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                 IN THE UNITED STATES DISTRICT COURT
               FOR THE NORTHERN DISTRICT OF OKLAHOMA
2
    LADONA A. POORE,
3
               Plaintiff,
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                                     CASE NO. 11-CV-797-CVE-TLW
    vs.
6
    STANLEY GLANZ, SHERIFF OF
    TULSA, in his Individual and
7
    Official Capacities; and
    SETH BOWERS.
8
              Defendants.
9
10
                   VIDEO DEPOSITION OF SETH BOWERS
                   TAKEN ON BEHALF OF THE PLAINTIFF
11
12
                         ON DECEMBER 14, 2012
13
                          IN TULSA, OKLAHOMA
                               * * * *
14
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16
    APPEARANCES:
    MR. LOUIS BULLOCK, Attorney at Law, of the firm BULLOCK,
17
    BULLOCK & BLAKEMORE, 110 W. 7th Street, Ste. 707, Tulsa, OK
    74119; appearing for the Plaintiff.
18
    MR. GUY A. FORTNEY, Attorney at Law, of the firm BREWSTER &
19
    DE ANGELIS, PLLC, 2617 E. 21st Street, Tulsa, OK 74114;
    appearing on behalf of the Defendant, Stanley Glanz and the
20
    Tulsa County Sheriff's Office.
21
    MR. ANTHONY L. ALLEN and MR. THOMAS LANDRUM, office of
    GRAHAM, ALLEN & BROWN, 427 S. Boston Avenue, Ste. 355,
22
    Tulsa, OK 74103; appearing for the Defendant, SETH BOWERS.
23
                    Josh Turley, Risk Management, Tulsa County
    ALSO PRESENT:
    Sheriff's Office
24
25
    REPORTED BY: KEMA L. HICKS, CSR
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Kema L. Hicks Reporting Service (918) 286-0881 Fax: (918) 872-8197

Plaintiff's Exhibit 9

SETH BOWERS - December 14, 2012

	7	
1	Q And how many hours a week do you work there?	
2	A Roughly 30.	
3	Q You get any benefits such as health insurance?	
4	A Yes.	
5	Q While you were working for the Tulsa County at	
6	the Tulsa County Jail, did you ever meet an inmate by the	
7	name of LaDona Poore?	
8	A I hereby invoke my right pursuant to the	
9	protection of the Fifth Amendment to the United States	
10	Constitution.	
11	Q Did you ever have sex with an inmate by the name	
12	of LaDona Poore?	
13	A I hereby invoke my right pursuant to the	
14	protections of the Fifth Amendment of the United States	
15	Constitution.	
16	Q Did you ever fondle her?	
17	A I hereby invoke my right pursuant to the	
18	protections of the Fifth Amendment of the United States	
19	Constitution.	
20	Q Did you touch her in any sexual manner?	
21	A I hereby invoke my right pursuant to the	
22	protections of the Fifth Amendment of the United States	
23	Constitution.	
24	Q Did you ever have intercourse with her?	
25	A I hereby invoke my right pursuant to the	

SETH BOWERS - December 14, 2012

	10
1	A I hereby invoke my right pursuant to the
2	protections of the Fifth Amendment to the United States
3	Constitution.
4	Q While employed at the Tulsa County Jail, did you
5	ever touch in a sexual manner any of the nurses that worked
6	in the medical unit at the Tulsa County Jail?
7	A I hereby invoke my right pursuant to the
8	protections of the Fifth Amendment to the United States
9	Constitution.
10	MR. BULLOCK: I don't think I have anything
11	further.
12	MR. FORTNEY: I have a few questions.
13	EXAMINATION
14	BY MR. FORTNEY:
15	Q Mr. Bowers, when when did you first become
16	employed by the Tulsa County Sheriff's Office?
17	A March 2009.
18	Q Okay. And at that time, did you receive any
19	training from the Tulsa County Sheriff's Office?
20	A Yes.
21	Q Can you generally describe that for the record,
22	please?
23	A I went through a 30-day academy or they taught us
24	different excuse me different aspects of the jail and
25	their policies and procedures.