

IN THE DISTRICT COURT OF STEPHENS COUNTY  
STATE OF OKLAHOMA

FILED DISTRICT COURT  
Stephens County, Okla.  
SEP 29 2025  
MELODY HARPER  
Court Clerk

STATE OF OKLAHOMA,  
Plaintiff,

v.

HEATHER DAWN CHANDLER,  
Defendant.

Case No. CF-2025-109

**DEFENDANT'S MOTION TO SUPPRESS EVIDENCE**

**INTRODUCTION**

COMES NOW the Defendant, Heather Dawn Chandler, appearing pro se, and respectfully moves this Court to suppress evidence obtained as a result of the unlawful stop and misleading affidavit authored by Officer Darius McReynolds of the Duncan Police Department. The affidavit contains material contradictions regarding Defendant's driver's license status and fails to establish probable cause, thereby violating the Fourth and Fourteenth Amendments to the United States Constitution, Article II, §§ 7 and 30 of the Oklahoma Constitution, and applicable Oklahoma statutes.

**STATEMENT OF FACTS**

1. On May 6, 2025, Defendant was arrested by Officer Darius McReynolds and charged in part with "Driving Without a Valid Driver's License."
2. In his sworn Officer's Impaired Driving Affidavit, Officer McReynolds listed Defendant's Driver's License Expiration Date as April 30, 2026. (See Exhibit A).
3. Defendant had lawfully reinstated her license months earlier, on November 17, 2023, as shown by her official Service Oklahoma reinstatement receipt. (See Exhibit B).
4. A Certified Motor Vehicle Record dated May 30, 2025 further confirms that Defendant's driver's license was "Active" with an expiration date of January 31, 2029. (See Exhibit C).
5. Despite these facts, the affidavit alleged Defendant had "no or expired driver's license," an assertion contradicted by both the officer's own affidavit entry and official Service Oklahoma records.
6. Additionally, discovery materials show that not all dash cam video was preserved or provided, raising further issues regarding the reliability of the stop and subsequent affidavit.

**ARGUMENT**

1. Affidavit Contradictions Destroy Probable Cause
  - The State's own affidavit states Defendant's license expiration date as 04/30/2026.
  - A reinstatement receipt from November 2023 confirms Defendant was fully reinstated prior to the arrest.
  - The Certified Motor Vehicle Record shows an "Active" license expiring in 2029.
  - Collectively, these documents prove Defendant held a valid driver's license at the time of arrest. Any contrary claim in the affidavit is unreliable, misleading, and insufficient to support probable cause.

2. Fourth Amendment Violation

An arrest or seizure based on materially false or contradictory statements violates the Fourth

Amendment. See *Franks v. Delaware*, 438 U.S. 154 (1978). When an affidavit contains knowingly false statements or reckless disregard for the truth, the evidence must be suppressed.

**3. Due Process Concerns**

The use of contradictory or misleading information to justify Defendant's detention violates the Fourteenth Amendment's guarantee of due process and Oklahoma's own constitutional protections.

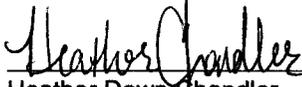
**4. Failure to Preserve Evidence**

The unexplained absence of Officer McReynolds' dash cam footage—while body cam footage was produced—further undermines the reliability of the affidavit and the State's evidence.

**PRAYER FOR RELIEF**

WHEREFORE, Defendant respectfully requests that this Court suppress the affidavit of Officer McReynolds and any evidence derived therefrom, including but not limited to all references to an "expired" or "invalid" driver's license, and grant such other relief as this Court deems just and proper.

Respectfully submitted,



Heather Dawn Chandler

408 W. Ash Avenue  
Duncan, OK 73533  
(572) 241-3068  
Pro Se Defendant

## **EXHIBIT INDEX**

Exhibit A – Officer's Impaired Driving Affidavit (listing expiration date 04/30/2026).

Exhibit B – Service Oklahoma Reinstatement Receipt (Nov. 2023).

Exhibit C – Certified Motor Vehicle Record (Active license, expires 01/31/2029).

Exhibit D – Discovery Discrepancy (body cam produced, dash cam missing).

**PROPOSED ORDER**

**IN THE DISTRICT COURT OF STEPHENS COUNTY  
STATE OF OKLAHOMA**

State of Oklahoma, Plaintiff,  
v.  
Heather Dawn Chandler, Defendant.  
Case No. CF-2025-109

**ORDER**

Upon consideration of Defendant's Motion to Suppress, and after hearing, the Court finds that the motion should be GRANTED.

IT IS THEREFORE ORDERED that the affidavit of Officer Darius McReynolds and all derivative evidence are hereby suppressed.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
JUDGE OF THE DISTRICT COURT

**CERTIFICATE OF MAILING**

I hereby certify that on this 29 day of September, 2025, a true and correct copy of the above Motion to Suppress with Exhibits was mailed, postage prepaid, to:

Jason M. Hicks  
District Attorney  
Stephens County Courthouse  
Duncan, OK 73533

  
Heather Dawn Chandler