

Plz

AFFIDAVIT OF HEATHER CHANDLER

FILED DISTRICT COURT
Stephens County, Okla.

STATE OF OKLAHOMA

COUNTY OF STEPHENS

DEC 31 2025
MELODY HARPER
Court Clerk

IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT
STATE OF OKLAHOMA SITTING IN AND FOR STEPHENS COUNTY

THE STATE OF OKLAHOMA,

Plaintiff,

vs.

JOSE M DECASTRO,

Defendant.

530

Case No. ~~CM-2025-509~~

**AFFIDAVIT OF HEATHER CHANDLER IN RESPONSE TO
DETECTIVE SMITH'S PROBABLE CAUSE AFFIDAVIT**

I, Heather Chandler, being first duly sworn upon my oath, hereby depose and state as follows:

AFFIANT'S BACKGROUND AND CREDIBILITY

1. My name is Heather Chandler. I am over the age of eighteen (18) years, am competent to testify to the matters contained herein, and make this affidavit based upon my personal knowledge and observations.
2. I am the defendant in Case No. CF-2025-109 in this Court, charged with DUI arising from a May 6, 2025 traffic stop conducted by Officer Darius McReynolds of the Duncan Police Department.
3. I am proceeding pro se in my criminal case and have documented extensive evidence of misconduct by Officer McReynolds, including provably false statements in sworn affidavits, missing dash camera footage, and multiple constitutional violations.
4. I have filed complaints with Duncan Police Department Internal Affairs and the Oklahoma Council on Law Enforcement Education and Training (CLEET) regarding Officer McReynolds' conduct.

5. I am the founder of Volunteer Surveillance Initiative (VSI), a community organization focused on police accountability, constitutional rights education, and civic engagement.

PURPOSE OF THIS AFFIDAVIT

6. I have reviewed the Probable Cause Affidavit executed by Detective Suzannhe Smith on December 10, 2025 in Case No. CM-2025-509 (State v. Jose M Decastro).

7. Detective Smith's affidavit identifies me by name - "Heather CHANDLER" - as being present in the Duncan Police Department parking lot on September 8, 2025, and describes conduct that could be interpreted as criminal activity.

8. I am providing this sworn affidavit to correct the record, protect my reputation, and establish the true facts of what occurred on September 8, 2025.

FACTUAL ACCOUNT OF SEPTEMBER 8, 2025

9. On or about September 8, 2025, I went to the Duncan Police Department parking lot located at 1000 S. 7th Street, Duncan, Oklahoma.

10. My purpose for being at the Duncan Police Department was related to my ongoing criminal case (CF-2025-109) and my efforts to document Officer McReynolds' pattern of misconduct.

11. I asked Jose Decastro and another individual (whose name I will not disclose to protect their privacy) to accompany me to the Duncan Police Department parking lot because I felt I was being targeted and harassed by Duncan Police Department officers and I wanted witnesses present.

12. I did not touch, handle, pull on, or otherwise make physical contact with any vehicle in the Duncan Police Department parking lot.

13. I did not attempt to open any vehicle doors, test any door handles, or manipulate any part of any vehicle.

14. I did not place my cellular phone or any other device against any vehicle window for the purpose of photographing or recording the interior of any vehicle.

15. I was present in a public parking lot, which is an area where members of the public have lawful access.

16. At all times during my presence at the Duncan Police Department parking lot, I was exercising my First Amendment rights to observe and document government operations and my Fourth Amendment right to be present in public spaces without unreasonable interference.

17. I felt extremely nervous and anxious during this visit because of my prior negative experiences with Duncan Police Department officers, particularly Officer McReynolds, who had stopped me three times in approximately three months prior to this incident.

18. Because of my nervousness, I primarily tried to avoid any interaction or confrontation with officers and was not paying close attention to exactly what Jose Decastro or the other individual were doing.

19. I do not believe that Jose Decastro or the other individual touched any vehicles or attempted to open any vehicle doors, but I cannot state this with absolute certainty because I was focused on managing my own anxiety and was not watching their every movement.

20. Based on my knowledge of the people I was with and the purpose of our visit, I do not believe they would have attempted to open or tamper with any vehicles, but I acknowledge that I was not directly observing them at all times.

21. However, I can state with absolute certainty that **I personally did not touch any vehicle, did not attempt to open any vehicle doors, did not pull on any door handles, did not place my phone against any vehicle windows, and did not engage in any conduct that could constitute "loitering in, injuring, or molesting a motor vehicle" under Oklahoma law.**

CONTEXT: PATTERN OF HARASSMENT AND RETALIATION

22. The September 8, 2025 incident occurred approximately four months after my May 6, 2025 arrest by Officer McReynolds.

23. Between May 6, 2025 and September 8, 2025, Officer McReynolds stopped me on at least two additional occasions, including one stop where I was riding a bicycle after my driver's license had been suspended as a result of the May 6 arrest.

24. These subsequent stops appeared to be pretextual and harassing in nature, as Officer McReynolds cited reasons for the stops that demonstrated a misunderstanding of applicable law.

25. I filed formal complaints with Duncan Police Department Internal Affairs regarding Officer McReynolds' pattern of harassment and misconduct.

26. I filed a complaint with the Oklahoma Council on Law Enforcement Education and Training (CLEET) regarding Officer McReynolds' conduct.

27. I filed a Governmental Tort Claim Notice with the City of Duncan regarding constitutional violations and civil rights deprivations arising from Officer McReynolds' conduct.

28. I believe that the filing of criminal charges against Jose Decastro, and the inclusion of my name in Detective Smith's affidavit, constitute retaliation for my exercise of constitutionally protected rights including: (a) My right to file complaints against police officers; (b) My right to document police conduct; (c) My right to challenge criminal charges through court proceedings; and (d) My First Amendment right to criticize government officials and advocate for police accountability.

DETECTIVE SMITH'S AFFIDAVIT CONTAINS MATERIAL INCONSISTENCIES

29. Detective Smith's affidavit contains a significant temporal inconsistency that calls into question the accuracy and reliability of her observations.

30. The affidavit states: "At approximately 1439 hours, I, Sgt. Suzannhe Smith was in the Duncan Police Department when Civilian Records Clerk Lori Adams paged me in the hallway, walking towards the south door to exit into the south parking lot. Adams mentioned that a male was walking around our vehicles. I followed Adams to the door and observed two females, one identified as Heather CHANDLER and the second unknown, in the south parking lot, looking into Adams' vehicle."

31. However, the affidavit then states: "At approximately 1431 hours, I observed a male later identified as Jose Maria DECASTRO, walking through the parking lot and carrying a long pole with a recording device attached to it."

32. The second observation is described as occurring at 1431 hours (2:31 PM), which is **eight minutes before** the first observation allegedly occurred at 1439 hours (2:39 PM).

33. This temporal impossibility suggests that Detective Smith's affidavit was not prepared with appropriate care and attention to detail, or that the described observations did not occur in the sequence claimed.

34. This inconsistency is material because it affects the reliability and credibility of all observations claimed in the affidavit.

LEGAL SIGNIFICANCE

35. The conduct alleged in Detective Smith's affidavit - walking through a public parking lot, looking at vehicles, and allegedly touching door handles - does not constitute criminal conduct under any reasonable interpretation of Oklahoma law.

36. Oklahoma law criminalizes "loitering in, injuring, or molesting" a motor vehicle, but this statute requires proof of unlawful intent to take the vehicle, use it for joyriding, or use it for some other unauthorized purpose. See 21 O.S. § 1787.

37. There is no evidence that I, Jose Decastro, or the other individual present had any intent to take any vehicle, use any vehicle for joyriding, or use any vehicle for any unauthorized purpose.

38. The decision to file three separate misdemeanor criminal charges against Jose Decastro for allegedly touching door handles in a public parking lot - each charge carrying a potential sentence of up to one year in prison and a \$500 fine - represents a grossly disproportionate use of prosecutorial discretion.

39. This charging decision is consistent with a pattern of selective enforcement and retaliatory prosecution against individuals who challenge Duncan Police Department officers' conduct.

IMPACT ON MY REPUTATION AND LEGAL PROCEEDINGS

40. The inclusion of my name in Detective Smith's affidavit, in connection with alleged criminal conduct, harms my reputation in the community.

41. This affidavit may be used in my own criminal case (CF-2025-109) to suggest that I have engaged in additional criminal or suspicious conduct, thereby prejudicing my defense.

42. The State may attempt to introduce evidence of the September 8, 2025 incident as "prior bad acts" or to impeach my credibility if I testify in my own defense.

43. I am providing this sworn counter-affidavit to ensure that if any reference is made to the September 8, 2025 incident in my case or in any other proceeding, the complete and accurate facts are available to the Court.

FIRST AMENDMENT PROTECTED ACTIVITY

44. To the extent I was present at the Duncan Police Department parking lot to observe, document, or photograph police vehicles or facilities, such activity is protected by the First Amendment to the United States Constitution.

45. The United States Supreme Court and numerous federal circuit courts have consistently held that individuals have a First Amendment right to photograph, record, and observe police officers, police facilities, and government operations in public spaces.

46. A public parking lot at a police department is unquestionably a public space where First Amendment protections apply.

47. Any attempt by Duncan Police Department to criminalize, discourage, or retaliate against my constitutionally protected documentation and observation activities violates my civil rights under the First and Fourteenth Amendments.

CONCLUSION AND REQUEST FOR JUDICIAL NOTICE

48. I swear under penalty of perjury under the laws of the State of Oklahoma that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

49. I respectfully request that this affidavit be filed with the Court and made part of the permanent record in Case No. CM-2025-509 (State v. Jose M Decastro) and Case No. CF-2025-109 (State v. Heather Chandler).

50. I further request that the Court take judicial notice of this affidavit in any proceeding where the events of September 8, 2025 are referenced or where Detective Smith's affidavit is introduced as evidence.

51. I declare that I stand ready to testify under oath regarding the matters contained in this affidavit should the Court require my testimony in any proceeding.

FURTHER AFFIANT SAYETH NOT.

DATED this 31 day of December, 2025.

Heather Chandler

Heather Chandler, Affiant

VERIFICATION

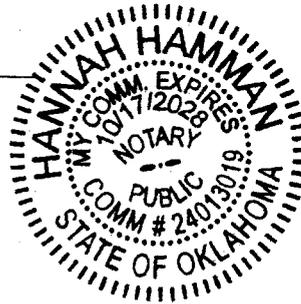
STATE OF OKLAHOMA

COUNTY OF STEPHENS

Before me, the undersigned Notary Public, on this 31st day of December, 2025, personally appeared Heather Chandler, who is known to me or who provided satisfactory evidence of identification, and who, being first duly sworn, stated that the facts contained in the foregoing affidavit are true and correct to the best of her knowledge, information, and belief.

Hannah Hamman

Notary Public



My Commission Expires: 10/17/28

Commission Number: 24013019

CERTIFICATE OF SERVICE

I hereby certify that on the 31 day of December, 2025, I served a true and correct copy of the foregoing Affidavit of Heather Chandler upon:

Office of the District Attorney
Stephens County Courthouse
Duncan, Oklahoma 73533

Jose M Decastro
1258 Franklin St.
Santa Monica, CA 90404

Service was made by: Personal Delivery U.S. Mail Email

A handwritten signature in cursive script, reading "Heather Chandler", is written over a horizontal line.

Heather Chandler