



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

CV 25 1369
Stinson

ASHLYND HUFFMAN, an individual,

and

FRONTIER MEDIA GROUP, INC., a
domestic corporation,

Plaintiffs,

v.

STATE OF OKLAHOMA *ex rel.*
OKLAHOMA DEPARTMENT OF
CORRECTIONS,

Defendant.

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

JUN - 2 2025

**RICK WARREN
COURT CLERK**

128 _____

Case No.

CV- 2025 - 1369

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

Plaintiffs Ashlynd Huffman and the Frontier Media Group, Inc. ("The Frontier"), through undersigned counsel, bring this action against the State of Oklahoma through the Oklahoma Department of Corrections ("Defendant" or "Department") for violations of the Open Records Act (the "ORA"), Okla. Stat. Ann. tit. 51, §§ 24A.1 *et seq.* In support of their Petition, Plaintiffs respectfully show the Court the following:

PARTIES

1. Plaintiff Ashlynd Huffman is an award-winning journalist at The Frontier, a nonprofit media company headquartered in Oklahoma. Her reporting focuses on criminal justice issues and other statewide matters. Ms. Huffman resides in Oklahoma County.

2. Plaintiff Frontier Media Group, Inc. ("The Frontier") is a nonprofit, 501(c)(3) corporation headquartered in Oklahoma. The Frontier makes its content freely available to the

public through various mediums, including its website (readfrontier.org), social media (@readfrontier), and more.

3. Defendant Oklahoma Department of Corrections (the “Department”) is an executive branch state government agency headquartered in Oklahoma City and governed by the State Board of Corrections. Okla. Stat. Ann. tit. 57, § 505. The Department is a “public body” subject to the ORA, within the meaning of Okla. Stat. Ann. tit. 51, § 24A.3(2).

4. The Department is not charged with enforcing state or local criminal laws and/or initiating criminal prosecutions. *See, e.g.*, Okla. Stat. Ann. tit. 57, § 509 (describing the Department’s authority over penal institutions and retaining the administrative powers and duties relating to such institutions); *id.* § 510 (describing the Director’s powers and duties over penal institutions, including hiring, compensation, training, Department operations, prisoner custody and control, and facility management, among others).

JURISDICTION AND VENUE

5. Jurisdiction is proper in this Court as a court of general jurisdiction pursuant to Okla. Const. art. VII, § 7.

6. Venue is proper in Oklahoma County pursuant to Okla. Stat. Ann. tit. 12, § 133.

THE OPEN RECORDS LAW

7. 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. Ann. tit. 51, § 24A.2.

8. The ORA defines records as “all documents including, but not limited to, any book, paper, photograph, microfilm, data files created by or used with computer software, computer tape, disk, record, sound recording, film recording, video record or other material regardless of physical

form or characteristic, created by, received by, under the authority of, or coming into the custody, control or possession of public officials, public bodies or their representatives in connection with the transaction of public business, the expenditure of public funds or the administering of public property.” Okla. Stat. Ann. tit. 51, § 24A.3(1).

9. “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.

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

11. “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 (emphasis added).

12. Under the ORA, a “law enforcement agency” is “any public body charged with enforcing state or local criminal laws and initiating criminal prosecutions including, but not limited to, police departments, county sheriffs, the Department of Public Safety, the Oklahoma State Bureau of Narcotics and Dangerous Drugs Control, the Alcoholic Beverage Laws Enforcement Commission, and the Oklahoma State Bureau of Investigation.” Okla. Stat. Ann. tit. 51, § 24A.3(5).

13. Law enforcement agencies must disclose certain categories of records enumerated in Okla. Stat. Ann. tit. 51, § 24A.8(A) and “may deny access to law enforcement records except where a court finds that the public interest or the interest of an individual outweighs the reason for denial.” Okla. Stat. Ann. tit. 51, § 24A.8(B)(1).

14. The Department does not qualify to invoke the aforementioned exemption because it is not a law enforcement agency since it is not charged with enforcing state or local criminal laws or initiating criminal prosecutions. *See* Okla. Stat. Ann. tit. 57, §§ 504, 509, 510.

15. Even if the Department were found to be a law enforcement agency within the meaning of Okla. Stat. Ann. tit. 51, § 24A.3(5), not all records of a law enforcement agency are subject to the law enforcement exemption to the ORA. While “law enforcement agencies *may* deny access to *law enforcement records* except where a court finds that the public interest or the interest of an individual outweighs the reason for denial,” Okla. Stat. Ann. tit. 51, § 24A.8(B)(1) (emphasis added), they “*shall* make available for public inspection and copying . . . [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,” *id.* § 24A.8(A)(3) (emphasis added).

STATEMENT OF FACTS

16. Oklahoma currently incarcerates 905 people per 100,000 residents—the fourth highest rate in the nation. The state has an incarceration rate that far exceeds that of many developed nations, including the United States itself.¹

17. In 2021, Oklahoma ranked second in the nation for the mortality rate of jail detainees.² In 2024, Oklahoma prisons saw 140 inmate deaths.³

¹ *Oklahoma Profile*, Prison Pol’y Initiative, <https://www.prisonpolicy.org/profiles/OK.html> (last accessed May 29, 2025); Emily Widra, *States of Incarceration: The Global Context 2024*, Prison Pol’y Initiative (June 2024), <https://www.prisonpolicy.org/global/2024.html>.

² Keaton Ross, *Oklahoma's Jail Mortality Rate Ranks Second in Nation*, Okla. Watch (Feb. 9, 2021), <https://oklahomawatch.org/2021/02/09/oklahomas-jail-mortality-rate-ranks-second-in-nation/>.

³ Jordan Gerard, *Oklahoma Sees Increase in Number of Inmates Dying in State Prisons*, The Oklahoman (Jan. 19, 2025), <https://www.oklahoman.com/story/news/politics/government/2025/01/19/oklahoma-state-prison-inmate-deaths-rose-in-2024/77487767007/>.

18. Oklahoma journalists and news outlets, including The Frontier and Ms. Huffman, help the public understand how carceral institutions operate, often leading to community-driven reform or oversight by federal agencies.

19. The public has an overriding interest in accessing serious incident reports from the Department which outweighs any exception or exemption that may apply because the severity of the conditions in prisons implicates not only the constitutional rights of inmates, but the public safety of entire communities—including Department employees who are at risk of serious violence or death if conditions inside a particular facility deteriorate without public intervention.

20. As recently as July 10, 2024, Defendant was fulfilling records requests for incident reports to Plaintiffs. “Incident” is defined in Department Policy OP-050109 as “[a]ny occurrence, which appears out of the ordinary, is suspect, is a rule violation, has serious impact to the security of the facility/unit, or provides the sharing of information.”⁴

21. On June 25, 2024, Ms. Huffman submitted an open records request (“ORR”) to the Department for “the serious incident reports at the Lawton Correctional Center from Jan. 1, 2024 to present.” On July 10, 2024, Jared Smith, records custodian for the Department, responded to the ORR by producing 526 pages of records to Ms. Huffman. *See* Exhibit A.

22. Ms. Huffman made additional records requests to the Department through its online portal on October 30, 2024, seeking transfer papers and investigation records related to the death of Marquiel Dae’juan Ross (“Ross Request,” attached as Exhibit B); January 21, 2025, requesting the investigation reports, serious incident reports, and video footage related to specific dates inside the Dick Conner Correctional Center (“Dick Conner Request,” attached as Exhibit C); and April

⁴ Policy No. OP-050109, § I.C, Okla. Dep’t of Corr. (eff. Mar. 29, 2022), <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-05/op050109.pdf>.

7, 2025, seeking the investigation report, serious incident report, and body camera footage related to the death of Cory Aaron Stegall (“Stegall Request,” attached as Exhibit D).

23. On April 7, 2025, Ms. Huffman submitted a records request to the Department through its online portal seeking, “[a]ll serious incident reports at the Allen Gamble Correctional Center Jan. 1, 2025 to present” (“AGCC Request,” attached as Exhibit E).

24. The AGCC Request is the subject of the instant action and Plaintiffs are seeking a court order mandating release of the records requested via the AGCC Request. Other requests and denials are provided to support factual assertions which demonstrate the change in policy and interpretation of the ORA by the Department.

25. On April 8, 2025, Mr. Smith responded to the AGCC Request via email, stating:

The request is denied under our policy OP-040177 [sic] <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Mr. Smith’s email is attached as Exhibit F.

26. The policy OP-040117 (“Policy”) referenced in Mr. Smith’s email provides: “Pursuant to the agency’s Administrative Rules adopted pursuant to the Oklahoma Administrative Procedures Act, 75 O.S. § 250.1 et seq., investigation reports and other supporting documentation are confidential and not available to the public or employees subject to an order of a court of competent jurisdiction or the agency director.”⁵

⁵ Policy No. OP-040117, § IV.A.1, Okla. Dep’t of Corr. (eff. Sept. 12, 2022), <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf>.

27. No Oklahoma statute or agency rule exists purporting to grant Defendant authority to declare public records confidential. Even if such a statute or rule did exist, the records requested fall outside the scope of the Department's Policy.

28. Also on April 8, 2025, the Department transmitted to Ms. Huffman denials to the Ross Request, the Dick Conner Request, and the Stegall Request. Those denials are attached as Exhibit G. The Department denied each of the foregoing open records requests by citing Policy OP-040117, and the law enforcement exception to the ORA. *See* Okla. Stat. Ann. tit. 51, § 24A.8.

29. On April 8, 2025, Ms. Huffman contacted Kay Thompson, Public Information Officer ("PIO") for the Department, via email and asked why the Department had denied her requests for incident reports at the Dick Conner Correctional Center and Allen Gamble Correctional Center, noting that she had previously received similar records from the Department in the past without issue. Ms. Huffman's email correspondence with Ms. Thompson is attached as Exhibit H.

30. On April 10, 2025, Ms. Thompson responded to Ms. Huffman stating: "We constantly re-evaluate our processes to ensure that they align with current best practices, policies and applicable statutes. After reviewing policy and the ORA statute, we've determined that investigation and incident reports are not public records. Also, documents created specifically for purposes of an investigation, either formal or informal, are confidential. Going forward, future requests such as these will be denied." Ex. H.

31. No changes to the ORA occurred between July 10, 2024 and April 8, 2025.

32. Defendant has offered no support to justify its sudden reinterpretation of the law.

33. On April 23, 2025, undersigned counsel provided the Department a notice of intent to litigate the denial of the AGCC Request as required by Okla. Stat. Ann. tit. 51, § 24A.17(C).

34. This action was filed at least ten business days after the date on which notice was provided to Defendant.

CAUSE OF ACTION

Violation of the Open Records Act, Okla. Stat. Ann. tit. 51, §§ 24A.1 *et seq.*

35. Plaintiffs re-allege and incorporate by reference the preceding paragraphs of the Petition.

36. Defendant's denial of Plaintiffs' open records requests seeking serious incident reports from the Allen Gamble Correctional Center is unlawful and violates the ORA.

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

38. Defendant possesses records responsive to Plaintiffs' open records requests; specifically, serious incident reports from the Allen Gamble Correctional Center between January 1, 2025 and the present day.

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

40. The law enforcement exception does not justify withholding the records requested because Defendant is not a law enforcement agency under the ORA. *See* Okla. Stat. Ann. tit. 57, §§ 504, 509, 510.

41. Defendant does not enforce state or local criminal laws and does not initiate criminal prosecutions. Both powers and duties are required pursuant to Okla. Stat. Ann. tit. 51, § 24A.3(5) to be considered a "law enforcement agency" for the purposes of the ORA.

42. Only a law enforcement agency may invoke the law enforcement exception, and Defendant does not qualify as a matter of law. *See* Okla. Stat. Ann. tit. 51, § 24A.8.

43. Even if the Department is determined to be a law enforcement agency, which it is not, the records at issue are subject to mandatory disclosure under numerous subsections of Section 24A.8, including, but not limited to, subsections 24A.8(A)(2), (3), (4), and (7).

44. Even if the Court finds that the Department is a law enforcement agency, which it is not, and that the records are not subject to release under the mandatory release provisions of Section 24A.8, which they are, the public interest in the requested records would still outweigh any reason for denial.

45. Disclosure of serious incident reports from the Allen Gamble Correctional Center will enable Plaintiffs and other members of the news media to disseminate information of high public value to the public and evaluate whether those entrusted with the affairs of the government are honestly, faithfully, and competently performing their duties as public servants.

46. Accordingly, Plaintiffs seek declaratory and injunctive relief under the ORA to prevent Defendant from continuing to deprive Plaintiffs of their statutory rights to request and obtain access to public records.

RELIEF REQUESTED

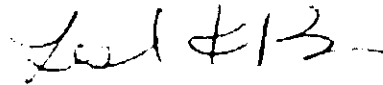
WHEREFORE, Plaintiffs respectfully request from this Court:

- (1) A declaratory judgment that the records and information requested by Plaintiffs are public records as defined by Okla. Stat. Ann. tit. 51, § 24A.3;
- (2) An injunction commanding Defendant to permit the inspection and copying of certain public records in its custody or control pursuant to Okla. Stat. Ann. tit. 51, § 24A.5;
- (3) An award of reasonable attorney fees pursuant to Okla. Stat. Ann. tit. 51, § 24A.17(A)(2);
- (4) Costs of suit pursuant to Okla. Stat. Ann. tit. 12, § 927; and

(5) Such other and further relief as the Court deems just and proper.

Dated: June 2, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leslie Briggs", with a horizontal line extending to the right.

Leslie Briggs, OBA 33845
Staff Attorney
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
P.O. Box 471094
Tulsa, OK 74147
P: (918) 850-8792
E: lbriggs@rcfp.org
Attorney for Plaintiffs

IN THE DISTRICT COURT IN AND FOR OKLAHOMA COUNTY
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Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT A



Fwd: Open Records Request

[REDACTED]

[REDACTED]

-Ashlynd Huffman, *The Frontier*
Investigative journalist
ashlynd@readfrontier.com
Follow me
X: @ashlyndhuffman
Call or text me
405-240-6359

----- Forwarded message -----
From: **Jared Smith** <Jared.Smith@doc.ok.gov>
Date: Wed, Jul 10, 2024 at 11:07 AM
Subject: Open Records Request
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

Good Morning! We've completed the request below. The file is too large (526 pages) to send via email so you'll be getting an email from WeTransfer shortly. It will fulfill this records' request.

Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

oklahoma.gov | oklahoma.gov/doc

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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Tuesday, June 25, 2024 3:31 PM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

[Redacted]

OPEN RECORDS REQUEST

[Redacted] Changes since 6/25/24, 1:28 PM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 418

Row ID	420
--------	-----

Status Not Started

Date 06/25/24, 1:28 PM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 1141 W Sheridan Ave

City Oklahoma City

State Oklahoma

Zip Code 73106

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information I am requesting the serious incident reports at the Lawton Correctional

Center from Jan. 1, 2024 to present.

Acknowledgement

100

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

For more information, contact the National Security Council, 2000 Wilson Boulevard, Suite 100, Arlington, VA 22201, or visit the [OPEN RECORDS REQUEST](https://www.eopensecrets.org) page at <https://www.eopensecrets.org>.

Exclude any charges from all negotiations. Unavailable.

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1. *Journal of the American Medical Association*, 1997; 277: 1001-1005.

100

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CORRECTIONS,

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT B



Fwd: Open Records Request - Ross

----- Forwarded message -----

From: **Jared Smith** <Jared.Smith@doc.ok.gov>
Date: Tue, Apr 8, 2025 at 10:26 AM
Subject: Open Records Request - Ross
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Wednesday, October 30, 2024 9:26 AM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

Details Changes since 10/30/24, 7:24 AM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 678

Row ID 681

Status Not Started

Date 10/30/24, 7:24 AM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested I am requesting the transfer papers and investigation into the death of Marquiel Dae'juan Ross DOC# 898181

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

You are receiving this email because you are subscribed to a workflow "Untitled Workflow" (ID# 8227843684393188) on sheet OPEN RECORDS REQUEST

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman

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ASHLYND HUFFMAN, an individual,

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OKLAHOMA DEPARTMENT OF
CORRECTIONS.

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT C



Fwd: Open Records Request - DCCC Incident Reports & Video Footage

----- Forwarded message -----

From: **Jared Smith** <Jared.Smith@doc.ok.gov>

Date: Tue, Apr 8, 2025 at 10:26 AM

Subject: Open Records Request - DCCC Incident Reports & Video Footage

To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

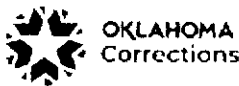
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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Tuesday, January 21, 2025 10:49 AM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 1/21/25, 8:47 AM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 868

Row ID 881

Status Not Started

Date 01/21/25, 8:48 AM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested

I am requesting the following video footage 12/31/24; DCCC, 7:30-8:00. 12/23/24, camera footage from DCCC, unit N&Q, Q-B side, 8:30-9:00 PM... 12/21/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 11:00-11:30AM. 12/21/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 8:45-9:00AM. 12/17/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 7:00-8:00 PM. 12/9/24, camera footage from D.C.C.C., Unit N&Q, N-B side 7:00-8:00 AM. Thanksgiving 2023, 11/23/23; camera footage from D.C.C.C., Unit N&Q, video footage of the entire day. 5/19/23, stabbing death in the chow hall, D.C.C.C.,. I am requesting all the incidents, staff and investigation reports for the following: 12/31/24; DCCC, 12/23/24, DCCC, unit N&Q, Q-B side, 12/21/24, D.C.C.C., Unit N&Q, Q-B side 12/21/24, D.C.C.C., Unit N&Q, Q-B side 12/17/24, D.C.C.C., Unit N&Q, Q-B side 12/9/24, D.C.C.C., Unit N&Q, N-B side Thanksgiving 2023, 11/23/23; D.C.C.C., Unit N&Q, video 5/19/23, stabbing death in the chow hall, D.C.C.C.,. I further request all serious reportable incidents, from Jan. 1, 2023 to present at Dick Connors Correctional Center.

Acknowledgement ☒**Completed by****Date Completed****Days to Completion**

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The Frontier

ashlynd@readfrontier.com

[@ashlyndhuffman](#)

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EXHIBIT D



Fwd: Open Records Request - Stegall Incident Reports & Video Footage

----- Forwarded message -----

From: **Jared Smith** <Jared.Smith@doc.ok.gov>

Date: Tue, Apr 8, 2025 at 10:26 AM

Subject: Open Records Request - Stegall Incident Reports & Video Footage

To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

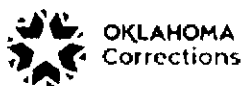
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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Monday, April 7, 2025 3:18 PM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 4/7/25, 1:16 PM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 1052

Row ID 1072

Status Not Started

Date 04/07/25, 1:18 PM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested Investigation report, serious incident report and body camera footage for the death of Cory Aaron Stegall DOC#741638 at the Allen Gamble Correctional Center in 2024.

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman

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

ASHLYND HUFFMAN, an individual,

and

FRONTIER MEDIA GROUP, INC., a
domestic corporation,

Plaintiffs,

Case No.

v.

STATE OF OKLAHOMA *ex rel.*
OKLAHOMA DEPARTMENT OF
CORRECTIONS.

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT E



Fwd: Open Records Request - AGCC Incident Reports

[REDACTED]

Leslie,

This is the most recent one but I am going to go ahead and send you the requests from last year that were also denied this week.

----- Forwarded message -----

From: **Jared Smith** <Jared.Smith@doc.ok.gov>

Date: Tue, Apr 8, 2025 at 10:27 AM

Subject: Open Records Request - AGCC Incident Reports

To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

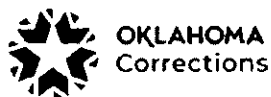
Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

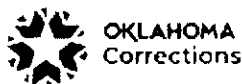
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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Monday, April 7, 2025 3:24 PM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 4/7/25, 1:21 PM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 1053

Row ID 1073

Status Not Started

Date 04/07/25, 1:23 PM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested All serious incident reports at the Allen Gamble Correctional Center Jan. 1, 2025 to present.

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman

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

ASHLYND HUFFMAN, an individual,

and

FRONTIER MEDIA GROUP, INC., a
domestic corporation,

Plaintiffs,

Case No.

v.

STATE OF OKLAHOMA *ex rel.*
OKLAHOMA DEPARTMENT OF
CORRECTIONS,

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT F



Fwd: Open Records Request - AGCC Incident Reports

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Jared Smith** <Jared.Smith@doc.ok.gov>

Date: Tue, Apr 8, 2025 at 10:27 AM

Subject: Open Records Request - AGCC Incident Reports

To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

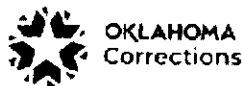
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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Monday, April 7, 2025 3:24 PM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 4/7/25, 1:21 PM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 1053

Row ID 1073

Status Not Started

Date 04/07/25, 1:23 PM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested All serious incident reports at the Allen Gamble Correctional Center Jan. 1, 2025 to present.

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman

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

ASHLYND HUFFMAN, an individual,

and

FRONTIER MEDIA GROUP, INC., a
domestic corporation,

Plaintiffs,

Case No.

v.

STATE OF OKLAHOMA *ex rel.*
OKLAHOMA DEPARTMENT OF
CORRECTIONS.

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT G



Fwd: Open Records Request - Ross

[REDACTED]

From: **Jared Smith** <Jared.Smith@doc.ok.gov>
Date: Tue, Apr 8, 2025 at 10:26 AM
Subject: Open Records Request - Ross
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Wednesday, October 30, 2024 9:26 AM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

Details Changes since 10/30/24, 7:24 AM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 678

Row ID 681

Status Not Started

Date 10/30/24, 7:24 AM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested I am requesting the transfer papers and investigation into the death of Marquiel Dae'juan Ross DOC# 898181

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman



Fwd: Open Records Request - DCCC Incident Reports & Video Footage

[REDACTED]

From: **Jared Smith** <Jared.Smith@doc.ok.gov>
Date: Tue, Apr 8, 2025 at 10:26 AM
Subject: Open Records Request - DCCC Incident Reports & Video Footage
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Tuesday, January 21, 2025 10:49 AM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 1/21/25, 8:47 AM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 868

Row ID 881

Status Not Started

Date 01/21/25, 8:48 AM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City Oklahoma City

State Oklahoma

Zip Code 73159

Email ashlynd@readfrontier.com

Phone +1 (405) 240-6359

Information Requested

I am requesting the following video footage 12/31/24; DCCC, 7:30-8:00. 12/23/24, camera footage from DCCC, unit N&Q, Q-B side, 8:30-9:00 PM... 12/21/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 11:00-11:30AM. 12/21/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 8:45-9:00AM. 12/17/24, camera footage from D.C.C.C., Unit N&Q, Q-B side 7:00-8:00 PM. 12/9/24, camera footage from D.C.C.C., Unit N&Q, N-B side 7:00-8:00 AM. Thanksgiving 2023, 11/23/23; camera footage from D.C.C.C., Unit N&Q, video footage of the entire day. 5/19/23, stabbing death in the chow hall, D.C.C.C., I am requesting all the incidents, staff and investigation reports for the following: 12/31/24; DCCC, 12/23/24, DCCC, unit N&Q, Q-B side, 12/21/24, D.C.C.C., Unit N&Q, Q-B side 12/21/24, D.C.C.C., Unit N&Q, Q-B side 12/17/24, D.C.C.C., Unit N&Q, Q-B side 12/9/24, D.C.C.C., Unit N&Q, N-B side Thanksgiving 2023, 11/23/23; D.C.C.C., Unit N&Q, video 5/19/23, stabbing death in the chow hall, D.C.C.C., I further request all serious reportable incidents, from Jan. 1, 2023 to present at Dick Connors Correctional Center.

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

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The Frontier

ashlynd@readfrontier.com

[@ashlyndhuffman](#)



Fwd: Open Records Request - Stegall Incident Reports & Video Footage

[REDACTED]

From: **Jared Smith** <Jared.Smith@doc.ok.gov>
Date: Tue, Apr 8, 2025 at 10:26 AM
Subject: Open Records Request - Stegall Incident Reports & Video Footage
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Hi Ashlynd,

The request is denied under our policy OP-040177 <https://oklahoma.gov/content/dam/ok/en/doc/documents/policy/section-04/op040117.pdf> and under ORA 51 O.S. § 24A.8. <https://www.oscn.net/applications/oscn/deliverdocument.asp?lookup=Previous&listorder=4400&dbCode=STOKST51&year=>

This email will fulfill the Open Records Request. Have a great day!

Respectfully,

Jared Smith | Division Support Coordinator

Public Relations | Department of Corrections

405-425-7033

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From: Smartsheet Automation <automation@app.smartsheet.com>
Sent: Monday, April 7, 2025 3:18 PM
To: Jared Smith <Jared.Smith@doc.ok.gov>
Subject: [EXTERNAL] Changes to OPEN RECORDS REQUEST: Ashlynd Huffman



Changes to OPEN RECORDS REQUEST: Ashlynd Huffman

OPEN RECORDS REQUEST

Details Changes since 4/7/25, 1:16 PM

1 row added , 1 row changed

1 row added or updated (shown in yellow)

Row 1052

Row ID 1072

Status Not Started

Date 04/07/25, 1:18 PM

Is this a media request? Yes

Purpose of Request

Requestor Name Ashlynd Huffman

Company

Media Affiliation The Frontier

Address 3018 SW 89th St, Oklahoma City, OK 73159

City

Oklahoma City

State

Oklahoma

Zip Code

73159

Email

ashlynd@readfrontier.com

Phone

+1 (405) 240-6359

Information Requested

Investigation report, serious incident report and body camera footage for the death of Cory Aaron Stegall DOC#741638 at the Allen Gamble Correctional Center in 2024.

Acknowledgement ☒

Completed by

Date Completed

Days to Completion

Changes made by web-form@smartsheet.com, automation@smartsheet.com

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The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman

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

ASHLYND HUFFMAN, an individual,

and

FRONTIER MEDIA GROUP, INC., a
domestic corporation,

Plaintiffs,

Case No.

v.

STATE OF OKLAHOMA *ex rel.*
OKLAHOMA DEPARTMENT OF
CORRECTIONS,

Defendant.

PETITION FOR RELIEF FOR VIOLATIONS OF THE
OKLAHOMA OPEN RECORDS ACT

EXHIBIT H



Fwd: [EXTERNAL] Media Inquiry

----- Forwarded message -----

From: **Kay Thompson** <kay.thompson@doc.ok.gov>
Date: Thu, Apr 10, 2025 at 11:51 AM
Subject: RE: [EXTERNAL] Media Inquiry
To: Ashlynd Huffman <ashlynd@readfrontier.com>

Ashlynd,

We constantly re-evaluate our processes to ensure that they align with current best practices, policies and applicable statutes. After reviewing policy and the ORA statute, we've determined that investigation and incident reports are not public records. Also, documents created specifically for purposes of an investigation, either formal or informal, are confidential. Going forward, future requests such as these will be denied.

Respectfully,

Kay Thompson | Chief
Public Relations | Department of Corrections
p. 405-425-2331 | c. 405-212-7578
Oklahoma.gov | Oklahoma.gov/DOC

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From: Ashlynd Huffman <ashlynd@readfrontier.com>
Sent: Tuesday, April 8, 2025 12:52:44 PM
To: Kay Thompson <kay.thompson@doc.ok.gov>
Subject: [EXTERNAL] Media Inquiry

Kay,

My open records request for investigation reports for an incident at DCCC was denied and my request for serious incident reports at AGCC were also denied based on ODOC policy and law enforcement exemption. I have received these reports in the past, is there a specific reason ODOC is now denying them?

--

-Ashlynd Huffman, *The Frontier*

Investigative journalist

ashlynd@readfrontier.com

Follow me

X: @ashlyndhuffman

Call or text me

405-240-6359

The Frontier

ashlynd@readfrontier.com

@ashlyndhuffman