

1 THE COURT: All right. Come up.

2 (The following was had at the bench by
3 Court and counsel out of the hearing of
4 the jury.)

5 MR. GIEGER: I expect tomorrow morning we'll get
6 to playing the video. Detective Davis and I -- we haven't
7 had our Jackson/Denno. We have that video and I want to
8 make sure that we get everything covered. Supplement number
9 10 in this. Before they take Mr. Holtzclaw downtown and
10 Mirandize him, in the videotape is Detective Davis and he
11 have a brief conversation at the Springlake station with the
12 defendant. And the defendant there admits that he made the
13 traffic stop as well. And so we may -- I'll point it out to
14 you again, but it's in supplement number 10 and he says it
15 in here. Detective Davis will say that he acknowledged he
16 made the traffic stop at the Springlake station before they
17 went downtown. So we may need to have a Jackson/Denno as to
18 that statement as well.

19 THE COURT: But there's no recording on that?

20 MR. GIEGER: There's no recording of that one,
21 your Honor. So I don't know if you want to have us come
22 early or them come a little bit late but we need to probably
23 make that record before we start.

24 MR. ADAMS: So are you saying we are going to do
25 the Jackson hearing in the morning?

1 A We didn't say anything about this case. We just kind
2 of tried to make small talk and make him feel comfortable.
3 I do remember I asked, like, who he ate dinner with, who did
4 he hang out with on his shift; just stuff like that. Just
5 trying to make him feel comfortable.

6 Q And was that by design? Were you trying -- were you
7 intentionally trying to make him feel comfortable?

8 A Yes.

9 Q And were you intentionally not asking him questions
10 about the traffic stop at 50th and Lincoln at that time?

11 A Yes.

12 Q And why were you intentionally not wanting to bring up
13 that subject?

14 A Because I hadn't read him his rights and it -- I didn't
15 have any way to document his responses.

16 Q Did you want to record whatever he said in regard -- in
17 that regard?

18 A Yes.

19 Q All right. Did you go directly from the Springlake
20 station to the Oklahoma City Police Department headquarters?

21 A Yes.

22 Q Do you have an estimate as to how long that trip took?

23 A I'm going to guess 20 minutes.

24 Q At any time during that trip did he say: You know
25 what, I really don't want to talk to you guys, maybe I need

1 Q Why did you take him downtown instead of just talking
2 to him there at the briefing station?

3 A Because we have interview rooms downtown that are
4 videorecorded.

5 Q And I think you may have -- you may have said -- if you
6 didn't, I apologize -- you wanted him to be recorded if you
7 were going to talk about it any further?

8 A Correct.

9 Q And why?

10 A Because I needed to be able to look -- that's a tool
11 for me to be able to look back and see what exactly I asked,
12 what exactly he answered. I needed it recorded that I read
13 him his Miranda, that I was being fair.

14 Q To both sides?

15 A Correct.

16 Q In case he said something that helped you and to
17 document what he said for whatever reason it might be
18 helpful for either side?

19 A Correct.

20 Q Did you place him under arrest at this time?

21 A No.

22 Q Why not?

23 A I hadn't proved that he'd done anything. I hadn't
24 disproved that he'd done anything. I just wanted to talk to
25 him.

1 Q And the interview lasts approximately two hours, give
2 or take a little bit; correct?

3 A Correct.

4 Q And actually -- and Officer Holtzclaw at that point in
5 time had been told by his captain that they want to question
6 you about some stop at 50th and Lincoln?

7 A That's what he said. I didn't know that from the
8 captain, yes.

9 Q And you came to learn that to be true.

10 A Yes.

11 Q Okay. So Officer Holtzclaw when he's sitting in the
12 room the very first conversation that comes up is something
13 about masturbation.

14 A Yes.

15 Q And you think that's going to make him feel at ease or
16 relaxed.

17 A Well, I mean, we -- we try to make him feel as relaxed
18 as we can.

19 Q I'm asking you as a seasoned trained detective bringing
20 in a fellow officer, sitting him in a room with two sex
21 crimes detectives, you think it's going to make him relaxed
22 and feel calm by talking about jacking off?

23 A Sure.

24 Q Okay. And then there's even some discussions whether
25 people are right- or left-handed and things of that nature.

1 question, like, I'm here to see if there's anything you need
2 to talk to me about or anything like that? Or however. Why
3 did you choose to approach it that way?

4 A It's such an odd question, I didn't want to lead her
5 into -- I didn't bring up Officer Holtzclaw's name, anything
6 like that. My whole thing -- Detective Davis and I's whole
7 thing was trying to make sure we had truthful victims,
8 victims that we didn't feel like that was lying. So we just
9 kind of put it very vaguely to them, or like I did with
10 Tabitha, to see if -- what their response would be. And we
11 just kind of worked from there. Also kind of to just kind
12 of gauge a little bit on whether, you know whether
13 they'll tell me the truth really.

14 Q Eventually were you able to obtain information that was
15 relevant in the investigation essentially consistent with
16 what Ms. Barnes testified to today?

17 A Yes, I believe so.

18 Q Okay. After you received her allegations that
19 something inappropriate had happened, what did you then do
20 in your investigation to try to determine or not if that's
21 accurate information?

22 A Went back to verify. Once she let me know if she was
23 sexually assaulted by -- by an officer she kind of gave me a
24 rough estimate of the time she could remember, best she
25 could recollect. I went back, verified. She kind of

1 gentleman sitting here at the end of the table; correct?

2 A Uh-huh. Yes.

3 Q And he arrived at your mother's house.

4 A Yes.

5 Q Did you know he'd been looking for you?

6 A No.

7 Q For quite some time?

8 A No.

9 Q Okay. Why -- why did he know to find you -- how did he
10 know to find you at your mother's house?

11 A Well, a lot of times I use my mother's address.

12 Q Okay. But that's not where your driver's license is
13 listed, is it?

14 A No, it was at my old -- my apartment address.

15 Q Do you know whether or not he'd been attempting to
16 leave messages for you?

17 A Not that I know of.

18 Q Okay. But you would agree with me that when you first
19 came into contact with Detective Gregory you had not -- not
20 only talked to anyone from Oklahoma City police officer
21 or an officer, but you had not reported a crime of any kind;
22 correct? Against you.

23 A Against me, no.

24 Q Okay. Now what happens is is you first talk to
25 Detective Gregory and at the beginning you don't have a clue

1 MR. ADAMS: Thank you, your Honor.

2 Q (By Mr. Adams) Ms. Raines, before we took this lengthy
3 break you had an opportunity with those headphones to listen
4 to something that you recognize as your voice and Detective
5 Gregory's; correct?

6 A Yes.

7 Q And, again, I believe you testified that no way, shape,
8 or form to your knowledge has that audio been manipulated in
9 any way.

10 A Correct.

11 Q All right. Now that you've had an opportunity to
12 listen to that would you agree with me that when the
13 conversation is started apparently you and Detective Gregory
14 had had some phone call.

15 A What do you mean had some --

16 Q This prior to this face-to-face interview between
17 you and Detective Gregory on August of '14, apparently from
18 listening to the tape, you and Detective Gregory had
19 previously talked on the telephone; do you recall anything
20 like that?

21 A No. No, I don't.

22 Q Well, then do you recall on the -- on the portion of
23 the tape that you did listen to, did Detective Gregory ask
24 you had you ever shown -- been -- exposed yourself to an
25 Oklahoma City police officer and you answered no?

1 A Right.

2 Q And he asked you several questions in that regard, five
3 to be exact, where he was questioning you whether or not
4 you'd exposed yourself, whether or not you'd been touched
5 inappropriately, anything like that, by an officer. And
6 each and every time you said no.

7 A Right.

8 Q Then after Detective Gregory, you -- you're questioning
9 him and you're asking him: Well, how did you even get my
10 name?

11 A Right.

12 Q And Detective Gregory then goes through and explains to
13 you that he's dealing with what he terms and his words were
14 a very bad guy; do you recall that?

15 A Yes.

16 Q Is that a yes?

17 A Uh-huh.

18 Q And then he also tells you that he has a lot of
19 victims.

20 A Uh-huh.

21 THE COURT: Ma'am, you need to answer verbally.

22 THE WITNESS: Yes. Okay.

23 Q (By Mr. Adams) Then up until this point in time you
24 haven't said that anything had happened between you and
25 Officer Holtzclaw; correct?

1 A Right.

2 Q Then you start talking about in generalities things
3 that

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

6 I'm sorry, Mr. Adams, for interrupting your
7 question.

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

11 MS. McCONNELL: Judge, I've already withdrawn my
12 objection in playing the video. I don't really see the
13 point of him going through little items in the interview and
14 not even asking, like, why she said that. He's just asking
15 if they occurred and I'm assuming the jury is fixing to hear
16 so it's kind of pointless to ask these questions.

17 MR. ADAMS: I'm simply asking her independent
18 knowledge of what -- what -- during her interview with
19 Detective Gregory, what was said. I guess fair game for
20 cross-examination.

21 THE COURT: Well, it is but why don't you kind of
22 get to the real point you want to get to and then we'll play
23 the tape.

24 (The following continued within the
25 hearing of the jury.)

1 Q (By Mr. Adams) After you said no approximately five
2 times and Detective Gregory told you that he's investigating
3 a really bad guy and he has lots of victims, and you talk in
4 generalities about the neighborhood, for the first time you
5 start talking about an interaction you had at 16th and
6 Fonshill with an officer; correct?

7 A Yes.

8 Q And you talk about it in -- and in those discussions
9 you admit that at no time did this officer -- and, again,
10 you don't know his name; correct?

11 A Correct.

12 Q You didn't know that it was Officer Holtzclaw that they
13 were alluding to. And in fact you had actually told
14 Detective Gregory that you'd only come into contact with one
15 officer in the last year; right?

16 A Right.

17 Q So you knew exactly which officer they were talking
18 about; correct?

19 A I didn't know that it was him. But I knew -- he
20 just -- I just gave him a description of who the officer was
21 that I raised my shirt up.

22 Q Okay. But during that entire conversation you admitted
23 that at no time did Officer Holtzclaw ever ask you to expose
24 yourself to him.

25 A Did I admit that?

1 like there had been something but she didn't quite want to
2 say. So I asked if I could come to her residence at that
3 time and she agreed to meet me.

4 Q Did prior to your interview that we've just listened
5 to with Ms. Raines did the two of you just have that one
6 phone call?

7 A Yeah, it was very short lived. It wasn't very long.
8 That's correct.

9 Q Did you give her any specific information regarding
10 dates or locations that you thought that an assault might
11 have occurred at --

12 A No.

13 Q -- in that phone interview?

14 A No.

15 Q During the interview that we've listened to there was
16 kind of some noise prior to whenever you actually started
17 speaking with Ms. Raines; did you hear that?

18 A The locusts?

19 Q Sure. Sure. But did you and Ms. Raines talk at all
20 prior to you recording that in-person interview?

21 A No, I mean, we just -- we talked very briefly just on
22 the phone and that was it.

23 Q So whenever we hear you greeting Ms. Raines that is in
24 fact the first face-to-face contact you had with her?

25 A That's correct.

1 MS. McCONNELL: Pass the witness.

2 THE COURT: All right.

3 CROSS-EXAMINATION

4 BY MR. ADAMS:

5 Q Detective Gregory, you would agree with me that you're
6 trained not only as a detective but as a police officer with
7 regards to writing reports.

8 A Yes.

9 Q And it's very important to be truthful and accurate but
10 to give both sides of the story that you're hearing from an
11 individual witness; correct?

12 A Yes.

13 Q And you know that eventually what happens is those
14 reports are turned over to members of the accused or the
15 other side that you're on and they rely upon those for their
16 truthfulness and accuracy; correct?

17 A Yes.

18 Q Whenever you had an opportunity to talk to Ms. Raines
19 you had a phone conversation with her that was not recorded;
20 is that a fair statement?

21 A That's correct.

22 Q And then the second conversation which has been
23 admitted into evidence is the audio conversation you had at
24 her mother's house with Ms. Raines; correct?

25 A That's correct.

1 happened, and she continually tells you no.

2 A She -- she did tell me no in the beginning. She also
3 let me know, as you heard, that she couldn't talk in front
4 of her mother. She didn't want her knowing.

5 Q Okay. So but you would agree -- even if her
6 mother's there or not, that -- none of these noes are
7 mentioned anywhere in your report, are they?

8 A No.

9 Q And in fact what happens is she doesn't even begin to
10 even come close to talking about anything that happened
11 that allegedly happened back in March of '14 until you tell
12 her you're investigating a bad guy.

13 A Right. Again, that's just kind of the vague questions
14 and letting her know some information without laying it all
15 out there for her.

16 Q Then you went on, she still didn't disclose any
17 information. You told her that you had a lot of victims.

18 A Correct.

19 Q Then you went on and told her, well, this is how we got
20 your name was this short -- it's a list. A short list.

21 A I don't remember if I said the short list, but I did
22 mention the list.

23 Q And you told her that -- that no one was coming to you,
24 you were having to go to them, making her trying to make
25 her feel like it was going to be okay to say something;

1 right?

2 A Yes, make her feel comfortable.

3 Q And then after that she talks in an abstract term about
4 other things that are going on in the neighborhood; correct?

5 A Yes.

6 Q Then eventually as you continued to question her and
7 question her then she starts talking about being over at
8 16th and Fonshill; correct? And -- and her run-in with
9 Officer Holtzclaw?

10 A I didn't think she took that long. But once she kind
11 of started feeling comfortable she did jump into it.

12 Q Well, let me back up. Why at this point have you not
13 documented anywhere in your report that not only has she
14 said no to five different occasions to where you asked her
15 if she's been sexually assaulted, exposed or made to do
16 anything inappropriate and she tells you no, why is that not
17 documented in anywhere in your report?

18 A The report is -- the report is a synopsis.

19 Q So from now on I need to look at reports as just being
20 a synopsis that you intentionally leave things out?

21 A A synopsis is just to kind of give you an overview of
22 what we -- what we have. I mean, obviously we had the
23 recording. Try to record everything.

24 Q I thought you just testified that you've been to school
25 and you knew how important it was to be accurate and

1 A Yes.

2 Q Okay. Now there's also 395 names of alleged victims on
3 the list; correct?

4 A I don't know about this specific list you're talking
5 about.

6 Q Do you recall contacting approximately 22 people -- 22
7 people, and 22 females that Officer Holtzclaw had either run
8 on CIU or Varuna and you went and talked to them and they
9 said nothing happened?

10 A Yeah, easily that many.

11 Q Okay. Well, did you record all those?

12 A If they said they they weren't assaulted, no. We
13 had a list of, like, I know around 33 women that said that
14 nothing happened.

15 Q Okay. You have a list of 33 women that said nothing
16 happened; correct?

17 A That's correct.

18 Q And you didn't record any of those conversations;
19 correct?

20 A Don't believe so, no.

21 Q Okay. Well, did any of them say something did happen?

22 A No, not on the ones that denied anything happened.

23 Q Okay. And there had been some women who claimed things
24 happened that you could absolutely 100 percent verify didn't
25 happen; correct?

1 A It's possible. I talked to lot of women.

2 Q Well, whenever you interviewed [REDACTED] [REDACTED] and she
3 denied anything inappropriate ever happened between her and
4 Officer Holtzclaw during his stop, certainly you made a
5 report on this particular day, you met Ms. [REDACTED] at
6 this particular location, these particular people were
7 present and she denied anything inappropriate happened and
8 I'll find a report to that effect?

9 A I don't believe so. It's probably on that Word
10 document list that I just

11 Q So you didn't make a report is what you're saying.

12 A No.

13 Q Okay. And so you wouldn't made a report on [REDACTED] [REDACTED]
14 either.

15 A These names I'm not recalling.

16 Q Are you not recalling because they simply said that
17 absolutely nothing happened?

18 A Yes.

19 Q Did you tell them while you were interviewing them when
20 they denied anything happened did you tell them that Officer
21 Holtzclaw's really a bad guy?

22 A I don't recall.

23 Q Well, you didn't record it so I don't have anything to
24 compare it to. So I'm asking you, did you tell them that
25 he's really a bad guy?

1 A I could've.

2 Q Okay. And then did you tell them that you also possess
3 this list that's rather lengthy of women that he allegedly
4 did assault? Did you tell them that?

5 A Everything that I did with the 13 alleged victims I did
6 with all of them. It's very vague and I was just trying to
7 get the truth.

8 Q So my question is this: So whenever they would tell
9 you nothing happened, we know you didn't make a report;
10 correct?

11 A Yes.

12 Q So -- and we know you didn't record it; correct?

13 A That's correct.

14 Q So how am I supposed to go back and verify anything
15 that you're saying here today?

16 A You're more than welcome to go talk to the women. They
17 denied anything happened.

18 Q So is that the way -- but when they denied it happened
19 did you tell them, again, that Officer Holtzclaw's a bad guy
20 and you've got a long list?

21 A I could've.

22 Q And it just wouldn't break them. They wouldn't come
23 forward with anything, is that what you're saying?

24 A I wasn't trying to break them.

25 Q Okay. They weren't saying what you wanted to hear.

1 Q Did you require your detectives underneath your command
2 to audiotape all of the interviews they conducted, including
3 the ones where people said nothing happened?

4 A No, the only ones that we recorded were the ones that
5 we were -- the people that said something actually happened
6 and that was directed by command.

7 Q So it would be a fair statement to say that you
8 intentionally excluded anyone that said it did -- nothing
9 happened?

10 A We didn't spend time on something that

11 Q My question's very simple, Lieutenant. Is it fair to
12 say that you excluded anyone that said nothing happened?

13 A That'd be correct.

14 Q Now you went on and told your detectives that you
15 wanted them to interview people on the list that you
16 started; correct?

17 A On the list that I -- on the packet that I handed them,
18 yes.

19 Q But, again, in your narrative you call it a list;
20 correct?

21 A Originally, yes, that -- I would've had to have a list
22 to get my names, yes.

23 Q Now you also testified that you were over the sex
24 offender registration unit; correct?

25 A Yes.

1 sworn, and testified as follows:

2 DIRECT EXAMINATION

3 BY MR. GIEGER:

4 Q Detective, in regards to these multiple questions about
5 this CIU list versus the Unit 800 list, I want to ask you,
6 ma'am, were you ever given that handwritten list by
7 Detective (sic) Muzny that he made as he went through the
8 individuals?

9 A No.

10 Q Do you know if Detective Gregory was ever given that
11 handwritten list?

12 A He was not.

13 Q But nevertheless, however they were identified -- and
14 did he -- did Detective Muzny give you names of individuals
15 then you would go contact?

16 A Yes.

17 Q And, ma'am, of the individuals that you contacted that
18 said either -- and I don't want -- I'll paraphrase. Nothing
19 happened to me, I don't know anything; were there a group of
20 women who said that to you?

21 A Yes.

22 Q And I think it's -- did you actually document it in a
23 formal police report that you made contact with this person
24 and this person said: No, I don't know anything?

25 A No.

1 Q Why did you not do anything?

2 A Because it -- police reports are for crimes that occur.
3 It's called a crime incident report. If they weren't
4 assaulted then no crime occurred and so there's no crime
5 incident report that needs to be made.

6 Q But in this case, ma'am, even though you didn't make an
7 official police report, did you in fact compile a list of
8 the women that were contacted either by you or Detective
9 Gregory in this investigation who said just that: No, I
10 don't know anything or, no, nothing happened to me?

11 A Yes.

12 Q And is it your understanding that that list was in fact
13 provided to the defense in this case?

14 A Yes.

15 MR. ADAMS: Judge, again, I would object to the
16 form. It's all leading.

17 THE COURT: Do you know?

18 THE WITNESS: Yes, I do know.

19 THE COURT: Okay. You can answer.

20 THE WITNESS: Yes.

21 Q (By Mr. Gieger) So that information as far as you know
22 was not hidden, it was not trying to be unfair, in fact
23 let me rephrase.

24 MR. GIEGER: That was leading; I apologize, your
25 Honor.

1 happened. So I felt like it was -- I didn't know if we had
2 a serial rapist or what was going on, so I felt like it was
3 in the best interest of public health that I go and talk to
4 Terri again.

5 Q Whenever you make contact with Terri Morris the second
6 time in June 24th, 2014, was it equally hard to find her as
7 it was the first time?

8 A Yes.

9 Q And did you use the same method generally?

10 A The exact same method.

11 Q Whenever you find her is she at the police department
12 on that second date?

13 A She is not. The informant advised the officers where
14 she was. She was walking around Northeast 21st and Kelley
15 area. They detained her. I went over there. I approached
16 her at that time.

17 Q Okay. And so you spoke with her out in the field?

18 A Yes, I did.

19 Q This time did Terri Morris cooperate more with you?

20 A Yes, just as soon as Terri saw me her first words out
21 of her mouth was: He did it again, didn't he? And I told
22 her -- I said: It's possible. And so I told her I really
23 want to talk with you and -- and try to get more
24 information. She she said she'd talk with me.

25 MR. ADAMS: Your Honor, I would object at this

1 Q And you recorded that conversation; correct?

2 A When I first met her I didn't. I just had introduced
3 myself and -- sorry. When I approached her we had a small
4 conversation. Then she told me she wanted to talk with me.
5 And that's when we went over and, yes, it was at that point
6 when we sat down I did record.

7 Q Okay. But you had not received any information from
8 any third parties at that point in time as of 7/10 of 2014
9 that Ms. Morris was actually really wanting to talk to you,
10 had you?

11 A That's correct.

12 Q You're agreeing with me in that regard?

13 A Yes.

14 Q Okay. So then what happens is -- is that actually the
15 recording device doesn't start until you're already into the
16 interview; correct?

17 A Yes.

18 Q I mean, I believe that the recording device starts with
19 Ms. Morris saying: 2014 and he gave me my crack pipe back.
20 That's how the whole interview that we have that has been
21 recorded starts; correct?

22 A That -- that sounds right.

23 Q Okay. So she clearly is already into some conversation
24 with you of some kind. Do you know how long the
25 conversation was with Ms. Morris that we do not hear on 7/10

1 of 2014?

2 A Well, when I first met with her she was handcuffed to a
3 bench after kind of I guess pleasantries. I would say
4 probably four minutes, five maybe.

5 Q Well, if she's talking -- if the very first thing she
6 says in the recording is: 2014 and he gave me back my crack
7 pipe, that would've been -- under her testimony would've
8 been after all the events allegedly transpired other than
9 her being dropped off; correct?

10 A I'm sorry, the -- she just said 2014?

11 Q When she -- all I can go off of is what has been
12 provided to me. When the recording starts it's she, Terri
13 Morris, is speaking. And she says: 2014 and he gave me
14 back my crack pipe. Under her testimony at the point in
15 time she's saying that her crack pipe is given back to her,
16 the sexual assault that she alleges here has already been
17 completed; correct?

18 A Yes. Yes, it would've.

19 Q So had she already discussed all these things with you
20 up until the point in time you decide to hit your recorder?

21 A No. No, she -- she really didn't. We just had enough
22 time -- it takes a while to get back over to an interview
23 room. She had -- she had started to talk, yes, but I didn't
24 know what she was getting ready to say. I wasn't over there
25 to interview her. I was just there for the buccal swabs.

1 That's why I didn't have the recorder on.

2 Q Okay. Well, so then when she starts out 2014 he gave
3 me back my crack pipe, do you know what precedes that? What
4 she said before that?

5 A I don't recall, no.

6 Q Okay. In any event on 7/10 of 2014 while you were
7 having this meeting with Terri Morris at the Oklahoma County
8 Jail, it's your testimony in front of this jury that you had
9 not pulled up Officer Holtzclaw's AVL records from the 8th
10 day of June -- let me get the exact date -- May -- of May
11 the 8th of 2014; correct?

12 A That's correct.

13 Q And you certainly did not show Ms. Morris during this
14 interview any maps, notes or any AVL information; correct?

15 A Correct.

16 Q So at that point in time you had no idea where, under
17 your testimony here today, where Officer Holtzclaw had
18 supposedly taken Ms. Morris; correct?

19 A That's correct. Alls I knew was just the Liberty
20 Station.

21 Q Okay. Well, you actually didn't know it when you first
22 got there because you -- you -- although -- you didn't know
23 anything about Liberty Station because she hadn't told you
24 yet; correct? When you got there on 7/10 of 2014.

25 A Well, I knew about Liberty Station because it was

1 A Yes.

2 Q Okay. That was the first time she ever used that word
3 "condom" was in front of this jury. She never said it in
4 any interviews you had with her, at the domestic, after the
5 domestic while she's beating on the door of the girlfriend
6 or at the preliminary hearing; correct?

7 A That's correct.

8 Q And certainly you never found any evidence of any
9 condom with Officer Holtzclaw's DNA anywhere; correct?

10 A That's correct.

11 Q Now you would also agree with me that on 7/10 of 2014
12 you apparently checked Ms. Morris out of the Oklahoma County
13 Jail.

14 A Yes.

15 Q Okay. And you took her on a drive throughout Oklahoma
16 City so that she could allegedly show you the route that was
17 taken; correct?

18 A Yes.

19 Q You would agree with me that at nowhere at any time did
20 you nor anyone else ever audio or video record the
21 conversation you had between you and Ms. Morris during the
22 drive after you checked her out of the Oklahoma County Jail?

23 A I don't believe so, no.

24 Q We know for a fact that you did have a recording device
25 on you at the Oklahoma County Jail because at least we have

1 a partial transcript of that; correct?

2 A Yes.

3 Q And for whatever reason you chose not to record your
4 conversations with Ms. Morris while you were in your car
5 driving around Oklahoma City; correct?

6 A Yes.

7 Q Now you stated earlier on cross-examination that as of
8 7/10 of 2014 that nobody had told you that Terri Morris was
9 going to talk to you, you were simply going over there to
10 get a buccal swab; correct?

11 A That's correct.

12 Q So do you recall this question being asked at the very
13 end of the interview while you're talking to Terri Morris?
14 Question by you: Well, I just found out you were over here
15 and I knew you wanted to -- that you wanted to talk to me.
16 Do you recall telling her that?

17 A I don't. If that's what it says, I believe it.

18 Q Okay. Who told you to go over there and talk to her?

19 A Well, we were told it was we didn't have the DNA for
20 this unknown female on his pants. So we were supposed to be
21 kind of finding all the victims that we had come in contact
22 with that didn't get buccal swabbed.

23 Q But when you told her "I knew you wanted to -- that you
24 wanted to talk to me," who are you talking about?

25 A Just Terri in general. Terri -- Terri and I finally

1 A Had cum? I'm sorry. I'm sorry.

2 Q When you told Detective Davis and Detective Homan that
3 Officer Holtzclaw ejaculated, were you saying that he jacked
4 off or were you saying that he came?

5 A I didn't say neither one because I don't use the word
6 "ejaculate."

7 Q So is Detective Davis and Detective Homan, if they
8 would state that in a report, are they mistaken or not
9 telling something other than the truth?

10 A I can't answer that question because I can't answer for
11 them. I can't answer that question for them.

12 Q But in any event, after all this happened you still
13 have the exact same clothes that you were wearing --

14 A Two years ago --

15 MR. GIEGER: Your Honor, beyond --

16 THE WITNESS: -- no.

17 MR. GIEGER: Hang on just a minute.

18 THE WITNESS: I'm sorry.

19 MR. GIEGER: Beyond redirect, your Honor.

20 THE COURT: Okay. I'll overrule --

21 THE WITNESS: Everything I have on is new.

22 THE COURT: She talked about cleaning up so I'll
23 overrule it.

24 Q (By Mr. Adams) At the time of the preliminary hearing
25 in this matter you had the exact same clothes you had on on

1 DIRECT EXAMINATION

2 BY MR. GIEGER:

3 Q Detective, before I forget, I want to ask you about the
4 question that Mr. Adams just asked Ms. Bowen about whether
5 or not she used the word "ejaculate" during your interview
6 with her. Do you remember that question?

7 A Yes.

8 Q Your report says: She said he ejaculated; correct?

9 A Correct.

10 Q Did she use that word?

11 A No.

12 Q Why did -- why is that word in your report?

13 A I try to make my reports sound as professional as they
14 can. A lot of times when we talk to these victims they say
15 crude words that -- and we -- unless we're quoting something
16 we don't put those words in our report.

17 Q In your reports, ma'am, do you typically put things in
18 quotation marks if you're saying the words they used?

19 A Yes.

20 Q And did you do that in that case?

21 A No.

22 Q All right. Tell the jury about your memory of how you
23 came in contact with Ms. Bowen, please.

24 A I had -- I was looking for another girl. And I got
25 ahold of her. And when I talked to her she told me that she

1 victim but she told me she knew someone who was.

2 Q Okay. And you also during August of 2014 talked to
3 Rosetta Grate?

4 A Right.

5 Q And did she give you Syrita's name?

6 A She didn't give me her name but she said Shardean's
7 mother.

8 Q Now was that Syrita? Did -- did you relate Shardean's
9 mother to be Syrita?

10 A Yes. Yes.

11 Q So apparently Ms. Grate, another alleged victim in this
12 case, was giving you someone else's name to contact.

13 A Yes.

14 Q Is that a fair statement?

15 A Yes.

16 Q Would it be also a fair statement to say that the very
17 first time you ever talked to Ms. Bowen would've been
18 October the 2nd, 2014?

19 A I talked to her once on the phone. Let me see.

20 Q My records reflect that was October 2nd.

21 A Okay. Then you're

22 Q Just checks yours, make sure that I'm right.

23 A Yes, that's correct.

24 Q Now was that phone call -- was it recorded in any way?

25 A No.

1 Q I'm on page -- it says page 2 at the top but it's
2 written page 3 at the bottom. And it's the same page as the
3 October 2nd of 2014 phone conversation with Ms. Bowen. And
4 it's down about third paragraph from the bottom or fourth.

5 A Okay. Yes.

6 Q Do you see that?

7 A Yeah, I found it.

8 Q I told her because she was a victim -- talking about
9 Syrita -- of an assault by an Oklahoma City police officer.

10 A Correct.

11 Q So then after that -- after you told Syrita's mother
12 that quote, you don't know whether or not Syrita and her
13 mother had any other conversations. That's not reflected in
14 any of your reports; correct?

15 A Right. Yeah, when I told Ms. Bowen that I had already
16 talked to Syrita on the phone.

17 Q You had actually already talked to her and were trying
18 to set up a face-to-face and this was in the interim that
19 her mother actually called you and left you a voice mail.

20 A That's correct.

21 Q Then you called her back, you had this conversation
22 that we just talked about; correct?

23 A Right. Right.

24 Q And, again, that conversation was not recorded in any
25 way.

1 A No.

2 Q Okay. Then there was eventually -- there was some
3 meetings set up that didn't happen. But eventually a
4 meeting did happen between you and Ms. Bowen on October the
5 9th of 2014.

6 A Right.

7 Q And that was at a church here in Oklahoma City.

8 A Yes.

9 Q And that was a church that Mr. Coleman testified to
10 where he went to the church along with Ms. Bowen; correct.

11 A Yes.

12 Q Mr. Coleman, under his testimony, did not go into the
13 interview with you and Detective Homan; correct?

14 A That's correct.

15 Q Now in that particular interview -- this is the very
16 first time you've been ever -- you were ever able to meet
17 face-to-face with Syrita Bowen; correct?

18 A Yes.

19 Q Now at that point in time you **still** had your recorder,
20 your recording device, that is **specifically** to record
21 conversations with other individuals; correct?

22 A No, not the same one because this meeting happened --
23 actually I was scheduled to work in the concession stand at
24 a football game when I got the phone call. And I said: I'm
25 working the football game, I can meet you at 8:00. So I

1 brought a recorder from my house. It wasn't the one that we
2 normally used at work. And I went and worked the concession
3 stand and then I went to the church. And when we got there
4 the recorder, it didn't work. I don't know if the batteries
5 were dead, if it just was an old recorder. It was -- I got
6 it out of my son's backpack.

7 Q For whatever reason though you did not go get any new
8 batteries or anything and repair the recorder so that in
9 fact it would work; correct?

10 A That's correct.

11 Q And so we know that that recording device did not work.

12 A Correct.

13 Q Also Detective Homan had her cell phone on with the
14 recording device on her cell phone; correct?

15 A She tried to record it with her cell phone but it
16 wouldn't work.

17 Q And that was my next question. Allegedly Detective
18 Homan attempted to record this conversation, the first
19 meeting with Ms. Bowen, and that recording did not -- did
20 not happen or work; correct?

21 A Correct.

22 Q Now -- but during that recording or during that
23 interview with Ms. Syrita Bowen was the very first time you
24 were ever able to sit down with her face-to-face and talk
25 about any allegations against her and Officer Holtzclaw;

1 A Right.

2 Q Okay. Are you aware of the fact whether or not that
3 conversation was audio-recorded in any way?

4 A No, it wasn't.

5 Q Okay. Do you know why that event, your meeting with
6 Detective Davis and Detective Homan was not recorded?

7 A Because they didn't have their recorder on. But
8 everything was wrote down.

9 Q Okay. And did you in any way record that meeting that
10 you had with Detective Davis or Detective Homan?

11 A No, I did not.

12 Q Okay. Now then and so in any event you do recall
13 telling Detective Davis back in August the 14th of 2014, on
14 the second occasion that Officer Holtzclaw supposedly
15 touched you on the outside; correct?

16 A Yes, correct.

17 Q But you changed that testimony at the preliminary
18 hearing to underneath your shirt; correct?

19 A Probably so. I don't remember but --

20 Q We're not the ones making the allegation so what I --

21 A I know.

22 Q -- need to understand is here today is it your
23 testimony that Officer Holtzclaw went underneath your shirt?

24 A Uh-huh.

25 Q Yes or no.

1 A Yes.

2 Q Can you tell the jury how you set that up, made
3 contact?

4 A Detective Homan and I went to her house. We were
5 looking for her. And so I went to the last address that was
6 listed in Varuna for her expecting to leave a card and she
7 answered the door.

8 Q All right. And so as far as finding her it seems to be
9 a little less effort as far as the steps as to what you've
10 had with some of the other victims; correct?

11 A Yes.

12 Q Was that interview recorded?

13 A No.

14 Q And can you explain to the jury how that came about
15 where it was not recorded?

16 A We went to leave a card on the door not expecting her
17 to answer and when she answered she was willing to talk to
18 us then. And I wasn't going to I didn't have a recorder
19 with me and I wasn't going to shut it down and go back and
20 get a recorder.

21 Q And I guess that was my next question. I mean, it's
22 possible I guess you could've asked her to go down to the
23 police department or, as you said, go back and get a
24 recorder; is there a reason you didn't do that?

25 A It just - she was willing to talk to me then and I

1 didn't want to risk her changing her mind before I could
2 interview her.

3 Q At this point, ma'am, had you -- I know you'd
4 identified her as -- on the master list. Did you have any
5 other independent information similar to what you might have
6 received from other victims like with Ms. Bowen, for
7 example, other people had told you Ms. Bowen might be or
8 someone named Shirita or something close to that. Had you
9 received any type of that information as to Carla Johnson?

10 A No.

11 Q When you interviewed her, ma'am, where did it take
12 place?

13 A At her house.

14 Q Who was there?

15 A Just her.

16 Q And you've heard her testimony today in the courtroom.
17 Is as far as the times and locations, things like that,
18 is it basically consistent with what she's testified to?

19 A Yes.

20 Q There's been some testimony about what she initially
21 told you, then testifying at the preliminary hearing and
22 then testifying again today about whether or not the touch
23 was on top of her clothes or underneath her clothes as far
24 as her breasts; do you remember that?

25 A Yes.

1 City Police Department -- first of all, CIU -- that Officer
2 Holtzclaw had run Ms. Lyles prior to June the 18th of 2014.

3 A Correct.

4 Q On how many different occasions did you show that
5 Officer Holtzclaw had run Ms. Lyles prior to June of 2014?

6 A In CIU, two other times. And then in Varuna, one other
7 time.

8 Q Okay. And the CIU is where you check the wants and
9 warrants; correct?

10 A Correct.

11 Q *Did* you ever have any discussions with Ms. Lyles about
12 why her -- why CIU had run her pursuant to Officer Holtzclaw
13 back on April the 9th of 2014?

14 A No, I found that out after I interviewed her. And I
15 never contacted her again to question her about that.

16 Q That wasn't my question. Did you ever contact her back
17 and say: Listen, I'm showing where Officer Holtzclaw had
18 actually run you back in April of 2014. Can you tell me
19 about that? Did you ever to talk to her about that?

20 A I did not.

21 Q Okay. Then, again, in your investigation you
22 determined that she was run in CIU by Officer Holtzclaw
23 again on 5/9 of 2014?

24 A 5/6.

25 Q 5/6, I apologize. On 5/6 of 2014. Did you make any

1 A Yes.

2 Q And **it** was; correct?

3 A Yes, **it's** okay.

4 Q Now at the very beginning -- before I go back to that,
5 in Officer Holtzclaw's car or in Ms. Ligons' car you would
6 agree that there was no semen nor pubic hairs.

7 A Correct.

8 Q Now at the very beginning of your direct examination
9 yesterday -- you were present during Ms. Ligons' testimony;
10 correct?

11 A Yes.

12 Q And you heard me questioning her about her drug usage
13 over at Mac's house.

14 A Yes.

15 Q And you understood exactly where I was coming from when
16 you saw her take the stand and you saw what she testified to
17 what she says she did on that evening; correct?

18 A Yes.

19 Q And you know where I got the information that she had
20 smoked two joints that evening?

21 A Yes.

22 Q That came from a report that you wrote in this case.

23 A Correct.

24 Q And you stated specifically and in plain English that
25 she had told you that she had smoked two joints while she

1 was at Mac's house that evening; correct?

2 A Yes.

3 Q But then after further -- and that was taken on -- that
4 report was done June the 18th of 2014, the day in question.

5 A My I took mine -- I don't remember when I typed the
6 report, but when I'm talking to Jannie I take my notes as
7 I'm talking to her.

8 Q It was certainly done closer in relationship to the
9 events than today.

10 A Absolutely.

11 Q And when you typed that report those -- those are your
12 words, not my words.

13 A Those that's correct.

14 Q But now that you've had further reflection on it you
15 believe that she was talking about there were two joints in
16 the house.

17 A Correct.

18 Q But you heard Mac testify he never saw any joints in
19 the house.

20 A Correct.

21 Q Did you ever execute any kind of a search warrant over
22 at Mac's house looking for anything like that?

23 A No.

24 Q And you also testified -- and I was just curious about
25 this -- that it was irrelevant to you whether or not

1 print a photo of that off, staple the photo and the Varuna
2 sheet together and I made a stack, made a pile. And then
3 once I got from April to June done, I handed them to
4 basically just split it in half, one for Detective Davis,
5 one for Detective Gregory and just -- until I was done.

6 Q So the list that you wrote out on a piece of paper, was
7 that ever documented in a police report?

8 A No, it was not.

9 Q But did it come from the totality of what is in the CIU
10 log and the Varuna log?

11 A Yes, the -- in my report where I say "list" the list is
12 going to be -- list is going to mean crime information log
13 and Varuna. It's -- it's the same. The list was just
14 something that I compiled as a product of the work product,
15 investigator's notes, just something to get through so we
16 could have people to look at.

17 Q And tell me what work product means to you.

18 A Your own personal -- it's your own personal notes that
19 you've gathered during the course of an investigation.

20 It's -- it's something that -- that we do every day. I
21 mean, every day I'm making notes on pieces of paper and
22 that -- I don't make reports on them, they don't go anywhere
23 except into a shredder.

24 Q Is it your understanding of the -- do you know what
25 discovery means?

1 Q Okay. Well, in this particular case you don't even
2 reference in your report that you had gone out there simply
3 to drop off a business card, you didn't take any recording
4 devices with you, did you?

5 A No, we didn't.

6 Q But any event we know for a fact that you did not --
7 you did not record the interview with Ms. Johnson; correct?

8 A That's correct.

9 Q Whenever you did talk to her she told you that she does
10 smoke crack cocaine; correct?

11 A Yes.

12 Q And also marijuana.

13 A Correct.

14 Q Now she she told you in that interview that she came
15 into contact with Officer Holtzclaw on two separate
16 occasions; correct?

17 A Yes.

18 Q The first occasion was in March of 2014.

19 A Yes, I don't know if she told me March, but, yes.

20 Q Well, she didn't tell you the date, did she?

21 A No, she didn't.

22 Q She just told you on two separate occasions.

23 A Correct.

24 Q And I'm assuming that she was talking about in the
25 past.

1 respect to Tabitha Barnes?

2 A That's correct.

3 Q And did you make an effort to make contact with Carla
4 Raines?

5 A Yes, I did.

6 Q Tell me about how you did so.

7 A When I first saw Carla Raines' name I tried to go back
8 in her history as far as, like, phone numbers, try to call
9 those. Left messages and then also eventually led me to the
10 last residence she had. And it was -- I left a card there.
11 And then Carla did contact me back.

12 Q And as you've had an opportunity to sit here in the
13 courtroom and listen to Defendant's Exhibit 2 which was just
14 played which was the interview with Carla Raines; correct?

15 A Yes.

16 Q During that interview did you hear yourself and
17 Ms. Raines allude to a phone call that you -- the two of you
18 had together?

19 A Yes, she -- she called me back just to kind of see what
20 it was in reference to. I had to be kind of vague in
21 reference to why I was trying to -- what I was trying to ask
22 her about. I couldn't tell her Officer Holtzclaw's name. I
23 didn't want to just lead her on in a certain direction. And
24 I just kind of advised her I received a tip that maybe she
25 was sexually assaulted. And she kind of hem-hawed around

1 life that you met with Detective Davis face-to-face;
2 correct? I'm not even trying a date. I'm just saying
3 sometime in your life.

4 A Yes.

5 Q And is Detective Davis this lady right here?

6 A Yes.

7 Q Okay. Where did that meeting take place?

8 A Divine Wisdom Church of God in Christ.

9 Q Mr. Coleman was not present while you were
10 interviewed -- was he present in the building?

11 A I think he came afterwards.

12 Q At the point in time when you were interviewed by
13 Detective Davis was there also a Detective Homan --

14 A Yes.

15 Q present?

16 Yes?

17 Was that interview either video or audiotaped in
18 any way to your knowledge?

19 A No, I think the recorder wouldn't work so she had to
20 write down the words.

21 Q I'm sorry, do what?

22 A The recorder wouldn't work so she had to write down the
23 words.

24 Q The recorder was not working?

25 A No. I guess. I don't know. I wasn't using it. I

1 can't answer that question. That's what I was told. Yes.
2 No.

3 Q During this meeting sometime in your life when
4 Detective Coleman (sic) and Davis interviewed you at the
5 church by yourself was any device used to record it either
6 audio or video?

7 MR. GIEGER: She's answered the question. She
8 says the recorder didn't work.

9 THE COURT: All right. If you know. Do you know
10 if it was recorded?

11 THE WITNESS: Well, she said it wasn't because she
12 wrote out because she said it wasn't working right so she
13 had to write the words down. So I don't

14 Q (By Mr. Adams) Did -- when you say she told you it was
15 not working, who are you talking about?

16 A Detective Davis.

17 Q And did Detective Homan also have a recording device
18 that she was attempting to use?

19 A No.

20 Q So if -- so as far as you know it wasn't recorded in
21 any way; correct?

22 MR. GIEGER: Asked and answered.

23 THE COURT: All right. Sustained. Ask another
24 question.

25 Q (By Mr. Adams) During this interview did you discuss

1 it.

2 Q Okay. What did she tell you about the GPS?

3 A Because I was telling her what streets when I was
4 telling her -- when she had the interview with the buccal
5 swab. She's -- she's like, okay, about -- around about
6 where were you when you were walking home. And I was
7 telling her. And she was like: Yeah, that matches up with
8 the GPS.

9 Q Okay. Just so that I'm clear, was -- was this the only
10 time you ever talked to Detective Davis?

11 A No, it wasn't.

12 Q Was this the first time you talked to Detective Davis?

13 A I believe this is the first time I talked to her in
14 person.

15 Q Okay.

16 A Was that time, yes.

17 Q So the first time you talked to Detective Davis --

18 A In person.

19 Q in person she told you that there was a GPS device?

20 A No, she did not.

21 Q Okay. She asked you -- then tell me what she told you
22 in regards to the GPS device.

23 A I already did. You're misconstruing what I'm saying.

24 Q I'm not trying to misinterpret it.

25 A Okay. Well

1 with her and her interview in October that he picked her up
2 at 13th and drove her to the house?

3 A Yes.

4 MR. ADAMS: Object to the form, your Honor; it's
5 leading and suggestive.

6 THE COURT: All right. Sustained.

7 Q (By Mr. Gieger) Did she tell you information
8 consistent with what the AVL showed?

9 A Yes.

10 Q And did she know that before you ever talked to her if
11 you ever talked to her about AVL?

12 A No.

13 Q Did she tell you where he took her before you ever even
14 had any discussions with her ever about AVL if you ever did
15 have a discussion about AVL?

16 A Yes, she told me where he took her, yes.

17 Q Ma'am, counsel -- I believe you told Mr. Adams that you
18 may have talked with her on occasions as whenever she -- we
19 met her before the preliminary hearing. Was finding Adaira
20 Gardner difficult?

21 A Very.

22 Q Before the preliminary hearing where did you have to go
23 to find her?

24 A Detective Homan and I had to drive to Muskogee to find
25 her.

1 Q And was she with her father there?

2 A She was supposed to be but she wasn't.

3 Q You found her?

4 A I found her.

5 Q And did yourself and Detective Homan have to bring her
6 back to Oklahoma City to honor the subpoena?

7 A Yes.

8 Q During that did you have conversations and small talk
9 in the car?

10 A Yeah.

11 Q Do you know if you talked about AVL during that
12 two-and-a-half-hour car ride back to Oklahoma City to
13 testify?

14 A I -- I have no idea.

15 Q Okay. Ma'am, after your initial interview and -- and I
16 would -- would you agree that Mr. Adams is exactly correct
17 and that is during that initial interview you would not
18 disclose this type of information.

19 A That is correct.

20 Q And he is correct that if you did disclose that type of
21 information it potentially could compromise --

22 A Absolutely.

23 Q -- an investigation.

24 A Yes.

25 Q You don't disagree with that representation?

1 on or logging off at his computer at his home; correct?

2 A Correct.

3 Q Now in your redirect examination I heard for the first
4 time that you had a two-and-a-half hour trip with Adaria
5 (sic) Gardner.

6 A Okay.

7 Q Is there any report or any paperwork anywhere in this
8 case that has literally produced thousands and thousands of
9 documents that would tell me or anyone representing Officer
10 Holtzclaw that you had two-and-a-half hours with Adaria
11 (sic) Gardner in a car from Muskogee to Oklahoma City,
12 anything?

13 A There's no reports on that.

14 Q There's nothing, is there?

15 A No.

16 Q Is there any recording of this two-and-a-half-hour
17 transport from Muskogee to Oklahoma City when you're alone
18 with Detective Homan in the car with Adaria (sic) Gardner
19 about anything that's said in that car?

20 A No.

21 Q Was it during that time that Adaria (sic) Gardner was
22 confused and you were telling her about the GPS device or
23 the AVL in Detective (sic) Holtzclaw's car?

24 A I have no idea what all we talked about during the
25 two-hour trip.

1 Q Well, could you have talked about the GPS, the AVL on
2 the trip from Muskogee back to Oklahoma City?

3 A It's possible that we talked about her being scared to
4 testify and will anybody believe her. And it is possible
5 that I said we have some things to back up what you said.

6 Q And why would you not document that anywhere in any
7 report or anything?

8 A That's just not done. We went to give her a ride to
9 the prelim.

10 Q And, again, that was in no way recorded.

11 A No.

12 Q Do you know why today was the first day I was ever told
13 about that?

14 A I have no idea.

15 Q You also testified that everything Ms. Gardner told you
16 was consistent with what she testified to; correct?

17 A Yes.

18 Q But that's not exactly true because she also testified
19 that you talked to her at the meeting on 10/24 of 2014 about
20 the GPS and the AVL in Officer Holtzclaw's car; correct?

21 A But I told you when I testified that she was confused
22 about that.

23 Q But when you -- when you answered Mr. Gieger's question
24 did she testify consistently with everything she told you
25 your answer was yes.

1 A With everything she told me, yes.

2 MR. GIEGER: Your Honor, that's not -- wasn't my
3 question. My question was did she testify about the
4 inappropriate contact with this -- with this defendant.
5 That was my question. And that's what she said yes to.

6 THE COURT: All right. Overruled the jury will
7 remember it as they remember it.

8 Q (By Mr. Adams) But what you're saying here is she is
9 mistaken or not telling the truth in regards to the
10 discussions about the AVL or the GPS system; correct?

11 A She you asked me if -- if her testimony -- my
12 question or my answer to Gayland was whether she -- her
13 testimony was consistent with me -- with what she told me
14 during my interview. Yes, it was because during my
15 interview we didn't talk about GPS. What her testimony was
16 about the incident is exactly what she told me.

17 Q But in regards to your interview with her it's still
18 your contention that you never talked to her about the GPS
19 or the AVL as she testified to.

20 A Yes, we did not talk about that.

21 Q Now other than Adaria (sic) Gardner what -- what other
22 of the alleged victims in this case have you spent
23 two-and-a-half hours with in a vehicle alone?

24 A Trying to think because we had to give a lot of victims
25 rides. But she was the furthest one out because she was in

1 Muskogee.

2 Q Okay. So would **it** be a fair statement to say that each
3 and every one of these alleged victims that you had time
4 with them exceeding an hour alone with them where no report
5 was made and no recording was made?

6 A Probably not -- not exceeding an hour, no, because
7 anybody that we gave a ride lived here in Oklahoma City
8 except for her.

9 Q So within 30 minutes to an hour that you had alone with
10 these alleged victims where no recording was made and no
11 report would be made; is that a fair statement?

12 A Yeah, that's fair. Not Rocky's victims though, just
13 mine. I never gave rides to Detective Gregory's victims.

14 Q Okay. Do you know whether or not he had an opportunity
15 to spend two-and-a-half hours with any of his people that he
16 was in control of that he did not either do a report or
17 recording of?

18 A I have no idea.

19 MR. ADAMS: Just one moment, your Honor?

20 THE COURT: Yes.

21 MR. ADAMS: Pass the witness.

22 THE COURT: Last word, Mr. Gieger?

23 MR. GIEGER: Thank you.

24 REDIRECT EXAMINATION

25 BY MR. GIEGER: