IN THE DISTRICT COURT FOR TULSA COUNTY STATE OF OKLAHOMA

MICHAEL SANCHEZ,)
JOHN JEFFERY PETERSON JR.,)
Plaintiff,) Case No. CJ-2015-00469) Judge Linda G. Morrissey
v.)
) ATTORNEY LIEN CLAIMED
(1) BLUE OX DANCE HALL, LLC d/b/a)
LEGEND'S DANCE HALL & SALOON,)
LLC,)
(2) BLUE OX DINING, LLC,)
(3)BLUE OX DINING GROUP, LLC,)
(4) JESSE PAUL TRIPLETT,)
(5) JOHN SEBASTIAN HOFFMAN)
(6) JOSHUA ADOLPH HANKE)
(7) JASON DONOVAN JENSEN)
(8) FRED JAMES CRAPSE, III)
)
Defendants.)

AFFIDAVIT OF JILL GALBRAITH

STATE OF OKLAHOMA)
)ss:
COUNTY OF TULSA)

Comes now, Jill Galbraith, being duly sworn upon her oath, and swears and affirms the following:

- My name is Jill Galbraith. I am 35 years old and have personal knowledge of the facts contained in this Affidavit.
- 2. I have lived in Tulsa County for the past fifteen (15) years.
- 3. On September 7, 2014, between approximately 1:20 a.m. and 1:40 a.m., I witnessed security staff at Legend's Dance Hall display excessively violent behavior toward multiple patrons, including myself.

- 4. I was standing close to the exit door of Legend's Dance Hall when I saw a man being removed by a member of security via chokehold. As the security member reached the exit door, another member of security came up behind them and, reaching over the shoulder of the member of security issuing the chokehold, punched the patron in the back of the head several times with his right fist.
- 5. I stepped over and tapped the back of his left shoulder. He stopped punching and turned around to me. I said, "He's already being taken out. Stop punching him." Almost before I could get those words out, he interrupted me and said, "Oh, really, bitch?" He subsequently grabbed me, threw me several feet outside the exit door while saying, "Get the fuck out of here, you fucking bitch." This man is large. I am 5'6" and 116 lbs., and I was wearing a dress and heels. I believe he used a considerable amount of his strength to pick me up and throw me. The only reason I did not hit the pavement face-first on the downward-sloped exit ramp is because I grabbed onto his T-shirt. The force he used as I grabbed onto his shirt for support cause his shirt to rip completely. Had I not grabbed onto his T-shirt, I more than likely would have been hospitalized as a result of injuries sustained from being thrown by the member of security.
- 6. Within a short period of time, I turned around again and witnessed a member of security throw a man to the ground just past the downward-sloped ramp and begin kicking him in the ribs. The man was curled up into the fetal position and the security guard continued kicking him. The style of kicking was similar to a football kicker, except before each shoe-to-rib connection, this security member jumped into the air and raised his arms in order to get more force behind his

kicks. The security member was angry and yelling. His treatment of the patron was brutal and unnecessary, and although other security members witnessed the attack, none attempted to stop the dramatic act of violence.

7. I walked over to the area of the attack with my phone faced at the assailant and yelled, "Stop kicking him. I have you on camera." Another member of security came toward me yelling, "Fuck you, you fucking bitch. Get out of here. Turn off the fucking camera." He forced me backward approximately 20 feet by walking directly into me. After I said, "I'm going as fast as I can, please stop pushing me," he turned away. During that time, my friend saw bystanders help the victim off of the ground and pull him away from security.

8. I emailed this information to Blake Ewing and he responded to my email. He did not show much concern.

9. Anything further, Affiant sayeth not!

Jill Galbraith, Affiant

Sworn and subscribed to before me by Jill Galbraith on this 12 day of August,

2015.

My Commission Expires:

(SEAL)

CAITLIN COX Notary Public, State of Oklahoma Commission # 11003147 My Commission Expires April 06, 2019