

1 Q (By Mr. Adams) Is that your testimony?

2 A No.

3 Q So after she finds the vial and you pretend like you're
4 about to pass out and you're wobbling back and forth you
5 actually can see that PCP vial on the back of that squad
6 car, can't you?

7 A Yes.

8 Q And you pretend or act like you're about to fall down
9 and you lean and you fall over the squad car and you grab
10 the vial of PCP with your mouth.

11 A Yes.

12 Q And when you -- when you grab that vial of PCP with
13 your mouth you then sucked it into your mouth; correct?

14 A Yes.

15 Q And to explain to the jury what the PCP vial is, it
16 looks like a little test tube that's a glass test tube vial
17 of a liquid of PCP; correct?

18 A Correct.

19 Q And it has a cap on it --

20 A Yes.

21 Q -- so it doesn't get spilled; correct?

22 A Right.

23 Q And you as you had it in your mouth you crunched
24 down on it with your teeth and you shattered it inside your
25 mouth.

1 A Right, I know I'm at the hospital.

2 Q Okay. What I didn't hear you talk about during your
3 direct examination is during your stay at Southwest Medical
4 Center Officer Holtzclaw has to leave you and go chase down
5 a running prisoner from some other police officer there; do
6 you recall that ever happening?

7 A No.

8 Q Because you've never testified to that before, have
9 you?

10 A No.

11 Q Are you aware of the fact that during your detention
12 there at Southwest Medical Center Officer Holtzclaw was in a
13 foot pursuit with some individual who was running from the
14 hospital who was in custody by another officer?

15 A That's what happened?

16 Q Yes.

17 A No.

18 Q You don't recall anything like that ever happening?

19 A No.

20 Q Because under your version of events he's with you from
21 the get-go. From the minute you arrived at the hospital
22 till he takes you to jail; correct?

23 A Correct.

24 Q Okay. Now in any event in this first room where you're
25 seated there's no monitors attached, they give you something

1 Q So as you're in the first room he's checking out or
2 looking at the PCP vial?

3 A Yes, sir.

4 Q But, again, at some point you're moved to a different
5 room that has nothing to do with Officer Holtzclaw
6 requesting you be moved there, the hospital moves you there;
7 correct?

8 A Uh-huh.

9 Q Is that a yes?

10 A Yes, sir. I'm sorry.

11 Q It's in the second room that you're talking about that
12 all this inappropriate activity allegedly happened; correct?

13 A Correct.

14 Q And under your version of events at first he appeared
15 to be looking at you; correct?

16 A He -- he appeared to look at me when?

17 Q I'm talking about the second hospital room that you
18 were in.

19 A Yes.

20 Q When you're hooked up to all the monitors. You would
21 agree with me that at this point in time you're hooked up to
22 the monitors at Southwest Medical.

23 A Right.

24 Q Heart rate, all sorts of stuff; correct?

25 A Right.

1 Q They're keeping an eye on you at the nurses' station to
2 make sure you don't die.

3 A Right.

4 Q And you stated that while you're in this second room
5 that Officer Holtzclaw keeps looking over at you; correct?

6 A Correct.

7 Q And he tells you on at least three occasions that
8 either your boobs or your titties are showing; correct?

9 A Correct.

10 Q And you felt at the time that he might have been kind
11 of hitting on you.

12 A Not at first I didn't, but after he said it so many
13 times -- because I'm thinking if he know my condition he
14 know I'm not tryna show it to him purposely. He know that
15 I'm kinda like --

16 MR. ADAMS: Judge, I'd just ask that she be
17 responsive to the question.

18 THE COURT: Well, go ahead and finish you answer
19 and then ask another question.

20 THE WITNESS: Okay. He know I'm not trying to
21 show myself to him. He knows that I kind of -- he know why
22 I'm in here. I'm not being -- tryna be provocative or
23 anything. So by him keep letting me know this is -- and I'm
24 thinking to myself I am --

25 THE COURT: All right. Go ahead and ask another

1 the heart monitors wouldn't go off because he knew that if
2 the heart monitor go off then they would come to check on
3 me. But he -- but him knowing that if I lay back and they
4 see that everything's fine they wouldn't come to check on
5 me. And that's what he was tryna make sure of.

6 Q Okay. Because you knew that you were hooked up to
7 these heart monitors and stuff; correct?

8 A Yes, but --

9 Q And Officer Holtzclaw, under your scenario of events
10 and what you want this jury to believe that he's coaching
11 you on how to beat the machine.

12 A Right.

13 Q Yeah, he's telling you to calm down.

14 A Yes.

15 Q Lay back.

16 A Yes.

17 Q Do not let those heart monitors go off because if you
18 do, somebody's gonna come in this room and see what I'm
19 doing; right?

20 A Yes, and at the moment that he's telling me this he's
21 saying it in a way that he's getting tryna to get me to
22 gain his trust. He's -- he's making me feel like he's
23 telling me the right thing to do.

24 Q So while you're high on PCP in the hospital, what
25 you're saying he's grooming you; correct?

1 A Right. Correct.

2 Q He's grooming you so he can sexually assault you in the
3 hospital is what you want this jury to believe?

4 A Right.

5 Q Okay. In any event on these touchings that allegedly
6 happened of your breast, your heart monitor does not go off
7 nor did any of the other alarms; correct?

8 A No, sir, because no one ever came to check on me.

9 Q Okay. Then it's your testimony that Officer Holtzclaw
10 while you're back in this second room after making some
11 other small talk decides it's a good time for him to remove
12 his service belt; correct?

13 A Correct.

14 Q And his service belt is that belt that we see the
15 police officers going around with that has their gun, their
16 magazines, their flashlights, their whips and everything
17 else -- handcuffs, everything else; correct?

18 A Correct.

19 Q And, again, the door's not locked, we know that;
20 correct?

21 A Correct.

22 Q It could've even been partial open; correct?

23 A It was closed.

24 Q It was closed. But it's your testimony that no one
25 ever came and checked on you in this second room; correct?

1 A Correct.

2 Q They were just leaving it up to Officer Holtzclaw for
3 your medical needs.

4 A Correct.

5 Q And so he decides to take off his service belt under
6 your version of events and lay it down on a chair; correct?

7 A Yes. Correct.

8 Q And at that point in -- at that point in time it's your
9 testimony that he exposes his penis which is erect

10 A Correct.

11 Q -- and inserts it into your mouth.

12 A Correct.

13 Q And while he's doing this, he's telling you again on
14 how to beat the machine.

15 A Right.

16 Q And he's telling you to be calm and lay down and
17 whatever, don't let those alarms go off.

18 A Right.

19 Q Correct?

20 A Correct.

21 Q And you somehow under your version of events manage for
22 that to happen.

23 A Right.

24 Q You subconsciously were able to control you heart rate.

25 MS. McCONNELL: Objection.

1 THE WITNESS: I was in control

2 THE COURT: Hang on. Hang on.

3 THE WITNESS: I moved to sit back like he was
4 telling me.

5 THE COURT: Hang on. Hang on.

6 THE WITNESS: Just like this.

7 THE COURT: Ma'am, if I say "hang on" that means
8 stop talking.

9 THE WITNESS: Okay. I'm sorry. Uh-huh.

10 THE COURT: Overruled.

11 Q {By Mr. Adams) You may answer the question.

12 A I'm not laying all the way down. I'm laying to where
13 when stands up he's right here. So, you know, I -- it's
14 not -- I don't have to really just do too much, you know,
15 for the heart -- heart monitor to go off. But, you know, I
16 wasn't doing too much. And he knew to make sure of that and
17 that not -- I just did what he said because I had in my head
18 I didn't want to go down. I want to trust him, that my
19 charges are gonna be dropped in a month like he's telling
20 me. He said, Give it a month. We can corroborate.
21 Everything be gone. And that's that's what stuck in my
22 head. I didn't want to go down for drugs.

23 Q With all that in your head, everything that you just
24 told us, the question is very simple. You were
25 subconsciously able to control your heart rate and

1 everything else so no alarms went off at the nurses'
2 station; correct?

3 A Correct.

4 Q Okay. Now after that event happened it's your
5 testimony that after some more small talk, Officer Holtzclaw
6 without warning this time decides it would be a good idea to
7 put his fingers into your vagina; correct?

8 A Correct.

9 Q And that startled you.

10 A Yes.

11 Q But it startled you -- but then, again, you kept all
12 those other things going off in your mind and you were
13 somehow able to control your heart rate and everything else
14 that's hooked up to you so that the alarms do not go off at
15 the nurses' station; correct?

16 A Every time that he knew that it was going up he told me
17 to stay back. But when he did that I was already laying
18 down. I wasn't doing no moving or nothing.

19 Q So he took a big risk at that time by not prewarning
20 you; correct?

21 A Correct.

22 Q That's what you want the jury to believe?

23 A Correct.

24 Q And in any event the heart rate monitor, nothing goes
25 off and that's the end of any of the sexual allegations you

1 us back. And it took them that long to get me to a
2 courtroom and then I made agreement with him and I was able
3 to get out. I had already posted bond on those charges the
4 same day or the next day. But the city tickets that I had,
5 that wasn't holding me in there.

6 Q Okay. In any event, it's your testimony that there was
7 a delay of some sort of getting you out of jail on the 20th
8 and had rolled over until Christmas Day; correct?

9 A Right. Correct.

10 Q You're not alleging Officer Holtzclaw had anything to
11 do with that delay?

12 A No.

13 Q So after you get out of jail on Christmas Day, the
14 first time you hear from Officer Holtzclaw is the Facebook
15 message; correct?

16 A Correct.

17 Q Up until that point in time under your testimony you've
18 had these incidents happen at the hospital; correct?

19 A Correct.

20 Q And you've shared that information with Jenaye;
21 correct?

22 A Correct.

23 Q And she's your cousin that was in the truck with you at
24 the apartment complex; correct?

25 A Correct.

1 Q And you're sure about that.

2 A Correct.

3 Q That you shared all these awful things that Officer
4 Holtzclaw did to you at the hospital.

5 A Yes, I *did*.

6 Q Then the first thing that you testified to *is* that --
7 or the first time that you heard from Officer Holtzclaw, and
8 *it* appears from looking at this Facebook -- and I'm
9 referring to Number 117. And the date is very difficult to
10 read but *it* appears *it's* January the 8th. Very first
11 message is from you to Mr. -- to Officer Holtzclaw that I
12 can read here. It says: Damn, took you long enough. I've
13 been waiting. Laugh out loud. You *still* got my number;
14 right? That's the first

15 A Okay.

16 Q Huh? Is that -- would that be the first message?

17 A Yes.

18 Q And I'm accurately reading that; correct?

19 A Correct.

20 Q And Officer Holtzclaw asked you: Is this your sister's
21 account?

22 A Correct.

23 Q And we know the confusion there. You'd actually given
24 your sister's name to him and she actually has a Facebook
25 account. But he's asking is this you or is this your sister

1 or what; correct?

2 A Right. He also sent her a friend request too.

3 Q And then, again, on January the 8th you say, no, it's
4 mine, I'm the one that had my twin and -- how do you
5 pronounce her name?

6 A Sharmarreon.

7 Q Sharmarreon. And thanks for looking out for me that
8 night, LOL.

9 You're telling him thanks for looking out for you
10 that night. I'm assuming we're talking about the hospital
11 night.

12 A No, the tickets.

13 Q Okay. When you're telling him thanks for looking out
14 for me that night you're telling the tickets is --

15 A Yes.

16 Q -- what you're saying that you're -- under oath that's
17 your testimony here today.

18 A Yes, I was saying thank you because I was able to get
19 out without having to pay all that money for my tickets.

20 That's what I was telling him, thank him for looking out for
21 me because he did.

22 Q I was under the impression that you got stuck in the
23 county jail from the 20th after you posted bond until the
24 25th.

25 A Right.

1 Q Okay. But you -- why didn't you just say thanks for
2 taking care of my tickets?

3 A Because that's just how I said it, just like that.
4 Because he know what I was talking about. He know what he
5 did.

6 Q Well, he tells you, I can't tell the difference between
7 you and your sister. Obviously you guys are twins. You
8 staying out of trouble. You better be.

9 He's saying, you staying out of trouble, you
10 better be; right?

11 A Uh-huh.

12 Q Did that offend you in any way?

13 A No.

14 Q And then you tell him, hey, I lost -- I lost my phone.
15 Stopping by seeing what you been up to. That means you're
16 checking in on him; correct?

17 A Yeah.

18 Q And that's what you told Detective Gregory that means.
19 You're checking on Facebook to see what he's up to; right?

20 A Right.

21 Q And you're not alleging that you'd been over to his
22 house or he'd been over to your house at this point;
23 correct?

24 A Correct.

25 Q And then Officer Holtzclaw answers, just hanging out,

1 A Correct.

2 Q For not the charges that Officer Holtzclaw had you on
3 but on a different deal; correct?

4 A Correct.

5 Q And what happened was is when you talked to
6 Detective Gregory you went in there after seeing it on
7 Facebook on the news -- news clips that were posted on
8 Facebook; correct?

9 A Correct.

10 Q And when you saw that you knew that that individual
11 that was being accused of all these acts was the same
12 officer that took you to the hospital when you were ODing on
13 PCP; correct?

14 A Correct.

15 Q And that's when you went and talked to Detective
16 Gregory; correct?

17 A Correct.

18 Q And you certainly didn't feel like this was some sort
19 of get-out-of-jail-free card for you, did you?

20 A No.

21 Q Now -- now going back to December 25th of 2013, when
22 you did bond out of jail your mother picked you up; right?

23 A Yes.

24 Q Your mother's name is Latonya.

25 A Yes, sir.

1 still contacting people --

2 MS. McCONNELL: Objection

3 Q (By Mr. Adams) -- on Facebook

4 MS. McCONNELL: may we approach, your Honor?

5 Q (By Mr. Adams) -- that he's arrested.

6 THE COURT: Come on up.

7 (The following was had at the bench by
8 Court and counsel out of the hearing of
9 the jury.)

10 MS. McCONNELL: I object to him just reading in a
11 statement from the report. If he wants to ask her a
12 question and she testifies inconsistent with that, then
13 certainly he can impeach her.

14 THE COURT: You can ask a leading question. Don't
15 read from the

16 MR. ADAMS: Okay.

17 (The following continued within the
18 hearing of the jury.)

19 Q (By Mr. Adams) Do you recall on your videotaped
20 statement with Detective Gregory after the interview appears
21 to be over, that you stand up from the table and you raise
22 your hands and you say: Is that good evidence? Even if
23 Officer Holtzclaw didn't rape anyone he contacts them after
24 he arrests them on Facebook.

25 A I'm so disturbed by everything that's been happening, I

1 probably did say that. I -- I can't remember every single
2 thing. All I all I remember that I'm telling the truth
3 about is what happened in the hospital. And like I said
4 before, my memory isn't just as fresh as it was when I told
5 the stories at the beginning. It's been about two years
6 now. A lot have been -- a lot of stuff been going on in my
7 life since then. But all I remember is what he did do to
8 me.

9 Q Okay. Well, you say a lot of stuff in your life has
10 been going on. What has been going on is you had to report
11 to your probation officer down in the state of Texas;
12 correct?

13 MS. McCONNELL: Objection; relevance.

14 THE WITNESS: That's over with.

15 THE COURT: Hang on.

16 Come up.

17 (The following was had at the bench by
18 Court and counsel out of the hearing of
19 the jury.)

20 MS. McCONNELL: Judge, I don't understand how
21 whether she has to report to her probation officer or not
22 report to her probation officer is relevant. And I think it
23 comes kind of close to the ruling that this Court has
24 already made about him not going into the details of her
25 probation.

1 everybody else?

2 A Because I'm not like everybody else.

3 Q Now in regards to the -- you're saying that any of this
4 nefarious activity that supposedly Officer Holtzclaw had
5 with you was on the telephone; correct?

6 A Correct.

7 Q And that he would call you up and you would talk about
8 the sexual things you guys are gonna do; correct?

9 A Right. Correct.

10 Q Can you tell me why in the thousands and thousands of
11 pages of documents I've received from the Government in this
12 case I cannot find one single phone call to your phone
13 numbers except two five-second phone calls?

14 A I don't know because most of them was -- we only --
15 that -- that was how many times we talked on the phone was
16 two. The rest of them was text messages.

17 Q So in five seconds you're telling me that you had these
18 sexual interaction phone conversations with Officer
19 Holtzclaw?

20 A He was telling me, like, to come to his house and stuff
21 like that. Like, he -- I mean, his -- I mean, I don't know
22 what to tell you besides that's what happened. He was
23 texting me and we only talked on the phone probably two
24 times. But I wasn't thinking like to -- to screen shot the
25 shots at the moment of the text messages. I wish I had just

1 so you could believe me.

2 Q So it's your testimony here today that in the thousands
3 of documents we've reviewed the only two phone calls we have
4 are five seconds apiece that y'all -- that you and Officer
5 Holtzclaw talked about hooking up and doing sexual things?

6 A It was mainly text messages.

7 Q So it did appear on text messages?

8 A Yes, I mean, when he was telling me to come over and
9 for one, his intentions this whole time is to get sex out of
10 me.

11 THE COURT: All right. Just -- ask another
12 question.

13 Q (By Mr. Adams) Very simple question: It's your
14 testimony under oath here today that Officer Holtzclaw
15 invited you to his residence on more than one occasion.

16 A Yes.

17 Q I want you to tell the jury Officer Holtzclaw's
18 address.

19 A I'm not sure if he gave me the address, but I think he
20 was he told me it's in Edmond or close to Edmond, that
21 away.

22 Q How were you supposed to go to his house if you did not
23 have

24 A Because he --

25 Q Let me finish my question. I promise you I'll let you

1 finish your answer.

2 How are you supposed to go to his house if you
3 don't have his address?

4 A Because he was gonna tell me over the phone when I
5 was got ready. But I didn't ever want to go to his
6 house. So I never asked him for his address. He was -- I
7 was -- probably asked him, like, where do he stay. And he
8 wouldn't give me his address because he smart enough to not
9 send it in a text message.

10 Q So he invited you over to his house. However, he
11 refused to tell you where he lived. Is that what you're
12 telling this jury?

13 A He told me that it's close to Edmond or near Edmond or
14 somewhere. If -- if you know where he lived then you know
15 what I'm talking about.

16 Q So -- so are you telling this jury that what he wanted
17 you to do was circle the city limits of Edmond until you
18 figured out where he lived?

19 A Because by the time if I'd a been, like, okay --

20 Q That's not my question, Ms. Hill. It's very simple.

21 Are you telling this jury that he invited you
22 over, he wouldn't give you his address. So what you thought
23 you were supposed to do is circle the city limits of Edmond
24 until you somehow located where he lived?

25 A I wasn't worried about where he lived.

1 MS. McCONNELL: Objection; argumentative.

2 THE COURT: Overruled.

3 THE WITNESS: I wasn't tryna go to his address.

4 Q (By Mr. Adams) Did you so much as take a screen shot
5 of him inviting you over to his residence?

6 A No, I didn't.

7 Q Is there anything in the entire world that we can look
8 at to verify your statement that he ever invited you over to
9 his residence?

10 A I don't know how y'all do it, but if y'all looked in
11 one of those numbers that I gave y'all to see it, pulled up
12 a text messages, they woulda came about because I didn't
13 just make that up.

14 Q Which number can I subpoena today that is going to have
15 that information? Give me the number.

16 A It's one of those numbers. I mean, it's been two
17 years. It's been two years. I don't see why you would
18 think that I would know exactly which number when I'm always
19 switching numbers. I -- I didn't keep up with stuff.

20 Q Which begs the question, are you always switching your
21 numbers because of your occupation as a drug dealer?

22 A No.

23 MS. McCONNELL: Objection; asked and answered.

24 MR. ADAMS: Pass the witness.

25 THE COURT: All right. Last word, State?

1 A Yeah, Integris Southwest. I worked at Midwest Regional
2 and then I also worked at Norman Regional Health Systems.

3 Q All right. Generally when describing the emergency
4 room at Southwest Medical Center would you consider that to
5 be a high-volume emergency room?

6 A Yeah, every time I sit in any of their numbers they
7 have by far the most by any of the other employment I've
8 had.

9 Q Just lots of stuff going on there?

10 A A lot, yeah.

11 Q You said a moment ago -- you made distinction between I
12 think you said the trauma side and then the medical -- did
13 you say decision side?

14 A Decision unit, yeah. The MDU.

15 Q Can you explain what those two different things are?

16 A The trauma side is where anybody who would come in for
17 a broken ankle to abdominal pain or anything. They would
18 get assessed and treated on that side of it. And then if
19 the doctors feel like they can't -- they -- you don't meet
20 admission criteria or they don't feel like you're well
21 enough to go home to be discharged, they'll -- they send
22 them over to the medical decision unit to be observed for
23 however long they feel *is* necessary.

24 Q Does the medical decision unit there at Southwest
25 Medical Center, would that also include patients who need to

1 be observed before they're medically cleared to be released?

2 A Yes, very frequently.

3 Q Sir, in that regard do you recall if you were working
4 in that capacity as a registered nurse in the emergency room
5 at Southwest Medical Center back in December of 2013?

6 A I -- yeah, I remember it. I don't vividly remember it.

7 Q And let me try to understand because I'm anticipating
8 what you're saying. You know you were working that day;
9 correct?

10 A Yeah. Yeah.

11 Q And specifically on the 20th of December you know
12 that's the day we're talking about?

13 A Yeah.

14 Q 2013.

15 A Yes, sir.

16 Q As you sit here today do you have any independent
17 recollection of a young lady named Shardayreon Hill coming
18 in and being treated?

19 A Not specifically, no.

20 Q Have you had the opportunity however to at least
21 briefly go over the medical records that were created as a
22 result of her being in the hospital and the emergency room?

23 A Yes, I have.

24 Q And you're somewhat familiar then with the treatment
25 and your involvement; is that fair?

1 either in the emergency room under observation in the trauma
2 part or in the medical decision unit for observation total?

3 A From that I think it said six hours total she was --
4 from trauma and MDU combined.

5 Q Is that in your experience with these types of
6 situations somewhat standard routine?

7 A Yeah, normally.

8 Q During that six hours -- and let's assume that she was
9 in that trauma unit for an hour to hour and a half. So,
10 again, the four-and-a-half to five hours she might have been
11 back, typically, in the medical decision room is there a
12 medical staff walking in all the time checking on her
13 routinely or is it a different kind of setup?

14 A It's a little different setup. It's routinely in those
15 situations I'll, you know, go by and there is usually people
16 going by, you know, infrequently or frequently, just depends
17 because it's kind of a big circle. And since it's so close
18 sometimes it's easier to go through the MDU than it is to go
19 all the way back around depending on where everything is.

20 Q Specifically -- let me maybe ask a little better
21 question, more specific question. Specifically if someone
22 is just being in there for observation to make sure their
23 heart rate doesn't spike back up, would there be any reason
24 for you as a medical provider just to go check on her absent
25 some reason to go back there? That's what I'm asking.

1 A Yeah, I mean, it's -- it's in the protocol that we're
2 supposed to, you know, check on them every so often, but
3 unless -- you know, if I got several patients

4 Q Busy night?

5 A a busy night, I'm -- you know, unless something is
6 spiking the interest -- like, an elevated heart rate or a
7 monitor going off, you know, not much more than maybe a walk
8 by. But that's about it.

9 Q And so would it be possible in your experience in those
10 situations for a patient to be in that room without a
11 medical person going in for an extended period of time?

12 A Yeah. Sometimes, yeah.

13 Q It's possible?

14 A Yeah, possible.

15 Q All right. Then let's talk about what you just told me
16 about a spike or an alarm going off. What do you mean
17 whenever you say that? In other words -- and let's try to
18 be specific. With someone presenting like Ms. Hill was
19 presenting, what type of monitor would you put on a patient
20 like that?

21 A Normally with that because they're worried about the
22 heart rate so I put them on a five lead EKG and then set the
23 parameters within -- you know, it's -- right now they're set
24 at 120 to 50 at the hospital, but sometime they're a little
25 wonky. But I set them between 125 and, like, 75, 80.

1 Q And specifically you were taking care of Ms. Hill this
2 night, you just don't have an independent recollection of
3 it.

4 A No, I do not.

5 Q Okay. So if you would've been following your normal
6 practice, you would've set those parameters to go off if it
7 would've gone above 125 --

8 A Yeah.

9 Q -- so an alarm would've sounded?

10 A Yeah, and then -- and if it, you know, stays elevated
11 and you'd look at how everything going, at least, you know,
12 you got to go in there and see to make sure there's anything
13 else you need to do.

14 Q Why do you pick 125 and not something just above your
15 normal resting heart rate? I think you said normal could be
16 anything -- anything below a hundred; right?

17 A Yeah.

18 Q Is what you said. So tell me why you pick 125. Why is
19 that your cut-off personally?

20 A Personally because it's -- it's really odd because
21 people can get really upset and get in the one-teens, 130s
22 and then, you know, be in the 122 range. And, you know,
23 people with -- with something like that they can easily stay
24 at 120 for an hour or so depending on, you know, if they --
25 you know, if it went that way or not.

1 county jail, at some point did you bond her out?

2 A Yes.

3 Q And when was that?

4 A I believe *it* was immediately after -- when she made *it*
5 to jail.

6 Q What time was she let out of the county jail's custody?

7 A I don't -- *it* wasn't that night -- same night.

8 Q Does sometime around Christmas of 2013 sound roughly
9 familiar?

10 A Yes.

11 Q And when -- did she go home where she resided with you
12 after she got out roughly around Christmas?

13 A Yes.

14 Q And did she disclose to you more things about who she
15 identified as her friend, Mr. Officer?

16 A Yes, ma'am.

17 MR. ADAMS: Judge, object to the form of the
18 question.

19 THE COURT: Overruled.

20 Q (By Ms. McConnell) What did you say, ma'am?

21 A Yes, ma'am.

22 Q And what time -- was that immediately after she was
23 released from the county jail's custody?

24 A Yes, as soon as she came in the house she started
25 telling me.

1 to ask the questions and her to answer specifically on the
2 very specific issues that the 2801(B) (1) (b) is concerning;
3 the prior consistent statements. Specifically of that but
4 not about everything that she said that night.

5 MS. McCONNELL: Yes, Judge.

6 THE COURT: Your objection is noted.

7 MR. ADAMS: You do note my objection?

8 THE COURT: Noted objection.

9 MR. ADAMS: Thank you.

10 (The following continued within the
11 hearing of the jury.)

12 THE COURT: Ms. McConnell, specifically as we
13 discussed as to your questions as the Court has relayed in
14 its order.

15 MS. McCONNELL: Yes, your Honor.

16 Q (By Ms. McConnell) Ms. James, specifically whenever
17 Shardayreon Hill bonded out and was released from the county
18 jail and was telling you about this person that she's
19 identified as Mr. Officer, did she tell you information
20 about whether this officer had made her perform oral sex?

21 A Yes.

22 Q And specifically on that, what did she tell you?

23 A She said that he had stuck his fingers in her and then
24 he had her to do oral sex on him.

25 Q That he made her perform oral sex on him?

1 A Yes.

2 Q Did Ms. Hill during this time tell you about a
3 statement that this Mr. Officer had told her while she was
4 performing oral sex on him?

5 A Yes.

6 Q And what statement was that?

7 A He had told her if she cooperates that he would get her
8 charge thrown out in 30 days.

9 Q And I think you had started to tell me this, ma'am, but
10 did Ms. Hill tell you anything specifically about whether
11 this male officer had penetrated her vagina with his
12 fingers?

13 A Yes.

14 Q What did she tell you?

15 A She said he stuck his fingers in her and was telling
16 her that he didn't -- he could just fuck the shit out of
17 her.

18 Q And did Ms. Hill tell you whether this male officer had
19 ever touched her breasts or commented about her breasts?

20 A Yes.

21 Q What did she tell you?

22 A She said that she was handcuffed to the bed and she was
23 coughing and stuff and kind of leaning over -- over the bed,
24 over a little bit. And he came over there and kind of
25 cropped up her chest and helped lean her back. And she said

1 Q And she told you that there was a deal in effect that
2 Officer Holtzclaw was going to take care of her charges
3 within the next 30 days; correct?

4 A Yes.

5 Q You know that in fact that never happened, Officer
6 Holtzclaw never did anything to help her out on her charges;
7 correct?

8 A We -- we didn't -- we didn't have a chance to see. She
9 got locked up on probation violation in Texas. So we
10 couldn't see if he was gonna clear the case or not.

11 Q You would agree with me that Officer Holtzclaw never
12 did anything in regards to helping your daughter out with
13 her current case; correct?

14 A Yes, he did. He helped her -- he hid her tickets. She
15 had tickets when I bonded her out and they was gone. I
16 didn't have to pay for them when she got out. So that was
17 what was told to me over the phone and that was what was
18 done.

19 Q If he hid her tickets how do we know about her tickets
20 if they're hidden? How do you hide a ticket?

21 A I don't know how he did it. I don't know how he did
22 it.

23 Q Do you know what the process is to get checked in at
24 the Oklahoma County Jail?

25 A No, I -- I don't know all about that. I haven't been

1 in trouble in a long time.

2 Q You just made the statement that he had hid her tickets
3 and I want to

4 A I guess he had -- I don't know.

5 THE COURT: Hang on. Hang on. Hang on.

6 Mr. Adams, go ahead and ask your question. Ma'am, don't try
7 to answer until he's completely

8 THE WITNESS: Okay.

9 THE COURT: -- done and I'll make sure he doesn't
10 ask another question before your completed answer.

11 THE WITNESS: Okay.

12 Q (By Mr. Adams) Tell the jury how Officer Holtzclaw hid
13 your daughter's tickets.

14 A I don't know. That's just what my daughter told me on
15 the phone that he was gonna hide her tickets when I bonded
16 her out. And when I bond her out I paid just her bond and
17 no tickets. I don't know. I don't do -- I don't I don't
18 know how he did it. That's something you would have to ask
19 him.

20 Q Are those the tickets that she currently today has
21 warrants out on her for her arrest?

22 A I believe so.

23 Q And are you aware that she also has an arrest warrant
24 out for her down in Cleveland County on a felony case?

25 MS. McCONNELL: Objection; relevance.

1 Q (By Ms. McConnell) Would it cause alarm to you that an
2 officer wasn't doing his job if that happened?

3 A Not necessarily to me. I would just find it.

4 MS. McCONNELL: May I have a brief moment, your
5 Honor?

6 I'll pass the witness.

7 THE COURT: All right. Particularly, Mr. Adams on
8 those last questions.

9 RECROSS-EXAMINATION

10 BY MR. ADAMS:

11 Q In regards to an alarm, it is -- my point is this: It
12 is not unusual at all and it happens every single day here
13 in Oklahoma County where a patrol officer arrests an
14 individual for felony offenses, books them into your jail
15 into the Oklahoma County Jail on the felony offenses,
16 doesn't list any city tickets. That's your whole job that
17 you then check them out; you find out that they have city
18 warrants and you add it to the charges; correct?

19 A That's correct.

20 Q It happens every single day as we sit here; correct?

21 A It does happen daily, yes.

22 MR. ADAMS: Okay. Pass the witness.

23 THE COURT: Last word, Ms. McConnell?

24 MS. McCONNELL: No, your Honor.

25 THE COURT: All right. Thank you, ma'am. You can

1 Shardayreon Hill and Daniel Holtzclaw were there?

2 A Approximately 117.

3 Q And during what dates did those take place?

4 A January 8th, 2014, to the early part of March.

5 Q This jury has heard testimony, as have you, Detective
6 Gregory, of the circumstances of the arrest of Shardayreon
7 Hill.

8 A Yes.

9 Q Would Daniel Holtzclaw be a witness in Shardayreon's
10 criminal case?

11 A That's correct.

12 Q During the time frame, January 8th through March 3rd,
13 that those 117 text messages were sent, was Shardayreon
14 Hill's criminal case pending?

15 A Yes.

16 Q Can you think of any reason why an officer who was a
17 witness in a criminal case would send 117 text messages back
18 and forth to the individual they arrested?

19 A Absolutely not.

20 MR. ADAMS: Judge, I would object to the
21 hypothetical.

22 THE COURT: Overruled, you can answer.

23 THE WITNESS: Absolutely not.

24 Q (By Ms. McConnell) Why not?

25 A Just even besides policy saying that we --

1 jury where she said that she does not recall Officer
2 Holtzclaw ever being out of her eyesight on December the
3 20th of 2013 while she's at Southwest Medical?

4 A Correct, she did not recall.

5 Q Okay. But you do agree with me that during this event
6 while she's being treated for overdosing and everything that
7 Officer Holtzclaw does go and assist another officer with
8 another prisoner who's escaped Southwest Medical.

9 A Yes, he did.

10 Q Okay. In fact you've introduced a picture of that and
11 I think that's 115.

12 MR. ADAMS: May I approach, your Honor?

13 THE COURT: Yes.

14 Q (By Mr. Adams) I'm putting up on the viewer there
15 Exhibit 115. This is a photograph that you've testified and
16 that's been introduced you testified that you received
17 from Southwest Medical of a still photograph from a video;
18 correct?

19 A Yes.

20 Q And you said this is after the event happens after the
21 individual's caught; correct?

22 A That's -- that was what I was informed, yes.

23 Q Okay. Who informed you of that?

24 A The safety director, ex-police officer Byron Boshell.

25 Q And Byron Boshell, was he present when this was taken

1 Q (By Mr. Adams) Okay. This is stepping out of
2 Ms. Hill's room looking to the left.

3 A Yes.

4 Q Okay. You would agree with me this is a nurses'
5 station.

6 A Yes.

7 Q That's where a nurse sits and where alarm bells and
8 things happen if anyone goes into distress; correct?

9 A That's -- it can be set up that -- it's not set up like
10 that all the time from what I've understood.

11 Q Well, tell the jury about what efforts you made to
12 determine who was sitting here on December the 20th of 2013
13 while Ms. Hill was in this room.

14 A As far as what I found out, no one.

15 Q You found out that no one was sitting there?

16 A Well, I couldn't -- I didn't find anyone that said that
17 they were sitting there.

18 Q Because you never asked anyone, did you?

19 A Yes, I did.

20 Q Okay. I want you to show me in the thousands of
21 reports that I have in this case where you've asked anyone
22 in the world who was sitting here on December the 20th of
23 2013. Just -- just refer me wherever it is. I want to see
24 it.

25 A Conversations with Jamie Hong, the nurse. The other

1 nurse who also said he only checked on her one to two hours.

2 Q I'm trying not to play games here and I'm trying
3 this is a very serious matter; would you agree with me?

4 A I agree.

5 Q Okay. Then I want you to tell me out of thousands and
6 thousands of pages of documents and reports that I have in
7 this case where you simply ever asked anyone in the entire
8 world who was stationed here on December the 20th of 2014.
9 Can you point me to anything?

10 A Right now I can't, but I verified it.

11 Q And you nod and you say you verified. Is that just --
12 we're supposed to take your word at this?

13 A That's what I'm saying under oath.

14 Q Okay. Well, then under oath if no one was here under
15 your scenario -- so when we go back and subpoena the records
16 you're telling this jury that there will be no one who was
17 placed here on December the 20th of 2013, under oath;
18 correct?

19 A Under oath, I found no one -- no one that was there
20 that night.

21 Q And you asked that question.

22 A I asked that question.

23 Q And you asked it of?

24 A I asked it of the nurses that were there.

25 Q The nurses whose reports that I have?

1 A Yes, anybody that I talked to. Even ex-captain Byron
2 Boshell.

3 Q You would agree with me that in all the reports that I
4 have of all the staff members at Southwest Medical Center
5 there's not one single individual in one single report that
6 ever tells you anything about that nurses' station and no
7 one being there?

8 A Going back to the reports?

9 Q Yes.

10 A That's correct.

11 Q That would be significant would it not, if someone was
12 stationed out there?

13 A That's correct.

14 Q Now after Ms. Hill says these events happened and she
15 tells you that -- actually what happens is they spend
16 about -- Officer Holtzclaw and Ms. Hill are together for
17 about six hours; correct?

18 A Yes, sounds right.

19 Q From the time of the incident at the apartment complex
20 to the hospital to while he's transporting her down to the
21 county jail we've got about six hours.

22 A Yes, that sounds right.

23 Q During that six hours would it not be normal for a
24 cop -- for a police officer to make small talk with an
25 individual?

1 guilty of the crime of forcible sodomy.

2 Count 18, procuring lewd exhibition. Defendant is
3 not guilty of the crime of procuring lewd exhibition.

4 Count 19, procuring lewd exhibition. Defendant is
5 not guilty of the crime of procuring lewd exhibition.

6 Count 20, rape in the first degree. Defendant is
7 not guilty of the crime of rape in the first degree.

8 Count 21, sexual battery. Defendant is not guilty
9 of the crime of sexual battery.

10 Count 22, sexual battery. Defendant is not guilty
11 of the crime of sexual battery.

12 Count 23, sexual battery. Defendant is not guilty
13 of the crime of sexual battery.

14 Count 24, forcible oral sodomy. Defendant is not
15 guilty of the crime of forcible oral sodomy.

16 Count 25, rape in the second degree by
17 instrumentation. Defendant is not guilty of the crime of
18 rape in the second degree.

19 Count 26, indecent exposure. Defendant is not
20 guilty of the crime of indecent exposure.

21 Count 27, forcible oral sodomy. Defendant is
22 guilty of the crime of forcible oral sodomy and punishment
23 is set at 16 years.

24 Count 28, rape in the first degree. Defendant is
25 guilty of the crime of rape in the first degree and