzclaw ran up on me.

13 **Q** Okay.

14 **A** Snatched me up, pushed me against the wall, put
15 me in handcuffs. Slammed my face against the wall.

16 **Q** Okay.

17 **A** Was perverted.

18 **Q** Okay.

19 **A** Put me in his car, drove away with me. Took me
20 back to the scene. Put me out and said that they said it
21 wasn't me.

22 **Q** Okay. Thank you for that. I'm going to break
23 down just a few of the things that you said.

24 You said that Officer Holtzclaw ran up on you.

25 Could -- what do you mean when you say "he ran up on you"?

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

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.

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

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.

1 **Q** Okay. So then what?

2 **A** He proceeds to take me to his vehicle.

3 **Q** Okay. Are you cuffed at this point?

4 **A** Yes.

5 **Q** Where are you cuffed?

6 **A** Behind.

7 **Q** Your wrists were cuffed behind your back
8 (indicating)?

9 **A** (Moved head up and down).

10 **Q** Is that a yes?

11 **A** Yes.

12 **Q** Okay. Were you -- and you've probably said
13 this, but I'm not sure. Were you cuffed behind your back
14 before you felt an erection?

15 **A** Yes.

16 **Q** Okay. While -- for this approximately two
17 minutes that you are feeling this erection, was he saying
18 anything? Was Holtzclaw saying anything?

19 **A** Yes.

20 **Q** Okay. What was he saying?

21 **A** "We'll find out. We'll find out."

22 **Q** Do you know what he was referring to?

23 **A** Yes.

24 **Q** Okay. What?

25 **A** I explained that I'm -- I just said, "I'm not

1 who you think I am."

2 **Q** Okay.

3 **A** He said, "We'll find out."

4 **Q** I'm taking it that, when this interaction with
5 Holtzclaw started, you had no idea what -- who he was
6 looking for or what he was looking for, because you had
7 done nothing wrong --

8 **A** Right.

9 **Q** -- is that fair?

10 **A** Yes.

11 **Q** Okay. Do you immediately try to explain to him
12 you're not who he thinks you are or you've done nothing
13 wrong or anything along those lines?

14 **A** Yes.

15 **Q** What do you recall saying to him?

16 **A** When he first grabbed me, I said, "Whoa, excuse
17 me, what's the problem?"

18 "Get up against the wall. Get up against the
19 wall."

20 **Q** Okay.

21 **A** I said, "Sir, if you can tell me who you think I
22 am or what you think I've done, I can assure you I'm not
23 the individual you are looking for." He continues to push
24 me against the wall, his forearm in my back.

25 **Q** Okay.

1 **A** Then he pulls my arm around, handcuffs me. He's
2 hard-pressed against me with his arm in my back while I'm
3 handcuffed, and that's when I felt the erection.

4 **Q** Okay. Do you recall if there was any -- strike
5 that.

6 This is outside the entrance to the restaurant;
7 is that correct?

8 **A** Yes.

9 **Q** Do you recall if there was anyone in the
10 vicinity that you believe may have or could have observed
11 what was going on?

12 **A** Yes.

13 **Q** Okay. Do you know any of those people?

14 **A** No.

15 **Q** Okay. Were they just patrons of the restaurant?

16 **A** Of the business behind.

17 **Q** Okay. Did anyone, to your recollection, while
18 this interaction between you and Holtzclaw is going on, to
19 your recollection, attempt, in any way, to intercede, to
20 speak to either of you, to ask, "Hey, what's going on
21 here, people," anything along those lines?

22 **A** No.

23 **Q** Okay. Do you recall if -- seeing if anyone was
24 standing there filming, using their -- using their phone
25 to video what was going on?

1 he are having any conversation with each other?

2 A No.

3 Q Okay. And so where does he go?

4 A Back into the initial parking lot, he pulled
5 into a driveway. I hear him yelling on the megaphone to
6 another car, "Back up, back up, back up." He pulls into
7 the driveway, stops.

8 Q Okay. I want to break that down just a little
9 bit. You say "driveway." Is that something different
10 than a parking lot?

11 A It was a driveway of the parking lot.

12 Q Okay. Back to the TJ's seafood place --

13 A Yes.

14 Q -- is that correct?

15 All right. And you say "megaphone." In my
16 mind, I'm picturing, you know, a -- a megaphone, which you
17 hold up to your hand, and it's, you know, loud and it
18 projects out.

19 A Yes.

20 Q Do you know what I'm talking about?

21 A Yes.

22 Q Is that what you're talking about?

23 A Yes.

24 Q Okay. You said he's yelling to another vehicle,
25 "Back up, back up, back up." Is it another police

1 **A** I called my brother and explained what had just
2 happened and gathered myself for a few minutes and...

3 **Q** Sure.

4 **A** Then I went back to the hospital.

5 **Q** Okay. You said you "called your brother."
6 What's your brother's name?

7 **A** Joe Campbell.

8 **Q** Where does -- at that time, where did he live?

9 **A** Gould, Oklahoma.

10 **Q** I take it, you called him from your cell phone?

11 **A** Yes.

12 **Q** Okay. Do you remember calling him -- or --
13 strike that. Let me back up.

14 When you walk away from Holtzclaw's patrol unit
15 and go to TJ's, do you walk directly and immediately into
16 TJ's?

17 **A** Yes.

18 **Q** Okay. Do you see anybody there you know?

19 **A** The owners.

20 **Q** Do you know them?

21 **A** Yes.

22 **Q** Okay. Do you -- what are their names?

23 **A** I don't know them by name, just by the business.

24 **Q** Okay, I'm -- I don't understand. I'm sorry.

25 **A** When I lived in Oklahoma City, we would always

1 go to order food there.

2 Q Okay. So you recognized them?

3 A Yes.

4 Q Okay. But you don't know them by name?

5 A Right.

6 Q Okay. Other -- you said "owners" in the plural.

7 Could you describe either of these people? Or I don't

8 know how many "the owners" are. Is it a husband and wife?

9 What --

10 A Yes.

11 Q -- is it?

12 Okay. Can you describe them, physically, for

13 me? Age, race, anything about them that you can describe?

14 A I can tell you that they are -- and I'm not sure
15 if they're Vietnamese or Chinese or --

16 Q Okay.

17 A But I can tell you that they are oriental.

18 Q Okay.

19 A She's small.

20 Q Okay.

21 A Really kind.

22 Q Okay.

23 A Husband -- both have dark hair, I remember. The
24 husband is very polite.

25 Q Okay. Can you give me a ballpark on age?

1 **A** That's hard to do.

2 **Q** Well --

3 **A** They don't look their age.

4 **Q** Yeah.

5 **A** If I were to guess, I would guess that she's
6 about -- maybe mid-forties.

7 **Q** Okay. Probably -- so it doesn't sound like
8 they're a young, in-their-early-20s couple?

9 **A** No.

10 **Q** Okay. And it doesn't -- it sounds like they're
11 not an elderly couple?

12 **A** No.

13 **Q** Okay. But you recognized husband and wife
14 owners. Anyone else that you recognize in the restaurant?

15 **A** No.

16 **Q** Okay. Do you have any conversation with the
17 husband and wife owners at that time?

18 **A** Yes.

19 **Q** Okay. Was it about anything that had just
20 occurred with Holtzclaw?

21 **A** Yes.

22 **Q** Okay. What do you just -- what do you have --
23 what conversation do you have with them?

24 **A** The wife said to me, "Oh, no, I'm so sorry, so
25 sorry. I said, 'No, no, not her, she nice lady, she nice

1 lady.'" And I said, "Well, why didn't you come out?"

2 And...

3 Q And I'm sorry to interrupt. Before she says
4 that, do you say anything to her, like, "Did you see what
5 just happened?", or anything along those lines?

6 A No.

7 Q Okay. So she -- she just voluntarily says, "So
8 sorry, so sorry, I say, 'Not her,'" or something like
9 that?

10 A She saw it.

11 Q Okay. You believe -- based on her comments to
12 you at that time, it registered with you, "She must have
13 seen what had occurred"?

14 A Yes.

15 Q Okay. Do you recall, while you are having this
16 interaction with Holtzclaw, seeing the wife/owner at
17 the -- you know, seeing what's going on?

18 A Yes.

19 Q Okay. Was she inside the building?

20 A Yes.

21 Q Okay. Do you have any visible marks on you
22 after this occurs -- after this has occurred? Excuse me.

23 A Yes.

24 Q Okay. What markings do you have on you?

25 A My left cheek was swollen.

1 **Q** Okay.

2 **A** Kind of a powder from the paint off the
3 building.

4 **Q** Okay.

5 **A** My jacket kind of had scuffs on it.

6 **Q** Okay.

7 **A** That's...

8 **Q** Do you recall if you were bleeding?

9 **A** Not bleeding, I don't think, but just inflamed
10 and --

11 **Q** Sure, sure. Okay. So you have the interaction
12 with the wife that you just described. Any other
13 communication you have with the wife at that time, as it
14 relates to this incident?

15 **A** No.

16 **Q** Okay. Do you have any communication with the
17 husband at that time, as it relates to this incident?

18 **A** He brought the food and said, "You okay, you
19 okay?" And I said, "No, but..."

20 **Q** Was that the extent of your communication with
21 him?

22 **A** Yes.

23 **Q** Okay. I want to get to your conversation with
24 your brother here in a moment, but anyone else you had any
25 communication with inside the restaurant, at that time, as

1 it relates to this incident?

2 A No.

3 Q About how long are you in the restaurant before
4 you leave, at this -- after this incident has occurred?

5 A I'd say maybe six minutes.

6 Q Okay. It wasn't very -- it wasn't very long?

7 A Huh-uh. No.

8 Q Okay. From the moment you first see Holtzclaw
9 approaching you or running up on you, as you said, until
10 the moment he allows you to walk away from the patrol
11 vehicle, can you give me an estimate as to how much time
12 passed?

13 A I would say maybe -- and, again, this is just
14 an --

15 MR. MUMINA: You don't have to guess.

16 A I'm really not sure, because so much is going
17 on, that I can't really process.

18 Q (By Ms. Gooch) Sure. Would you say it was --
19 the incident, itself, from the moment you see him until
20 the moment you walk away from the patrol vehicle, would
21 you say it was 30 minutes or less?

22 A Yes.

23 Q Okay. Would you say it was 20 minutes or less?

24 A Not sure about that.

25 Q Okay. When do you call your brother?

1 **A** When I go into TJ's.

2 **Q** Okay. Do you call him before you get the food
3 from the family --

4 **A** Yes.

5 **Q** -- or from the owners? Excuse me.

6 **A** Yes.

7 **Q** Okay. Do you call him before you have the
8 exchange with the wife that you've already told us about?

9 **A** No.

10 **Q** Okay. So you have the exchange with the wife
11 and then do you -- and you told us that you got the food
12 from the husband and he asked if you're okay. So where,
13 in that sequence of events, do you call your brother?

14 **A** I called my brother as I was walking into the
15 restaurant.

16 **Q** Okay. Do you call him -- do you make the call
17 to him while you're outside the restaurant, then?

18 **A** No.

19 **Q** Okay.

20 **A** No, after I enter the building.

21 **Q** Okay.

22 **A** Standing at the counter, I dialed his number.

23 **Q** Okay.

24 **A** While it's ringing, she says she's "so sorry, so
25 sorry."

1 **Q** Okay.

2 **A** Talk to my brother, tell him what's just
3 happened. He says what he -- what he said, and the
4 husband comes up with the food, says, "Are you okay?"

5 **Q** Right.

6 **A** I take the food and I left.

7 **Q** Okay. So while you're on -- if I understand you
8 correctly, it sounds like you're on the phone with your
9 brother, at the counter, get- -- while you're paying for
10 and getting your food?

11 **A** Yes.

12 **Q** Okay. Did I just say, "You're on the food with
13 your brother"? You're on the phone with your brother. I
14 don't know what I said. You're on the phone with your
15 brother.

16 **A** Yes.

17 **Q** So it sounds like your conversation with your
18 brother was rather short?

19 **A** Yes.

20 **Q** Would you say it's 30 seconds?

21 **A** I would say maybe -- maybe a minute.

22 **Q** Okay. And when you say you "tell him what
23 happened," what do you recall telling him?

24 **A** That I was assaulted by a police officer.

25 **Q** Okay.

1 **A** And that I was scared and I didn't really know
2 what else to do. And I said, "I just want to tell you, in
3 case something else happens, because he's still out there
4 waiting."

5 **Q** Okay.

6 **A** So...

7 **Q** When you say -- I understand you're telling me
8 that you told your brother that you were assaulted. Is
9 that the word you used when you told your brother?

10 **A** Yes.

11 **Q** Okay. Did you provide any other information to
12 your brother, about what had occurred to you, at that
13 time, on the phone?

14 **A** Yes.

15 **Q** Okay. What else?

16 **A** He said, "What do you mean?" And I said,
17 "Getting out of my car, going to get the food, and this
18 officer runs up, grabs me, I'm on the wall, I'm in
19 handcuffs."

20 **Q** Can you speak a little louder, please?

21 **A** I said to him, "I was going to get food, an
22 officer runs up, grabs me, I'm up -- in handcuffs. He
23 puts me in his car, he's taking me away, and I come back
24 and he let's me go."

25 And he says, "Get off this phone. You call the

1 news right now."

2 Q Okay.

3 A I said, "No, just pray for me. I'm going to be
4 okay."

5 Q Okay. I take it, you didn't call the news right
6 then?

7 A No.

8 Q Okay. I want to back up and ask a question.
9 You testified, earlier, that -- that you felt the erection
10 against you for two minutes. At that -- during that two
11 minutes, was Mr. Holtzclaw pressed up against you and
12 making any movement or motion of any kind?

13 A He's pressed up against me.

14 Q Okay. But -- but he's not making any movement
15 or motion; is that what you're telling me?

16 MR. MUMINA: I'm going to object to the form of
17 that question. Answer if you can.

18 Q (By Ms. Gooch) But you can answer it, if you
19 can.

20 A When you say "movement," do you mean gyrating?
21 Do you mean his hand doing something else over here?

22 Q Sure. Any move- --

23 A Clarify, please.

24 Q Yeah, I would like you to describe for me, if
25 you can, to the best that you can, what movement, if any,

1 he was making while he's -- his -- he's pressed against
2 you with an erection?

3 A He was handcuffing me.

4 Q Okay.

5 A And then his forearm was against my back.

6 Q Okay.

7 A He's hard-pressed up against me.

8 Q Okay.

9 A I attempt to look into his face, to see, because
10 I'm thinking, "This cannot be a real officer --"

11 Q Right.

12 A "-- this behavior is totally not acceptable."

13 So, as I looked up into his face to try and get
14 a visual, he takes my head, slams it against the wall.

15 Q Okay.

16 A There was movement, yes.

17 Q Okay. Was there gyration, to use the word that
18 you used, or -- did he gyrate against you?

19 A No.

20 Q Okay. So we're going to go back in the
21 restaurant. You've gotten your food. At that point, to
22 the best of your recollection, as you sit here today, have
23 you told me all the conversation or communications you had
24 with either your brother or the husband and wife, inside
25 the restaurant?

1 the food"?

2 A I went and sat down while waiting.

3 Q Okay.

4 A Called Stephanie.

5 Q Okay. Up to this point, have you had to
6 complete any paperwork?

7 A No.

8 Q And are -- do you feel that you've told me
9 everything you said to the woman at the admitting desk at
10 this point?

11 A Yes.

12 Q Okay. So when you -- do you use the word
13 "assault" when you talk to the woman at the admitting
14 desk?

15 A Yes.

16 Q Okay. Earlier, when I was asking you what all
17 occurred between you and Holtzclaw on that occasion, and I
18 think the phrase that you used, when I asked you what all
19 he did, you said, "He was perverted," and we discussed at
20 length what that entailed, right --

21 A Yes.

22 Q -- we discussed that at length?

23 Okay. When you spoke to the woman at the
24 admitting desk, did you discuss with her the actions that
25 you believe were perverted?

1 **A** No.

2 **Q** So you simply told her you've been assaulted;
3 fair?

4 **A** Yes.

5 **Q** Okay. When you called your brother in the
6 restaurant, from your cell phone, and told him you had
7 been assaulted, did you discuss with him the actions we've
8 discussed today about -- that were perverted?

9 **A** No.

10 **Q** Did you also just tell him you had been
11 assaulted?

12 **A** Yes.

13 **Q** Okay. So about how long, to your recollection,
14 were you seated in the waiting room at the ER, before
15 Stephanie comes down and gets the food?

16 **A** Maybe six minutes.

17 **Q** In that time, has the nurse come back out to
18 talk with you?

19 **A** No.

20 **Q** Okay. When Stephanie comes down, do you discuss
21 with her anything that had occurred?

22 **A** Yes.

23 **Q** I'm sorry?

24 **A** Yes.

25 **Q** Okay. What do you say to her?

1 **A** Yes.

2 **Q** Did you tell her the perverted acts that we've
3 discussed here today --

4 **A** No.

5 **Q** -- that Mr. Holtzclaw did?

6 **A** No.

7 **Q** Okay. At this point, you're seated in the ER.
8 Have you taken any photos of anything with your phone?

9 **A** Yes.

10 **Q** What -- what photos had you taken?

11 **A** Of my face.

12 **Q** Okay. Do you have those photos today?

13 **A** No.

14 **Q** And I don't necessarily mean with you, sitting
15 in this room, but do they still exist in the world
16 somewhere today?

17 **A** Yes.

18 **Q** Okay. Where are they?

19 **A** I'm not sure. In a phone I had at home.

20 **Q** Okay. Have you ever, for example, provided them
21 to anybody?

22 **A** Yes.

23 **Q** Okay. Who have you provided the photos to?

24 **A** My attorney.

25 **Q** Okay. Anyone else?

1 **A** Yes.

2 **Q** You tell her you were assaulted?

3 **A** Yes.

4 **Q** But you don't mention the perverted acts?

5 **A** No.

6 **Q** Okay.

7 MS. D'ANTONIO: Objection, asked and answered.

8 **Q** (By Ms. Gooch) And then does Stephanie leave the
9 waiting room area?

10 **A** She told me to take pictures --

11 **Q** Okay.

12 **A** -- of my face. She said, "Momma, I knew there
13 was something wrong. It was taking you too long to come
14 back."

15 **Q** Okay.

16 **A** She said, "Do you want me to tell Chy'nequa?"
17 And I said, "Just tell her I'm in the ER and I'll talk to
18 her when I come up there."

19 **Q** Okay. And then do you take pictures of your
20 face with your phone?

21 **A** Yes.

22 **Q** Stephanie doesn't take the pictures?

23 **A** No.

24 **Q** Okay. Do you know how many pictures you took?

25 **A** No.

1 mind, remember hearing or learning of criminal charges
2 being filed against Daniel Holtzclaw?

3 A Can I back up just for a second on that evening?
4 With my daughter --

5 Q Sure.

6 A -- when I told her, she said, "Momma, no.
7 Anybody else -- no. You don't deserve that." And she
8 attempted to get out of her bed.

9 And I said, "Chy'nequa, where do you think
10 you're going?" And she said, "Momma, I need to find him
11 and take care of him." And I said, "No, you don't." I
12 said, "You stay in your bed and God's going to handle
13 him."

14 She said, "Momma, you don't do anything to
15 anybody." She said, "You're always kind, you're always
16 good." She said, "You don't deserve what has happened to
17 you," she said, "and especially not by a police officer."

18 She said, "Momma, if I could find him, I would
19 kill him myself." I said, "Chy'nequa, we don't go after
20 wrongdoers, we let God deal."

21 My daughter wept and said, "Momma, this is my
22 fault that it happened to you." She said, "If you weren't
23 here with me, it never would have happened, it never would
24 have happened." I said, "Some things happen and we cannot
25 explain why," I said, "but it's not your fault,

1 Chy'nequa."

2 I told my daughter, I said, "I -- I try and live
3 by the Bible."

4 Q Sure.

5 A Not perfect, but I try hard. I said, "The Bible
6 has said, 'Vengeance is mine, thus sayeth the Lord. I
7 will repay.'" I said, "So even if nothing ever comes out
8 of this incident for your Momma, God will bring him to
9 justice." I said, "You don't worry."

10 I remember us being there at the hospital and
11 Stephanie saying, "Well, Momma, I have to leave. I have
12 to go back home." I said, "Okay, we'll be okay." I said,
13 "You pray and don't worry."

14 Q I'm sorry, where was home for her?

15 A Hollis.

16 Q Okay. Go ahead.

17 A Hollis.

18 My daughter had -- had Milagro, and he was
19 actually there with me to -- because I rushed away to take
20 care of her. I said, "God has already taken care of us."
21 I said, "I'm grateful that Stephanie came in and was here
22 with Milagro, because Milagro would have been in the car,"
23 I said, "and he never would allow me to explain." I said,
24 "He would have been there, unattended." I said, "But
25 Stephanie is here, she was able to take care of the baby."

1 I said, "You got the food you wanted. It's going to be
2 okay."

3 My daughter was in the hospital for a long
4 while. They didn't think she would actually be able to
5 leave the hospital because of her condition.

6 We stayed, and I told -- I said, "Hey, I've
7 already -- I'll talk to an attorney tomorrow, don't
8 worry." I said, "We'll take care of things."

9 I met with my attorney, filed that information
10 with her, and I left that alone.

11 Q Okay.

12 A I saw on the news, about Daniel Holtzclaw,
13 almost a year later.

14 Q Okay. Let me -- let me -- may I stop you there
15 for just a moment?

16 A Yes.

17 Q Okay. Thank you for all that information. I
18 appreciate it. I know I asked you when is the first time
19 you learned that criminal charges had been filed.

20 A Yes.

21 Q And you're saying it was about a year later?

22 A Yes.

23 Q Okay. Something you said, I want to follow-up
24 on. You said you met with an attorney "tomorrow." So
25 this convers- -- are -- was the "tomorrow" November 6th,

1 2013?

2 **A** Yes.

3 **Q** Okay. All right. And I want to be careful
4 about what I'm asking here. I'm not asking you to tell me
5 what you discussed with your attorney.

6 **A** Uh-huh.

7 **Q** Did you, in fact, meet with an attorney
8 tomorrow, November 6th, 2013?

9 **A** Yes.

10 **Q** Was that Ms. D'Antonio?

11 **A** No.

12 **Q** Okay. Who was the attorney you met with on
13 November 6th, 2013?

14 **A** I only remember his first name being John.

15 **Q** Okay. Fast-forward. You said about a year
16 later, you learned criminal charges were filed; is that
17 correct?

18 **A** I can't say that criminal charges had been
19 filed.

20 **Q** Okay.

21 **A** But I learned that there was more going on with
22 Mr. Holtzclaw.

23 **Q** Okay. And is -- did you learn, whatever you
24 learned, from media or news reports?

25 **A** Yes.

1 **Q** Okay. Are you -- as you sit here today, are you
2 certain that you spoke with an attorney on November 6th,
3 2013, about this incident?

4 **A** Yes.

5 **Q** Okay. Do you know -- I'm going to give you a
6 few names and I'm going to -- for each one, I'm going to
7 ask you if you know them and then we'll take it from
8 there.

9 **A** Okay.

10 **Q** Do you know Terri Morris?

11 **A** No.

12 **Q** Okay. Do you know a lady named Kala Lyles?

13 **A** No.

14 **Q** Do you -- do you know a lady named Janie or
15 Jannie Ligons?

16 **A** No.

17 **Q** Do you know a woman named Carla Johnson?

18 **A** No.

19 **Q** Do you know a woman named Tabatha Barnes?

20 **A** No.

21 **Q** Okay. Last one: Do you know a woman named
22 Shardayreon Hill?

23 **A** No.

24 **Q** Okay. Those ladies' names are names that I am
25 aware, from documents that I've read or lawsuits that I've

1 **Q** Okay. Also, when you were in the vehicle with
2 Officer Holtzclaw, you stated that -- somewhere in your
3 direct -- that you urinated on yourself?

4 **A** Yes.

5 **Q** Did that happen in the vehicle or were you
6 outside the vehicle?

7 **A** It was before he took me to the vehicle.

8 **Q** And can you explain what led to that involuntary
9 act?

10 MS. GOOCH: Object to the form.

11 **Q** (By Ms. D'Antonio) Okay. Go on.

12 MS. GOOCH: Yeah, go ahead.

13 MS. D'ANTONIO: Can you -- I withdraw that, or
14 it's --

15 MS. GOOCH: Oh.

16 MS. D'ANTONIO: -- not there.

17 MS. GOOCH: Okay.

18 **Q** (By Ms. D'Antonio) Ms. Campbell, can you explain
19 what led to that act?

20 **A** I was terrified. When he had me against the
21 wall and I felt the erection, I didn't know what else
22 would transpire. It scared me. I wet my pants, hoping
23 that it would deter anything that he may have considered
24 doing or -- because I didn't know what was going on, at
25 that point, with him.

1 **Q** When you testified that he had you against the
2 wall and you said that he's -- his penis was erect,
3 correct?

4 **A** Yes.

5 **Q** How do you know that wasn't a gun?

6 MS. GOOCH: Object to the form.

7 **Q** (By Ms. D'Antonio) You can answer.

8 **A** I've felt a few penises in my life. I know it
9 was a penis.

10 **Q** Okay. You also testified several times, during
11 the depo, that there were periods of time when you were
12 sobbing and crying, correct?

13 **A** Yes.

14 **Q** Why were you crying?

15 **A** An emotional wreck, first of all, again not
16 understanding what was going on, not knowing who he
17 thought I was, not knowing where we were headed. The fact
18 that he slammed my face against the wall and no regard to
19 me as a person, no regard to even trying to help me to
20 understand what was going on. The pain. Again, the fear
21 of not knowing what he may do to me after taking me to his
22 car. Even him saying, at the end, why he did what he said
23 he did, I was upset, I was hurt.

24 **Q** Okay. And you said Mr. Hol- -- Officer
25 Holtzclaw told you that there was a call about a stolen

1 vehicle --

2 A Yes.

3 Q -- was his reason?

4 Okay. So when you were with him during that
5 period of time, whether you were outside the car, inside
6 the car, or both, did he ever talk to you about your
7 vehicle, the tags or the title, or anything like that?

8 A No.

9 MS. GOOCH: Object to the form.

10 Q (By Ms. D'Antonio) Did he ever ask you if you --
11 if the vehicle belonged to you?

12 A No.

13 Q Any questions that you can recall, from Officer
14 Holtzclaw, that would indicate that he was trying to find
15 out whether or not you had stole the vehicle that you were
16 driving?

17 A No.

18 Q I'd like to draw your attention to what we --
19 we'll call it Plaintiff's Exhibit 1 -- well, Demetria
20 Campbell Plaintiff's Exhibit 1. We can call it that. I
21 want you to take a look at that. It's a two-page
22 document. I want you to take a look at that document and
23 tell me if you recognize it.

24 A Yes.

25 Q And, of course, it's a copy, correct?

1 **A** Yes.

2 **Q** And tell, for the Court, what this document
3 represents.

4 **A** It's the card that Lieutenant Bennett gave me at
5 the hospital.

6 **Q** And I noticed there's two pages. What is the
7 second page?

8 **A** On the back of it, I wrote the officer's name
9 and what happened and where.

10 **Q** Okay. So that is your handwriting, correct?

11 **A** Yes.

12 **Q** And when was that handwriting placed on this
13 business card?

14 **A** At the hospital, the night that I had spoken
15 with Dr. -- with Lieutenant Bennett.

16 **Q** Okay. So on November 5th, 2013?

17 **A** Yes.

18 MS. D'ANTONIO: Okay. I'd like to offer this as
19 an exhibit.

20 **Q** (By Ms. D'Antonio) When you were talking to
21 Lieutenant Bennett, did he state to you that he was going
22 to follow-up with you on the questioning that he had
23 conducted that night?

24 **A** Yes.

25 **Q** Okay. How did he say that? What exactly did he

1 say?

2 A He told me that, again, he was sorry that things
3 had -- had transpired, that he was going to talk it over
4 with higher authority and that it would not be swept under
5 the rug and that someone would follow-up with me.

6 Q Okay. Did Lieutenant Bennett ever get back in
7 contact with you after November 5th, 2013?

8 A No.

9 Q Did anyone from the Oklahoma City Police
10 Department get in contact with you after November 5th,
11 2013, regarding your statement that you gave to Lieutenant
12 Bennett?

13 A No.

14 Q When -- you said that Lieutenant Bennett had --
15 looked like he was taking notes when you were talking with
16 him, correct?

17 A Yes.

18 Q When he was writing this down, what did you
19 think he was doing?

20 A I thought he was taking the report, the
21 information and...

22 Q Okay. So you believed you were giving a
23 statement?

24 A Yes.

25 Q Okay. Have you ever received a copy of anything

1 **A** He told me that it was Holtzclaw.

2 **Q** (By Ms. D'Antonio) What do you mean by that?

3 **A** He said, "I've spoken with my officer,
4 Holtzclaw." And I said, "Okay."

5 MS. D'ANTONIO: Okay. All right. That's all I
6 have.

7 EXAMINATION

8 BY MR. SMITH:

9 **Q** Ms. Campbell, my name is Rick Smith.

10 **A** Yes.

11 **Q** Ms. Katz and I represent the City of Oklahoma
12 City in your lawsuit and the City of Oklahoma City and
13 Chief Citty and Detective Gregory in other lawsuits --

14 **A** Okay.

15 **Q** -- okay? I have a few other questions and I
16 hope not to...

17 MS. D'ANTONIO: Is he on the phone?

18 MS. GOOCH: I was just remembering. Did we get
19 them back on the phone? Sorry.

20 MS. D'ANTONIO: Yeah, he was on.

21 MS. GOOCH: Okay. I'm sorry.

22 MR. SMITH: Okay.

23 **Q** (By Mr. Smith) Anyway, I hope not to repeat what
24 everybody else has asked you. I do have a few other
25 questions, unfortunately, and I'm sorry.

1 Let's go to what I believe has been marked as...

2 MS. D'ANTONIO: Campbell Exhibit... 1.

3 MR. SOLOMON-SIMMONS: 1.

4 **Q** (By Mr. Smith) ...1. There's two pages to
5 Campbell's Exhibit 1, correct?

6 **A** Yes.

7 **Q** And I believe you testified that the second page
8 is a -- what you wrote on the back of Officer Bennett's
9 card, correct?

10 **A** Yes.

11 **Q** This is what -- your statement of what happened
12 on November 5th, 2013, correct?

13 **A** Yes.

14 **Q** And when did you write that?

15 **A** At the emergency room.

16 **Q** Was it before or after Bennett interviewed you
17 and left?

18 **A** It was after.

19 **Q** Okay. Do you understand that the accusation or
20 the belief was that a different car, other than your car,
21 had been stolen?

22 **A** Could you rephrase that?

23 **Q** Okay. Do you understand that the accusation was
24 that -- or the belief was, or the suspicion was that it
25 was a different car that was stolen, other than any car

1 that you were associated with?

2 **A** I didn't know.

3 **Q** Okay. Well, we -- we talked about your car. It
4 wasn't your car that people thought was stolen; did you
5 know that?

6 **A** No.

7 **Q** Okay. And your lawyer asked you about whether
8 or not you'd ever seen Lieutenant Bennett's report or
9 whether anybody from the police department had given you
10 that report, correct?

11 **A** Yes.

12 **Q** Do you know that that's been produced to lawyers
13 in this room, in these other lawsuits?

14 **A** No.

15 **Q** Have you seen it from them?

16 **A** No.

17 **Q** Do you know that Mr. Solomon has got your
18 medical records?

19 **A** No.

20 **Q** Did you give him your medical records?

21 **A** No.

22 **Q** Do you know where he got the medical records?

23 **A** No.

24 **Q** Okay. Mrs. Gooch asked you some questions about
25 whether or not Mr. Solomon was ever your lawyer. Have you

1 ever talked to Mr. Solomon before today?

2 A No.

3 Q Talked to Mr. Hall before today?

4 A No.

5 Q Talked to Mr. Hammons before today?

6 A No.

7 Q Okay. I'm going to hand you what's been marked
8 as City's Exhibit No. 1.

9 MR. SOLOMON-SIMMONS: For the record, it's
10 Solomon-Simmons.

11 MR. SMITH: I'm very sorry, sir.

12 Q (By Mr. Smith) I'm going to hand you what's been
13 marked as Defendants' Exhibit No. 1 -- Defendant City's
14 Exhibit No. 1, if I can have the --

15 MS. GOOCH: Oh.

16 MR. SMITH: Yeah, thank you.

17 Q (By Mr. Smith) This is an article out of The
18 Guardian. Do you know what The Guardian is?

19 A No.

20 Q Have you ever seen this article before?

21 MR. SOLOMON-SIMMONS: Thank you, sir.

22 A No.

23 Q (By Mr. Smith) Take a minute, read it, if you --
24 if you want, but the reason I'd like to talk to you about
25 it is Page 4 of six --

1 MS. D'ANTONIO: And before we go there, I'd just
2 like, for the record, an objection as to a lack of
3 personal knowledge. She said she's never seen it before,
4 so if there's going to be questions regarding the
5 substance, I'd just like the record to reflect my
6 objection.

7 MR. SMITH: Well, that's fine, ma'am.

8 **Q** (By Mr. Smith) If you'll read -- if you'll go to
9 Page 4 of six. It seems to say, "With D.C.'s permission,
10 through her attorney, Cynthia D'Antonio, The Guardian
11 reviewed her medical records from the day of her alleged
12 assault." Do you see that?

13 **A** No.

14 **Q** Okay. I'm going to point it to you, ma'am.
15 It's the second full paragraph on Page 4 of six.

16 Were you aware of the fact that Ms. D'Antonio,
17 or at least it's reported, had let The Guardian read your
18 medical records?

19 **A** No.

20 **Q** Okay. Were you aware that Ms. Gooch wants your
21 medical records and I wouldn't give them to her, even
22 though she's representing a police officer?

23 **A** No.

24 MR. SOLOMON-SIMMONS: Object to the form.
25 Relevance.

1 MR. SMITH: I don't believe we've -- going to
2 object to relevance in a deposition.

3 MR. SOLOMON-SIMMONS: I believe I may, if I feel
4 like I need to. I'm not from Oklahoma City, sir.

5 MR. SMITH: The federal -- okay, so the federal
6 rules don't apply where you came from?

7 MR. SOLOMON-SIMMONS: No.

8 **Q** (By Mr. Smith) I'm going to hand you what's
9 been --

10 MR. SOLOMON-SIMMONS: You will not bully me for
11 where I came from.

12 MR. SMITH: Okay, I'm not trying to bully you,
13 sir.

14 MR. SOLOMON-SIMMONS: Oh, no.

15 MR. SMITH: We agreed, at the beginning of this
16 deposition, to the usual stipulations, which don't include
17 relevance, and we've allowed Ms. D'Antonio to ask
18 questions that weren't really relevant, so --

19 MR. SOLOMON-SIMMONS: Well, you should have made
20 your record.

21 MR. SMITH: I did make my record. It's called
22 you -- you don't waive them.

23 **Q** (By Mr. Smith) I'm going to hand you what's been
24 marked as Defendants' Exhibit No. 2 and ask you if you've
25 ever seen that document before, ma'am.

1 MS. D'ANTONIO: Thank you.

2 MR. SOLOMON-SIMMONS: Thank you, sir.

3 MR. SMITH: You're welcome. Don't try the stare
4 down.

5 MR. SOLOMON-SIMMONS: You are funny.

6 MR. SMITH: What?

7 MR. SOLOMON-SIMMONS: I said you are funny, sir.

8 MR. SMITH: Okay. Glad you think so.

9 Q (By Mr. Smith) Have you ever seen those, ma'am?

10 A Yes.

11 Q Okay. And for the record, what are they?

12 A Medical records.

13 Q Okay. Did you ever tell anybody, on the night
14 of this incident, at the hospital, that Daniel Holtzclaw
15 perverted you?

16 A Yes.

17 Q Who did you tell at the hospital?

18 A Lieutenant Brian Bennett.

19 Q Okay. When I meant from the hospital -- and
20 that was a poorly-worded question.

21 Did you tell anybody employed by the hospital
22 that Daniel Holtzclaw perverted himself?

23 A No.

24 Q Okay. So is that why it's not in these medical
25 records?

1 **A** Yes.

2 **Q** Okay. Why did you not tell the doctors, the
3 nurses, the technicians, the reception lady, at the
4 hospital, that Daniel Holtzclaw perverted himself?

5 MR. SOLOMON-SIMMONS: Object to form.

6 **A** I was ashamed. I felt degraded.

7 **Q** (By Mr. Smith) Okay.

8 **A** I felt nasty. And I didn't feel that I needed
9 to disclose it to everyone, already feeling as bad as I
10 was. I had enough on my plate, as I said before. I did
11 not want to discuss it with everyone because it wasn't
12 everyone's business.

13 **Q** Okay. So you didn't need medical treatment for
14 it?

15 **A** No.

16 **Q** Okay.

17 **A** Not at that time.

18 **Q** Have you ever disclosed it to any medical
19 provider?

20 **A** Yes.

21 **Q** Which ones?

22 **A** My personal doctor.

23 **Q** And what is the personal doctor's name?

24 **A** Akram Abraham.

25 **Q** Okay. Do you know when you did that? Because

1 I've got his records, too, ma'am, and I don't see it in
2 there. So tell me when --

3 A During the follow-ups.

4 MS. D'ANTONIO: I'm going to object as to form.
5 Go ahead.

6 Q (By Mr. Smith) Do you know what date?

7 A No.

8 Q Okay.

9 MR. SMITH: And I don't believe I brought any
10 copies. I've only got the original of this one, and it
11 wasn't because of anything -- that I was trying to be
12 funny or whatever.

13 Q (By Mr. Smith) But I will mark my only copy as
14 Plaintiff's Exhibit 3, and I will give it to your lawyer
15 and let you and your lawyer have an opportunity to look at
16 it and see if you can find, in there, anywhere where I
17 have missed it that you described to him the sexual
18 assault.

19 MS. D'ANTONIO: Well, I'm just going to reflect
20 -- make an objection on the record. We're not aware if
21 that includes all of those medical records, so my client
22 will review them, with the caveat that they're inclusive
23 of everything.

24 MR. SMITH: That's inclusive of everything
25 you've given me, ma'am, but -- but I understand. If you

1 think that there's some that's not there, I'll be willing
2 to listen to what it is that you think I do not have.

3 MR. HALL: Cynthia, can we -- can we get a copy?
4 I mean, can you --

5 MS. D'ANTONIO: Yes, uh-huh. And they're not
6 numbered, either, page numbers or anything.

7 MR. SMITH: They're exactly the way I got them
8 from you, ma'am. Actually, I didn't get them from you, I
9 got them from the medical clinic.

10 MS. D'ANTONIO: You didn't get them from me.

11 MR. SMITH: I apologize, you're right.

12 (Recess was had from 2:00 p.m. to 2:05 p.m.)

13 MS. D'ANTONIO: Okay, we're back on the record.
14 You're still under oath.

15 Q (By Mr. Smith) Okay, I'd asked you to look at
16 the medical records to see if it refreshes your memory
17 what time -- when you told Dr. -- is it Dr. Abram?

18 A Abraham.

19 Q Abraham? Could you look at those, please,
20 ma'am?

21 A Okay, I've looked at them.

22 Q Do you see any indication there where you told
23 him that you were sexually assaulted that night?

24 A No.

25 Q Okay. And I actually see that there's two

1 immediately afterwards. There's one for 11/11/13?

2 A (Moved head up and down).

3 Q And I don't even think it -- it talks about this
4 incident. But I have to refresh my memory.

5 Okay, I apologize, it is there. The incident is
6 there, but it doesn't say anything about a sexual assault,
7 correct?

8 A Correct.

9 Q And there's also one about 11/29 that talks
10 about this incident, correct? Four pages on or so -- five
11 pages on. 11/23 -- 11/29/2013, "The patient is a
12 43-year-old female who presents with headaches since the
13 time she was assaulted by a police officer in Oklahoma
14 City." Do you see that, ma'am?

15 A I'm looking.

16 Q It's five pages in, I believe.

17 A Okay, yes.

18 Q It doesn't say anything about any perversion or
19 sexual assault or anything, does it?

20 A No.

21 Q Okay. Do you recall, then, when you did talk --
22 tell this doctor that you were sexually assaulted?

23 A Yes.

24 Q When?

25 A The 11th.

1 MS. GOOCH: I'm sorry?

2 THE WITNESS: The 11th.

3 Q (By Mr. Smith) On the 11th?

4 A Yes.

5 Q It's just not in the record?

6 A Not in detail.

7 Q It doesn't say "sexual," at all, does it?

8 A No.

9 Q It doesn't say "perversion"?

10 A No.

11 Q It doesn't say any of the words you've used
12 today?

13 A No.

14 Q It doesn't say about "erection"?

15 A No.

16 Q But you say you told him that?

17 A Yes.

18 Q Okay. I'm going to hand you what's been marked
19 as Defendants' Exhibit...

20 THE REPORTER: 4;.

21 Q (By Mr. Smith) ...4, if I could ever find it.
22 I'm sure I've hidden them from me.

23 I'll ask you if you've ever seen this document
24 before, ma'am. It is the use of force report done by
25 Lieutenant Bennett.

1 MR. SOLOMON-SIMMONS: Thank you, sir.

2 MR. SMITH: You bet.

3 A Okay.

4 Q (By Mr. Smith) I -- I think you're going to say
5 that's not what you told him, but I would like for you to
6 read the entire thing. It's actually the first two pages.
7 And I'm going to give you an -- I'm going to ask you about
8 it, so I'm just saying that's his report, okay? And I
9 will ask you if that's what you told him or if that's
10 correct or incorrect, and you'll have your chance, all
11 right?

12 A Okay. Okay.

13 Q Okay. And just for the record, there's more
14 than four page- -- two pages here. If you want to read
15 the whole document, you can read the whole document. I'm
16 telling you that the first two pages are what is --
17 supposedly, what you told Lieutenant Bennett, and the next
18 pages are what Holtzclaw told him. If you want to read
19 the whole thing, please do. I don't want you to say that
20 I didn't give you the opportunity.

21 MS. D'ANTONIO: And I just want the record to
22 reflect that the witness has testified she's never seen
23 this document before, so lack of personal knowledge.

24 So answer the questions the best you can.

25 MR. SMITH: And I appreciate that, ma'am.

1 MS. D'ANTONIO: You can tell him when you're
2 done.

3 A I'm -- I'm done.

4 Q (By Mr. Smith) Okay. First of all, it's five
5 pages, not four. I apologize.

6 A Uh-huh.

7 Q Okay. The first two purport to be what you told
8 Lieutenant Bennett. And I understand you've never seen
9 that document before today, until I just gave it to you.
10 Do you agree with what -- that that's what you told
11 Lieutenant Bennett, what's reported in there on the first
12 two pages?

13 A Not all of that. Not all of that.

14 Q Okay. So some of it is what you told him?

15 A Yes.

16 Q Okay. Can you tell me what it is that you did
17 tell him, or is it easier to go and say what you didn't
18 tell him?

19 A I did tell him that Holtzclaw had me against the
20 wall.

21 Q Okay.

22 A That he was perverted while he had me against
23 the wall.

24 Q Okay.

25 A I told him that he would not explain why he had

1 me, that he would not allow me to ask questions, that
2 there was no conversation about why he had me against the
3 wall. I also explained to him that he was rude, racist,
4 that he was prejudiced, that I -- hateful -- that he was
5 perverted, I say again. There was -- let me just find
6 another portion, please.

7 Q Take your time, ma'am.

8 A The hospital called.

9 Q Okay. What -- what paragraph are you referring
10 to --

11 A The first.

12 Q -- what page?

13 A First page, first paragraph.

14 Q Okay, thank you.

15 A It -- it says where -- "Mrs. Campbell was being
16 in the ER and wanting to speak to a supervisor"?

17 Q Yes, ma'am.

18 A The hospital called and requested.

19 Q Okay.

20 A I did not.

21 Q Okay. Did you ask the hospital to have --

22 A No.

23 Q Okay.

24 A I did not tell him that -- it's the second
25 paragraph.

1 **Q** Okay.

2 **A** Second sentence. I did not tell him that I
3 thought he used unnecessary force by placing me against
4 the wall. I told him that he placed me against the wall
5 and that he was aggressive.

6 **Q** Okay.

7 **A** I told him that he was perverted, that --
8 there's so much in here that I didn't say, but...

9 **Q** Okay. Well, let's talk about -- you keep saying
10 the word "perverted." Is that the word you used?

11 **A** "Perverted."

12 **Q** That was the word you told him?

13 **A** Yes --

14 **Q** Okay.

15 **A** -- "perverted."

16 **Q** All right. And I understand that he summarized
17 some of the things that you said in the second paragraph,
18 at least that's my take on it. Is that a correct
19 assumption, that he's summarizing some of the things that
20 you have told him about?

21 MS. D'ANTONIO: I'm going to object to
22 speculation.

23 **Q** (By Mr. Smith) Ma'am, you can answer it.

24 **A** Oh, I'm sorry. Repeat that, please.

25 **Q** Well, we can do it the hard way and I can go

1 line by line and ask you, "Did you say that?," or is he
2 trying to summarize things that you've said? Has he left
3 out anything important in that second paragraph, other
4 than the word "perv-" -- that Holtzclaw was perverted?

5 A No.

6 Q Okay. How about the third paragraph?

7 A He didn't follow me into the store. He
8 approached and grabbed me as I was attempting to open the
9 door.

10 Q Okay. So you never made it into the store?

11 A No.

12 Q Okay. Anything else that's incorrect in that
13 paragraph?

14 A I didn't ask him, "Why are you stopping me?" I
15 asked him if he could explain to me what he thought I had
16 done.

17 Q Okay.

18 A And I told him I could assure him that I was not
19 the individual he was looking for.

20 Q Okay. Anything else?

21 A He didn't pull me out of the store --

22 Q Right.

23 A -- because I had never made it into the store.

24 Q Okay. Understood.

25 MS. D'ANTONIO: I'd just like the record to

1 reflect the witness was referring to Paragraph 3.

2 THE WITNESS: Yes.

3 MR. SMITH: And I understand -- just Paragraph
4 3. Just Paragraph 3?

5 MS. D'ANTONIO: No, at that point.

6 MR. SMITH: Okay.

7 MS. D'ANTONIO: As far as that statement.

8 MR. SMITH: Yeah, okay.

9 MS. D'ANTONIO: I just want to be clear, so when
10 we go through this on the --

11 MR. SMITH: Right.

12 MS. D'ANTONIO: -- summary judgment motion, it's
13 clear.

14 MR. SMITH: You already know what my summary
15 judgment is going to be in your case; you told the judge
16 that day we had the oral argument.

17 MS. D'ANTONIO: Could you please strike that
18 from the record, the sidebar?

19 Q (By Mr. Smith) Is there anything else about
20 Paragraph 3?

21 A It states, "harsh and forceful." I, also, told
22 him that he was aggressive, that he was angry. I, also,
23 told him that he was hateful.

24 Q Okay. Anything else? Okay, I'm only talking
25 about the third paragraph. Have you moved on to the

1 **A** I told him exactly how he said it: "Oh, sorry
2 about that."

3 **Q** Okay. I just --

4 **A** Yeah, I did.

5 **Q** Okay. All right. I just --

6 **A** I did.

7 **Q** -- didn't know if -- okay. Go ahead.

8 **A** Yes.

9 **Q** Anything else about that paragraph?

10 **A** It says, "Mrs. Campbell said Officer Holtzclaw
11 told her that he was sorry. Mrs. Campbell told him that
12 she forgave him for his actions but that she thought that
13 what he did was wrong." I didn't tell him that.

14 **Q** You --

15 **A** I did not tell him that I thought what he did
16 was wrong.

17 **Q** Okay. Did you tell him that you forgave
18 Holtzclaw for Holtzclaw's actions?

19 **A** I told Hol- -- Holtzclaw, "I'll forgive you."

20 **Q** Okay. And did you tell that to Bennett?

21 **A** Yes.

22 **Q** Okay. But you didn't say, "and that -- but that
23 she thought what he did was wrong"?

24 **A** I didn't tell Holtzclaw --

25 **Q** Okay.

1 exactly accurate, correct? I won't say that you would say
2 it's a lie. It's not true, right?

3 A Possibly.

4 Q Okay. Did you follow Daniel Holtzclaw's trial?

5 A Random.

6 Q I'm sorry?

7 A Randomly.

8 Q Okay. I'm going to hand you what's been marked
9 as Defendants' Exhibit 6, which happens to be a bunch of
10 Facebooks off of yours.

11 THE REPORTER: 7.

12 MR. SOLOMON-SIMMONS: It's 7.

13 MR. SMITH: 7? I apologize.

14 MS. D'ANTONIO: 7.

15 Q (By Mr. Smith) And ask you if you -- and I
16 understand -- I don't know much about Facebook. I know
17 some of those aren't yours, some of those are yours. At
18 least I understand them to be. So if you...

19 MS. D'ANTONIO: How do I --

20 THE WITNESS: Can I have that, please?

21 MS. D'ANTONIO: You can have that one.

22 Q (By Mr. Smith) I guess maybe you could educate
23 me. If it says "Demetria Campbell," anything underneath
24 that is your posting?

25 A Yes.