

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
Plaintiff,

v.

HEATHER DAWN CHANDLER,
Defendant.

Case No. CF-2025-109

FILED DISTRICT COURT
Stephens County, Okla.

SEP 26 2025

MELODY HARPER
Court Clerk

DEFENDANT ' S MOTION TO COMPEL DISCOVERY, FOR
PRESERVATION ORDER, AND FOR SANCTIONS OR EXCLUSION IF
MATERIALS ARE NOT PRODUCED

TO THE HONORABLE COURT:

COMES NOW Defendant, Heather Dawn Chandler, appearing pro se, and pursuant to 22 O.S. § 2002, *Brady v. Maryland*, 373 U.S. 83 (1963), and *Giglio v. United States*, 405 U.S. 150 (1972), respectfully moves this Court to compel the State to disclose specific discoverable items in its possession, custody, or control; to enter a preservation order prohibiting alteration or destruction of such items; and to impose sanctions or exclusion of testimony should such evidence be withheld.

I. BACKGROUND

1. On May 6, 2025, Defendant was arrested following a traffic stop involving multiple officers of the Duncan Police Department.
2. During booking, dispatcher Patricia Pearson stated that Defendant ' s driver ' s license was expired. In fact, Defendant ' s license is valid until April 30, 2026. The database, printout, or other source relied upon remains unclear.
3. Defendant specifically requested a breath test at the Stephens County Jail, within the two-hour statutory window permitted by 47 O.S. § 751 and § 752. Jail staff, including Julie Smith, denied this request. Jail footage would confirm Defendant ' s condition and the denial of the test.
4. The traffic stop involved three coordinated patrol units executing a " box-in " maneuver, suggesting pre-arranged coordination rather than routine patrol.
5. Officer McReynolds ' affidavit claims he casually met back up with Defendant on Main Street. However, officer statements (including Officer Ramsey ' s) confirm that McReynolds

accelerated down 7th Street, passing the Duncan Police Department at a high rate of speed to intercept Defendant. This discrepancy makes the AVL/GPS location data and vehicle speed logs critical to evaluating the credibility of the State ' s evidence.

II. LEGAL BASIS

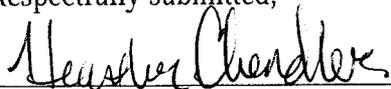
- 22 O.S. § 2002 requires the State to disclose evidence in its possession.
- 51 O.S. § 24A.1 (Open Records Act) requires law enforcement and correctional agencies to produce records.
- 47 O.S. § 751(E) guarantees a defendant the right, at their own expense, to obtain an independent chemical test within two hours of arrest or booking. The denial of such a test is admissible evidence.
- 47 O.S. § 752 provides that chemical tests conducted within two hours are admissible as evidence.
- Failure to disclose or preserve these materials violates Brady, Giglio, and Defendant ' s due process rights.

III. RELIEF REQUESTED

Defendant respectfully requests that the Court:

1. Compel the State to produce all discoverable materials, including but not limited to:
 - CAD logs, dispatch audio, and source records relied upon by Patricia Pearson regarding Defendant ' s license status;
 - Jail booking and W-1 cell video from 1:30 a.m. to 4:00 a.m. on May 6, 2025;
 - Logs or rosters identifying inmates housed with Defendant (including " Gracie ");
 - Dashcam and body-worn camera footage of all officers involved;
 - AVL/GPS location data, speed logs, and officer notes for Officer McReynolds ' patrol unit on May 6, 2025, particularly between Ray ' s Place and the Duncan Police Department;
 - Any related reports concerning the " box-in " maneuver and coordinated pursuit.
2. Enter a preservation order prohibiting deletion, alteration, or overwriting of such records until the final resolution of this case.
3. In the alternative, impose sanctions or exclude testimony if the State fails to comply.

Respectfully submitted,



Heather Dawn Chandler

Defendant, Pro Se

408 West Ash

Duncan, OK 73533

(572) 241-3068

hdpchandler1@gmail.com

EXHIBIT A

DEFENDANT ' S SPECIFIC REQUEST FOR PRESERVATION AND PRODUCTION OF EVIDENCE OF MULTI-UNIT INTERCEPTION

Defendant respectfully requests the Court order preservation and production of the following:

1. Dashcam / in-car video from all patrol vehicles in the area of Ray ' s Place and the roadway toward Duncan on May 6, 2025, between 1:00 a.m. and 2:30 a.m., including:
 - The unit that followed directly behind Defendant ' s vehicle throughout;
 - The unit that emerged from the left and briefly positioned in front;
 - The unit that emerged from the right and then disengaged.
2. Body-worn camera footage from each officer in the above-listed units.
3. CAD / Dispatch logs showing assignments, unit positions, and communications about the coordinated stop.
4. Radio transmissions between dispatch (including Patricia Pearson) and responding officers.
5. AVL / GPS data for the involved patrol cars during the timeframe.
6. Supervisor directives or instructions regarding the deployment of multiple units to intercept or contain Defendant ' s vehicle.

PROPOSED ORDER

On this ____ day of _____, 2025, the Court considered Defendant ' s Motion to Compel Discovery, for Preservation Order, and for Sanctions or Exclusion if Materials Are Not Produced.

IT IS HEREBY ORDERED that:

1. The State shall produce forthwith the discovery items listed in Defendant ' s Motion.
2. The Stephens County Jail and Dispatch are directed to preserve all such records.
3. If evidence is not produced, the Court will consider sanctions or exclusion of testimony.

SO ORDERED.

JUDGE OF THE DISTRICT COURT

NOTICE OF HEARING

PLEASE TAKE NOTICE that Defendant ' s Motion to Compel Discovery, for Preservation Order, and for Sanctions or Exclusion will be heard before the Honorable Judge of the District Court, Stephens County Courthouse, Duncan, Oklahoma, on the ____ day of _____, 2025, at _____ a.m./p.m.

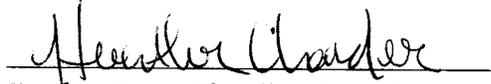
Respectfully submitted,

Heather Dawn Chandler
Defendant, Pro Se

CERTIFICATE OF MAILING

I hereby certify that on this 26 day of Sept, 2025, a true and correct copy of the foregoing Motion to Compel Discovery, Exhibit A, Proposed Order, Notice of Hearing, and Certificate of Mailing was mailed, postage prepaid, to:

District Attorney 's Office
Stephens County Courthouse
101 S. 11th Street
Duncan, OK 73533



Heather Dawn Chandler, Defendant Pro Se
408 West Ash
Duncan, OK 73533
(572) 241-3068
hdpchandler1@gmail.com

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

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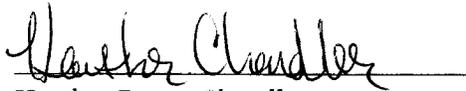
Case No. CF-2025-109

EXHIBIT A

Certified Mail Receipts
(Proof of Service on State and Agencies)

↑
is with motion to compel
discovery

Respectfully submitted,



Heather Dawn Chandler
Defendant, Pro Se

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
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EXHIBIT B

Open Records Act Requests
(Directed to Duncan Police Department and Stephens County entities)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heather Dawn Chandler", is written over a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

My goal is to

25-01071

REQUEST FOR RECORD(S) COPY

CITY OF DUNCAN POLICE DEPARTMENT

TO BE COMPLETED BY REQUESTER (As per State Statute and City Ordinance)

NAME: Heather Chandler

ADDRESS: 408 W. Ash

CITY: Duncan STATE OK AGENCY/BUSINESS DPD

SIGNATURE: Heather P. Chandler DATE May 20, 2025

PHONE: 572-241-3068 hdp.chandler1@gmail.com

COPIES SOUGHT: Please provide as specific a description as possible of the record(s) you desire a copy of.

TYPE OF RECORD
(Accident, Complaint, Arrest, etc.)

INVOLVED PERSON(S)

- all 1. Radio Communication w/district & other officers officer Darius McReynolds badge 35 & officer David Ramsey
- 2. in car computer activities, dash cam, body cam, Any other cam video, of Tail,
- 3. while I was being bodded, phone records, any and all disciplinary infractions/complaints
all voice recordings between Darius. from 1:00 am until 2:00 am
May 6, 2025

CHARGES: A CHARGE FOR PROVIDING COPIES OF PUBLIC RECORDS IS AUTHORIZED BY STATE LAW AND HAS BEEN ESTABLISHED BY THE CITY GOVERNING BODY. THESE CHARGES ARE SET AT A LEVEL TO COMPENSATE THE CITY FOR THE ACTUAL COSTS INCURRED IN HONORING YOUR REQUEST. THE FEE SCHEDULE ESTABLISHED BY THE CITY IS POSTED IN THIS OFFICE.

also officer Darius McReynolds location at 1:15 am
May 6, 2025

THE CHARGE TO YOU FOR COPIES OF THE RECORD(S) YOU REQUEST IS \$ _____

A COPY OF THIS FORM IS YOUR RECEIPT

also, Darius McReynolds training records, and All his arrests & convictions

TO BE COMPLETED BY CITY ATTORNEY:

APPROVED _____

DENIED _____

DATE _____

CITY ATTORNEY OFFICE

TO BE COMPLETED BY RECORDS PERSONNEL:

DATE/TIME OF REQUEST _____ DATE/TIME RECORD WAS PROVIDED: _____

RECORDS PERSONNEL PROVIDING COPY(S)

Duncan Police Department does not have GPS tracking in its patrol units or on its officers.

Records keeper did not sign his name
~~that~~ I asked him to
~~write it~~ recorded write
I asked him to write his
Date requested: July 14, 2025 thinking he would sign his name. oops.
I show it on video though. So maybe that's as good as a signature.

Heather Chandler 572-241-3063

Duncan Police Department

Darius Mc Reynolds Badge 35

David Ramsey

Gene Thatcher ??

on May 6 2025 ~~at~~ Stom 01:15 am to 01:45 am ^{gps locations of all 3 patrol units.}

the Oklahoma Open Records Act states that information requested from anyone especially the person defending themselves by a government agency shall be granted to either physically view in person or/and agency shall make copies to that individual upon request and agency must give a timely estimated number of days it will take to release data and if denied, a written or verbal reason why request will be refused. I will note also that any data withheld from requester or victim or defendant defending self, will be in violation of amendment and will be forced to go to further measures to gain access to said information, and will take it to a higher agency or official to gain ~~such~~ said data.

Respectfully

Heather Chandler

July 14, 2025

OPEN RECORDS REQUEST

Pursuant to the Oklahoma Open Records Act (51 O.S. §§ 24A.1 – 24A.31)

Date Requested: July 14, 2025

To:

Duncan Police Department

Attn: Records Custodian

Also directed to:

- Officer Darius McReynolds, Badge No. 35
- Officer David Ramsey
- Officer Gene Thatcher (spelling uncertain)

From:

Heather Dawn Chandler

408 West Ash

Duncan, Oklahoma 73533

Phone: 572-241-3063

Email: hdpchandler1@gmail.com

Request for Records

Pursuant to the Oklahoma Open Records Act, 51 O.S. §§ 24A.1 – 24A.31, I hereby request the following:

- GPS location records of all patrol units assigned to or active with the Duncan Police Department on May 6, 2025, between 1:15 a.m. and 1:45 a.m.

Agency Obligations

Under 51 O.S. § 24A.5(6), public bodies must provide a prompt, reasonable timeline for release of records. If this request is denied, the specific statutory authority for the denial must be stated in writing. Withholding data that is material to a pending criminal defense may constitute a violation of my 6th Amendment right to confront evidence and my 14th Amendment right to due process.

Deadline for Response

Please provide the requested records, or a written explanation citing statutory authority for any denial, within ten (10) business days of receipt of this request, as required under Oklahoma law. If this request is denied or ignored, I will pursue further remedies, including filing with higher state agencies, the Oklahoma Attorney General's Office, or through the court

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STATE OF OKLAHOMA,
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EXHIBIT D

Reserved for supplemental evidence, if needed

Respectfully submitted,

A handwritten signature in cursive script that reads "Heather Chandler". The signature is written in black ink and is positioned above a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

Attorneys

HAMMOND & ARCHER, PLLC

Legal Assistan

David W. Hammond
Dhammond@duncanlegal.net

ATTORNEYS AT LAW

Cheryl A. Upchurch
Cupchurch@duncanlegal.net

Jeffery K. Archer
jarcher@duncanlegal.net

1102 WEST MAPLE AVENUE
DUNCAN, OKLAHOMA
Telephone (580)252-9033
Facsimile (580)-252-6251
Email office@duncanlegal.net
URL: duncanlegal.net

Allie N. Sande
allie.duncanlegal@outlook.com

Joe K. White
Joekwhite07@gmail.com

Julia K. Suson
julia.duncanlegal@outlook.com

I made Request on May 20, 2025
May 27, 2025 and ✓

I did not receive this data
until after my court hearing PCH

City of Duncan
Police Department
Records Division
100 S 7th Street
Duncan, OK 73533

June 25, 2025
Court date

Mont Russell
CR 5477@yahoo.com

RE: Open Records Act

They DPD
City attorney

did not hand me these until the 26th or 27th of June

Records Department,

Attached hereto are two recent Open Records Act Requests. I have also attached the Open Records Act as it specifically applies to Law Enforcement Agencies (51 O.S. §244.8). As you can see, the Police Department is required to make available, IF KEPT, those records contained in Section (A).

The Police Department does not disclose Identifying Information such as driver's license or social security numbers or date of birth. We do not disclose audio/video or photos that would identify minors, or depict death, severe injury or nudity.

More specifically, as to the Open Records Requests that accompany this letter, please assemble for my review, all bodycam/dashcam video and the 911 comms for the accompanying arrests. No other requested information is subject to disclosure.

If you have any further questions, do not hesitate to call.

Yours very truly,

Jeffery Archer
City Attorney

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
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v.

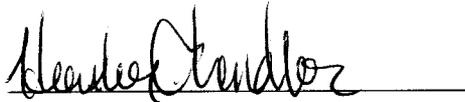
HEATHER DAWN CHANDLER,
Defendant.

Case No. CF-2025-109

EXHIBIT F

Impeachment of Officer McReynolds ' Affidavit
(Contradictions between affidavit and video evidence)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heather Dawn Chandler", is written over a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

EXHIBIT F

IMPEACHMENT OF OFFICER McREYNOLDS' AFFIDAVIT BY VIDEO EVIDENCE

This exhibit is submitted by Defendant Heather Dawn Chandler to demonstrate contradictions between Officer Darius McReynolds' sworn affidavit and statements captured on contemporaneous body-worn and dash-camera video during the May 6, 2025, traffic stop. The attached transcript excerpts and side-by-side comparison illustrate material inconsistencies relevant to the Court's consideration of discovery, suppression, and impeachment issues.

TRANSCRIPT EXCERPT FROM VIDEO RECORDING

[Video Timestamp 2:24]

Ramsey walks up to McReynolds' car, opens passenger door, and says:

Ramsey: "Where have I seen this car from?"

McReynolds: "Ray's."

Ramsey: "Huh?"

McReynolds: "Ray's."

[Video Timestamp 2:30]

Ramsey: "I was just wondering 'cause I just seen you vroom right down in front of PD—"

(McReynolds then cuts him off mid-sentence.)

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**DEFENDANT'S IMPEACHMENT EXHIBIT –
CONTRADICTIONS BETWEEN AFFIDAVIT AND
VIDEO RECORDINGS**

Defendant respectfully submits this impeachment exhibit to highlight material contradictions between Officer Darius McReynolds' sworn affidavit (filed May 6, 2025) and contemporaneous statements captured on body-worn camera and dash-camera video during the traffic stop in question. These contradictions bear directly on the credibility of the officer and the reliability of his testimony, and they support Defendant's motions to compel discovery, for sanctions or exclusion, and for suppression of unlawfully obtained evidence.

II. SIDE-BY-SIDE COMPARISON

Sworn Affidavit of Officer McReynolds

"...conducting my routine patrol duties in the area of South 13th Street and Highway 7... observed a tan 4-door vehicle... continued to follow the vehicle..."

Actual Video Statement / Conduct

[Video Timestamp 2:24] – Officer Ramsey opens McReynolds' car door and asks: "Where have I seen this car from?" McReynolds answers: "Ray's."

Sworn Affidavit

"...continued to follow the vehicle... began to run the vehicle's information... at intersection of 7th and Main..."

Video

[Video Timestamp 2:30] – Ramsey: "I was just wondering, 'cause I just seen you vroom right down in front of PD." McReynolds then cuts him off mid-sentence.

Sworn Affidavit

"...routine patrol... observed lawful and unlawful driving behavior..."

Video

Shows intentional pursuit from Ray's Place and speeding in front of PD to catch up with Defendant, inconsistent with "routine patrol."

III. LEGAL SIGNIFICANCE

1. False or misleading statements in affidavits undermine the credibility of the affiant and may warrant suppression of evidence obtained as a result. See *Franks v. Delaware*, 438 U.S. 154 (1978).
2. Brady/Giglio obligations require disclosure of evidence impeaching the credibility of law enforcement witnesses. The video evidence is such impeachment material.
3. The State cannot rely on testimony or affidavits materially contradicted by contemporaneous body-cam evidence without violating Defendant's rights to due process and a fair trial.

IV. REQUEST

Defendant respectfully requests that this Court:

- Take judicial notice of the contradictions between the affidavit and the video evidence;
- Compel full production of all dash-cam, body-cam, and dispatch recordings;
- Exclude or strike testimony and affidavit portions that are false, misleading, or contradicted by the video record;
- Grant such other relief as may be just and proper.

Respectfully submitted,

Heather Dawn Chandler, Pro Se
408 West Ash
Duncan, OK 73533
Tel: (572) 241-3068
Email: hdpchandler1@gmail.com

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
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HEATHER DAWN CHANDLER,
Defendant.

Case No. CF-2025-109

EXHIBIT G

Clarification of Stop Sign Compliance
(Legal standards and intersection photographs)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heather Chandler", is written over a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
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Defendant.

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DEFENDANT'S EXHIBIT: CLARIFICATION OF STOP SIGN COMPLIANCE

I. INTRODUCTION

Defendant respectfully submits this filing to clarify the proper legal standard governing compliance at stop signs under Oklahoma law and to address Officer McReynolds' inconsistent characterizations of Defendant's driving conduct.

II. FACTUAL BACKGROUND

1. Officer McReynolds claimed in his sworn affidavit that Defendant failed to stop at a stop sign.
2. On video, McReynolds altered his description, stating instead that Defendant 'slow rolled' the stop sign.
3. When Defendant attempted to explain that she had properly stopped and then lawfully rolled forward to ensure safety before proceeding, McReynolds dismissed her explanation, stating

she could 'argue it to the judge.'

III. LEGAL STANDARD

1. **Oklahoma Statutes:** 47 O.S. § 11-201 and § 11-403 require motorists to stop at designated stop signs and yield the right-of-way to vehicles in or approaching the intersection.
2. **Practical Application:** Compliance requires both (a) a full stop at the stop line or before entering the intersection, and (b) a careful roll-up to a point of visibility to ensure that no vehicles are approaching before proceeding.
3. **Local Ordinance:** Duncan city traffic ordinance mirrors this requirement.

IV. ARGUMENT

1. McReynolds' conflicting descriptions ('no stop' vs. 'slow roll') call into question the reliability of his affidavit.
2. Defendant's conduct—stopping fully, then rolling forward to verify safety—is consistent with the legal standard.
3. McReynolds' refusal to acknowledge this standard and his statement that it could only be argued 'to the judge' reflects bias and dismissiveness.

V. CONCLUSION

Defendant submits this clarification to aid the Court in evaluating the credibility of Officer McReynolds' testimony and the lawfulness of Defendant's driving conduct at the stop sign in question.

Respectfully submitted,

Heather Dawn Chandler, Defendant

CERTIFICATE OF MAILING

I certify that on this ____ day of September 2025, a true and correct copy of the foregoing was mailed to the Stephens County District Attorney's Office.

Heather Dawn Chandler

EXHIBIT A

Relevant statutory provisions:

- 47 O.S. § 11-201
- 47 O.S. § 11-403
- Duncan City Ordinance (Stop Signs)

IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,
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v.

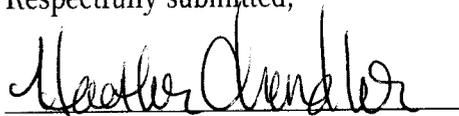
HEATHER DAWN CHANDLER,
Defendant.

Case No. CF-2025-109

EXHIBIT H

Service Oklahoma Reinstatement Receipt
(November 2023, showing reinstatement and payment in full)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heather Dawn Chandler", written over a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

Service Oklahoma

6015 N Classen Blvd Building 4, OKLAHOMA CITY, OK 73118

4055216521

Invoice To: Heather D Chandler
Invoice Number: 63835682275512
Invoice Date: Nov 16, 2023
Payment Due: Dec 16, 2023

0.00 USD

▲ Hide invoice details

Reinstatement Fee	1 × 25.00 USD
DRF Statutory Fee	1 × 290.00 USD
Credit Card Fee 4%	1 × 12.60 USD
Subtotal	327.60 USD
TOTAL	327.60 USD

DESCRIPTION:

M082405718

PAYMENTS:

Date	Amount (USD)	Transaction ID
Nov 17, 2023	327.60	120122399047

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HEATHER DAWN CHANDLER,
Defendant.

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EXHIBIT I

[Optional] Drug Court Stay Order
(August 28, 2025, confirming license privileges remain valid)

already filed

Respectfully submitted,

Heather Chandler

Heather Dawn Chandler
Defendant, Pro Se



HEATHER DAWN CHANDLER
408 W Ash Ave
Duncan, OK 73533-6530

DATE: 08/28/2025
DL #: M082405718
EXP: 01/31/2029
DOB: 05/17/1977

DRUG COURT STAY ORDER

RE:
1000434551

The above-named court has issued a Stay Order for the following suspensions and/or revocations.

<u>Conviction Date</u>	<u>Violation</u>	<u>DPS Case Number</u>
05/20/2025	DRF Chemical Test - Refusal To Test - 21 Years Of Age Or Older	1000434551

The above listed revocations or suspension have been stayed effective the 08/28/2025 until midnight on or until the court has ordered the stay to be lifted.

If you have any questions, please contact a Department of Public Safety Compliance Officer at 405-425-2424.

Driver License Services
Department of Public Safety
www.ok.gov/dps

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EXHIBIT J

Transcript Excerpt and Video Evidence
(Officer Ramsey contradicting Officer McReynolds re: odor of alcohol)

Respectfully submitted,

A handwritten signature in cursive script that reads "Heather Dawn Chandler". The signature is written in black ink and is positioned above a horizontal line.

Heather Dawn Chandler
Defendant, Pro Se

IN THE DISTRICT COURT OF STEPHENS COUNTY
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Case No. CF-2025-~~104~~

DEFENDANT ' S EXHIBIT J

Transcript Excerpt and Video Evidence: Contradictory Statements Regarding Odor of Alcohol

Description of Evidence

This exhibit consists of a segment of Officer David Ramsey ' s body-worn camera footage recorded on May 6, 2025, during the traffic stop involving Defendant. The footage contains an exchange between Officers Ramsey and McReynolds that is directly relevant to probable cause for Defendant ' s arrest.

Transcript Excerpt (verbatim)

- McReynolds to Ramsey: " Go and ask Heather if she can find her insurance verification and see if you can smell alcohol. "
- Ramsey to McReynolds (after returning): " I don ' t know what I smell... maybe a dirty car. "
- McReynolds (later, after reviewing Defendant ' s 2020 record): " I ' m smelling a strong odor of alcohol. "
- Defendant: " No you ' re not. I don ' t drink. "

Relevance to Defense

1. Contradiction Between Officers:

- Ramsey explicitly states he did not detect the odor of alcohol.
- McReynolds later asserts a " strong odor of alcohol, " but only after learning of Defendant ' s prior 2020 " refusal " entry.

2. Impeachment of Officer Testimony:

- Ramsey ' s statement undermines McReynolds ' s credibility and narrative of probable cause.

3. Due Process Concerns:

- The sequence of statements indicates that McReynolds ' s claim was potentially fabricated or influenced by extraneous information (prior record), not actual sensory observation.

Respectfully submitted,

Heather Dawn Chandler
Defendant, Pro Se

IN THE DISTRICT COURT OF STEPHENS COUNTY
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HEATHER DAWN CHANDLER,
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Case No. CF-2025-~~109~~

CERTIFICATE OF MAILING

I hereby certify that on this ___ day of _____, 2025, a true and correct copy of the foregoing Defendant ' s Motion to Compel Discovery, for Sanctions or Exclusion, and Incorporating Exhibit J was mailed, with proper postage prepaid, to the following: Stephens County District Attorney ' s Office
101 South 11th Street, Room 303
Duncan, OK 73533

Respectfully submitted,

Heather Dawn Chandler
Defendant, Pro Se