

DECLARATION OF LANCE OLDRIDGE

1. I, Lance Oldridge, am an adult and competent to testify.

2. I am the Plaintiff in the civil action, *Lance Oldridge v. City of Wichita, Kansas et al.*, No. 6:21-cv-1284, U.S. District Court – Kansas.

3. On October 13, 2014, I sent an email to the Wichita City Council expressing concern about a City-sponsored trip to Africa that was attended by a group of individuals from the Council, other city employees, and members of our community, expressing concern about the Ebola virus and what efforts the City was making to ensure that the Ebola virus would not be spread in Wichita upon the return of this delegation. A true and accurate copy of the 10/13/2014 Ebola email is attached as Exhibit 22.¹

4. In 2016, I was working as an investigator in the department's Professional Standards Bureau (PSB), commonly known as "internal affairs." PSB was commanded by Captain Russell Leeds. He supervised Lieutenant Randall Reynolds, and five detectives. The five detective positions included me and co-worker Detective Kevin Real. PSB reported directly to the Chief of Police. I had been in this position for about 3 years when the City of Wichita hired Gordon Ramsay as our Chief of Police around February 2016.

5. Within a few months, Chief Ramsay removed Captain Leeds from his position in PSB and transferred him. Due to difficult working conditions created by Chief Ramsay in PSB, including his suspicions of PSB investigators cooperating with Federal Bureau of Investigation (FBI) investigators, Lt. Reynolds requested a transfer out of the Bureau and went back to working as a street supervisor. Captain Leeds and Lt. Reynolds have both since retired from the department.

6. The Chief then placed Captain Doug Nolte (September 3, 2016) and Lt. Paul Duff (August 13, 2016) in Professional Standards. Captain Nolte was a more senior member of the department, but Lt. Duff was a rather junior member of the department. Lt. Duff had not been a supervisor for very long and was a Lieutenant for less than a year. Captain Nolte has since retired from the department.

7. Once these changes took place, Det. Real and I were being told by our new supervision that certain members of the Executive Staff of the Fraternal Order of Police (FOP) had been talking to the Chief and wanted Det. Real and I moved out of PSB, and the Chief was listening to them. Detectives cannot be removed from this position without just-cause, which is in accordance with the Fraternal Order of Police (FOP) agreement with the City. Captains and Lieutenants, like Leeds and Reynolds, are not covered by this agreement. I, along with the other detectives in PSB, were told on multiple occasions by Captain Nolte that the Chief's philosophy for PSB was going to change, but he would not explain what the change would be. I was told the way PSB cases were being investigated was going to change, but those changes could not be described to us. I was then asked if there were any other

¹ Defendants' exhibits in support of their motion for summary judgment are Exhibits 1 to 19. This declaration is filed as Exhibit 20.

assignments in the department that I may want to go to. I told Captain Nolte I was fine working in PSB. Captain Nolte and Lt. Duff acknowledged to me that I couldn't be forced to leave PSB, but they wanted me to leave voluntarily. During this time, I was complimented by Captain Nolte on how well I did my job in PSB. I even asked both he and Lt. Duff if either of them had seen me doing anything wrong and they said they had not.

8. Also, during this time, around September and October 2016, I was assigned an investigation involving an off-duty Wichita Police Officer, who was allegedly drunk and committed a hit and run accident. The victim of the hit and run was a 17-year-old girl. During the investigation of this officer, I felt there were actions taken by Chief Ramsay which were an attempt to cover up the alleged misconduct of this officer, and I vocalized this to Captain Nolte, Lt. Duff, and my co-workers in PSB. After this, I was continually asked by Captain Nolte and Lt. Duff if there were other assignments I would like to transfer to. I continually told them there were not.

9. I was taking contemporaneous notes of meetings I had with my supervision at this time. On October 21, 2016, I was called into a meeting with Captain Nolte. I surreptitiously recorded this meeting to protect myself. During this meeting Captain Nolte made the following statements, *"my observation is that you are fair, you're honest, you're thorough, and those are things that are putting a mark on you."* *"Lance, I, I know I say it a lot, and I hope you know that I'm not just giving you lip service man, I think you're a hell of a detective, I really do."* I asked Captain Nolte, *"In the time you've been here, either one of you (Nolte or Duff), have you seen Kevin and I do anything wrong, together, or apart?"* Captain Nolte said, *"No."*

10. After talking to Det. Real and the other three detective co-workers of mine, I learned that Det. Real and I were the only ones being asked to voluntarily leave PSB. I would describe my interaction as my supervisors pressuring me to leave, because they could not force me to leave.

11. On October 25, 2016, I raised my voice to Lt. Duff because an unknown person, outside of PSB, had cancelled my scheduled interview of the off-duty officer in the hit and run case without the knowledge of anyone in PSB. On October 26, 2016, Lt. Duff took me to lunch to discuss what had happened the previous day. During this lunch conversation, which he told me was a "Paul and Lance" conversation, which I took to mean we were both to be frank with each other, Lt. Duff again stated I could not be forced to leave PSB but told me I needed to think about putting in for another assignment. I reiterated my concerns about what was going on in PSB at the time, which primarily included my thoughts concerning how the off-duty officer investigation was leading to a cover-up of her misconduct by Chief Ramsay. Lt. Duff told me that the conversation over lunch would be considered my verbal counseling for what had happened and wanted to keep it in house.

12. However, I was removed from PSB on Friday, October 28, 2016, on a "temporary" basis due to my interaction with Lt. Duff on October 25th. I believed, and still do believe, there was an attempted cover-up of this case and misconduct was being committed surrounding the off-duty officer investigation. An internal investigation of me was initiated on November 1, 2016.

13. Based on the interaction with Lt. Duff, I was subsequently sustained on a departmental regulation and permanently removed from PSB.

14. Although unrelated to the original allegation regarding my interaction with Lt. Duff, during the internal investigation of me, there was a focus on what information I may have provided to federal law enforcement partners or the media. I grieved my discipline in the investigation and in 2017, in an offer by the City to avoid arbitration, I accepted a written reprimand and they placed me in a pre-employment detective position at our training academy.

15. In March 2017 I filed a complaint of misconduct and retaliation against me with Wichita City Manager Robert Layton and HR Director Chris Bezruki. The complaint pertained to the actions taken by Chief Ramsay and his staff, which included Deputy Chief Jose Salcido. Manager Layton said he investigated my claims, but I was never told what the finding or outcome of my complaint was.

16. My wife, Sarah Oldridge, is formerly a Lieutenant with the Wichita Police Department. Just prior to and following my removal from PSB, Sarah participated in two promotional processes for the rank of Captain but was not promoted. In 2018, a federal lawsuit was filed on her behalf regarding circumstances surrounding the process and reported discrimination. Sarah was subject to a vicious investigation, in which the PSB interviewed 47 people about an email that Sarah had sent asking why someone who did not meet the stated qualifications was promoted, and how WPD would filter out bias if it was using SurveyMonkey to seek information about candidates for captain. *S. Oldridge v. City of Wichita*, Memo in Opp to MSJ, 6:18-cv-01243, Doc. 73, SOF 1-16, at pp. 3-7. Wendell Nicholson had been promoted to Captain though he did not have 1 year or experience as a lieutenant at the time he applied. *See id.* During the lawsuit, the City produced a fabricated application for Nicholson, revised to ask whether he would have one year of experience as a lieutenant by the time he was promoted to captain. *S. Oldridge v. City of Wichita*, Memo in Opp to MSJ, 6:18-cv-01243, Doc. 73, SOF 8-11, at pp. 4-5. Sarah pursued sex discrimination and retaliation claims against the City and summary judgment was entered against her claims on May 25, 2022. *Id.*, Doc. 89. She is appealing that dismissal. A true and accurate copy of Sarah Oldridge's Amended Charge of Discrimination dated 3/8/2019 is attached as Ex. 30.

17. During the interview of my wife by PSB investigators, they told her she did not have the correct promotion dates for Wendell Nicholson regarding her questions on whether or not he met the promotional qualifications. Knowing that the PSB investigators were wrong by saying this, on August 15, 2018, I sent a KORA request to the City of Wichita requesting the promotional dates for Wendell Nicholson. The city responded with the requested information, confirming that the promotional dates my wife had for Wendell Nicholson were correct.

18. On July 11, 2019, the Wichita Eagle newspaper printed an Associated Press article titled, "*Wichita Chief Concerned About Police Shooting Investigations.*" The article started by saying, "*Wichita's police chief testified in a newly released deposition that he was so concerned about the fairness of internal department probes of police shootings in Wichita that he removed the high-ranking officers overseeing them and detectives conducting them. Police Chief Gordon Ramsay acknowledged investigators asked leading questions that could have prompted police officers to claim*

the shootings were self-defense. He also testified that detectives working on the internal probes got involved in the related criminal investigations and were 'potentially contaminating' those investigation." The article went on to say, "One of the investigations that concerned him involved the 2015 shooting of John Paul Quintero...In his deposition, Ramsay acknowledged he had concerns about the Quintero investigation in part because of the way the Professional Standards Bureau detective framed a leading question...When Ramsay was questioned during his deposition about whether that interview between the detective and the officer raised concerns about the integrity of the Professional Standards Bureau investigation, the chief replied he had concerns about that probe and leading questions. Ramsay added: 'I've made changes so that that is not happening anymore.' Ramsay said he moved the captain, lieutenant and some detectives in 2016 and 2017 because of concerns about a 'wide range of issues.'"

19. KWCH, a local television station reported about the deposition release on their website and added the following, *"One question an attorney asked was about why Ramsay moved some officers from the investigation. The chief responded it wasn't just for leading questions, but 'also fairness of the investigation.'"*

20. Several other local new outlets also ran the story. One National on-line news outlet, The Root, posted an article titled, *"A Police Chief Was 'Concerned' About How His Department Handled Police Shootings, So He Kept It a Secret"*. This article started, *"A Kansas police chief said that he was so concerned that his department was 'contaminating' police shooting probes that he took several steps to address the issue, including continuing to employ allegedly corrupt officers, keeping broken policies in place and – most importantly – keeping all of this a secret."*

21. It was clear that Chief Ramsay's testimony was about Capt. Leeds, Lt. Reynolds, Det. Real and me. We were the only 4 people who left PSB in 2016 and 2017. In addition, the John Paul Quintero investigation was my case.

22. On Friday, July 12, 2019, Chief Ramsay released a widely distributed response to the report from the previous day. This response, in part said, *"I continually make personnel changes based on rank, experience, union contracts and strengths of each individual employee...The department members involved are good officers and good employees, striving to reach the goals of the WPD. They committed no legal or WPD internal violations. The employees moved to different positions based on their strengths and where they could best serve the department...Taking a snippet from a deposition that lasted hours and drawing conclusions does not give full context and unnecessarily hurts the good name of our investigators."*

23. After being made aware of these articles I signed up for a PACER account and was able to purchase the transcript of Chief Ramsay's testimony from his May 24th deposition which was filed in Federal Court. His testimony named Captain Leeds, Lieutenant Reynolds, Det. Real and I. After reviewing Chief Ramsay's testimony, it was clear he was not truthful in his testimony regarding Capt. Leeds, Lt. Reynolds, Det. Real and I. In addition, the claim of bias against Det. Real and I by Chief Ramsay subjected us to possible Brady/Giglio disclosure regarding our law enforcement duties and testimony in court. It is well known in the law enforcement community that being subject to *Brady / Giglio* disclosure makes it much more difficult to maintain employment and seek and obtain promotions.

24. Following the release of this information and the negative comments about me, I attempted to meet with Chief Ramsay with the assistance of the FOP. Chief Ramsay refused to meet with me regarding this publicly released information. However, I have been told Chief Ramsay and Deputy Chief Jose Salcido had met with detectives of our Person Crimes Section to assure them the testimony and subsequent news articles were not about any of their interviews or actions, and the testimony was only in reference to past PSB personnel.

25. Given the libelous information about me now in the public, which specifically affects me and my job as a police officer in the public's perception and trust of me, I believed this was a violation of law under Kansas Statute 21-6103; Criminal False Communication. "Criminal False Communication is: (1) Communicating to any person, by any means, information that the person communicating such information knows to be false and will tend to: (A) Expose another living person to public hatred, contempt or ridicule; (B) Deprive such person of the benefits of public confidence and social acceptance." "Criminal False Communication is a class A nonperson misdemeanor." This was very apparent with what the media reports took from Chief Ramsay's false testimony.

26. On July 24, 2019, I delivered a one-page complaint and the news articles regarding Criminal False Communication to Sedgwick County District Attorney, Marc Bennett. I requested an investigation of Chief Ramsay be conducted for a violation of Criminal False Communication. I told DA Bennett I had further evidence to prove the violation.

27. On October 29, 2019, DA Bennett emailed me and stated he was not going to pursue prosecution of Chief Ramsay for the crime of Criminal False Communication. DA Bennett never interviewed me, nor did he speak with the other witnesses, Captain Leeds, Lt. Reynolds or Det. Real. Nor did he request to see any of the evidence I had. However, DA Bennett, in his response, said he spoke with Chief Ramsay and the views he (Ramsay) testified to were his opinions; and he (Bennett) was not willing to prosecute someone based on their opinion. Even though I told DA Bennett I had evidence to prove the Chief's "opinions" were false information and not based on fact, he did not request or review the evidence prior to rendering his decision regarding prosecution.

28. On November 12, 2019, I spoke on the telephone to Sedgwick County Sheriff Jeff Easter. I told Sheriff Easter that Chief Ramsay had lied in a sworn deposition on May 24, 2019. I told Sheriff Easter that I was making a formal complaint to him on the crime of perjury committed by Chief Ramsay. I told Sheriff Easter I had made a complaint of Criminal False Communication, a misdemeanor, recently to DA Bennett regarding the false testimony. I told Sheriff Easter that DA Bennett declined to file charges against the Chief for that crime. Sheriff Easter said he would need to discuss the new allegation against the Chief with DA Bennett and he would be in touch.

29. On November 15, 2019, Sheriff Easter telephoned me and said he had spoken with DA Bennett about my allegation. Sheriff Easter requested I provide him the evidence I had regarding the perjury complaint. This was on a Friday, I told Sheriff Easter I could have all the information to him on Monday (11/18).

30. On November 18, 2019, I made a formal complaint to Sedgwick County Sheriff Jeff Easter regarding the crime of perjury, committed by Chief Ramsay in his May 24th deposition. The crime of perjury is a felony under Kansas State Statute 21-5903. “(a) Perjury is intentionally and falsely: (1) Swearing, testifying, affirming, declaring or subscribing to any material fact upon any oath or affirmation legally administered in any cause, matter or proceeding before any court, tribunal, public body, notary public or other officer authorized to administer oaths; (b) Perjury is a: (1) Severity level 9, nonperson felony...”

31. Sheriff Easter had requested I provide him the evidence via email to his official Sheriff’s Department email address. I emailed Sheriff Easter a typed written complaint, to include a synopsis of what had occurred including my communications with DA Bennett. I included copies of the emails between DA Bennett and myself regarding the Criminal False Communication claim. I also sent Sheriff Easter a copy of Chief Ramsay’s deposition testimony and several other documents I feel is evidence that the Chief was not truthful in his testimony. The emails to Sheriff Easter took place while I was off duty and from my personal email account.

32. On November 26, 2019, Sheriff Easter sent me a letter by mail and stated he and DA Bennett had reviewed my complaint of Perjury and determined charges would not be filed against Chief Ramsay. The letter also stated the two reviewed and compared the crimes of Criminal False Communication and Perjury regarding this incident. The letter stated their belief was a crime had not occurred in this matter.

33. I had even asked both DA Bennett and Sheriff Easter to request an investigation by the Kansas Bureau of Investigation (KBI) or the Kansas Attorney General’s Office, but they both refused. I specifically made this request to alleviate any appearance of special treatment as the Chief, Sheriff, and District Attorney have a close working relationship.

34. On December 6, 2019, I had just arrived at work and placed my briefcase in my office located on the second floor of our training center when I was summoned to a first-floor office. In that office, Deputy Chief Wanda Givens served me with an Official Notification of Administrative Internal Investigation alleging I committed a violation of Wichita Police Regulation, 3.206 F – Conduct Unbecoming an Officer Prohibited; Employees shall not knowingly depart from the truth in making reports, affidavits, court documents, in giving testimony, or in connection with any official duties, except the use of deception in criminal cases as a legitimate investigative technique. The complainant on the allegation against me was WPD Deputy Chief Wanda F. Parker-Givens #1350 and stated it was initiated on December 5, 2019. The notice of investigation briefly outlined my communication with Sheriff Easter alleging the Chief committed a crime and utilized quotes from the declination letter Sheriff East had mailed me. The notice also stated that on December 4, 2019, DA Bennett provided the WPD with a copy of the email he sent me on October 29th, where he stated he was not going to charge the Chief with Criminal False Communication. The sole basis for Deputy Chief Givens’ complaint against me stated, “Even though Detective Oldridge received DA Bennett’s finding prior to contacting Sheriff Easter, he still presented the incident as criminal and did not inform Sheriff Easter of DA Bennett’s previous review and ruling.” A true and accurate copy of the Official Notification of Administrative Internal Investigation is attached as Exhibit 26.

35. After reading the allegation, I asked Deputy Chief Givens if I could ask a question. She said no. I then told her the allegation that was in her complaint was 100 percent false. She said that would be for the investigation to determine.

36. The official notification also listed 21 witnesses for the allegation. Of course, it listed DA Bennett and Sheriff Easter, but the other 19 witnesses were all my current co-workers and supervisors, as well as a former co-worker who left the department around May 2019. Given the allegation centered around my conversations with DA Bennett and Sheriff Easter, I questioned why any co-workers were listed as witnesses. Specifically, witnesses 1 and 2 were relevant to the charge that I reported criminal conduct of Chief Ramsay to outside third parties. Witnesses 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, and 21 had nothing to do with my reports of Chief Ramsay's criminal conduct.

37. Upon serving me the Notice of Investigation, Deputy Chief Givens placed me on Administrative Leave indefinitely, suspending me with pay and required me to be at my residence Monday through Friday from 8:00 a.m. to 5:00 p.m., stating I could only leave my house from 12:00 p.m. to 1:00 p.m. for lunch. This requirement for me was different than past practice which was that employees had to be available by phone during the work hours.

38. After Deputy Chief Givens served me and suspended me, she told me I had to immediately leave the building and could not return to my office. I asked about getting my briefcase and she said I could not, but she would allow WPD Sgt. Jeremy Vogel (Asian American) to retrieve it. I then stepped out of the office and began to wait in the publicly accessible area of the building, as the WPD and Sedgwick County Sheriff share the building with Wichita State University, Criminal Justice Department. I and my union representative, Detective Hans Asmussen, were standing in the lobby by the reception desk when Deputy Chief Givens said I had to wait in the parking lot. As I began to walk to the parking lot, she then said, well it's cold outside and told me I could wait in the small breezeway at the entrance between the exterior door and the interior doors. Again, her order for me to leave a publicly accessible building is not consistent with how other employees have been treated.

39. As I have explained to you above, I was in possession of documented proof that the allegation against me as alleged by Deputy Chief Givens was 100 percent false. I did tell Sheriff Easter about my communications with DA Bennett and his decision. I had even provided Sheriff Easter with copies of my email communications with DA Bennett, specifically the email DA Bennett had sent me when he declined to charge the Chief with Criminal False Communication.

40. I collected the evidence to prove Deputy Chief Givens' allegation was false and met with representative of the Fraternal Order of Police (FOP) to discuss the situation. My FOP representative agreed that my evidence showed the allegation was false. My FOP representative contacted the Professional Standards Bureau commander, Lt. Blake Mumma to let him know what I would provide. Lt. Mumma was the one in charge of investigating Deputy Chief Givens' allegation against me. Lt. Mumma said he would take the information and look at it, but a decision regarding the

information would have to come from someone higher than him. When my FOP representative took the evidence to PSB in the afternoon of December 6th, there was no one in the office to accept it.

41. During a conversation between FOP President Dave Inkelaar and Lt. Mumma during that day (December 6th), President Inkelaar inquired why former detective Rick Craig was listed as a witness in the investigation. Lt. Mumma told him it was related to additional information they were looking into regarding when Rick left the department. Lt. Mumma said when Rick left the department, he said that Det. Oldridge hated the WPD and would do anything in his power to bring the Chief of Police down. Rick Craig left the department in disgrace in May 2019 and ultimately executed a diversion agreement admitting to going into a woman's office, putting his hand over her mouth, pushing her back into her desk chair, and kissing the back of his hand. A true and accurate copy of the Wichita Eagle article, "Former Wichita police detective granted diversion after sexual harassment allegation," 10/3/2019, is attached as Exhibit 39.

42. On December 9, 2019, my FOP representatives delivered the documentary evidence to prove the allegation was false, to Lt. Mumma in PSB. At the same time, they delivered an official complaint to PSB on my behalf. My complaint alleged that Chief Ramsay lied in his sworn deposition on May 24, 2019; that Deputy Chief Givens and Chief Ramsay lied in their allegation against me as detailed in the Notification of Investigation I was served on December 6th; and that I was being retaliated against by Deputy Chief Givens and Chief Ramsay by investigating me because I had reported, in good faith, that Chief Ramsay had committed a crime. A true and accurate copy of my PSB complaint of 12/9/2019 is attached as Ex. 36.

43. On December 16, 2019, I was served with a second Official Notification of Administrative Internal Investigation. The second notification had the same general outline, except it started by saying the complaint was initiated on December 5th, 2019, and was amended on December 11, 2019. A true and accurate copy of the 12/11/2019 Official Notification of Administrative Internal Investigation is attached as Ex. 28. This notification changed the verbiage of the sole allegation against me in the first notification by removing the words, "did not inform Sheriff Easter of DA Bennett's previous review and ruling." This second notification also added the charge of 3.1601 F – Misconduct Prohibited; Any course of conduct that indicates a member of the Department has little or no regard for their obligations as a member of the Wichita Police Department shall be deemed misconduct and will be cause for dismissal. The only other "facts" added to this notification from the first one was: "It is additionally alleged that Detective Oldridge was engaged in a course of conduct with a goal to discredit the Wichita Police Department without regard to his obligations as a member of the organization. The conduct included statements and suggestions that he and co-workers should act in violation of SOP (Standard Operating Procedures), Policy and Regulation."

44. This notification removed one witness who was on the first notification (FOP President Robert Schmeidler), but it added four additional witnesses who were more co-workers of mine. This notification contained no further details of what was being alleged against me. This is a violation of the FOP contract in that the City is required to include "factual details of the accusation of misconduct" and "all other material facts known to the City and its employees," in the noticing.

45. Following this second notification, my FOP representative tried on more than one occasion to get the factual details and any material facts known to the City. The City ignored these requests.

46. Due to contractual violations regarding how the police department initiated this investigation of me, the FOP contacted HR Employee Relations Officer, Terry Jones, to request mediation. This was done because the grievance process outlined by contract requires a grievance to be filed with the Chief of Police. However, the Chief of Police is the subject of a criminal allegation which I am being investigated for. Mr. Jones advised the FOP to go ahead and file the grievance with the Chief as directed by contract.

47. On January 10, 2020, the FOP filed the grievance with Chief Ramsay. On January 13, 2020, the Chief's office forwarded the grievance request to Terry Jones, without responding to me or the FOP. Mr. Jones scheduled a grievance hearing for January 23, 2020.

48. On January 22, 2020, Deputy Chief Hatter denied the grievance that was sent to the Chief in a letter to me and the FOP. In addition, on the same day Mr. Jones said the grievance hearing was moving to February 4th, 2020, as the police department asked for more time before the hearing was held.

49. On January 30, 2020, I was interviewed by Lt. Mumma and Lt. Christian Cory, regarding the complaint against me. This was following 25 witness interviews they conducted. Prior to my interview, I was allowed to review the interviews and any documents PSB had in their investigative file (this is required by contract). I was not allowed to have a copy of any documents, but I was allowed to take notes. So, some of the following statements are not quotes, but are almost verbatim to what the documents stated. However, I did have time to take some verbatim notes which can be quoted.

50. It was during the review of these documents that I learned on December 4, 2019; Deputy Chief Givens authored an Officer's Report (internal document) to Chief Ramsay. Defendant filed this document as Exhibit 13. The subject of the report was, "Request for Investigation." The body of the report stated that Deputy Chief Givens was requesting PSB conduct an investigation related to conduct by Detective Lance Oldridge. It stated, on November 13, 2019, Chief Gordon Ramsay informed Deputy Chief Givens that Detective Oldridge requested DA Bennett open an investigation on Chief Ramsay about perjury pertaining to a deposition involving the "swatter call." Detective Oldridge then also requested Sheriff Easter open an investigation on Chief Ramsay on November 15, 2019.

51. There was no other documentation regarding this request, leading to the only reasonable inference that Chief Ramsay gave her permission to open the investigation, as it was initiated the next day. In reading Deputy Chief Givens' request to investigate me, it is unequivocal that the investigation against me was retaliation for reporting, in good faith, that the Chief committed a crime. Deputy Chief Givens' own request states as much. Her only allegation against me is that I requested DA Bennett and Sheriff Easter open an investigation on the Chief for committing perjury. The only wrongdoing even mentioned in her officer's report is that of the Chief. Her only reason for taking

this adverse action against me is that I reported a crime, against the Chief, who Deputy Chief Givens asked permission from to investigate me.

52. While reviewing the PSB file before my interview, I also found a memorandum written by Deputy Chief Jose Salcido. The memo was dated December 4, 2019, and was titled: Memo for the Record. The memo outlined how Deputy Chief Salcido was off duty on November 13, 2019, when he received a phone call from Chief Ramsay who told him that Sheriff Easter had just informed him about Detective Oldridge alleging the Chief committed perjury in his deposition. According to the memo, the Chief told Deputy Chief Salcido that he told Sheriff Easter that DA Bennett had communicated with him in the recent past about reviewing the same complaint and that DA Bennett told the Chief he had not committed a crime.

53. The memo went on to say that Deputy Chief Salcido was “processing” what the Chief had told him, and it was “clear and convincing” that I pushed my “agenda” past DA Bennett to the Sheriff. Deputy Chief Salcido went on to write, that this was a “course of conduct that indicated Detective Oldridge had little or no regard for his obligation as a member of the department since his actions could potentially create a climate of distrust between,” the Wichita Police Department (WPD) and the Sheriff’s Office and negatively impact order and discipline within the WPD.

54. Deputy Chief Salcido said in the memo that he “reasoned” that I “knowingly and with reckless indifference departed from the truth” when I reported “the fact pattern to Sheriff Easter since it was evident from the details the Chief relayed to me on 11/13/19, that Detective Oldridge did not disclose to Sheriff Easter that Marc Bennett had already reviewed the Chief’s deposition.”

55. Deputy Chief Salcido also stated that he believed I had “whistleblower protection” when I made my report to DA Bennett. However, he stated that I did not have such protection when I reported the crime to Sheriff Easter.

56. By reading this memo, it is unequivocal that Deputy Chief Salcido already determined that I committed major offenses against WPD regulations after speaking only to Chief Ramsay. He even used terms of guilt utilized in administrative cases such as, it was “clear and convincing” to him that I committed regulation violations. He did this by also using common terms from our regulation manual such as, “little or no regard for his obligation as a member of the department,” and “knowingly...departed from the truth.” These are the same terminology used in the WPD regulation manual for offenses that have termination penalties. (The same offense and terminology used in the investigation I was served on December 6th.) Again, it is apparent Deputy Chief Salcido was wanting to terminate me based solely on information he received from Chief Ramsay. In fact, that information (failure to disclose prior report to Bennett) was proven to be entirely false as soon as WPD served me with my notice of investigation.

57. Deputy Chief Salcido then wrote that he, Deputy Chief Anna Hatter, and Deputy Chief Givens all met with DA Bennett on November 14, 2019, to discuss the Sheriff’s phone call to the Chief. Deputy Chief Salcido wrote that DA Bennett told them there was “not a shred of probable cause or reasonable suspicion of the Chief having committed a crime.” Deputy Chief Salcido said DA Bennett

told them he was aware that Detective Oldridge “had gone around him,” and took the matter to the Sheriff. Deputy Chief Salcido said they requested something in writing from DA Bennett because, “we reasoned that when Detective Oldridge decides to continue along his course of conduct to further cause organizational disruption by taking his agenda to the media, we could quickly restore order within the department by having the letter on hand to refute any claims.” I did not take this to the media.

58. During the review of the witness interviews prior to my interview, I learned that several witnesses were asked a line of questioning about me trying to move unqualified applicants through the hiring process in my position as a pre-employment/background detective. They asked if I ever suggested hiring someone who would cause problems or harm to the Department or cause chaos. They also asked if I said or suggested anything about removing documents from an applicant’s file so someone could be hired. The question was also asked of one of my co-workers if I suggested losing a document to get someone hired, and if they knew of me doing things like this to harm the Chief.

59. One of the witness interviews was with former WPD detective Rick Craig. Rick was a former co-worker of mine at the training center who resigned around May 2019 as he pled guilty to battering a female civilian employee at the training center. The line of questioning with Rick primarily focused on multiple questions about me trying to get people hired on the department who would cause problems, and about me concealing things or documents to get these types of people hired. Rick told them he didn’t have any knowledge of that. They also asked Rick if I had made comments about the Chief being a liar or being incompetent, or if I made degrading comments or said derogatory things about Chief Ramsay. He indicated that he didn’t believe I did.

60. After reading these interviews, it was apparent something to do with this line of questioning was the basis for the second allegation against me that stated, “It is additionally alleged that Detective Oldridge was engaged in a course of conduct with a goal to discredit the Wichita Police Department without regard to his obligations as a member of the organization. The conduct included statements and suggestions that he and co-workers should act in violation of SOP (Standard Operating Procedures), Policy and Regulation.”

61. However, not one witness told them that I did anything related to that line of questioning, not one. At the conclusion of my interview on January 30th, I asked Lt. Mumma about this line of questioning and how it must have something to do with the second allegation against me. Lt. Mumma said it was related to the second allegation. I asked Lt. Mumma where the second allegation against me came from, because no one in all the interviews conducted, said I did anything like that. Lt. Mumma said that when Rick Craig was under criminal investigation and looking to get fired, he made statements like, “Lance Oldridge has suggested we do much greater things. Wouldn’t it be interesting if we pulled these documents out?” Lt. Mumma said Rick made this statement to him back when he was under criminal investigation, but they couldn’t talk to him at that time. This would have been around May 2019. I asked Lt. Mumma why it was not addressed at the time the information was learned, but is now being investigated 6 to 7 months later, after I reported the Chief of Police committed a crime? Lt. Mumma said they did not believe at the time the information was credible and they chose not to investigate it until they began this investigation of me in December. This is clearly after they learned that I reported the Chief committing a crime.

62. By the end of my interview, it was evident that both “F” penalty allegations alleged against me, which were the basis for this whole investigation, were false, and Lt. Mumma acknowledge such. In Sheriff Easter’s response to questioning by PSB, he told them that I had told him about my conversations with DA Bennett and DA Bennett’s decision of not filing charges for the Criminal False Communication charge. And, as I describe above, not one witness knew anything related to the second allegation against me.

63. In addition, while reviewing the PSB investigative file, I saw a copy of a KORA request I had submitted to Sedgwick County 911 related to a police call back in September 2019. I saw documents where my KORA to 911 had been obtained by the police department and used in the investigation against me. The copy of my KORA request in the case file had a note on it that said, “From DC Givens for Oldridge case - Thanks!” The copy was stamped as received in PSB on January 17, 2020.

64. On February 3, 2020, I was told HR moved my grievance hearing scheduled the next day, to February 7th. On February 4th, I was told HR was now postponing the grievance hearing until the police department completed their investigation of me.

65. On March 10, 2020, Anna Hatter prepared a “Memo for Record” discussing her participation in the PSB investigation of me. Memo for Record 3-10-2020 (Ex. 24). She interviewed the FBI about me, used information from that interview to sustain me for lying, and never gave me the opportunity to rebut that before she made a “sustained” finding about me. This was another violation of the FOP contract, which requires the police department to interview me following the interview Hatter conducted with the FBI.

66. On March 20, 2020, I received a disposition or “finding” letter regarding the investigation from Deputy Chief Hatter. This eight-page letter did not make one mention of the two original violations I was alleged to have committed, not one. However, this letter stated the investigation found three other “F” (termination) penalties for departing from the truth against me; one additional “F” penalty violation for “misconduct” and three additional “E” penalty violations against me regarding Departmental Correspondence (each of these “E” penalty violations carry a penalty of 15 days of without pay up to termination). The letter stated the department’s intent to terminate my employment based on their investigation.

67. In his 168-page PSB report about me, dated March 16, 2020, PSB commander Mumma discussed my wife’s lawsuit against the City and referred to my wife’s underlying email as her attempt to “ridicule” Chief Ramsay. A true and accurate copy of page 1 and 26 of the PSB commander Mumma’s report about me is attached as Ex. 29. Mumma Officer Report 3-16-2020, p. 26 (Ex.29).

68. These seven new violations I was found to have committed and sustained for, are a combination of misapplication of our regulations and fabrication of facts. I believe this was done because the investigation had proven their original allegations against me were 100% false, but the WPD executive staff is determined to fire me because I reported Chief Ramsay committed a crime. I can outline each of these allegations for you and how they do not conform with past practice, the facts do

not fit the sustained allegation, and how there is more 100% false information used to sustain me. For example, one example of lying/deceit that PSB cited against me, was redacting with a black marker information that I provided to PSB. That is far from dishonest or deceitful. I was simply focusing PSB on information that I voluntarily provided and PSB aware of the information that was redacted.

69. On March 25, 2020, I attended a due process hearing to state mitigating facts regarding the findings. This was done in front of Deputy Chief Hatter and Captain Chester Pinkston. During this hearing I outlined how their information used to sustain me does not conform with past practice, the facts do not fit the sustained allegations, they have misapplied regulation, and how there is more false information used in their finding to sustain and terminate me.

70. On March 26, 2020, I telephoned Lt. Mumma in PSB to inquire about the status of the complaint I submitted to PSB on December 9, 2019, regarding allegations against Chief Ramsay and Deputy Chief Givens for lying and retaliation. Lt. Mumma told me that his superiors placed the complaint I made on hold, because Deputy Chief Givens had gone to Human Resources and made a complaint regarding me making the PSB complaint against her.

71. I then telephoned Susan Leiker with the City of Wichita Human Resources who said she was in receipt of a complaint made against me on December 10, 2019. Ms. Leiker said the alleged incident occurred on December 9, 2019, and was in reference to the complainant stating I filed a complaint against them the day after they had served an investigation on me. Ms. Leiker said she was aware I was on administrative leave and was waiting to proceed with the investigation and interview me if I came back to work. I explained that I was on administrative leave, meaning I was still receiving pay and could be interviewed by her at any time.

72. I questioned her about this, asking if I never came back to work what would happen to the complaint. She said that was a good question, and basically said it would be closed if I was no longer an employee. I told her it was concerning how the police department said they were waiting on her to proceed with a complaint and she is waiting on them to proceed with a complaint.

73. On March 31, 2020, I telephoned Ms. Leiker again to ask if the complaint against me alleged racial bias. Ms. Leiker said the complaint did not allege racial bias. Ms. Leiker said she needed to clarify something with me because she had misspoken the week before when she talked to me. Ms. Leiker said the complaint that was filed was not against me, it was against the City. I inquired further about the status of her investigation, and she said with the Covid19 situation it was difficult to get anything done at work.

74. I then telephoned Lt. Mumma in PSB to again inquire about the status of the complaint I filed. Lt. Mumma said it was his understanding that Deputy Chief Givens had made a racially based complaint to Susan Leiker in Human Resources. I asked him who told him it was a racially based complaint and he said Deputy Chief Givens herself had told him. When I told him that HR just told me there was not a racial aspect to the complaint, Lt. Mumma then said he didn't know if it was racial or sexual. Lt. Mumma said that his supervision was not going to move forward with the complaint I made until a determination had been made by Human Resources.

75. I then telephoned Ms. Leiker back and she said the complaint was filed as an EEO complaint but may end up being more of a retaliation complaint that is not EEO related.

76. The filing of this complaint by Deputy Chief Givens is no doubt direct retaliation against me for filing a complaint of misconduct against her. This complaint by Deputy Chief Givens has resulted in the police department not initiating an investigation of her or the Chief. The police department says they are waiting on Human Resources. When I spoke with Human Resources regarding the complaint filed by Deputy Chief Givens, they say they are waiting on the police department to conclude their investigation. I believe there is a coordinated effort between the police department and Human Resources to postpone these investigations in hopes that I am terminated. That way it will be easier to cover up the misconduct and make the allegations go away.

77. Gordon Ramsay, Jose Salcido, and Wanda Givens did not testify at my December 8-11, 2021, arbitration hearing over my termination.

78. Sgt. Jeremy Vogel (Asian American) was my direct supervisor at the Training Academy. He testified at the arbitration hearing over my termination: he “tried to do a lot of coaching and mentoring” so he would not reach the point of formal discipline with Oldridge. Lance Oldridge Arbitration Hearing Transcript 12-9-2020 at tr. p. 354 (Ex. 31). When asked, “Did you write down or make notes about your discussions with Mr. Oldridge?”, Vogel responded: “No, I didn’t because it was too numerous, and if I did over the course of the time that I had supervised him, it would be like a thick novel.” *Id.*

79. After the arbitrator ordered the City of Wichita to rehire me, the City refused to do so, citing “the repeated mentoring [I] received by Sergeant Vogel in the Training Center.” Manager Letter Refusing to Reinstate Oldridge 9-22-2017 at 2 (City Ex. 17).

80. But when I was the subject of the PSB investigation in 2019 and 2020, Sgt. Vogel reported that he had never “coached” or “mentored” me for my actions and did not see any issues. PSB Interview of Jeremy Vogel re Lance Oldridge 12-16-19, pp. 5-6 (Ex. 32).

81. In a lawsuit filed by a current WPD employee, Kelly Mar, Deputy Chief Chet Pinkston testified that Vogel’s statements were inconsistent, and that he “does not know why [Vogel] changed from one statement of no instances that he recalls to this was constant and ongoing, which was more consistent with what we found from the investigation, that Detective Oldridge’s conduct was constant and ongoing.” *Mar v. City of Wichita*, Memo in Opp to MSJ, 6:19-CV-01330, Doc. 111, p. 48. Despite that, Pinkston testified he does not see Vogel’s inconsistent testimony as a matter for PSB. *Mar v. City of Wichita*, Memo in Opp to MSJ, 6:19-CV-01330, Doc. 111, pp. 48-49.

82. Between December 2, 2021, and May 24, 2022, I received approximately 121 text messages, screenshots, or text links from telephone number 816-265-1434. I did not know who the number belonged to, or who was sending the messages. However, based on my knowledge of current Wichita Police Department matters, the information contained in the text messages, especially intimate

knowledge of issues related to Captain Wendell Nicholson and Captain Nicholson's position advising the Wichita Citizen's Review Board, which gives him access to confidential personnel administrative matter and investigations, I believe the 816-865-1434 number is used by Captain Nicholson and that the messages came from Captain Nicholson. The following facts reference some of the messages that I have received to date.

83. On December 2, 2021, at 9:30 p.m., I received two, back-to-back text messages from phone number 816-265-1434. The messages said, "I saw on the news you were suing the WPD. FYI Wichita State did a survey on officers' attitude in Patrol East and South and officers were very critical of treatment of women and retaliatory behavior by the Executive Staff. WSU plans to release the surveys in January as part of PSN. The chief is trying to block the release. Just someone who thinks the chief is full of shit and his deputy chiefs." I responded the next morning, "Thank you."

84. On December 3, 2021, I received another text from 816-265-1434. The message said, "I also found out that Nickleson (sic) (Captain Wendell Nicholson) filed a retaliation complaint against the chief of police today. Things are getting interesting." I asked what the complaint was about. The number responded, "Something about the survey that Koch (Captain Kevin Kochenderfer) and Nickelson (sic) had done. Chief is blaming those two for the results he was supposed to go to the FBI NA in Jan and the Chief pulled his endorsement because the survey made the chief and executive staff look bad." I asked who I was speaking with, and they said they wanted to remain anonymous but indicated they worked for the police department and were "just tired of all of the crap around this place." I responded by telling the person I appreciated that and to feel free to keep me "in the loop." I told them, "The only thing I want is an ethical police department and these people to be held accountable."

85. On December 7, 2021, I received this message from 816-265-1434. "Tim Relph (a WPD homicide detective) was involved in a fatal accident with a box truck. Secondary involvement there was some question as to whether he was drunk. Instead of investigating Relph they are now investigating the officers who said something about it which has now bled over into the spouses of Schmitts Nagy's and Doshier's all being investigated for gossiping about internal investigations."

86. On December 8th, a message from 816-265-1434 said, "I have heard rumors that Nickleson (sic) has him (Deputy Chief Chet Pinkston) dead to rights lying and thst (sic) is one of the things HR is investigating. I hear there is a meeting Friday mayor and mgr with the chief to talk about his future. Evidently their (sic) is a shit storm falling on Ramsay."

87. I received another message from 816-265-1434 that said, "Heard Nickelson (sic) is being investigated for sharing his command notes and division notes with his Lieutenants and for calling the Chief disrespectful names that's why the Chief pulled his fbina (FBI National Academy endorsement) and they blame him for officers being negative at south and east. But he filed a retaliation complaint with HR and HR and the manager's office is backing Nickelson (sic)." An additional message went on to say, "Also found out Capt. Stephens made a reference of black people being baboons while drinking on a work trip to Arizona. Salcido (Deputy Chief Jose Salcido) inv (investigation) was 3 sentences written and it was ruled unfounded but coaching and mentoring. This place is shady. Obviously, morale is at a (sic) all-time low. The environment is dysfunctional."

88. After reading these last texts, my wife, and former WPD Lieutenant, Sarah Oldridge, called Kevin Kochenderfer, now retired, and found out that earlier in the day he had spoken to Captain Wendell Nicholson and was told by Captain Nicholson he had just been served a notice of investigation by Deputy Chief Chet Pinkston for the investigation outlined in the text message from the previous paragraph. Kochenderfer also told Sarah that he had just been told by Captain Nicholson about the Officer Schmitt, Detective Nagy, and Detective Doshier investigation outlined in the text message above.

89. In addition to this, I recalled the minutes from the Citizen's Review Board (CRB) for April 2021, reflected that they had reviewed an investigation where, "a Wichita Police Department (WPD) supervisor attended training in Arizona, when it was alleged, he made racially offensive comments." The WPD member assigned to assist the CRB and the one who presented this investigation to the CRB for review, was Captain Wendell Nicholson.

90. On January 16, 2022, the Wichita Eagle published a news story, "Wichita police officers raise concerns in focus groups, blame leaders for some problems", which validated the things stated to me by the source on December 2 and 3, 2021. A true and accurate copy of the subject article is attached as Ex. 37.

91. On March 2, 2022, I received a text screenshot from 816-265-1434 of what appeared to be a police department secure email titled, "A Suspension with Pay WPD Personnel Action was entered for Turner, Mia R V1189". Mia Turner is African American. The email on "New Police Secure 365" was sent to Jose Salcido and 25 others. The body of this email indicated it was a notification of suspension with pay for police department employee Mia Turner, dated March 2, 2022. The message accompanying this screen shot said, *"This was Wanda's secretary." "Discovered about 3 months ago she was in jail calls giving an inmate info about a shooting he was in jail for the executive staff waited until Wanda and Ramsay left to do anything. Nothing suspicious about that."* Several additional messages said that Professional Standards isn't looking into this, and they know nothing about it, because the Department was having Executive Officer, Lt. Robert Reichenberger, investigate the allegation and Professional Standards knows nothing about it. The message went on to say that "sensitive" cases don't go through Professional Standards any longer and are investigated by Lt. Reichenberger and Captain Mumma *"to protect the executive staffs interests."* The message said there were approximately eight cases being worked by "special investigators" Lt. Reichenberger and Captain Mumma, all cases which would be embarrassing to the Executive Staff.

92. The text went on to say that Officer H made a sexual harassment complaint which Captain Paul Duff and Deputy Chief Pinkston sat on the complaint for six months. The complaint was then assigned to a supervisor to investigate, and this supervisor was one of the people accused in the sexual harassment complaint. Neither Professional Standards nor Human Resources were notified according to the texter.

93. I messaged 816-265-1434 and asked if it this person knew if the department was notifying the Citizen's Review Board of these secret cases, because the policy was to notify the

Citizen's Review Board on every Professional Standards case opened and closed. I told the person if the department was doing secret investigations, were they keeping this from the Citizen's Review Board as well?

94. The person messaged back that Chief Ramsay is very careful what he gives Professional Standards, the Citizen's Review Board and Captain Nicholson. The person said they know for a fact that the "secret investigations" are not given to Professional Standards to be entered into the records system until they are completed.

95. The person went on to say, "*Your complaint against the Chief (Ramsay) and Wanda (Deputy Chief Givens) was never investigated. They gave it to Mumma (then PSB Lt. Blake Mumma), and he just sat on it as he was instructed to do.*" "*That inv with Ramsay and Givens was NEVER investigated.*"

96. On March 6, 2022, the person at 816-265-1434 texted me and said they were aware of Deputy Chief Pinkston contacting officers and demanding they tell him who participated in the WSU survey, and he was searching departmental members email records to also find out. The person said that Officer Anthony Villegas went to Human Resources the previous week to complain about Pinkston doing this. The person said Human Resources has completed the investigation on the complaint by Captain Nicholson and now that Chief Ramsay is gone the City Manager is ready to act on Deputy Chief Pinkston, and the rumor was that Pinkston would be demoted or asked to retire.

97. This type of an inquiry is similar to another situation at WPD, where management was more concerned with locating the leak of compromising information about the WPD than rectifying improper conduct. In Kelly Mar's lawsuit against the City of Wichita, the City of Wichita (Chet Pinkston) falsely stated in an interrogatory response that the City didn't know whether it had hosted a racially segregated meeting in the summer of 2020. *Mar v. City of Wichita*, Memo in Opp to MSJ, 6:19-CV-01330, Doc. 111, SOF 79-81, p. 32. The City had, in fact, held such a segregated meeting in the summer of 2020. *Id.* Blake Mumma of PSB set up a PSB file to identify the individual or individuals who forwarded emails about a June 2020 segregated meeting at the WPD. *Mar v. City of Wichita*, Memo in Opp to MSJ, 6:19-CV-01330, Doc. 111, pp. 32, 50-51. Specifically, When WPD invited African American officers to the segregated meeting in June of 2020, the officers were told not to forward or share the invitation with anyone. *Id.*, SOF 195, p. 50. Wanda Givens "self-reported" to PSB the fact that, at the racially segregated meeting, a black law enforcement organization had solicited members. *Id.*, SOF 196, p. 51. PSB made no disposition on matter. *Id.*, SOF 197, p. 51. I notified the City Council about the racially segregated meeting that WPD held in the summer of 2020. *Id.*, SOF 198, p. 51. At Givens' direction, Mumma researched the City of Wichita email accounts of the individuals invited to the meeting to find out who had forwarded the invitation to others. *Id.*, SOF 199, p. 51. Following her misuse of PSB to discover the individuals who told City Council about the racially segregated meeting, Givens sent a "cease and desist" letter to me. *Id.*, SOF 200, p. 51. A true and accurate copy of Given's cease and desist letter from January 2021 is attached as Exhibit 33.

98. In the letter, Givens (African American) refers to my report of Ramsay's criminal activity to the district attorney and to the sheriff as "continued harassment." She makes other unfounded accusations in the letter.

99. The text messages from 816-265-1434 went on to say that Deputy Chief Givens' secretary Mia Turner had been charged with felony computer crimes. They said Chief Ramsay and Deputy Chief Givens knew that Mia Turner had been passing information to people in jail for three months, but they waited until Givens retired and the Chief was leaving, to do anything about it. The person said, *"You called it from the beginning, Ramsay and Givens were some (sic) crooked bastards. The swat inv it took them 6 months to look into it."*

100. The person went on to say Officer Kevin McKenna was the person who discovered the jail calls with Mia Turner, and he told his supervisor Lt. Jason Bartel about them. Lt. Bartel then told Captain Mumma who he assumed then told Deputy Chiefs Pinkston, Givens, and Chief Ramsay. The person said the Chief then sat on this information until after the day he resigned (March 1st) and March 3rd was the first time Professional Standards was notified and the case entered in the computer records system for Professional Standards.

101. The person believed that Officer McKenna first notified his supervision of the Mia Turner calls in November or December 2021 and he was ordered to not say anything or tell anyone. Captain Mumma told Officer McKenna, *"maybe you didn't hear what your (sic) heard on the jail call."* The person told me that Turner had been taking pictures of axon videos and downloading documents from the WPD records system and giving the information to a family member who was in jail.

102. The fact that this person had disclosed on March 2, 2022, the email stating that Mia Turner had been suspended, a week before the story about her misconduct hit the news, further led me to believe that this person is a genuine source within the department.

103. On March 13, 2022, the person texted and said there were a lot of rumors circulating about the Chief, the Deputy Chiefs and the law department having meetings about "swatgate" (the WPD SWAT text messaging investigation). The rumors were that the Department was planning to blame Deputy Chief Salcido or Deputy Chief Pinkston, but not former Chief Ramsay for anything that went wrong in the investigation. The person texted, *"Picture is supposed to be a naked black guy with large genitals sitting on George Floyd's neck."*

104. In another message, the person said of the eight WPD SWAT texting cases that were to be reviewed by the Citizen's Review Board, the Board was only able to review three of them. They said the Board was not happy with the decision to give a "slap on the wrist" for the "racist text messages." The department didn't include Captain Nicholson in the presentation to the Board and had Lt. Reichenberger do it, "and he was horrible." The person said they heard Deputy Chief Pinkston had said they don't like Captain Nicholson because he doesn't try to protect the department at the Citizen's Review Board meetings, and he just presents the facts as they are. They said that Lem (Acting Chief of Police, Lemuel Moore) threw Deputy Chief Pinkston and Salcido "under the bus" at the Citizen's Review Board meeting the week before. They went on to say that Deputy Chief Pinkston has been attempting

to make officers in the Patrol South Bureau tell him who was involved in the WSU survey about the department. They said some officers have filed a complaint with HR over Pinkston's actions. The person went on to say that Human Resources had finished with their investigation of Deputy Chief Pinkston and Chief Ramsay, and they have Pinkston on four confirmed lies.

105. In another message the person said they were guessing that I hadn't seen the picture in question in the WPD SWAT text messaging investigation. I was then sent what appeared to be a screen shot of a paper with a black and white photo on it that appears to have the tailgate and bumper of a Minneapolis police car with a large black male sitting over George Floyd's head with the black male's large penis laying over George Floyd's neck. The person texted, *"This should have been a lot worse than coaching and mentoring and Chet is going to have to explain that one. The only person who got days off was Kochenderfer for calling the Chief a fucking tool." "Makes everyone who puts on the badge look horrible. Hell at least the Sherriff (sic) fired everyone when he found out they were racist. But Chet and Ramsay coached them. Because he didn't want the scandal."*

106. On March 21, 2022, the person sent me a link to the Wichita Eagle article from that morning titled, Leaked messages: Wichita-area officers sent racist memes, talked about shooting people. The person said, *"Sheds light on what type of things have been allowed to happen with Ramsay. This is just terrible."*

107. On March 22, 2022, the person at 816-265-1434 sent another text message that said, *"I heard on your deal yesterday Mumma had opened an inv but then received an order from Wanda not to do anything with it. And then I heard Chet wrote a 20-page inquiry, but no one ever saw it and of course none of this went through PSB it all went through the (sic) created under Ramsay PSB sib of Mumma and Reichenberger."*

108. This reiterated my concern that WPD had squashed my complaint to protect Ramsay and Givens. There are other circumstances supporting this belief. On February 5, 2021, I submitted a KORA request regarding the status of the complaint I had made against Chief Ramsay and Deputy Givens on December 9, 2019. On February 10, 2021, the city responded to my request and said the investigation was still open. I later discovered through a KORA request I submitted in August 2021, that on February 11, 2021, the day after the previous KORA request, the police department closed the complaint against Chief Ramsay and Deputy Chief Givens. I later learned that the Citizens Review Board had then requested to review the closed investigation during their April 22, 2021, meeting. According to publicly available meeting minutes, the Board went into Executive Session during the April 22nd meeting to review the closed case. After coming out of Executive Session, the Board announced they had suspended the review of the case because it was not closed.

109. On March 22, 2022, the person at 816-265-1434 texted and said they were told Deputy Chief Pinkston was to be investigated for Brady/Giglio violations and that there is evidence of him lying in the Captain Nicholson complaint. They said the lies are on tape. They also said they heard that the City Manager plans to have Acting Chief Moore throw Deputy Chiefs Salcido and Pinkston, as well as former Chief Ramsay, "under the bus" regarding the WPD SWAT text messaging incident. The person said that since the City Manager is being called to Council for a special executive session, he is

chopping heads off. They also heard the manager plans to launch an investigation into the WPD Executive Staff and their handling of the WPD SWAT text messaging investigation.

110. In May 2022, Deputy Chiefs Pinkston and Salcido appeared on the news to talk about the PSB investigation of the racist and homophobic swat messages. They disclosed information about the investigation to the public. A true and accurate copy of the article, "Wichita police leaders back former chief, echo concerns about internal review," KWCH 5/18/2022 is attached as Ex. 38. In the article, Ramsay is quoted as stating that the City of Wichita's HR director inappropriately interferes with WPD discipline. *Id.*

111. As a result of the abusive investigation & termination accompanied by a sustained finding for serious misconduct, my record with Kansas C-Post has been substantially tarnished and this has substantially harmed by ability to find a reasonably comparable job in law enforcement. I used to work as a pre-employment detective and personally know how damaging such information is to one's ability to get a job in law enforcement.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



LANCE OLDRIDGE

EXECUTED ON 7/6/2022