

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

DISTRICT COURT
FILED

DEC 20 2022

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

OKLAHOMA WATCH, INC.
and
WHITNEY BRYEN,

Plaintiffs,

v.

CITY OF TULSA,

Defendant.

Case No.

CV-2022-02584

Caroline Wall

**PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT**

Plaintiffs Oklahoma Watch, Inc. and Whitney Bryen (collectively, "Plaintiffs"), by and through undersigned counsel, Petition this Court pursuant to the Oklahoma Open Records Act ("ORA"), Okla. Stat. tit. 51, §§ 24A.1–24A.33, for (1) a declaration of the rights and responsibilities of Defendant City of Tulsa as to the public records sought by Plaintiffs, and (2) grant an injunction and/or issue a writ of mandamus requiring Defendant to immediately produce all records requested by Plaintiffs pursuant to the ORA and designate certain persons available at all times during Defendant's regular business hours and authorized to release all open records.

In support of this Petition, Plaintiffs allege and state the following:

PARTIES

1. Plaintiff Oklahoma Watch, Inc. ("Oklahoma Watch") is a nonprofit news corporation that produces in-depth and investigative journalism as a public service for the benefit of all Oklahomans. Oklahoma Watch makes its content freely and openly available to the public on its website (oklahomawatch.org), social media platforms, newsletters, and more.

2. Plaintiff Whitney Bryen (“Bryen”) is an award-winning investigative reporter and multimedia journalist for Oklahoma Watch where she covers mental health and other topics.

3. Defendant City of Tulsa is a city incorporated in the state of Oklahoma and situated in Tulsa County, Oklahoma.

4. Defendant City of Tulsa is a “public body” within the meaning of and subject to the ORA. *See* Okla. Stat. tit. 51, § 24A.3.

5. The Tulsa Police Department is authorized by, created by, and under the control of Defendant City of Tulsa.

6. The Tulsa Police Department is a “public body” and “law enforcement agency” within the meaning of and subject to the ORA. *See* Okla. Stat. tit. 51, § 24A.3.

STATEMENT OF FACTS

A. Tulsa Police Department officers taunt elderly woman experiencing mental health crisis before violently arresting her

7. On October 25, 2021, LaDonna Paris, a 70-year-old woman, was violently arrested by officers of the Tulsa Police Department while experiencing a mental health crisis. *See* Tulsa Police Department, *10-25-2021 Tulsa Police Department Arrest of LaDonna Paris* (Mar. 30, 2022), https://www.youtube.com/watch?v=-nw_kTetA_Y; Complaint at 2–6, *Paris v. Carrocia*, No. CJ-2022-1434, OSCN (Tulsa County Dist. Court, May 10, 2022); *see also* Chris Polansky, ‘*This is gonna be so fun, ’ TPD officer says before violent arrest of elderly woman in apparent mental health crisis*, Public Radio Tulsa (Mar. 30, 2022), <https://www.publicradiotulsa.org/local-regional/2022-03-30/this-is-gonna-be-so-fun-tpd-officer-says-before-violent-arrest-of-elderly-woman-in-apparent-mental-health-crisis>.

8. Body camera footage of the incident shows Tulsa Police Department Officers Ronni Carrocia and Daylan Root laughing about Ms. Paris being “mental” after Ms. Paris locked

herself inside the bathroom of a Habitat for Humanity ReStore in Tulsa. *Id.* Through the bathroom door, Ms. Paris could be heard saying “the cops are trying to kill me here.” *Id.* Throughout the video, Carrocia and Root repeatedly laughed, rattled, and banged on the bathroom door, with Carrocia saying at one point, “this is gonna be so fun.” *Id.* Both officers repeatedly told Ms. Paris they were going to pepper spray her. *Id.* At one point in the video, Carrocia arced a Taser next to the bathroom door and asked Ms. Paris if she wanted to get tased while Ms. Paris pleaded with her to stop. *Id.* A few minutes later Tulsa Police Department Officer Ty Burns arrived at ReStore and kicked down the bathroom door. *Id.* Burns immediately forced Ms. Paris to the ground—bloodying her face and chipping her tooth—and the three officers arrested her. *Id.* After spending nearly one month in jail, charges against Ms. Paris were ultimately dropped. *See* Kevin Canfield, *Tulsa police respond after video shows arrest of woman in mental health crisis*, *Tulsa World*, https://tulsaworld.com/news/local/govt-and-politics/tulsa-police-respond-after-video-shows-arrest-of-woman-in-mental-health-crisis/article_9a45b404-af6f-11ec-893a-7be3178a329d.html#tracking-source=home-top-story (last updated Oct. 3, 2022). Ms. Paris has since filed suit against Carrocia, Root, and Burns as well as the City of Tulsa and Mayor G.T. Bynum for violating her civil rights. *See* Complaint, *Paris v. Carrocia*, No. CJ-2022-1434, OSCN (Tulsa County Dist. Court, May 10, 2022) (removed to federal court as *Paris v. Carrocia*, No. 4:22-cv-00235-TCK-JFJ, PACER (N.D. Okla. May 27, 2022)).

9. Five months after Ms. Paris’s arrest, her son posted a video on YouTube that included approximately six minutes of body camera footage from the incident and highlighted Ms. Paris’s treatment by Tulsa Police Department officers. *See* Chris Williams, *LaDonna Paris Tulsa PD Arrest Video* (Mar. 30, 2022),

<https://www.youtube.com/watch?v=t16uCMhjPnE&t=10s>. The video, which has over 68,000 views and 400 comments, many admonishing the officers, prompted public outcry over Tulsa Police Department's handling of the incident. *Id.*

10. In response, Tulsa Police Department released “the full unedited videos” to the media along with a statement by Tulsa Police Department Captain Richard Meulenberg, who said, “The overall actions of the Officers and the way in which the call was handled is within the policies of the Tulsa Police Department.” Press Release, Tulsa Police Department Communications Unit, Subject: Arrest of LaDonna Paris on October 25, 2021 (Mar. 29, 2022), <https://npr.brightspotcdn.com/20/7b/45ba3337459fb3478d9f8deb93b9/10-25-2021-paris-arrest.pdf>.

11. An Oklahoma Watch review of Tulsa Police Department policies, hours of body camera footage and interviews with law enforcement experts raised questions about the department's stance towards LaDonna Paris's arrest and who the department's policies protect. See Whitney Bryen, *Tulsa Police Response, Policies Questioned After Arrest of Woman in Bipolar Episode*, Oklahoma Watch (Apr. 27, 2022), <https://oklahomawatch.org/2022/04/27/tulsa-police-response-policies-questioned-after-bipolar-womans-arrest%E2%80%9C/>.

B. Plaintiffs' two Oklahoma Open Records Act requests

12. On April 4, 2022, Bryen, in her role as a reporter for Oklahoma Watch, submitted an ORA request (“First Request”) to Defendant for “all incident reports, case reports and statements related to the response to LaDonna Paris on Oct. 25, 2021, including any statements made by responding officers, first responders or others after the incident and following the release of the vide[o] in March of 2022.” A true and correct copy of Plaintiffs' Request is attached as **Exhibit A**.

13. Bryen followed up with Defendant regarding her First Request multiple times. For example, on May 27, 2022, Bryen had a telephone conversation with two of Defendant's employees to understand why her request had not yet been fulfilled and who had the authority to release open records. Bryen was eventually directed to, and did, contact the Chief of the Tulsa Police Department regarding her First Request.

14. Additionally, Plaintiffs' counsel contacted Defendant via email on June 6, 2022, to clarify Defendant's obligations under the ORA to make the requested records available in a prompt and reasonable manner or establish a lawful reason for its position and failure to comply with the ORA. A true and correct copy of Plaintiffs' counsel's June 6 correspondence to Defendant is attached as **Exhibit B**.

15. On June 28, 2022, Defendant provided Plaintiffs with two pages of what it described as "incident reports" in response to Plaintiffs' First Request. The "incident reports" only contained information such as an address and phone number for the location where the incident occurred, the date and time the incident took place, the reporting agency, and the reporting officer identified by number. A true and correct copy of the two "incident reports" Defendant provided to Plaintiffs are attached as **Exhibit C**.

16. As of the filing of this Petition, Defendant has not made any records available to Plaintiffs in response to the First Request besides the "incident reports."

17. On April 13, 2022, Bryen, in her role as a reporter for Oklahoma Watch, submitted an ORA request ("Second Request") to Defendant for "the audio recording and transcript of the call that sent Tulsa Police officers to Habitat for Humanity Restore 1234 S. Norwood Ave. where LaDonna Paris was locked in a bathroom." A true and correct copy of Plaintiffs' Second Request is attached as **Exhibit D**.

18. On April 15, 2022, Defendant denied Plaintiffs' Second Request via the Tulsa Police Department's online portal for public records requests stating, "Our 911 call center will only release a call log. You can't get the audio without a subpoena. Do you want the call log?" A true and correct copy of Defendant's denial is attached as **Exhibit E**.

19. On April 17, 2022, Defendant provided Plaintiffs with one page of what it described as a "call log" with a single entry in response to Plaintiffs' Second Request. The "call log" contained information including the incident number, case number, call type, address, name, issue, and date. A true and correct copy of the "call log" Defendant provided to Plaintiffs is attached as **Exhibit F**.

20. As of the filing of this Petition, Defendant has not made an audio file or transcript of the 911 call available to Plaintiffs in response to the Second Request.

CAUSE OF ACTION

21. The purpose of the ORA is "to ensure and facilitate the public's right of access to and review of government records so they may efficiently and intelligently exercise their inherent political power." Okla. Stat. tit. 51, § 24A.2.

22. Accordingly, the ORA provides that "[a]ll records of public bodies and public officials shall be open to any person for inspection, copying, or mechanical reproduction during regular business hours." *Id.* § 24A.5.

23. "Unless a record falls within a statutorily prescribed exemption in the [ORA], the record must be made available for public inspection." *Citizens Against Taxpayer Abuse, Inc. v. City of Oklahoma City*, 2003 OK 65, ¶12, 73 P.3d 871, 875.

24. "The public body urging an exemption [to disclosure] has the burden to establish the applicability of such exemption." *Id.*

25. “Because of the strong public policy allowing public access to governmental records,” the ORA’s provisions must be construed “to allow access unless an exception clearly applies” *Okla. Ass’n of Broads., Inc. v. City of Norman*, 2016 OK 119, ¶15, 390 P.3d 689, 694.

26. Further, law enforcement agencies are required to “make available for public inspection and copying” certain records including, but not limited to, “a chronological list of all incidents, including offense report information showing the offense, date, time, general location, officer, and a brief summary of what occurred,” “facts concerning the arrest, including the cause of the arrest and the name of the arresting officer,” and “radio logs, including a chronological listing of the calls dispatched.” Okla. Stat. tit. 51, § 24A.8(A).

27. Law enforcement agencies must also make publicly available records that are made open by other state or local laws and may not rely on Okla. Stat. tit. 51, § 24A.8 to deny access to records that were previously made available to the public as provided in the ORA or otherwise provided by law. Okla. Stat. tit. 51, § 24A.8(B)(1).

28. Additionally, law enforcement agencies cannot deny access to records where a court finds that the public interest or the interest of an individual outweighs the law enforcement agency’s reason for denial. *Id.*

**Count I:
Violation of the ORA for Unlawful Withholding of Records Responsive to
Plaintiffs’ First Request**

29. Plaintiffs repeat, reallege, and incorporate the allegations set forth in paragraphs 1 through 28 as though fully set forth herein.

30. The records sought by Plaintiffs’ First Request are records of public bodies and/or law enforcement agencies as defined by the ORA. Okla. Stat. tit. 51, § 24A.3.

31. Defendant possesses records responsive to Plaintiffs' First Request.

32. There is no legal basis for Defendant's failure or refusal to disclose the requested records.

33. Disclosure of the requested records is intended to, and reasonably likely to, enable Plaintiffs, who are members of the news media, to evaluate whether those entrusted with the affairs of the government (*i.e.*, policing) are honestly, faithfully, and competently performing their duties as public servants.

34. Accordingly, disclosure of the requested records serves the public interest.

35. The public interest in the requested records outweighs any reason offered by Defendant for denying Plaintiffs access thereto. *See id.* § 24A.8(B)(1).

36. Defendant has violated the ORA by unlawfully withholding the records requested by Plaintiffs' First Request and will continue to be in violation of the ORA absent relief from this Court.

**Count II:
Violation of the ORA for Unlawful Withholding of Records Responsive to
Plaintiffs' Second Request**

37. Plaintiffs repeat, reallege, and incorporate the allegations set forth in paragraphs 1 through 28 as though fully set forth herein.

38. The records sought by Plaintiffs' Second Request are records of public bodies and/or law enforcement agencies as defined by the ORA. Okla. Stat. tit. 51, § 24A.3.

39. Defendant possesses records responsive to Plaintiffs' Second Request.

40. There is no legal basis for Defendant's failure or refusal to disclose the requested records.

41. Disclosure of the requested records is intended to, and reasonably likely to, enable Plaintiffs, who are members of the news media, to evaluate whether those entrusted with the affairs of the government (*i.e.*, policing) are honestly, faithfully, and competently performing their duties as public servants.

42. Accordingly, disclosure of the requested records serves the public interest.

43. The public interest in the requested records outweighs any reason offered by Defendant for denying Plaintiffs access thereto. *See id.* § 24A.8(B)(1).

44. Defendant has violated the ORA by unlawfully withholding the records requested by Plaintiffs' Second Request and will continue to be in violation of the ORA absent relief from this Court.

Count III:

Violation of the ORA for Failure to Designate Certain Authorized Persons Available at All Regular Business Hours to Release Open Records

45. Plaintiffs repeat, reallege, and incorporate the allegations set forth in paragraphs 1 through 28 as though fully set forth herein.

46. The records sought by Plaintiffs' First and Second Request are records of public bodies and/or law enforcement agencies as defined by the ORA. Okla. Stat. tit. 51, § 24A.3.

47. All records of public bodies "shall be open to any person for inspection, copying, or mechanical reproduction during regular business hours." *Id.* § 24A.5.

48. "Public bodies are required to designate certain persons who are authorized to release records of the public body for inspection, copying, or mechanical reproduction. At least one person shall be available at all times to release records during the regular business hours of the public body." *Id.* § 24A.5(7).

49. Defendant has failed to designate certain persons that are available at all times during Defendant's regular business hours and authorized to release all open records.

50. Defendant has violated the ORA by failing to designate certain persons that are available at all times during Defendant's regular business hours and authorized to release all open records and will continue to be in violation of the ORA absent relief from this Court.

REQUESTED RELIEF

Therefore, Plaintiffs respectfully request the Court:

A. Declare the records sought by Plaintiffs' First and Second Request open records available to the public for inspection and copying in accordance with the Oklahoma Open Records Act;

B. Declare Defendant's refusal and failure to provide the requested records an unlawful violation of the Oklahoma Open Records Act;

C. Declare the public interest in the requested records outweighs any reason to deny Plaintiffs access thereto;

D. Declare Defendant's failure to designate certain persons available at all times during Defendant's regular business hours and authorized to release all open records an unlawful violation of the Oklahoma Open Records Act;

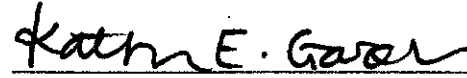
E. Grant an injunction and/or issue a writ of mandamus requiring Defendant to (1) immediately produce all records requested by Plaintiffs pursuant to the ORA, and (2) designate certain persons that are available at all times during Defendant's regular business hours and authorized to release all open records;

F. Award Plaintiffs reasonable attorney's fees and the costs of this action; and

G. Grant such other and further relief as the Court deems just and proper.

DATED: December 20, 2022

Respectfully submitted,

Handwritten signature of Kathryn E. Gardner in black ink, written over a horizontal line.

Kathryn E. Gardner, OBA #33509

Reporters Committee for Freedom of the Press

110 S. Hartford Ave., Ste. 2524

Tulsa, OK 74120

T: (918) 255-0060

kgardner@rcfp.org

Counsel for Plaintiffs

Oklahoma Watch and Bryen

EXHIBIT A



Dear Whitney Bryen:

Thank you for your interest in public records of the Tulsa Police Department. Your request has been received and is being processed in accordance with Title 51 of the Oklahoma State Statutes, Subsection 24, also known as the Oklahoma Open Records Act. Your request was received in this office on 4/4/2022 and given the reference number P005191-040422 for tracking purposes.

Records Requested: I'm seeking all incident reports, case reports and statements related to the response to LaDonna Paris on Oct. 25, 2021, including any statements made by responding officers, first responders or others after the incident and following the release of the vide in March of 2022.

Your request will be forwarded to the relevant department(s) to locate the information you seek and to determine the volume and any costs associated with satisfying your request. You will be contacted about the availability and/or provided with copies of the records in question. PLEASE NOTE: Title 51 of the Oklahoma State Statutes, Subsection 24, also known as the Oklahoma Open Records Act does not require a governmental body to create new information, to do legal research, or to answer questions.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Again, thank you for using the Open Records Center.

Tulsa Police Department

To monitor the progress or update this request please log into the Open Records Center

EXHIBIT B

REPORTERS COMMITTEE

FOR FREEDOM OF THE PRESS

1156 15th St. NW, Suite 1020
Washington, D.C. 20005
(202) 795-9300
www.rcfp.org

Bruce D. Brown
Executive Director
bbrown@rcfp.org
(202) 795-9301

STEERING COMMITTEE CHAIRMAN

STEPHEN J. ADLER, *Reuters*

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Gibson, Dunn & Crutcher LLP

MASSIMO CALABRESTI
Time Magazine

MANNY GARCIA
Austin American-Statesman

EMILIO GARCIA-RUIZ
San Francisco Chronicle

JOSH GERSTEIN
POLITICO

ALEX GIBNEY
Jigsaw Productions

SUSAN GOLDBERG
National Geographic

JAMES GRIMALDI
The Wall Street Journal

LAURA HANDMAN
Davis Wright Tremaine

DIEGO IBARGÜEN
Hearst

KAREN KAISER
The Associated Press

DAVID LAUTER
The Los Angeles Times

MARGARET LOW
WBUR

JANE MAYER
The New Yorker

COLLEEN MCCAIN NELSON
The McClatchy Company

MAGGIE MULVIHILL
Boston University

JAMES NEFF
The Philadelphia Inquirer

NORMAN PEARLSTINE
New York, New York

THOMAS C. RUBIN
Stanford Law School

CHARLIE SAVAGE
The New York Times

FINNIFER SONDAG
Bloomberg News

NABIHA SYED
The Markup

ADAM SYMSON
The E.W. Scripps Company

PIERRE THOMAS
ABC News

SAUNDRA TORRY
Freelance

VICKIE WALTON-JAMES
NPR

JUDY WOODRUFF
PBS/The NewsHour

HONORARY LEADERSHIP COUNCIL

CHIP BOK
Creators Syndicate

DAHLIA LITHWICK
Slate

TONY MAURO
American Lawyer Media, ret

ANDREA MITCHELL
NBC News

CAROL ROSENBERG
The New York Times

PAUL STEIGER
ProPublica

*Affiliations appear only
for purposes of identification.*

Kathryn E. Gardner
110 S. Hartford Ave., Ste. 2524
Tulsa, OK 74120
Telephone: (918) 255-0060
kgardner@rcfp.org

June 6, 2022

Tulsa Police Department

Delivered via email to TPDchief@cityoftulsa.org

Re: Oklahoma Open Records Act Request from Whitney Bryen of Oklahoma Watch

To whom this may concern:

I represent Oklahoma Watch in connection with a request for public records sought by reporter Whitney Bryen under the Oklahoma Open Records Act ("ORA"), Okla. Stat. tit. 51, §§ 24A.1-24A.33. Oklahoma Watch is a non-profit, award-winning, news organization that produces in-depth and investigative journalism as a public service for the benefit of all Oklahomans. Ms. Bryen is a Multimedia Reporter at Oklahoma Watch.

On April 4, 2022, Ms. Bryen submitted an ORA request to Tulsa Police Department ("TPD") for the following public records:

"[A]ll incident reports, case reports and statements related to the response to LaDonna Paris on Oct. 25, 2021, including any statements made by responding officers, first responders or others after the incident and following the release of the vide[o] in March of 2022."

In the weeks that have since passed, Ms. Bryen has yet to receive a single record responsive to her ORA request despite her efforts to follow up with TPD multiple times. I write to you today regarding TPD's position towards Ms. Bryen's request.

It is my understanding that TPD representatives have told Ms. Bryen in response to her ORA request that the records at issue contain information "still under internal review" and "cannot be provided at this time." Additionally, a representative mentioned possible litigation related to the incident with Ms. Paris prohibited release of the requested records.

The ORA does not recognize any such exemptions or exceptions to TPD's obligations to make records available for public inspection and copying.

TPD is required by the Oklahoma Open Records Act to make records available for public inspection and copying in a prompt and reasonable manner. *See Okla. Stat. tit. 51, §§ 24A.5(6), 24A.8.* If your agency chooses not to make records available, it has the burden to establish a lawful reason for its actions. *See id.* § 24A.2. This duty is accompanied by the burden of paying attorneys' fees if it wrongly decides not to disclose records. *See id.* § 24A.17.

The ORA clearly contemplates release of the records requested by Ms. Bryen. For example, § 24A.8(A)(3) of the ORA requires law enforcement agencies to make available “[a] chronological list of all incidents, including initial offense report information showing the offense, date, time, general location, officer, and a brief summary of what occurred.” And § 24A.8(A)(2) requires law enforcement agencies to make available “[f]acts concerning the arrest, including the cause of arrest and the name of the arresting officer.”

TPD, or any other agency, cannot deny access to records that would otherwise be available for public inspection and copying under the ORA by using the records for an investigatory purpose or placing them in a litigation or investigation file. *See id.* § 24A.20.

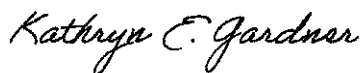
Accordingly, please comply with your duties under the ORA and fulfill Ms. Bryen's request no later than Friday, June 10, 2022. If a response will require more time, please respond in writing indicating why a longer response time is required, as well as the anticipated response date for the requested records.

If responsive records do not exist, please provide a written response outlining which records specifically do not exist. To the extent that you still choose to withhold records based upon an exemption or exception to the ORA, please detail your reason for denial so that we may balance it against the interests of the public and/or relevant individuals.

If we do not receive relevant records or a written response from you by June 10th, we will accept this as a willful decision by TPD to withhold the requested records. Ms. Bryen and Oklahoma Watch reserve all rights in relation to this matter.

Please do not hesitate to contact me with any questions. Thank you for your time and attention to this matter.

Respectfully,



Kathryn E. Gardner
Attorney | Local Legal Initiative Oklahoma
Reporters Committee for Freedom of the Press

EXHIBIT C

COUNTER INCIDENT INQUIRY - TRCINC

cmd
INCIDENT NO 2021055132 **ARSON** **UCC** 9 **DVIOL** N
LOCATION 1234 S NORWOOD AV TULSA, OK 74112 **GEO** A5E2
OCCURRED BETWEEN 10252021 MON 1403 **AND** 10252021 MON 1605 **REPORT AGENCY** TP
REPORTING DATE 10252021 MON 2211

FIRM HABITATRESTORETULSA **FIRM PHONE** 9183595555
FIRM ADDR 1234 S NORWOOD AV TULSA OK 74112 **GEO** A5E2
STATUS CLEARED BY ARREST 10252021 **CLEARED BY** **ASSIGNED**
INVESTIGATOR ASSIGN
TOTAL VALUE TAKEN \$ **RECOVERED** \$ **REPORTED OFFICER** 02536
DA CASE NUMBER **CADS NO**

PERSONS RELATED TO THE INCIDENT

SAVAGE	KRISTIE		REPORTING	PID	1781543

UPDATED BY SYS **LAST UPDATE** 10-27-2021

DOC609240

COUNTER INCIDENT INQUIRY - TRCINC

cmd
INCIDENT NO: 2021055200 **ASSAULT ON POLICE OFFICER** **UCC** 8P **DVIOL** N
LOCATION: 1234 S NORWOOD AV TULSA, OK 74112 **GEO** A5E2
OCCURRED BETWEEN: 10252021 MON 1403 **AND:** 10252021 MON 1605 **REPORT AGENCY:** TP
REPORTING DATE: 10252021 MON 2303

FIRM: _____ **FIRM PHONE:** _____
FIRM ADDR: _____
STATUS: CLEARED BY ARREST 10252021 **CLEARED BY:** _____ **ASSIGNED:** _____
INVESTIGATOR ASSIGN: _____
TOTAL VALUE TAKEN: \$ _____ **RECOVERED:** \$ _____ **REPORTED OFFICER:** 02536
DA CASE NUMBER: _____ **CADS NO:** _____

PERSONS RELATED TO THIS INCIDENT

SHANKS	NICOLE		VICTIM	PID	1785695

UPDATED BY: SYS **LAST UPDATE:** 10-27-2021

DOC 609240

EXHIBIT D

From: Tulsa Police Department Open Records Center <tuisapolice@govqa.us>
Date: April 13, 2022 at 11:47:02 AM CDT
To: wbryen@oklahomawatch.org
Subject: Public Records Request :: P005741-041322



Dear Whitney Bryen:

Thank you for your interest in public records of the Tulsa Police Department. Your request has been received and is being processed in accordance with Title 51 of the Oklahoma State Statutes, Subsection 24, also known as the Oklahoma Open Records Act. Your request was received in this office on 4/13/2022 and given the reference number P005741-041322 for tracking purposes.

Records Requested: I am seeking the audio recording and transcript of the call that sent Tulsa Police officers to Habitat for Humanity Restore 1234 S. Norwood Ave. where LaDonna Paris was locked in a bathroom.

Your request will be forwarded to the relevant department(s) to locate the information you seek and to determine the volume and any costs associated with satisfying your request. You will be contacted about the availability and/or provided with copies of the records in question. PLEASE NOTE: Title 51 of the Oklahoma State Statutes, Subsection 24, also known as the Oklahoma Open Records Act does not require a governmental body to create new information, to do legal research, or to answer questions.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Again, thank you for using the Open Records Center.

Tulsa Police Department

To monitor the progress or update this request please log into the Open Records Center

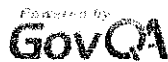


EXHIBIT E

On Apr 15, 2022, at 12:39 PM, Tulsa Police Department Open Records Center <tulsapolice@govqa.us> wrote:

--- Please respond above this line ---



Our 911 center will only release a call log. You can't get the audio without a subpoena. Do you want the call log?

Jocelyn

To monitor the progress or update this request please log into the [Open Records Center](#)

Powered by
GovQA

EXHIBIT F



911 PUBLIC SAFETY COMMUNICATIONS



Name: WHITNEY BRYEN

Reason: ORA

Begin Date: 10/25/2021 End Date: 10/25/2021 r 500

This includes Police, Fire, EMSA, Tulsa County and Catoosa (Will ONLY show the Top 500 records)

Address/Tracis # (Partial): 1234 S NORV

Go

Incident	Call Type	Pri	Address	APT	City	Name	Issue	Date	Reg	Disp	Arrv	Clr	CaseNumber
TPD2021009480385	DIST		3 1234 S Norwood Ave		TULSA	HEATHER FRAISER	Disturbance	10/25/2021	14:01	14:04	14:51	17:40	2021-055132