

10TH JUDICIAL DISTRICT COURT
PARISH OF NATCHITOCHEs
STATE OF LOUISIANA

NUMBER: C-90,284

CALVIN W. BRAXTON, SR.

VERSUS

LOUISIANA STATE TROOPERS ASSOCIATION AND

JAY OLIPHANT

Deposition of T.J. DOSS, taken on Tuesday,
June 25, 2019, before Leslie B. Doyle, Certified
Court Reporter (LA #93096), at the Law Offices of
Avant & Falcon, 429 Government Street, Baton Rouge,
Louisiana, commencing at 4:12 p.m.

COURT REPORTERS OF LOUISIANA, L.L.C.
9614 Brookline Avenue, Suite A
Baton Rouge, Louisiana 70809
PHONE (225) 201-9650 * FAX (225) 201-9651
E-Mail: Depos@courtreportersla.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

Caption	1
Appearances	3
Agreement of Counsel	4
Examination	
BY MS. CRAFT	5, 110
BY MR. OXENHANDLER	108
Reporter's Certificate	116 - 117
Witness' Certificate	118

* * *

EXHIBITS

EXHIBIT 19.....	56
8/16/17 Letter to Jim Mustian from Jason Hannaman	

* * *

1 APPEARANCES :

2

3 REPRESENTING THE PLAINTIFF:

4 JILL L. CRAFT, ESQ.
5 JILL L. CRAFT, ATTORNEY AT LAW, LLC
6 330 GOVERNMENT STREET
7 BATON ROUGE, LOUISIANA 70802

8 REPRESENTING JAY OLIPHANT:

9 STEVEN M. OXENHANDLER, ESQ.
10 GOLD, WEEMS, BRUSER, SUES & RUNDELL
11 2001 MACARTHUR DRIVE
12 ALEXANDRIA, LOUISIANA 71301

13 REPRESENTING THE LOUISIANA STATE TROOPERS
14 ASSOCIATION:

15 FLOYD J. FALCON, JR., ESQ.
16 AVANT & FALCON
17 429 GOVERNMENT STREET
18 BATON ROUGE, LOUISIANA 70802

19 REPRESENTING THE LOUISIANA STATE POLICE COMMISSION:

20 M. LENORE FEENEY, ESQ.
21 TAYLOR, PORTER, BROOKS & PHILLIPS, LLP
22 450 LAUREL STREET, SUITE 800
23 BATON ROUGE, LOUISIANA 70801

24 ALSO PRESENT:

25 MICHELE GIROIR

JAY OLIPHANT

CALVIN W. BRAXTON, SR.

JAY O'QUINN

* * *

1 S T I P U L A T I O N

2

3 It is stipulated and agreed by and between
4 all Counsel that the testimony of T.J. DOSS, on June
5 25, 2019, is hereby being taken for discovery
6 purposes and for any and all purposes authorized
7 under the Louisiana Code of Civil Procedure.

8

9 The witness reserves the right to read and
10 sign the deposition. The original is to be
11 delivered to and retained by Jill L. Craft, Esq.,
12 for proper filing with the Clerk of Court.

13

14 All objections, except those as to the
15 form of the question and the responsiveness of the
16 answer, are considered reserved until trial or other
17 use of the deposition.

18

19

20

21

22 * * *

23 Leslie B. Doyle, Certified Court Reporter
24 in and for the State of Louisiana, officiated in
25 administering the oath to the witness.

1 T.J. DOSS,
2 having been first duly sworn, was examined
3 and testified as follows:

4 * * *

5 EXAMINATION

6 BY MS. CRAFT:

7 Q. Mr. Doss, my name is Jill Craft, and I
8 represent Calvin Braxton, seated to my left, in
9 connection with a lawsuit that's pending in
10 Natchitoches Parish. It's very important during the
11 course of this deposition that you understand what
12 I'm asking you, and if at any time you do not, then
13 tell me to stop and rephrase it. I'm happy to do
14 so. It's also important, nods of the head yes or no
15 cannot be taken down by the reporter, so you need to
16 make sure to answer out loud. And my final
17 instruction is rather unique to me insofar as I may
18 ask you to spell names, places or things, not to
19 test your spelling. It's just much easier to get
20 them down as we go along. Is that fair enough?

21 A. Yes, ma'am.

22 Q. Have you given a deposition before, sir?

23 A. Not that I recall, no, ma'am.

24 Q. Have you testified in court before?

25 A. Yes, ma'am.

1 Q. How many times, you think?

2 A. I couldn't give you an honest answer.
3 Numerous times.

4 Q. Would you walk me through your educational
5 background, starting with where and when you
6 graduated high school, please, sir?

7 A. 1999, Cedar Creek High School.

8 Q. Is Cedar Creek one word?

9 A. I believe it's two.

10 Q. Okay.

11 A. Shame on me. I don't know the alma mater,
12 either.

13 Q. And where is Cedar Creek High School
14 located?

15 A. Ruston.

16 Q. And any education beyond that?

17 A. Yes, ma'am. I attended ULM and Delta
18 Community College.

19 Q. Do you have any degrees or certifications?

20 A. Yes, ma'am. I have a degree in business
21 management.

22 Q. Is that an associate's degree or something
23 else?

24 A. It's an associate's.

25 Q. And you got that from Delta; is that

1 right?

2 A. Yes, ma'am.

3 Q. And when did you get the associate's
4 degree?

5 A. I don't recall the year.

6 Q. Did you -- at some point in time, I
7 understand you went to work for the State Police.

8 A. Yes, ma'am.

9 Q. Can you tell me what year that was?

10 A. 2008.

11 Q. Between 1999 and 2008, what did you do for
12 a living?

13 A. I worked at Depot 33, which was a now
14 closed-down business, or lumber business. I worked
15 at Shreveport PD. I worked at Dubach High School as
16 a math teacher.

17 Q. Spell Dubach, please.

18 A. D-U-B-A-C-H. I worked --

19 Q. As a math teacher?

20 A. Uh-huh.

21 Q. Is that a yes?

22 A. Yes, ma'am.

23 Q. Okay.

24 A. And I worked at Shreveport PD.

25 Q. You told me that. When did you work at

1 Shreveport PD?

2 A. 2005 to 2006, approximately.

3 Q. Did you attend an academy?

4 A. Yes, ma'am.

5 Q. Which one?

6 A. The Shreveport basic police academy.

7 Q. And when did you attend the academy?

8 A. During that timeframe.

9 Q. Was it before or after you began
10 employment?

11 A. I mean, when you get hired at Shreveport,
12 you have to go through their academy, so --
13 everybody. I mean, you can't just get hired there
14 if you don't have an employ, so as soon as I got
15 hired, I went to their academy.

16 Q. Okay. And you stayed working there for a
17 year, including the academy time?

18 A. Yes, ma'am.

19 Q. Why did you leave?

20 A. My brother was killed in a car wreck, and
21 I wanted to move back closer to my family.

22 Q. Which was here or Ruston?

23 A. Ruston.

24 Q. And that's when you went to work at
25 Dubach?

1 A. Ruston PD.

2 Q. Ruston PD. Okay. You didn't tell me
3 about them.

4 A. I thought I said Ruston.

5 Q. No, sir. When did you work for Ruston?

6 A. 2006-2008.

7 Q. And then you went to the State Police?

8 A. Yes, ma'am.

9 Q. And at Ruston PD, did you ever have an
10 occasion to receive any disciplinary action,
11 including nondisciplinary letter of caution or
12 verbal reprimand?

13 A. No, ma'am.

14 Q. Did you have any complaints, to your
15 knowledge, brought against you in conjunction with
16 your employment at Ruston PD?

17 A. Not that I'm aware.

18 Q. And how about with respect to the
19 Shreveport Police Department? Did you have any
20 complaints brought against you in connection with
21 your employment with the Shreveport Police
22 Department?

23 A. Not that I'm aware.

24 Q. Did any of your supervisors ever speak to
25 you about your behavior either at the Shreveport

1 Police Department or the Ruston Police Department?

2 A. No, ma'am.

3 Q. So how did you get on at LSP?

4 A. Applied. Just went through the whole
5 hiring process. The pay was better.

6 Q. Okay. Did you know that there was an
7 opening, or how did that work?

8 A. I mean, when you get on the website, it
9 says they're accepting applications, and I went
10 through the hiring process and I got a phone call
11 saying I was starting the academy in 2008.

12 Q. You got a phone call from whom?

13 A. I don't even recall who, I think it was
14 internal affairs, saying that I had a conditional
15 offer. I don't recall who it was that called me.
16 It wasn't anybody of importance.

17 Q. Did you know any state troopers in
18 conjunction with your employment at either
19 Shreveport or Ruston PDs?

20 A. I've known troopers. I wouldn't say I was
21 close friends with any of them.

22 Q. Okay. And when you were hired at State
23 Police, you came to the academy, I think you said.
24 Was that the academy here in Baton Rouge?

25 A. Yes, ma'am.

1 Q. And did you have any understood assignment
2 after you finished the academy, like where you were
3 going to go?

4 A. Troop F patrol.

5 Q. Which is where?

6 A. Monroe.

7 Q. And how long did you attend the academy?

8 A. Approximately 20 weeks. I don't recall.

9 Q. So you've attended two academies, one for
10 Shreveport and one for State Police; is that right?

11 A. Yes, ma'am.

12 Q. Okay. In connection with your attendance
13 at the academy, at State Police academy, I
14 understand that you guys go through a number of, for
15 lack of a better phrase, kind of like training
16 components, one being report writing. Do you
17 remember that?

18 A. Yes, ma'am.

19 Q. And what do you recall in general about
20 how you were trained by the State Police academy
21 with respect to writing a report?

22 A. Clear, concise. That's about what I
23 remember from a class ten years ago on report
24 writing. You know, be clear, be concise in your
25 statements, and, you know, don't speculate. You're

1 not there to talk about your feelings. It's just
2 the facts.

3 Q. And you're certainly not there to talk
4 about somebody else's feelings, right?

5 A. Yes, ma'am.

6 Q. You're there simply to report what it is
7 you, as a trained observer, observed?

8 A. Uh-huh.

9 Q. Yes?

10 A. Yes, ma'am. You can include statements.
11 I mean, if they say, I've never been more afraid in
12 my life, I suppose you could include that in a
13 report, the subject stated it, but you're not
14 allowed to interpret it.

15 Q. And with respect to writing reports, do
16 you recall receiving training at the academy that
17 you should write the report as close in time to the
18 event occurring as possible?

19 A. I don't recall anything being about the
20 timeliness of when the report should be written.

21 Q. Okay. Well, in your work at the State
22 Police, Shreveport and Ruston PDs, do you recall an
23 occasion where you took six months to write a
24 report?

25 A. I mean, I don't recall when most of my

1 reports are submitted. It just depends on which
2 section I was in.

3 Q. State Police, do you know whether or not
4 they have a policy regarding when your report must
5 be submitted?

6 A. I do not.

7 Q. Are you aware of any troopers, for
8 example, being disciplined for not submitting their
9 reports within 30 days?

10 A. I'm not aware of any, but they -- I mean,
11 no, I'm not aware.

12 Q. What's your current rank at State Police?

13 A. Senior trooper.

14 Q. And when did you become a senior trooper?

15 A. September of last year.

16 Q. 2018?

17 A. I believe so, yes, ma'am.

18 Q. And prior to that, you had what rank?

19 A. TFC.

20 Q. Trooper first class?

21 A. Yes, ma'am.

22 Q. From when to when?

23 A. Subtract five from 2018, so September of
24 2013.

25 Q. And then, prior to that, 2008 to 2013 you

1 were a --

2 A. TPR, trooper; yes, ma'am.

3 Q. Okay. So describe for me, when you
4 graduated the academy and you went to Troop F in
5 Monroe, were you part of an FTO program?

6 A. Yes, ma'am.

7 Q. Who was your field training officer?

8 A. I had several, Adam Martin, Justin Morris
9 and Mark Jones.

10 Q. Okay. All spelled the way that we would
11 ordinarily spell --

12 A. Common spelling, yes, ma'am.

13 Q. Okay. And during your field training
14 officer assignments, were you ever counseled for
15 your behavior?

16 A. No, ma'am. Not that I recall.

17 Q. And how long did your FTO program last?

18 A. I honestly don't remember. I believe
19 approximately ten weeks. Whatever was the standard.

20 Q. And who was your commanding officer at
21 Troop F in Monroe?

22 A. He's retired. I'm trying to remember who
23 it was when I got out. He was before Kevin Reeves.
24 Baldheaded man. I just can't think of his name.
25 Last time I saw him, he had a long beard, and I

1 think he lives on the east side of the state.

2 Q. Okay. Troop F in Monroe, you said Kevin
3 Reeves was at some point in time the commander
4 there?

5 A. Yes, ma'am.

6 Q. What period of time?

7 A. I honestly don't know.

8 Q. And are you still at Troop F?

9 A. No, ma'am.

10 Q. Okay. So walk me through -- when you went
11 to State Police, you were at Troop F from when to
12 when?

13 A. When I got out, I was on patrol for a
14 short amount of time, working Ouachita Parish and
15 Lincoln Parish primarily on patrol, and then I went
16 to narcotics.

17 Q. So what year did you go to narcotics?

18 A. Approximately 2010.

19 Q. And was your duty station here in Baton
20 Rouge, or was that a --

21 A. It was in Troop F, Monroe narcotics. Yes,
22 ma'am.

23 Q. Who was your commanding officer in
24 narcotics?

25 A. Chris Jordan was the sergeant, and Gary

1 Beasley --

2 Q. Chris who?

3 A. Chris Jordan.

4 Q. Okay.

5 A. Common spelling. And Gary Beasley was the
6 lieutenant.

7 Q. Beasley, B-A-S-L-E-Y [sic], like the judge
8 up there?

9 A. I don't know if it's like the judge, but
10 that seems like the right spelling. Forgive me.
11 I'm not much of a speller.

12 Q. That's all right.

13 And from what period of time to what
14 period of time did you remain in narcotics?

15 A. Approximately 2014, 2015.

16 Q. So from 2010 to 2014, 2015?

17 A. Uh-huh.

18 Q. Is that a yes?

19 A. Yes, ma'am.

20 Q. And then where did you go?

21 A. CIU, our intelligence unit.

22 Q. And where is that based out of?

23 A. It was out of Shreveport.

24 Q. And who was the commanding officer there?

25 A. Jason Turner was the sergeant. I'm trying

1 to think of who the lieutenant was.

2 Q. Jason, spelled J-A-S-O-N?

3 A. I believe so, yes, ma'am.

4 Q. Okay.

5 A. Turner, common spelling.

6 I don't remember who the lieutenant over
7 the section was, to be honest with you.

8 Q. And you were at CIU until when?

9 A. I don't recall. Sometime maybe 2016.

10 Q. And what did you do at CIU?

11 A. We conducted investigations that were
12 unique. We liaised with federal agencies. We did
13 a lot of protest monitoring. Just following
14 criminal trends.

15 Q. Okay. And where did you go in 2016?

16 A. I did a TDY to op. dev. in Baton Rouge.

17 Q. TDY is just a detail; is that right?

18 A. Yes, ma'am.

19 Q. To op. dev., which is operational
20 development?

21 A. Yes, ma'am.

22 Q. In Baton Rouge?

23 A. Yes, ma'am.

24 Q. So you're now transferred away from your
25 home?

1 A. Yes, ma'am.

2 Q. Okay. And you were in op. dev. from what
3 period of time to what period of time?

4 A. I couldn't give you a beginning/end date.
5 Approximately, six to ten months, maybe. I don't
6 know. I apologize if that's incorrect, but I just
7 don't remember.

8 Q. And what did you do in operational
9 development?

10 A. Conducted research for the agency on
11 specific things, Narcan policy --

12 Q. Narcan, N-A-R-C-A-N?

13 A. Yes, ma'am.

14 Q. Okay.

15 A. I did research on scrap yard enforcement,
16 whether scrap metal purchasers are being compliant
17 with state law. I mean, it was just whatever was
18 detailed to me to research at that time.

19 Q. And who was your commander in operational
20 development?

21 A. Jason Shavers was the sergeant, and Robert
22 Burns was the lieutenant.

23 Q. Jason Shavers, spelled --

24 A. -- S-H-A-V-E-R-S.

25 Q. And Jason, common spelling?

1 A. Yes, ma'am, I believe so.

2 Q. And then Robert Burns?

3 A. Common spelling. B-U-R-N-S, I believe.

4 Q. And you were in there until, what, 2017?

5 A. Maybe. I don't know. I don't recall when
6 I transferred. When I left there, I went to gaming
7 in Shreveport, but I don't remember the exact date.

8 Q. Do you remember what year you went to
9 gaming in Shreveport?

10 A. I don't remember if it was 2016 or 2017.

11 Q. Why were you transferred to gaming in
12 Shreveport?

13 A. Because the op. dev. was just a TDY
14 assignment and I wanted to return back north.

15 Q. So this was something initiated solely by
16 you?

17 A. I mean, I had been expressing my interest
18 in returning back to north Louisiana. I just said
19 somewhere investigative.

20 Q. Who did you say that to?

21 A. I had expressed it numerous times to
22 several people.

23 Q. Who?

24 A. Jason Shavers, Robert Burns. I mean, I
25 hadn't put in any formal paperwork, but, I mean, it

1 was my interest to go back.

2 Q. I get it. My question was: This transfer
3 to Shreveport in gaming, that was a transfer
4 initiated solely by you?

5 A. I don't know. I don't know who it was
6 initiated by.

7 Q. Was it a surprise to you that you were
8 being transferred?

9 A. Not necessarily, no, ma'am.

10 Q. Well, who told you you were being
11 transferred?

12 A. Mike Noel.

13 Q. Mike Noel?

14 A. Yes, ma'am.

15 Q. And what was his position?

16 A. Chief of staff.

17 Q. Did he tell you why you were being
18 transferred?

19 A. No, ma'am. He just said that that was my
20 duty -- or my home station, so that was where I was
21 being moved to.

22 Q. Did you know whether or not your transfer
23 was as a result of any alleged behavior on your
24 part?

25 A. I was never told that.

1 Q. Did you believe that?

2 A. No, ma'am.

3 Q. So this transfer to gaming in Shreveport,
4 who do you report to now?

5 A. Jason Russell.

6 Q. And what are you doing in gaming?

7 A. Video poker enforcement.

8 Q. So largely field reports and the like; is
9 that right?

10 A. Yes, ma'am.

11 Q. Okay. And do you have a sergeant or
12 somebody to whom you report on a shift, or is this
13 an 8:00 to 5:00 job?

14 A. Jason Russell is the sergeant. To clarify
15 that, he's the sergeant over video poker, and I'm
16 the trooper underneath him. The lieutenant in the
17 section, which just changed, like, maybe last week,
18 Michael Smith is the lieutenant over the section.
19 So that's who I report to is Jason Russell, and it's
20 Monday-through-Friday, ten-hour-a-day job.

21 Q. Okay. So at some point in time, as I
22 understand it, you joined the LSTA; is that right?

23 A. I joined the LSTA while I was in the
24 academy.

25 Q. Okay.

1 A. Yes, ma'am.

2 Q. Well, that was my second question, when
3 did you join the LSTA, and I get an answer to that.

4 A. Yes, ma'am.

5 Q. And can you walk me through what
6 affiliations you've had with the LSTA since you
7 joined it in the academy?

8 A. I've never held a office in it. I mean,
9 I've always just been a supporter of the LSTA. I
10 know that being a member gives you a benefit package
11 for burial and potential legal representation, if
12 necessary. I've attended some of their functions,
13 not all.

14 Q. Have you attended as a delegate?

15 A. I have attended certain functions as a
16 delegate.

17 Q. When were you a delegate?

18 A. Honestly, I don't recall. Maybe one or
19 two of the conventions, I went to, and went to the
20 business meeting as a delegate.

21 Q. Do you remember being a delegate in 2016
22 at a convention held in Lafayette?

23 A. I don't recall if I was a delegate or not,
24 but I may have been.

25 Q. And how do you become a delegate?

1 A. They essentially send out an e-mail asking
2 if anybody would like to be a delegate to attend the
3 convention and go to the business meeting. It's --

4 Q. Who -- go ahead.

5 A. It's whatever troop president -- you know,
6 each troop has a LSTA president. They'll just send
7 out an open e-mail, would anybody like to be a
8 delegate. If you'll be a delegate -- if you'll
9 attend the business meeting, you're essentially a
10 delegate.

11 Q. Okay. So if you attended as a delegate,
12 do you remember which LSTA troop level, whatever,
13 you represented at the convention?

14 A. I would assume it would have been Troop G.

15 Q. Which is where?

16 A. Shreveport.

17 Q. So that would have been in conjunction
18 with your time in CIU?

19 A. Yes, ma'am.

20 Q. And do you know how many delegates Troop G
21 sent?

22 A. No, ma'am.

23 Q. Did you ever hold a position on the
24 retirement board or anything like that?

25 A. No, ma'am.

1 Q. And do you recall how many times you
2 served as a delegate?

3 A. No, ma'am.

4 Q. Do you know Mr. Oliphant at the end of the
5 table?

6 A. Yes, ma'am.

7 Q. How do you know him?

8 A. Mr. Oliphant was on SWAT, which I'm on
9 SWAT. He was a sniper with the SWAT team.
10 Mr. Oliphant was my first lieutenant when I went
11 into narcotics. He was the XO over Region 3 BOI
12 when I went into narcotics, so I've known him since
13 my career in the BOI began.

14 Q. Would you consider yourself friends?

15 A. Yes, ma'am.

16 Q. And you worked with him, you said, in
17 narcotics; is that correct?

18 A. Yes, ma'am.

19 Q. And you're currently on SWAT?

20 A. Yes, ma'am.

21 Q. And he's currently on SWAT?

22 A. No, ma'am. But he -- correct me if I'm
23 wrong, but he presides over SWAT in his capacity.

24 Q. In what capacity, sir?

25 A. As colonel over patrol, which I believe

1 he's the colonel that presides over SWAT. SWAT is
2 underneath his chain of command.

3 Q. Okay. And when you worked with
4 Mr. Oliphant on SWAT before he became a lieutenant
5 colonel, how frequently did you interact with him on
6 SWAT?

7 A. We didn't interact much on SWAT. I
8 interacted with him more on the bureau side of the
9 house, but it was just whenever I would see him.
10 Again, he served at Alexandria, and I served in
11 Monroe, so we didn't see each other that frequently.

12 Q. But you would see each other for
13 trainings; is that right?

14 A. Yes, ma'am.

15 Q. And were the trainings conducted here in
16 Baton Rouge?

17 A. Training is held wherever they decide or
18 deem training to be held. It's -- they may hold
19 training up in north Louisiana. They may hold
20 training in Alexandria. They may hold training in
21 Baton Rouge. That's just been my experience. They
22 move it around.

23 Q. Is there anything called the JESTC?

24 A. Yes, ma'am. Joint Emergency Services
25 Training Center.

1 Q. Where is that?

2 A. Zachary.

3 Q. And is that where training is held for
4 State Police?

5 A. Some training, yes, ma'am.

6 Q. By the way, when you were detailed here in
7 Baton Rouge, did you stay at headquarters?

8 A. Yes, ma'am.

9 Q. You stayed on the premises?

10 A. Yes, ma'am.

11 Q. For how long?

12 A. Again, however long I was TDY'ed.

13 Q. Did you have to get permission from the
14 State Police Commission to stay on headquarters'
15 premises?

16 A. Not that I recall.

17 Q. Did anybody ever talk to you about having
18 to get permission from the Commission?

19 A. Not that I recall.

20 Q. Okay. Did you ever stay at the facilities
21 of JESTC?

22 A. Are you -- in what timeframe?

23 Q. At any time.

24 A. I've stayed at JESTC numerous times in my
25 history at the State Police.

1 Q. Did you ever pay for your room?

2 A. No, ma'am.

3 Q. Do you know who cleaned up your room after
4 you left?

5 A. No, ma'am.

6 Q. Did you ever have a cocktail or alcoholic
7 beverage at the -- I'm going to call it the alcohol
8 facility located at JESTC?

9 A. Which facility are you speaking of? I'm
10 just trying to figure out where exactly you're
11 talking about.

12 Q. Okay. Let me ask it this way: To your
13 knowledge, was there ever some sort of bar or bar
14 facility at JESTC at any time?

15 A. There's a recreation room with a bar in
16 it, but it doesn't serve alcohol, or never has since
17 I've been there. I've never been there when it was
18 serving alcohol.

19 Q. So how many times have you been there?

20 A. We were stationed there when I was in the
21 academy. We did our -- again, that goes back to
22 2008. We did our officer survival there. We did
23 our driver track training there. Any SWAT firearms
24 training we have there, any breacher training.
25 In-service is held at JESTC. There's just quite a

1 bit of training that's held down there. I mean,
2 it's -- but it's not consistently down there. I
3 mean, there's training that's held at headquarters.
4 There's training held at JESTC. There's training
5 held -- there's a training today in Ruston that I'm
6 not at. So, I mean, it's not always there is what
7 I'm saying.

8 Q. My question is about JESTC, in particular.

9 A. Okay.

10 Q. So if you could focus for me on the time
11 period, let's say, June of 2009 to January 31st,
12 2011.

13 A. Okay.

14 Q. Do you recall being at JESTC?

15 A. Yes, ma'am. I've been there during that
16 timeframe.

17 Q. And is it your testimony that between June
18 of 2009 and January 31st of 2011, you never saw a
19 bar being operated in the recreational facility or
20 anywhere at JESTC?

21 A. I never saw it during that time period,
22 yes, ma'am.

23 Q. Never?

24 A. Never.

25 Q. So did you ever have a cocktail at JESTC?

1 A. I've had a drink at JESTC, yes, ma'am.

2 Q. Where?

3 A. I brought it myself. Typically, in my
4 room.

5 Q. Okay. Were you aware of any functions
6 serving alcohol ever occurring at JESTC?

7 A. I've never been to a service there that
8 the alcohol was provided for me. I mean, if I ever
9 brought my own drinks, I would drink my own drinks
10 there, but I was never provided drinks by somebody
11 else while at JESTC.

12 Q. Did you ever see anybody else being
13 provided drinks at JESTC?

14 A. Not that I recall.

15 Q. At some point in time, you were on the
16 State Police Commission; is that right?

17 A. Yes, ma'am.

18 Q. How did you get there? How did you get on
19 it?

20 A. I was elected.

21 Q. And was that an election from the
22 membership of State Police at large?

23 A. Yes, ma'am.

24 Q. Okay. So when you were on the State
25 Police Commission, do you recall an issue being

1 raised with respect to the serving of alcohol at
2 JESTC?

3 A. Yes, ma'am.

4 Q. What can you tell me about that?

5 A. There was a claim that there was a bar
6 functioning at JESTC.

7 Q. And who was making the claim?

8 A. To the best of my recollection, Bucky
9 Millet.

10 Q. Do you recall Mr. Braxton making any
11 comments about the operation of said bar at JESTC?

12 A. It's possible he did, but I just don't
13 recall specifics.

14 Q. Do you remember making a statement on the
15 record, there's no bar being operated at JESTC?

16 A. It's possible, but I don't recall making a
17 statement.

18 Q. Do you know what the investigation was
19 about?

20 A. What investigation?

21 Q. About -- I'm sorry -- the claim, that
22 there was a bar functioning at JESTC.

23 A. No, ma'am.

24 Q. Do you remember Mr. Braxton making a
25 statement, of course, there is, I was just there

1 last night, about the bar at JESTC?

2 A. I don't recall him making that statement,
3 but I don't know what that's about.

4 Q. Because you never saw anybody being served
5 alcohol at JESTC, other than your personal
6 consumption which you brought for yourself?

7 A. Yes, ma'am.

8 Q. So did you ever see Mr. O'Quinn have Crown
9 Royal at the JESTC bar?

10 A. I don't recall seeing him with Crown Royal
11 at the JESTC bar.

12 Q. How about Mr. Dupuy?

13 A. I don't recall that either.

14 Q. Okay. So the JESTC bar, is it a room in
15 the recreational facility with pool tables, or what
16 is it?

17 A. What you're calling the bar is a room
18 offset from the cafeteria. It has a pool table. It
19 has, I believe, some dartboards, but don't hold me
20 to that. It has a big screen TV. It's just a place
21 for people to sit in the afternoons, but --

22 Q. Is there any alcohol in there?

23 A. I haven't seen alcohol actually stored in
24 there. I mean, you can tell there's a bar, but
25 there's no alcohol out in the open.

1 Q. Have you ever seen anybody functioning as
2 some sort of bartender back there?

3 A. Not to the best of my recollection, no,
4 ma'am.

5 Q. Other than being at JESTC for training,
6 have you ever gone up to JESTC, like not for
7 training, like to meet up with some folks up there,
8 or maybe for some sort of board meeting or
9 something?

10 A. No, ma'am. I've been up there for range
11 days and things like that, but it's always been for
12 some sort of a training or firing range purpose.

13 Q. Did you ever talk with anyone affiliated
14 with LSTA, the LSTA board, or its executive director
15 about this claim that there was a bar at JESTC?

16 A. I don't remember a conversation. The only
17 thing I recall being said was that, did I know that
18 the LSTA at one time had a ATC permit to operate
19 there, but, again, I've never saw anybody serving
20 alcohol there. That was news to me. I don't know.
21 That's secondhand.

22 Q. Who did you get it secondhand from?

23 A. I don't recall. Again, that's why I said,
24 it was a conversation where I heard somebody make
25 that statement.

1 Q. And that was someone affiliated with LSTA?

2 A. I believe so. That's why it sticks in my
3 mind. My belief, they had a permit at one point in
4 time, but, again, I don't recall anybody serving it
5 there, so -- and I couldn't give you any details
6 about the permit, if they actually did.

7 Q. In recent memory -- let's talk about, say,
8 2012 --

9 A. Okay.

10 Q. -- to 2016. Were you ever aware of any
11 occasion where Mike Edmonson would call the State
12 Troopers Association and order specific liquor to be
13 delivered to JESTC?

14 A. No, ma'am.

15 Q. Did you ever hear anything about that?

16 A. No, ma'am.

17 Q. Did you ever hear anything about command
18 staff being allowed to consume alcohol at JESTC?

19 A. Not to my recollection, no, ma'am.

20 Q. When was the last time you were in that
21 bar area?

22 A. I don't recall. I mean, I think I've
23 actually gotten my lunch to go and sat in there when
24 we ate lunch when we were over there for training,
25 just because it's off to the side and there's a TV

1 in there, but I don't recall the last time I was in
2 there socially or just hanging out.

3 Q. And when you say "socially," that would be
4 in conjunction with trainings, or would it be in
5 conjunction with trainings and other things?

6 A. No, just trainings. When you get off a
7 training -- like, if I have a breacher training on a
8 Wednesday and we have a firearms training on a
9 Thursday, I can't remember being off work and just
10 going, oh, I'm going to go in there and hang out and
11 shoot pool. I mean, if I go get lunch -- I like to
12 eat by myself -- I'll take my lunch in there and sit
13 at a table and watch TV. So that's about the last
14 time I sat in there, was probably eating a plate
15 lunch.

16 Q. What year?

17 A. Maybe in the last 12 months, but I don't
18 recall a date.

19 Q. Did you ever have any conversations with
20 Mr. Young of the LSTA regarding Calvin Braxton?

21 A. I mean, we had many discussions, but I
22 don't remember the specifics.

23 Q. You and Mr. Young had many discussions
24 about Mr. Braxton?

25 A. No. Me and Mr. Young have talked on many

1 occasions. I just can't remember the specifics of
2 the conversations. I mean --

3 Q. Well, my question was, do you recall
4 having any conversations with Mr. Young regarding
5 Mr. Braxton?

6 A. None come to mind. None come forth.

7 Q. How about with Mr. O'Quinn?

8 A. Me and Mr. O'Quinn have discussed the
9 Commission on several occasions since he's the
10 president of the LSTA, but I don't remember any of
11 them being specifically about Mr. Braxton.

12 Q. Let me ask you a question.

13 A. Okay.

14 Q. After Mr. Braxton was no longer on the
15 Commission, do you remember having a conversation
16 with Mr. Hannaman? He's the new executive director,
17 right?

18 A. Yes, ma'am.

19 Q. And do you remember him asking -- you
20 asking him or assisting him in any manner to look
21 for e-mails or communications, anything like that?

22 A. I know that there was public records
23 requests for e-mails and communications, but I
24 didn't assist him in that search.

25 Q. How do you know there were public records

1 requests?

2 A. Because Mr. Hannaman informed the
3 Commission.

4 Q. And do you know when those public records
5 requests were?

6 A. No, ma'am, not specifically.

7 Q. Have you ever talked to any member of the
8 media?

9 A. I've spoke to members of the media, but
10 nothing concerning Mr. Braxton.

11 Q. Who -- what members of the media have you
12 spoken to?

13 A. I don't recall. I believe at times
14 that -- because there was so much media at the
15 Commission meeting, if they were there and they
16 would come up and speak, I would be cordial, but I
17 don't recall who all they were.

18 Q. What about Lee Zurik?

19 A. I believe Lee Zurik has spoke to me.

20 Q. What about?

21 A. I don't recall the content of the
22 conversation, but if it was important, I would
23 remember it.

24 Q. Well, how do you know Mr. Zurik?

25 A. He's -- I mean, he's just a media

1 personality. I mean, he's pretty well-known
2 throughout the state.

3 Q. Do you recall when it was you first met
4 him?

5 A. No. No, ma'am, I don't.

6 Q. Do you recall how it was you first met
7 him?

8 A. At a Commission meeting. He just showed
9 up.

10 Q. Was that while you were on the Commission?

11 A. Yes, ma'am. I believe so. I haven't been
12 to the Commission meetings without being a
13 commissioner.

14 Q. Okay. So when Lee Zurik showed up at the
15 Commission meeting, that was the first time you
16 recall meeting him?

17 A. Yes, ma'am.

18 Q. And was he there to ask questions about
19 Mr. Braxton or Ms. Derbonne?

20 A. He didn't ask me any questions. Really,
21 he just -- there was a crowd in the back, and he
22 just said, hey, Lee Zurik. And I was like, hey, how
23 are you doing? And he was setting up a camera and
24 whatnot, but that was it. I mean, it was not a
25 conversation, per se. I just -- I think -- I

1 believe the extent of what I said to him was, we're
2 about to start our meeting, so you're going to have
3 to excuse me, so...

4 Q. Is that the only conversation you've ever
5 had with Lee Zurik?

6 A. To the extent of -- yeah. I mean, there's
7 never been any in-depth conversations I've had with
8 Mr. Zurik.

9 Q. That wasn't my question. Was that the
10 only conversation you had with Mr. Zurik?

11 A. I may have spoken to him elsewhere, but I
12 don't recall what the content of that conversation
13 was.

14 Q. Elsewhere being where?

15 A. I mean, just -- I believe he filed the
16 public records request, and I made sure Jason
17 Hannaman was responsive to the public records
18 request. Or if there was some issue getting public
19 records requests, we would always go through counsel
20 and say, look, here's the timeline, make sure that
21 we were honoring the public records request
22 timelines.

23 Q. You're saying you thought that Mr. Zurik
24 did a public records request?

25 A. I believe so.

1 Q. I'll show you a document which we've
2 already introduced as Exhibit #16. It looks like a
3 public records request from Lee Zurik dated July
4 14th, 2017. This one is directed to the governor's
5 office.

6 A. Okay.

7 Q. Are you aware of any public records
8 request from Lee Zurik to the State Police
9 Commission?

10 A. I'm not aware of how the public records
11 request was issued, but it -- to me, it seems like I
12 thought he had issued one at one point in time.

13 Q. Did you go searching for e-mails to
14 determine if there were any e-mails between Calvin
15 Braxton and Cathy Derbonne regarding -- and I'm
16 going to use the phrase "ticket-fixing." That's my
17 term.

18 A. No, ma'am.

19 Q. Did you become aware of any such things?

20 A. It became aware eventually when it came
21 out in the media. The only e-mails that I ever went
22 through, after Cathy resigned from the Commission --
23 there had been a period where Cathy had been
24 nonresponsive to my e-mail requests for information,
25 and I really didn't understand what was going on

1 within the Commission at that time. It was
2 roughly -- again, this is an approximate
3 timeframe -- March to June of 2016, where I had sent
4 Cathy numerous e-mails requesting information
5 pertinent to what was being conducted on the
6 Commission.

7 Q. Okay.

8 A. Cathy did not respond to any of my e-mail
9 requests at that time for information. When she
10 resigned, I went ahead, because -- just out of
11 concern for preservation of documents, I told
12 Mr. Hannaman or I told counsel we needed to make
13 sure that all e-mails were preserved, and at that
14 time, I went back just to make sure -- to see what
15 was being conducted business-wise at that time and
16 just -- I went through to see if my e-mails had been
17 responded, but I didn't go looking for any one
18 specific e-mail or e-mail specific to one person,
19 no.

20 Q. But you found some?

21 A. I mean, there were some recovered, but I
22 think later more may have been recovered. I don't
23 know. I didn't go through them all, so --

24 Q. Were there some recovered that were
25 communications between Cathy Derbonne and

1 Mr. Braxton or his secretary about tickets?

2 A. I've learned about those in a news
3 article, but I didn't -- I don't recall seeing those
4 when I went through the e-mails that we had
5 preserved.

6 Q. Did you utilize any criteria to designate
7 how to search for the e-mails?

8 A. I don't recall specifying any criteria. I
9 just wanted to save as much information as we could
10 from that time period so that it would be searchable
11 and we could go back and find out how certain things
12 had been conducted on the Commission at that time.

13 Q. Like what?

14 A. Well, in March of 2016, Cathy hired Taylor
15 Townsend without covering any information about
16 pursuing outside legal counsel with the Commission.
17 She went to the -- I believe she went to the
18 capital, and, based on hearsay, she met with Matthew
19 Block, and unless I'm mistaken, I believe Calvin
20 went with her, and they procured outside legal
21 counsel through Taylor Townsend with a contract of
22 \$75,000.

23 Well, at that time, we had in-house legal
24 counsel with Taylor Porter, and Taylor Porter's
25 contract was for approximately \$42,000. Well,

1 Taylor Townsend's contract was for \$75,000, and I
2 was trying to ascertain, one, why were we never
3 given an option. Was there a list of attorneys to
4 pick from? Were we assigned an attorney? Because I
5 genuinely didn't know. I don't know anything about
6 Taylor Townsend, other than reputation. I mean, I
7 know he was a legislator, a politician at one point,
8 and has a great reputation as an attorney, but I
9 don't know how we decided on him. Secondly, I
10 didn't know how we came up with a \$75,000 fund to
11 conduct an investigation that wasn't ordered by the
12 Commission.

13 Q. Okay. That's a lot. Let me ask it this
14 way: You started on the Commission when?

15 A. January of 2015.

16 Q. So this is 2016, March; is that correct?

17 A. Yes, ma'am.

18 Q. And you said you learned through hearsay
19 that Cathy had gone and spoken to Matthew Block in
20 the governor's office. What hearsay?

21 A. It was just -- we were informed --

22 Q. Who is "we"?

23 A. The Commission members.

24 Q. Which ones?

25 A. The remaining Commission at this point.

1 Because in March -- excuse me, I'm sorry -- in
2 December of 2015, there was a investigation launched
3 into LSTA contributions, political contributions.
4 It was not until March, I believe -- I believe it
5 was March -- that allegations of campaign
6 contributions were made against sitting Commission
7 members, which was not illegal, but it was against
8 the Commission rules for sitting members.

9 Now, there was still a quorum at that
10 time. There were still four members that did not
11 have allegations against them. There was myself,
12 there was Donald Breaux, there was Calvin Braxton,
13 there was Lloyd Grafton. Nothing was ever given to
14 the quorum of Commission members remaining
15 conducting this investigation.

16 You have to understand this: There -- the
17 Commission itself has no authority to enforce that
18 rule. What we can do is instruct the executive
19 director or counsel to conduct an investigation,
20 provide it to the Commission, and we could have
21 ultimately voted to give it to the governor.
22 Because, ultimately, the only way a Commission
23 member can be removed is by hearing by the governor
24 or a resignation of the Commission member. That
25 being said --

1 Q. You're telling me the Commission has no
2 authority to investigate whether or not a state
3 trooper is breaking state law?

4 MR. FALCON: Commission members.

5 A. I said Commission members.

6 BY MS. CRAFT:

7 Q. Oh, I'm sorry.

8 A. For political contributions.

9 Q. Okay.

10 A. Okay. So, again, this came up in March.
11 So she takes this information --

12 Q. "She," who?

13 A. Cathy Derbonne takes this information,
14 which --

15 Q. Takes what information?

16 A. That there had been an allegation of
17 campaign contributions by sitting board members, and
18 I believe the complaint was filed by Bucky Millet,
19 who raised the complaint. She took this information
20 on her own and went with Calvin to the capital and
21 requested outside legal counsel to conduct the
22 investigation.

23 Q. And you know that how?

24 A. That was the information provided to the
25 Commission at a later time by Cathy.

1 Q. She told you after the fact?

2 A. Yes.

3 Q. Okay.

4 A. We were not given any -- we were not given
5 the opportunity to hear it as a quorum of the
6 Commission. Again, there was still four. You
7 needed a quorum of four to make any decisions, but
8 we were never given the opportunity to say, should
9 we hire outside counsel, should this investigation
10 be conducted by inside counsel, anything. And from
11 March until July, I sent numerous e-mails at that
12 time that were just never responded to. I mean,
13 like, I would say, please provide me this
14 information by close of business. I just wanted to
15 know what the details of Taylor Townsend's contract
16 was, because between March and July of that year,
17 what I saw was that Taylor Townsend, who I was led
18 to believe after the fact was just there for a
19 special investigation, began handling the day-to-day
20 business of the Commission; and I also noticed that
21 at one point, Taylor Porter, who's our in-house
22 counsel, had actually been removed from the website.
23 And, again, I was just trying to figure
24 out, are we going with new counsel, this hasn't been
25 voted on, how did we select Taylor Townsend, what is

1 the stipulations of his contract, why is his
2 contract for 75,000 as opposed to the standard
3 contract of approximately 42,000, which I believe is
4 what our in-house counsel was being paid at that
5 time. But I didn't have any of that information,
6 and when I was requesting it, I wasn't given it.

7 Q. Did you go to the State and ask them?

8 A. I shouldn't have had to. I was a sitting
9 Commission member, and I should have been able to
10 ask my executive director what the situation was and
11 receive a concise written response.

12 Q. So the answer is, no, you did not go to
13 the State and ask them?

14 A. No, ma'am.

15 Q. Understood. Between March of 2016 and
16 July of 2016, are you telling me that the State
17 Police Commission had meetings with quorums present?

18 A. I don't believe there was a quorum present
19 during that time.

20 Q. So you said Taylor Townsend started doing
21 the day-to-day business. How do you know that if
22 there was not a meeting?

23 A. His -- all our e-mails began to be
24 including Taylor Townsend, but not including Lenore
25 Feeney or -- I can't remember the older man's name,

1 the baldheaded older attorney that was before --

2 MR. FALCON: Norfolk.

3 BY MS. CRAFT:

4 Q. Mr. Norfolk?

5 A. Bill Norfolk. That's it. I'm sorry. I'm
6 very blunt when I describe people, so when I say
7 baldheaded, old -- but they -- there was just --
8 they weren't being included on anything at that
9 point.

10 Q. So you were receiving e-mails from Cathy?

11 A. I was receiving e-mails from counsel.

12 Q. From Mr. Townsend?

13 A. Yes.

14 Q. And what was he saying?

15 A. I don't recall. I didn't refresh myself
16 and read the e-mails. I'm sorry.

17 Q. Well, what did it appear to you that he
18 was doing?

19 A. The day-to-day operations, from what I
20 could tell.

21 Q. Like what?

22 A. Any public records request, things like
23 that, is what I recall. There was things that
24 typically would have gone to our in-house counsel
25 that were not going to our in-house counsel.

1 Q. These were public records requests about
2 what, specifically?

3 A. Don't recall.

4 Q. Do you know what investigation
5 Mr. Townsend was conducting beyond what you said,
6 allegations of campaign contributions?

7 A. That was as far as I knew.

8 (Brief interruption.)

9 MS. CRAFT: Sorry. Can I take a quick
10 break?

11 MR. FALCON: Sure.

12 (Recess.)

13 BY MS. CRAFT:

14 Q. I asked you about meetings and whether or
15 not there was a quorum present, and I wanted to ask
16 you specifically about meetings held in March, or
17 meetings that were set --

18 A. Uh-huh.

19 Q. -- for March, April, May and June of 2016.
20 Do you recall that time period during which the
21 Commission did not have a quorum at those four
22 meetings?

23 A. Yes, ma'am.

24 Q. And can you tell me why there was no
25 quorum at those four meetings? Who didn't show?

1 A. I know I had obligations outside, but I
2 don't know if somebody else didn't show. During
3 that timeframe, I had federal training in
4 Fayetteville, Arkansas, I believe. I had -- my
5 daughter had surgery. My grandfather died. I don't
6 recall what all, but, I mean, there was only four
7 Commissioners, so if any one person didn't show, it
8 wasn't a quorum.

9 Q. So did you not show for all four of those
10 meetings?

11 A. I don't believe I was available for them.

12 Q. For all four?

13 A. I believe so.

14 Q. Did you have a conversation with anyone
15 affiliated with LSTA about whether or not you were
16 going to be showing up to create a quorum for the
17 Commission to do business?

18 A. I don't recall any direct conversations
19 about it. I mean --

20 Q. I didn't ask direct. I'm asking any
21 conversations at all.

22 A. I don't recall, but it could be that
23 somebody'd go, hey, are you going to be there
24 tomorrow? I'd be like, no, my kid has got surgery,
25 or, no, I've got a funeral, but that would be the

1 extent of it, and I don't recall any specific
2 conversations that that was said, but it's very
3 possible, as many people as I talk to.

4 Q. Do you know if it was some sort of plan,
5 after the investigation was launched into the
6 political contributions by LSTA, that because there
7 were only four Commission members, you were not
8 going to show up so they would not have a quorum?

9 A. No, ma'am.

10 Q. You never voiced that to anybody, I just
11 won't show up, and there won't be a quorum, and they
12 can't do anything for the next board meetings?

13 A. No, ma'am.

14 Q. Or the next meeting?

15 A. No, ma'am.

16 Q. Mr. Doss, while you were stationed at
17 headquarters, did you have breakfast at
18 headquarters?

19 A. Sometimes.

20 Q. Do you ever remember having any kind of
21 conversation with Derrell Williams?

22 A. Not specifically, but I've talked to
23 Derrell frequently. We're friends.

24 Q. Okay. And how long have you and Derrell
25 been friends?

1 A. He was an instructor at my academy. I'd
2 consider him a friend since then.

3 Q. Did you ever talk to Derrell Williams
4 about Calvin?

5 A. About who?

6 Q. Calvin Braxton.

7 A. I thought you said Kevin.

8 MS. FEENEY: I did, too.

9 BY MS. CRAFT:

10 Q. No. Calvin.

11 A. It sounded just like you said it.

12 No, I don't -- I mean, I'm sure we've
13 discussed him, I don't recall in what capacity.

14 Q. Do you recall discussing Calvin with
15 Derrell Williams and his daughter's arrest?

16 A. No.

17 Q. Did you ever talk to Mr. Oliphant?

18 A. Regarding?

19 Q. Calvin's daughter's arrest or any
20 allegations relating to Calvin.

21 A. The only time that I can recall discussing
22 Calvin with Mr. Oliphant is, I was told by someone,
23 and I honestly can't recall who -- I received a
24 phone call that said that they believed that Calvin
25 was having Mr. Oliphant followed and that he was

1 potentially shopping a story about Mr. Oliphant to
2 the media. And I called Mr. Oliphant and I just
3 said, just FYI, this is being said; I don't know if
4 it's a rumor or if it's true, but it was just what
5 was told to me, and I felt like I should let you
6 know.

7 Q. Do you know if Mr. Oliphant ever verified
8 the information that you provided to him?

9 A. I don't know what Mr. Oliphant did with
10 the information I provided to him.

11 Q. Okay. Who called you?

12 A. I don't recall.

13 Q. Did they call you on your cell?

14 A. I don't recall. I don't know if it was a
15 personal conversation or a cell phone conversation
16 or what.

17 Q. That seems like a pretty big deal, that
18 there's some allegation that a Commissioner is
19 having a trooper followed, and you're telling me you
20 don't have any recollection of whether or not that
21 information was relayed in person or by phone or
22 even who the heck it was?

23 A. It was probably two years ago, and there
24 was a lot going on at the time, so, no, I don't
25 recall.

1 Q. Okay. So when you called Mr. -- when you
2 spoke to Mr. Oliphant, was that by phone or --

3 A. I believe I called him on the phone.

4 Q. On his cell?

5 A. I don't remember what number I called.

6 Q. Tell me what you remember him saying.

7 A. In sum or substance, he just said, I
8 appreciate you letting me know. And I said, well,
9 look. I said, I don't know if it's verified or
10 anything, but just do with it what you will, I mean,
11 just be careful. I was concerned for his safety.
12 If somebody is being followed in the State Police,
13 my first inclination is just, you know -- I don't
14 know what purpose you'd be being followed for, but
15 watch yourself.

16 Q. Well, it sounds to me like you believed
17 whomever it was that transmitted the information to
18 you, that you're concerned for his safety, you
19 believe he's being followed, but you can't tell us
20 who told you that?

21 A. Genuinely, I just don't recall at this
22 time.

23 Q. Okay. Well, you've used informants
24 before; you were in narcotics, right?

25 A. Yes, ma'am.

1 Q. And you understand the importance of a
2 reliable informant, right?

3 A. Yes, ma'am.

4 Q. That's because, if you have an informant,
5 you have to ultimately sometimes be able to tell a
6 judge, this guy is reliable, or gal, because I've
7 used them before, right?

8 A. Yes, ma'am.

9 Q. So in this situation, you passed on
10 information that you're scared for Mr. Oliphant's
11 safety, and you don't know who that was?

12 A. Well, when you're talking about
13 informants, there's a difference between verified
14 and unverified information; and if there's
15 unverified information, I will share it with
16 somebody and just say, if you can do something with
17 it, do something with it. But I've had informants
18 give me information that I couldn't corroborate.
19 I've had informants say, this individual is selling
20 drugs. And I say, well, can you buy from them?
21 They say, no. Just like, you know, with this
22 information, I don't know. I never wanted to put it
23 to a test to say, can you prove it. I just passed
24 the information along and said, hey, FYI.

25 Q. Does February 2018 sound about right when

1 you made that call?

2 A. I couldn't be honest and say I recall
3 exactly when the call was made.

4 Q. Was it after you became aware of myself
5 submitting public records requests?

6 A. No, ma'am.

7 Q. You were aware of that, were you not?

8 A. I don't recall that. I don't recall what
9 time you started requesting public information.

10 Q. I know. But you knew I did, right?

11 A. I don't recall being told that you were.

12 Q. You never were provided copies of any of
13 those, including to the Commission?

14 A. I don't recall getting information, but I
15 may have. It just doesn't --

16 Q. Did you --

17 A. At this time, I don't recall.

18 Q. Were you on the Commission in February of
19 2018?

20 A. Was I? I don't know. When did I get off
21 the Commission?

22 Q. Let's see if we can figure that out. You
23 submitted a resignation letter, did you not, for the
24 Commission?

25 A. Yes, ma'am.

1 Q. Let me see if I can find it. I had it a
2 second ago. It may be this. Yes. I'm going to
3 show you a document which we're going to mark and
4 attach as Exhibit #19.

5 (Deposition Exhibit #19 was marked for
6 identification.)

7 A. Okay.

8 Q. And this appears to be, number one, a
9 public records response from Mr. Hannaman to Jim
10 Mustian -- that's M-U-S-T-I-A-N -- with The
11 Advocate. And attached to it, it looks like a
12 resignation letter sworn in front of Mr. Peak, who's
13 an attorney, I think, at Taylor Porter, in August --

14 A. So I wasn't on there in --

15 Q. Let me finish -- in August of 2017. Is
16 this your resignation letter dated August 11th,
17 2017?

18 A. Yes, ma'am.

19 Q. And does this refresh your recollection as
20 to when you resigned from the board?

21 A. Yes, ma'am.

22 Q. So when you called Mr. Oliphant and said
23 you were concerned for his safety, were you, in
24 fact, still on the board, or were you in a different
25 position?

1 A. I don't recall when I call- -- recall the
2 exact time when I called Mr. Oliphant.

3 Q. And did you believe the following business
4 by Calvin Braxton to be a credible threat to
5 Mr. Oliphant?

6 A. I believed it to be information that
7 should be shared. I didn't know if it was credible
8 or not, to be honest with you. I just gave him
9 information that was given to me.

10 Q. And what was the business about the media,
11 that Mr. Braxton was shopping stuff to the media?
12 What's that about?

13 A. Again, that was just the information that
14 was given to me, but, again, it was not verified. I
15 told him it wasn't verified. I just provided him
16 the information that was given to me and moved on.

17 Q. So you wouldn't have expected
18 Mr. Oliphant, for example, to take any action with
19 respect to the information you provided him, right?

20 A. I mean, if the information was provided to
21 me, I would attempt to verify it or disprove, so it
22 wouldn't be surprising if he did something with the
23 information I gave him.

24 Q. Well, would you have expected him to post
25 it on Facebook?

1 A. I can't speak to Mr. Oliphant's actions or
2 what he could have done or should have done.

3 Q. Did you have a meeting with Calvin
4 Braxton, an in-person meeting, about an hour or so?

5 A. When?

6 Q. While you were still on the Commission.

7 A. I had several meetings with Mr. Braxton.

8 Q. Well, tell me about them. Where were
9 they?

10 A. We met once at the Marriott. We met once
11 privately in the offices at the Commission. There
12 was -- we had an opportunity to have a private
13 conversation in Harold Pierite's office one day.

14 Q. Who's that?

15 A. He's another Commission member.

16 Q. Harold Pierite, can you spell that?

17 A. Can we go to the website?

18 Q. We'll figure it out.

19 Any other times?

20 A. I don't recall any other private meetings.

21 Q. Tell me about the meeting at the Marriott.

22 A. It was just a long-winded conversation
23 about disagreements within the Commission, but I
24 don't remember the specifics.

25 Q. What were the disagreements?

1 A. Just philosophy differences. Again, I
2 don't recall the specifics. It was a long time ago.

3 Q. What about the one at the Commission
4 privately?

5 A. I believe in the one at the Commission
6 privately, where we stepped into one of the offices,
7 Calvin insinuated I knew something about his
8 daughter getting a DWI, and I tried to emphatically
9 tell him I did not, and that was the extent of it.

10 Q. What did Calvin say?

11 A. He just insinuated that I had knowledge of
12 the traffic stop and subsequent arrest of his
13 daughter, and I said, I did not. I didn't know
14 anything about it until well after the fact.

15 Q. How did you find out about it after the
16 fact?

17 A. Just -- it kept coming up through the
18 Commission. Calvin even approached me about it at
19 one point and brought it up and talked to me about
20 it.

21 Q. Okay. That's another meeting you had with
22 him?

23 A. It wasn't -- I wouldn't call it a meeting.
24 It was a conversation we had at the Commission.

25 Q. What did Calvin say?

1 A. He -- he just approached me and said that
2 his daughter had received a DWI.

3 Q. Go ahead. I can do two things at once.
4 Go ahead.

5 A. Okay. I just can't. It's hard for me to
6 focus.

7 He just -- he had insinuated to me that
8 Linebaugh knew him and gave his daughter this DWI,
9 and that he was very upset about it. And I made the
10 comment to Mr. Braxton, I said, you know, if one of
11 my family was stopped for a DWI, I said, you know, I
12 would be thankful that they were removed from the
13 road before they hurt themselves or somebody else.
14 And he said that he felt that Linebaugh knew him and
15 that there was a purpose behind this, and he said, I
16 thought that we were untouchable on this Commission.
17 And I said, no, that's not the case. I said,
18 discretion is up to the officer. I said, Calvin, I
19 don't know, I wasn't there. But that was the sum or
20 substance of the conversation. It wasn't --

21 Q. He used the phrase "untouchable"?

22 A. I believe so, yes, ma'am.

23 Q. Is that a guess on your part, sir?

24 A. That's a quote he said. It stuck with me.

25 Q. When?

1 A. I don't recall the date. It was --

2 Q. Where?

3 A. Commission meeting.

4 Q. Where?

5 A. We spoke off to the side, behind the
6 table, one of those conversations we would have had.

7 Q. So if I go look at the videos, I'm going
8 to see a particular point in time where you and
9 Calvin are standing behind the table?

10 A. There was no video of the Commission when
11 I first got there. It was audio tape. It was only
12 done during the Commission meetings. If we met
13 there earlier and had a conversation, it wouldn't be
14 on the record.

15 Q. Well, sir, I get that may be the excuse.
16 I'm just asking a question.

17 A. I can't --

18 Q. If I go look at the videos, you're telling
19 me I'm not going to see you and Mr. Braxton having a
20 private conversation behind the table, right?

21 A. I'm telling you there was no video up to a
22 certain point. That's why -- I'm answering your
23 question.

24 Q. Got it. So when did y'all get video?

25 A. Do they do video now? There wasn't video

1 when I was there.

2 Q. On the Commission?

3 A. Yeah. There was just audio.

4 Q. Okay. But Mr. Millet's people, they video
5 those meetings, right?

6 A. Again, that's -- I don't know what they
7 do, so you would have to ask them.

8 Q. Okay. So you can't give us a year that
9 this comment allegedly took place?

10 A. I don't -- I don't have an approximate
11 time, no, ma'am.

12 Q. Year. I asked a year. Can you tell me
13 what year it was?

14 A. If I gave you a timeframe, I wouldn't be
15 accurate because I don't recall.

16 Q. Okay. Now, with respect to my client, do
17 you remember him discussing with you some pictures
18 that he had received of cars, trooper cars, at
19 Superior Grill?

20 (Brief interruption.)

21 MS. CRAFT: I'm so sorry. I thought
22 this was off. I apologize.

23 BY MS. CRAFT:

24 Q. Do you remember that?

25 A. I believe I remember him making a

1 statement to that fact.

2 Q. What did he tell you?

3 A. In sum or substance, just that he had
4 pictures of vehicles at Superior Bar & Grill.

5 Q. Did he tell you he had received them
6 anonymously?

7 A. I don't recall how he said he received
8 them.

9 Q. Did he show them to you?

10 A. No, ma'am.

11 Q. Did he tell you who it was?

12 A. No, ma'am.

13 Q. Did you ask to see them?

14 A. No, ma'am.

15 Q. Did other Commission members receive a
16 package of information, pictures of officers at
17 Superior Grill?

18 A. Not that I'm aware of.

19 Q. So what did Calvin say to you about that?

20 A. I just remember him saying something about
21 having pictures of us at Superior Bar & Grill.

22 Q. You?

23 A. Yeah, or troopers.

24 Q. Did he say you or troopers?

25 A. He insinuated me. He said troopers at

1 Superior Bar & Grill, including me.

2 Q. He said that?

3 A. Insinuated, yes.

4 Q. Insinuated or said it directly?

5 A. I don't recall.

6 Q. Okay. And so what did you say to him?

7 A. I don't recall my response. Didn't say
8 much of anything, I imagine.

9 Q. Had you gone to Superior Grill in your
10 unit?

11 A. Yes, ma'am.

12 Q. How many times?

13 A. Countless times.

14 Q. And who would you have -- who would you
15 meet at Superior Grill in your unit?

16 A. A varied assortment of people. It was
17 close to the academy and good food.

18 Q. So tell me who.

19 A. Again, I don't recall who all I met there.
20 I mean, it was just, if we were going for lunch,
21 that was a close place. Sometimes we'd get lunch
22 there. Sometimes we'd go there after the end of the
23 workday just to eat supper. Again, it was a mile up
24 the road. I don't recall who all I've eaten there
25 with.

1 Q. Have you ever consumed alcohol and then
2 climbed back in your unit?

3 A. I have never driven my unit intoxicated.

4 Q. That wasn't my question. Have you ever
5 consumed alcohol and climbed back in your unit?

6 A. In what seat? The passenger seat?
7 Because I've ridden intoxicated from there, but I
8 don't --

9 Q. That wasn't my question again. Have you
10 ever consumed alcohol and climbed back in your unit?

11 A. In what capacity?

12 Q. In any capacity, sir. If I knew what you
13 knew, I wouldn't be asking the questions.

14 A. I agree. I'm just saying, I've been in a
15 unit while consuming alcohol, but not as the driver.

16 Q. Okay. So there's never been an occasion
17 where you've consumed even one beer or one drink and
18 gotten behind the wheel of your unit?

19 A. No. I've consumed alcohol and driven my
20 unit before, but it was -- there's been times where
21 it was in the capacity of an undercover operation,
22 where we would consume alcohol, and there's policy
23 and procedure to dictate that. You know, it's
24 incumbent upon the trooper to ensure they're not
25 impaired.

1 Q. Okay. My question, then -- I guess I'll
2 narrow it -- have you ever consumed alcohol and
3 gotten behind the wheel of your unit, driven it, not
4 in conjunction with any alleged undercover
5 operation?

6 A. I don't recall that at this time.

7 Q. You said you've been drunk before and some
8 other trooper has driven you in his or her unit.

9 A. Uh-huh.

10 Q. How many times has that happened?

11 A. Not many. I mean, if there was a function
12 and, you know, we had the opportunity to go out for
13 drinks and I could ride with somebody, I would
14 imbibe more than I would on a usual occasion.

15 Q. So who drove you drunk in their unit?

16 A. I don't -- I don't recall, but --

17 Q. Tell me one person.

18 A. Christopher Perry. He's a trooper from
19 Shreveport. We had -- what is it -- AT training for
20 SWAT. During the first night, he drove a mini van
21 and let -- he was the designated driver.

22 Q. And that was his unit?

23 A. It was a van that they had brought. I
24 don't know if it was a unit or a rental or what, but
25 he was the driver of it. I think it was a State

1 unit. I think it was a Sprinter van that belonged
2 to the State.

3 Q. Do you know a Carey Carruth or Carey
4 Carruth Hamlin?

5 A. No, ma'am.

6 COURT REPORTER: Hanlin?

7 MS. CRAFT: Hamlin or Hannelin. I'm
8 not sure.

9 A. No, ma'am.

10 BY MS. CRAFT:

11 Q. Do you know a Carey at all?

12 A. No.

13 Q. Now, with respect to my client, is it your
14 sworn testimony that he never talked to you about
15 following somebody?

16 A. Can you clarify that?

17 Q. Did my client ever talk about somebody
18 being followed?

19 A. Are you asking if Calvin --

20 Q. Yes.

21 A. -- said he had anybody follow him?

22 Q. No. Ever talk to you about anybody being
23 followed?

24 A. I don't recall it.

25 Q. Or hiring a private investigator?

1 A. I don't recall it.

2 Q. Were you at one point in time accused of
3 following Cathy Derbonne?

4 A. No. I was never accused of that.

5 Q. Were you ever accused of micromanaging
6 Cathy Derbonne?

7 A. After the fact, yes, ma'am.

8 Q. Okay. Did you ever follow Cathy Derbonne?

9 A. No, ma'am.

10 Q. Never happen?

11 A. No, ma'am.

12 Q. Do you know if anyone affiliated with
13 State Police did?

14 A. No, ma'am.

15 Q. You don't know?

16 A. Not that I'm aware of.

17 Q. Did you ever talk -- do you know a guy by
18 the name of Craig Brown?

19 A. No, ma'am.

20 Q. Or a Mike Braxton?

21 A. No, ma'am.

22 Q. Do you know anything about some allegation
23 that my client hired a private investigator?

24 A. Nothing firsthand.

25 Q. Okay. So you know something. What do you

1 know?

2 A. I had heard that he hired somebody to
3 follow Mr. Oliphant.

4 Q. You heard that from whom?

5 A. Again, I don't recall.

6 Q. This is the anonymous source
7 conversation?

8 A. Yes, ma'am.

9 Q. So in the anonymous source conversation,
10 they told you, not that Calvin was following
11 somebody, but that he had hired a private
12 investigator to follow somebody?

13 A. I never heard private investigator. I
14 heard that he was having him followed.

15 Q. Okay. So the private investigator, you
16 never heard anything about Calvin hiring somebody
17 like that, right?

18 A. Yes, ma'am. That's correct.

19 Q. Do you know a Lamar McCaskey? Lamar is
20 L-A-M-A-R. McCaskey is M-C-C-A-S-K-E-Y.

21 A. No, ma'am.

22 Q. Now, have you participated in obtaining
23 any kind of statements regarding Calvin's claim?

24 A. No, ma'am.

25 Q. Did you ever talk to Mr. Oliphant about a

1 Lydia Raschal, R-A-S-C-H-A-L?

2 A. Not that I recall.

3 Q. Some unfortunate woman who apparently
4 committed suicide, and there was some allegation
5 that Calvin was somehow investigated in her suicide.

6 A. I had heard of the case, but I don't
7 recall if I heard it from him.

8 Q. Who did you hear it from, or what did you
9 hear?

10 A. I just heard that there was a case
11 involving a female who had possibly died of a
12 gunshot wound, that Calvin was involved in the case,
13 and it was being tasked out through the Shreveport
14 field office. But I don't know who was
15 investigating it. I don't know if there was an
16 investigation done. It was just hearsay. Again, I
17 don't recall where I heard it from, but I remember
18 hearing that story.

19 Q. When you were at Shreveport PD or when?

20 A. No. I had heard about it in the last
21 couple years, but, again, I didn't -- I didn't put
22 much credence to it. I mean, it may have just been
23 somebody saying that they knew Calvin and maybe knew
24 his association to her in the case, but I don't
25 recall.

1 Q. What was his alleged association with
2 Lydia?

3 A. Again, I don't have any allegation of an
4 association. It was just I remember hearing the
5 case.

6 Q. I'm confused. You heard what about the
7 case, that some former employee or some employee of
8 Calvin drove to Shreveport and killed herself, and
9 then somehow he was supposed to be investigated?
10 What's that about?

11 A. I didn't know if he was being investigated
12 or not. I just heard that there was -- again, I
13 don't recall what the whole situation -- it was very
14 general -- it was basically what you just read off
15 that paper. An unfortunate woman died, and his name
16 was involved in it. That's it. That's all I know.

17 Q. Did you ever tell anyone that Calvin had
18 been investigated or had been identified as a person
19 of interest in this poor woman's suicide?

20 A. No, ma'am.

21 Q. Well, you said you knew that it was being
22 tasked to the Shreveport field office. What field
23 office?

24 A. Well, forgive me for that. That's not
25 tasked -- it had been investigated in Shreveport.

1 Q. By what field office?

2 A. I think it was just the Shreveport --
3 either -- whatever agency investigated it, because I
4 think she had killed herself in Shreveport, correct?

5 Q. I'm asking the questions, sir.

6 A. I'm -- again, I don't know the whole facts
7 of the case, because I don't know any more than what
8 I've told you.

9 Q. Did you ever tell anybody that you had
10 heard about poor Lydia Raschal and her suicide and
11 somehow Calvin's name was involved?

12 A. No, ma'am.

13 Q. You never shared that information with
14 anyone?

15 A. No, ma'am.

16 Q. In fact, is today the first time you're
17 speaking about it?

18 A. Yes, as far as I know.

19 Q. You never, for example, shared that
20 information with anyone affiliated with LSTA?

21 A. I don't recall having that conversation
22 with anybody before today.

23 Q. Okay. Did you ever talk to Mr. Linebaugh
24 about Calvin?

25 A. Yes, ma'am.

1 Q. Tell me about that.

2 A. Linebaugh is on SWAT with us. I've served
3 several --

4 Q. He's on SWAT with who?

5 A. With me.

6 Q. And Oliphant?

7 A. No, just -- Oliphant is not on SWAT
8 anymore, but he's --

9 Q. He's the commander?

10 A. Yes. But the most Linebaugh has ever
11 stated to me about the case, that he was just in
12 fear of losing his job, and that he was very afraid
13 of how this was going to affect him and his career.

14 Q. When did he express that to you?

15 A. He's expressed it to me several times.

16 Q. When was the last time?

17 A. It was either New Year's or Bayou Classic.
18 I can't remember which one he worked, but we were
19 assigned to a unit, four of us in there. And, I
20 mean, again, it was just a very quick passing
21 conversation.

22 Q. Who were the four in there?

23 A. I would have to go back and remember which
24 one he was assigned to me with, but I believe it was
25 Chris Jordan and Mike Jones, me and Jayson Linebaugh

1 were the four assigned to a rapid response element.

2 Q. And that was in 2018?

3 A. It was either December of 2018 or January
4 of 2019. I think -- I think it was December of
5 2018.

6 Q. And so Jayson told you that he was in fear
7 of losing his job, afraid of losing his career. Did
8 you ask him why?

9 A. I didn't.

10 Q. Did you have any suspicion as to why he
11 has this fear in late 2018, early 2019?

12 A. I didn't ask.

13 Q. My question was, did you have any
14 suspicion as to why he had this fear?

15 A. I wouldn't speculate. I don't know.
16 Again, I didn't -- we didn't talk about it that
17 much.

18 Q. Well, you said you talked about it more
19 than once, so tell me about each time you talked
20 about it with Jayson Linebaugh.

21 A. In sum or substance, I would say, hey,
22 man, how are you doing; how are things? Oh, things
23 are good. Is everything going good at the troop?
24 Man, I'll just be glad when all this is over; I feel
25 like I'm just -- like I'm being targeted or, you

1 know, whatever.

2 Q. He said, I feel like I'm being targeted?

3 A. By Mr. Braxton to that extent in sum or
4 substance.

5 Q. When?

6 A. When -- I mean, I don't recall each time
7 he said it, but whenever we talked, I just asked him
8 how he was doing in passing.

9 Q. Did he say in 2018-2019, he still -- he
10 felt like he was being targeted by Mr. Braxton?

11 A. I don't recall the exact statement he
12 made. He just said that he was still dealing with
13 the issues to the extent, but, again, I didn't ask
14 him to explain further.

15 Q. Did he express that anyone affiliated with
16 State Police had in any way treated him unfavorably
17 after December 5th, 2015, when he arrested,
18 correctly so, my client's daughter?

19 A. I didn't ask him to expand further. That
20 was it. That was the extent of the conversation.

21 Q. Did you ever talk to him about whether or
22 not he, Jayson, had to attend court on the DWI?

23 A. No, ma'am.

24 Q. You understood, did you not, that Calvin's
25 daughter immediately accepted responsibility, right,

1 and did everything that was required of her?

2 A. I had no knowledge of how the case was
3 adjudicated.

4 Q. Did Jayson ever talk to you about that?

5 A. No, ma'am.

6 Q. And you never out of curiosity went to
7 find out, gee, what happened to that DWI arrest that
8 you're saying people say Calvin was upset about?

9 A. No, ma'am, I never asked.

10 Q. Any idea who the attorney was for Calvin's
11 daughter?

12 A. I have no idea.

13 Q. Do you know if it was Taylor Townsend?

14 A. I have no idea.

15 Q. Okay. So you have a fellow trooper who's
16 lower in rank than you are, who has expressed to you
17 on more than one occasion that he is in fear of
18 losing his job and afraid of losing his career, so
19 you did what?

20 A. Let me clarify. He's not lower in rank
21 than I am. I've just got longevity over him. But
22 it's not like I have the ability to give him an
23 order. There's no subordination here between him
24 and myself. I just want to clarify that.

25 Q. Okay. Well, as a master trooper --

1 A. I'm not a master trooper.

2 Q. Oh, I'm sorry. Whatever --

3 A. Senior trooper.

4 Q. Senior trooper.

5 A. Yes, ma'am.

6 Q. Even as a trooper, you have another
7 trooper who tells you more than once he's in fear of
8 losing his job, he's afraid of his career, and then
9 I think you mentioned he may have said something
10 about my client targeting him, you, as a member of
11 the State Police, did what?

12 A. I never gave him any legal advice or any
13 advice as to how to handle it.

14 Q. Did you report it to your superiors?

15 A. No, ma'am.

16 Q. You understand, do you not, that you have
17 an obligation to report to your superiors anytime
18 you become aware of complaints by other officers
19 involving retaliation, right? You know that's the
20 policy.

21 A. You would have to provide me with that
22 policy. I don't know of any policy that when
23 somebody expresses frustration, that I have to
24 report it to my supervisors.

25 Q. You didn't say frustration, sir. You said

1 fear, didn't you?

2 A. Yes, I said fear.

3 Q. And was Mr. Linebaugh a whiner, or did you
4 take it as being a legitimate fear that he expressed
5 to you?

6 A. I didn't ask him to expand on his
7 feelings, so I don't really know. I didn't know if
8 it was venting or if it was legitimate fear or -- I
9 will say this: During my experience with Linebaugh,
10 he was not a whiner at all, so it struck me, but...

11 Q. It struck you as what?

12 A. Out of the norm for Linebaugh to express
13 that concern.

14 Q. Did you ever take it a step further and
15 ask him, hey, man, what is it that's causing you to
16 have this fear?

17 A. Again, I never asked him to expand on it.

18 Q. Do you know who Chris Wright is?

19 A. Yes, ma'am.

20 Q. And who is he?

21 A. He's a Troop E trooper, sergeant over DPS
22 weights, and he's a sniper with the SWAT team.

23 Q. So you, Linebaugh, and Chris Wright and
24 Mr. Oliphant all were on the SWAT team or had roles
25 on the SWAT team; is that right?

1 A. I -- well, let me clarify this. I don't
2 think Linebaugh was ever on SWAT when J.D. was
3 there. But, yes, we've all been SWAT at one point
4 in time.

5 Q. Okay. But when J.D. Oliphant was on SWAT
6 team, that was with you and Chris Wright?

7 A. He -- again, I don't know when he actually
8 got off. I know he provided a lot of experience. I
9 don't know if he was there when I first got on, but
10 I know he came from SWAT.

11 Q. Okay. I understand that. But did you
12 serve with J.D. Oliphant and Chris Wright on SWAT at
13 the same time?

14 A. I know I served with Chris. I don't know
15 about J.D.

16 Q. And J.D. is the commander of SWAT, yes?

17 A. He's the colonel -- in his chain of
18 command, SWAT answers to him, from what I
19 understand, and I may be wrong about that. That's
20 just the flow chart of the chain of command at State
21 Police on my memory. If I'm wrong, I apologize, but
22 I'm just thinking that's correct.

23 Q. How did Jayson Linebaugh get on the SWAT
24 team?

25 A. Like everybody else. He passed an oral

1 interview, a shooting test, a physical fitness test.

2 Q. Oral interview with what oral interview
3 board or person?

4 A. I don't know who was on his oral
5 interview, but I know there's an oral interview
6 board.

7 Q. Did you recommend him for SWAT membership?

8 A. No, ma'am. I didn't know him that well
9 when he got on.

10 Q. But you know him well now?

11 A. Yes, ma'am. I know him well now.

12 Q. You're friends?

13 A. Yes, ma'am.

14 Q. And Chris Wright, I think you told me,
15 you're friends, too?

16 A. Yes, ma'am.

17 Q. Do you know who Deputy Mike Wilson in
18 Natchitoches is?

19 A. No, ma'am.

20 Q. Did you ever have a conversation with my
21 client about -- something about watching your back,
22 where my client warned you to watch your back?

23 A. I believe he had told me that, yes, ma'am.

24 Q. So that was another conversation slash
25 meeting you had with my client?

1 A. I don't recall when he told me that, but I
2 do remember him telling me to watch my back at one
3 point.

4 Q. And did he tell you why?

5 A. He did not.

6 Q. Did you take that as helpful advice or
7 mean advice?

8 A. I just took it as Calvin talking. I
9 didn't really ask him to expand on it.

10 Q. We introduced Exhibit #19, which I believe
11 is your resignation letter. In it, you refer
12 specifically to some sort of suggestion that
13 Ms. Manzella has done anything that could be
14 portrayed as disreputable or dishonorable. Who was
15 Ms. Manzella?

16 A. She was the vice-chair of the Commission.

17 Q. And when did -- and it's Monica; is that
18 right?

19 A. Yes, ma'am.

20 Q. And when did she join the Commission?

21 A. I don't recall the exact start date.

22 Q. What about a year? What year?

23 A. 2016, maybe.

24 Q. And did you and Ms. Manzella have some
25 sort of relationship?

1 A. Yes, ma'am. We had a personal
2 relationship.

3 Q. For how long?

4 A. I don't recall. I mean, we still speak.

5 Q. At some point in time, was there an issue
6 raised about your personal relationship with
7 Ms. Manzella and both of you serving on the
8 Commission at the same time?

9 A. Not necessarily. There was an article
10 that came out that put both of us in disrepute, and
11 both of us resigned following that article.

12 Q. Article by whom?

13 A. I don't recall who wrote it.

14 Q. Do you have any suspicions as to who
15 tipped off or gave information to the press?

16 A. I don't.

17 Q. Did you ever talk to Cathy or Calvin about
18 it?

19 A. Not that I recall, no, ma'am.

20 Q. Did you ever think that they had any
21 involvement in it, either one of them?

22 A. No, ma'am.

23 Q. And Ms. Manzella lived in New Orleans; is
24 that right?

25 A. Yes, ma'am.

1 Q. And were there occasions where she stayed
2 with you at State Police headquarters?

3 A. She had a room at the State Police
4 headquarters, but she was provided one.

5 Q. For what reason?

6 A. If there was research or a meeting the
7 next day, she could request a room from the academy
8 and it was facilitated.

9 Q. Now, that's something different from the
10 training people we've talked about with the alcohol
11 bar?

12 A. Yes, ma'am.

13 Q. Okay. Understood. And so you said that
14 there was an article in the paper. The article
15 portrayed that you had a personal relationship with
16 Ms. Manzella while both of you served on the
17 Commission?

18 A. Yes, ma'am.

19 Q. And you resigned because you felt that it
20 portrayed you as being disreputable or dishonorable?

21 A. I resigned because I was ordered to by
22 Mike Noel.

23 Q. What did he say?

24 A. He called me to his office and he asked
25 me -- or he basically said that he didn't feel that

1 I was serving the Commission in its best capacity.
2 I asked him for some time to think about what my
3 next course of action was, and he called me back to
4 his office and said he would like my resignation
5 that day.

6 Q. And so that's when you wrote the August
7 11th, 2017, letter?

8 A. Forgive me, but it says August 14th on the
9 bottom of this.

10 Q. Sorry. It's dated August 11th at the top.

11 A. Okay. I don't know which one. It was one
12 of the two dates that it's there, so -- but, yeah,
13 it was probably August the 11th.

14 Q. Did you type this?

15 A. Yes, ma'am.

16 Q. How did you end up in Mr. Tom Peak's
17 office?

18 A. I don't know who Tom Peak is. I don't
19 think that Tom Peak and I ever met each other. I
20 think that that was -- is Tom Peak not with the
21 boards and commissions when you submit your stuff?

22 Q. I don't believe so, sir.

23 A. I don't know. I don't know who Tom Peak
24 is.

25 Q. Did you sign this document, Exhibit #19,

1 in front of a notary?

2 A. No, ma'am.

3 Q. So if it's notarized, you would have
4 signed it and somebody notarized it later? Because
5 it is notarized.

6 A. Honestly, I don't remember. And I may
7 have signed it in front of Thomas Peak. I just
8 don't know who Thomas Peak is. And maybe if I saw
9 his face, I would remember it. So I may be speaking
10 out of turn here. Again, I had had no sleep when I
11 think this was written, and I don't know who Thomas
12 Peak is, but --

13 Q. Do you remember meeting with a lawyer?

14 A. Yes, I do remember meeting with a lawyer
15 shortly after that. But Thomas Peak may have been a
16 subordinate at the law firm, because I met with --

17 Q. Subordinate to who?

18 A. I met with Lenore to review this, and that
19 may be why I don't remember Thomas Peak, is that he
20 may be a notary at Lenore's firm, and I don't know.
21 Again, this is two years ago. It was a long day,
22 and that may have been what the deal was, was I
23 signed it and he came in and notarized it, but I
24 just don't remember the name Thomas Peak.

25 Q. Do you remember anything about the

1 description of the person who notarized it, or was
2 that outside your presence?

3 A. No. There was people coming in and out of
4 the office. Again, I'm just trying to recall what
5 happened that day.

6 Q. Why were you submitting your resignation?
7 Because you were ordered to by Mr. Noel?

8 A. He's the chief of staff. If the chief of
9 staff tells me to do something, I'm going to do it.

10 Q. Well, where is that reflected in this
11 letter, that you're doing it because you were
12 ordered to do so?

13 A. I didn't reflect it in this letter. I
14 feel if I had lost confidence in the chief of staff
15 and was being ordered to, that it's probably best to
16 submit a letter of resignation.

17 Q. And so then why did you visit with a
18 lawyer?

19 A. Because --

20 Q. I don't want to --

21 MS. FEENEY: I just want to let him
22 know not to talk about what we talked
23 about.

24 MS. CRAFT: No. I just want to know
25 why he went to go talk to a lawyer, that's

1 all, not what y'all talked about.

2 A. Well, if I met with a lawyer, it was her,
3 and I don't recall what we talked about, but I
4 probably wanted to ask about the legalities of
5 resigning from a board or commission. I don't know.
6 I don't know what was said.

7 BY MS. CRAFT:

8 Q. I'm not asking what was said. I want to
9 know what was going on in your head. Why would
10 you -- why did you reach out to a lawyer as opposed
11 to, I mean, just turning in your letter? I don't --

12 A. I don't -- I don't know. I can't -- I
13 can't answer that. I don't recall my mindset at
14 that time, and I don't know what I was thinking. I
15 probably just thought, I'd like to have a second
16 legal advice given to me before I resign from a
17 board or commission.

18 Q. Okay. When you met with Mr. Noel, did he
19 tell you anything else about maybe transferring you
20 somewhere else?

21 A. No, ma'am. Because I was already working
22 in gaming. I was --

23 Q. You had already been transferred?

24 A. Yeah, I was -- there was no transfer after
25 this.

1 Q. Okay. With respect to Mr. Oliphant, did
2 you ever review any documents that he prepared?

3 A. No, ma'am.

4 Q. Did you ever review any notes that
5 Mr. Oliphant made?

6 A. No, ma'am.

7 Q. I'm going to show you a document which
8 we've introduced throughout these depositions -- let
9 me see if I can put my hands on it; here it is -- as
10 Exhibit #14. It's in here. And I'll represent to
11 you that these are notes that were obtained pursuant
12 to a public records request issued, I believe, to
13 the governor's office and/or State Police. Have you
14 ever seen these notes?

15 A. No, ma'am, I have not.

16 Q. I wanted to ask you a few questions. In
17 the document, at Line No. 1278 -- see how they're
18 all lined?

19 A. 1278, you said?

20 Q. Yes, sir. For the record, the entry is
21 dated June 6th, 2016, Monday, at Line 1164.

22 A. 1278?

23 Q. Uh-huh. Do you see Line 1278?

24 A. Yes, ma'am.

25 Q. It reads, the information above is

1 supposed to be used in order to facilitate Calvin
2 Braxton's removal from the LSP Commission.

3 Do you know anything about that?

4 A. No, ma'am.

5 Q. Do you know why Mr. Oliphant would write
6 something like that?

7 A. I have no idea.

8 Q. Did you know Mr. Oliphant was preparing
9 some sort of report in June of 2016?

10 A. No, ma'am.

11 Q. Did you hear anything about it?

12 A. No, ma'am.

13 Q. And I think you told me you didn't talk to
14 anybody at the LSP about my client, right?

15 A. To the best of my knowledge, no, ma'am.

16 Q. Did you know that the LSTA was going to be
17 sending some sort of letter?

18 A. What letter are you referring?

19 Q. Well, there's two.

20 A. Okay.

21 Q. One that was sent July 11th, 2016, I
22 believe, and the other one that was sent, like, June
23 9th, 2017, by the LSTA regarding my client.

24 A. I don't -- let me be clear. I didn't know
25 of any letter that was being sent, but I just wanted

1 to be clear what letter you were asking about.

2 Q. Did you ever hear about any such letter?

3 A. If a letter was received at the
4 Commission, we were informed of it, but I don't
5 recall knowing anything prior to that.

6 Q. Do you recall receiving a letter authored
7 by Mr. Falcon -- it's attached to Exhibit #1; it's
8 dated July 11th, 2016 -- while you were on the
9 Commission?

10 A. Yes, I do recall receiving this.

11 Q. What, if anything, did you do with that?

12 A. I believe it was just included in our
13 binders, and I read it, and to the best of my
14 knowledge, I believe I went to our counsel and just
15 asked, what do we do with this, and that's the
16 extent of it.

17 Q. Let me ask you something. When you
18 receive information when you were serving on the
19 State Police Commission, you understand that
20 whatever you get is a public record, right?

21 A. Yes, ma'am.

22 Q. And so what did you do with that letter
23 when you received it as a Commission member?

24 A. Once again, I -- when we received it,
25 again, it's just a document, and I believe at that

1 time, I asked our counsel, Ms. Feeney, what were we
2 supposed to do with the information that was
3 provided to us. I mean, again, I'm not a lawyer.
4 That's for lawyers to hash out. I don't know where
5 we go for this.

6 And I go back to what I say -- said
7 earlier. As a commissioner, the Commission could
8 not enforce anything on another Commission member.
9 You know, if it was brought up in open meeting, we
10 could discuss it or we could go into executive
11 session and discuss it, but what would ultimately
12 have to happen is, we would just have to compile
13 this and give it to the governor, because the
14 governor is the only person who could remove a
15 Commission member. So, I mean, there's really
16 nothing, as a Commission member, I could do with
17 this information.

18 Q. Were you ever aware of that particular
19 letter, however it got there, making its way to the
20 press? And that's the July 11th, 2016, letter.

21 A. I'm aware it did eventually make it to the
22 press, but I didn't know who all this letter was
23 sent to when I received it.

24 Q. Do you know how it got to the press?

25 A. No, ma'am.

1 Q. Are you aware of a public records request
2 that was submitted to the State Police Commission?

3 A. I believe there was, but I don't recall
4 the exact nature or the date of it or who filed it.

5 Q. When you received the July 11th, 2016,
6 letter, was the report or document authored by
7 Mr. Oliphant dated June 2nd, 2016, also attached?

8 A. To the best of my memory, yes, ma'am.

9 Q. Okay. There was another letter -- and I
10 think we established, I believe, that you were off
11 the Commission as of August 2017. Does that sound
12 right?

13 A. Yes, ma'am.

14 Q. Do you recall receiving a copy of this
15 letter, which is June 19th, 2017, which, just so you
16 know, I believe enclosed the July 2016 letter and
17 the June 2016 Oliphant report?

18 MR. OXENHANDLER: June 2nd.

19 MS. CRAFT: June 2nd. I keep doing
20 that.

21 A. I'm sorry. I was just trying to read this
22 and then that went down there.

23 BY MS. CRAFT:

24 Q. That's okay.

25 A. What was your question again?

1 Q. Do you recall receiving this letter dated
2 June 19th, 2017?

3 A. I believe so. I believe it was included
4 in our binders at the deal because -- it would have
5 been included because I see that Lenore Feeney and
6 Taylor Townsend were included on it, so it would
7 have been provided to the Commission.

8 Q. Now, in June of 2017, was the board
9 getting ready to receive some sort of final report
10 or conclusion from Taylor Townsend?

11 A. I don't recall. I don't recall the date.
12 I mean, I would have to go back and review the
13 meeting minutes to know what was coming or what was
14 on the agenda at that time.

15 Q. Do you recall there being some
16 anticipation of receiving some sort of report from
17 Taylor Townsend about the political contributions?

18 A. I remember that Taylor was supposed to
19 provide a report and he provided an opinion. I
20 don't know that he ever provided an actual report.

21 Q. Do you remember when that was?

22 A. I couldn't give you an honest day.

23 Q. Were you still on the Commission at the
24 time?

25 A. Yes, ma'am.

1 Q. Do you know if Calvin Braxton was still on
2 the Commission at the time?

3 A. I believe so.

4 Q. Do you know if Cathy Derbonne was still
5 the executive director at the time?

6 A. Yes, ma'am, I believe so.

7 Q. Now, the original letter was sent in July
8 of 2016. Do you recall what was going on at the
9 Commission in July of 2016?

10 A. I believe the July meeting was -- we were
11 beginning to fill the vacancies that were created
12 during the political contribution resignations, and
13 I was elected chairman. The meeting on July 2016,
14 we basically held the elections, and there -- the
15 date of July 2016 is actually pretty significant
16 because there had been public records requests at
17 that time asking for information regarding the
18 appointment of the Commission members.

19 And at that time, there was a gentleman by
20 the name of Dan Sullivan, which Dan Sullivan works
21 with the Civil Service League, which is kind of a
22 nonprofit organization that oversees all the civil
23 service commissions around the state to ensure that
24 proper protocols are enforced. And Dan Sullivan had
25 reached out, and once I got elected chairman, I was

1 informed that Dan Sullivan was upset with the
2 Commission -- this is one of the first things I was
3 told, was that Dan Sullivan was very upset because
4 we weren't following protocol, and that Cathy had
5 been extremely rude to him when he reached out to
6 her to let her know that she wasn't following
7 protocol. So the July --

8 Q. Following protocol how?

9 A. There's an established protocol for how
10 vacancies on boards and commissions under civil
11 service are to be followed, and it had been
12 established -- Dan Sullivan was actually the guy
13 who, when the civil -- State Police Commission was
14 started, he came in and instructed the executive
15 director how to fill vacancies on the Commission.

16 And the process is, there are several
17 private colleges in the state, and each of those
18 private colleges represent a congressional district.
19 So the strange thing is, there's not enough private
20 colleges in the university [sic] that there's one in
21 each congressional district, so -- and I'm just
22 giving an example here -- Xavier may represent
23 Shreveport. It's just because there's a --

24 Q. It's your testimony that Dan Sullivan
25 concluded that Cathy Derbonne hadn't followed the

1 procedure for appointment of commissioners or that
2 the Commission wasn't following the procedure for
3 appointing commissioners?

4 A. It was Cathy Derbonne who did not follow
5 the proper procedure, because it was her role as the
6 executive director that she was to notify these
7 colleges, and there was a procedure for notifying
8 the colleges. What you were required to do was send
9 them a letter, and there was a prescriptive time
10 allowed during this -- once there was a vacancy. It
11 had to be sent immediately. And so -- and let me --
12 let me clarify on this. Okay? So I get elected.
13 We immediately set up this meeting with Dan Sullivan
14 because Dan Sullivan --

15 Q. Who is the "we"?

16 A. Me, Lenore, Dan Sullivan and Cathy. And
17 we go in -- because I'm just wanting to hear what
18 Dan Sullivan has to say. Dan Sullivan tells us that
19 we are not in compliance, and Cathy produces an
20 e-mail or she produced this saying that, no, I sent
21 a letter to all these universities in April, and I
22 remembered getting it in April of 2016 once there
23 was vacancies. But what she had done was, she had
24 sent a letter to every university saying that there
25 was these three vacancies. She didn't do the

1 research to say, okay, this slot went to this
2 university, which you're supposed to notify the
3 specific university representing that seat.

4 So as we met with Dan Sullivan, he's
5 explaining to us that we've just got this all wrong,
6 and the process is, you notify the university, the
7 university is supposed to provide a list of three
8 individuals to the governor, and the governor
9 selects from that list of three people. That's --
10 that's the standard protocol that's been provided
11 here.

12 Q. According to Mr. Sullivan?

13 A. Yes, ma'am.

14 Q. And so it's your testimony that
15 Ms. Derbonne didn't follow the law?

16 A. And correct me if --

17 Q. She broke the law?

18 A. Well, the constitution dictates how these
19 appointments are to be made. During that meeting,
20 we sat down. We discussed all this. He gives us
21 the information. We even requested he come back,
22 help us with some education on how this is done,
23 make sure that we're doing the proper appointments.
24 He left the -- he left the room -- or left the
25 building. He left.

1 At that point, Lenore, myself and Cathy
2 began to call all the sitting Commission members to
3 ask how they were appointed to the Commission. We
4 called Calvin. I think Calvin said that he was
5 asked by the governor and had been recommended by
6 Mike Edmonson. We talked to Lloyd Grafton. Same
7 thing. He said, I don't know about any nomination
8 process.

9 So up until Cathy was hired, we had
10 actually followed the protocol. Every executive
11 director -- when we did the research, every
12 executive director --

13 Q. Who is "we"?

14 A. Me and Lenore. Lenore and I did the
15 research. Every executive director prior to her had
16 done the notifications. When -- once this all came
17 up, we actually had to go back and get the genealogy
18 of who these seats actually belonged to. Like, who
19 was Franklin -- where was Franklin Kyle's seat
20 actually attached to, which university was going to
21 recommend him. And I'm not saying the prior
22 appointments weren't lawful, because the university
23 didn't nominate anybody. It ultimately fell to the
24 governor. But we didn't do the proper protocol of
25 notification to the university.

1 Q. "We," the Commission, didn't follow the
2 law?

3 A. Well, no. The executive director did not.
4 Excuse me. I say "we" because I always incorporate
5 the Commission. But the executive director's role
6 was to ensure proper notification of universities in
7 the event of a vacancy.

8 Q. Okay. But, Mr. Doss, with all due
9 respect, and I understand what you're wanting to
10 tell me about Cathy.

11 A. Uh-huh.

12 Q. My question is, with respect to
13 Mr. Sullivan, you met with him --

14 A. Uh-huh.

15 Q. -- and you're telling me that he said
16 Cathy didn't follow the law.

17 A. Yes, ma'am.

18 Q. And then you and Lenore had to go back and
19 research all the appointments that had been made.

20 A. With Cathy, yes, ma'am.

21 Q. With Cathy. And you determined, did you
22 not, that several of those appointments had been
23 made before she even became executive director?

24 A. I don't recall us making that
25 determination.

1 Q. Well, you knew that to be true, right?

2 A. I don't know that to be true, no, ma'am.

3 Q. In fact, at some point in time, you became
4 aware of the governor having to issue amended
5 appointment letters to shorten people's terms
6 because they weren't correctly serving terms.
7 That's the governor's office, right? You saw those
8 documents.

9 A. I would have to see them again to refresh
10 my memory. I don't recall those exact documents
11 that you're referencing.

12 Q. With respect to Cathy Derbonne, since you
13 brought up the subject, you had a meeting with her
14 and told her she needed to resign, did you not?

15 A. I did not.

16 Q. You never mentioned to her that she needed
17 to quit, resign, leave?

18 A. I don't recall those words being said.

19 Q. Do you recall saying anything to her about
20 remaining or leaving as the executive director?

21 A. The only thing I recall is that she said
22 she wanted to use all of her sick time for an
23 extended period of time to take leave and then that
24 she was planning to resign. And I said, claiming
25 sick leave if you're not sick is technically payroll

1 fraud and is illegal, and that was the extent of it.
2 I don't recall having any other conversations other
3 than that, as far as her leaving or resigning.

4 Q. Did you know whether or not there was
5 enough votes to remove her as executive director?

6 A. No, ma'am.

7 Q. Had no idea?

8 A. No idea, no, ma'am.

9 Q. So you never told a single soul that there
10 were enough votes on that Commission to remove Cathy
11 Derbonne as executive director?

12 A. I have never said that there was enough
13 votes on there to get her removed.

14 Q. Have you said anything like that, sir?

15 A. The only thing that I've ever said is that
16 there was frustration with her performance, and that
17 was it. I did not give a statistic of how much
18 frustration there was. But, no, I did not say we
19 had the votes to remove her. No, ma'am.

20 Q. Did you ever hear anyone utter any threats
21 as it related to Mr. Braxton or his family?

22 A. No, ma'am.

23 Q. Like, we're going to take care of him?
24 Anything like that?

25 A. No, ma'am.

1 Q. So have you ever been to the Roosevelt
2 Hotel?

3 A. I've never stayed there. I've gone
4 through. I've walked through it.

5 Q. Do you know who Mr. Conn is at the
6 Roosevelt Hotel?

7 A. No, ma'am.

8 Q. Have you ever received free rooms in New
9 Orleans?

10 A. No, ma'am.

11 Q. Have you ever received free food in New
12 Orleans?

13 A. No, ma'am. Not that I can recall.

14 Q. As a public servant, a member of the State
15 Police, is it your understanding that you're allowed
16 to receive free drinks, for example, from a private
17 organization?

18 A. I don't know about the State Police. I
19 know we have to take an ethics training every year
20 that says we're allowed to receive approximately a
21 50-dollar meal, but I don't ever get them, so...

22 Q. Ethics training as a state trooper?

23 A. Ethics training -- everybody in state
24 government, I think, has to take the ethics training
25 every year. It's like a yearly requirement.

1 Q. Okay. And so you would have never, for
2 example, sat in a bar at the JESTC facility and
3 consumed some Crown Royals for free?

4 MR. FALCON: He said he did not
5 multiple times. It's 6:00 o'clock. Don't
6 repeat the questions. He's answered that
7 multiple times.

8 MS. CRAFT: I get it. I'm just asking
9 him with respect to his ethics training,
10 which he said every member of State Police
11 gets it.

12 BY MS. CRAFT:

13 Q. In accordance with your ethics training,
14 you would not have sat at the JESTC facility and had
15 free Crown Royals.

16 A. I have never sat at JESTC and gotten free
17 Crown Royal. No, ma'am. That's why I bring my own.

18 Q. Did you know anything about some sort of
19 cooperative endeavor agreement between Mike Edmonson
20 and the LSTA Enterprise, L.L.C.?

21 A. No, ma'am.

22 Q. I know you've told us that you take the
23 ethics training every year. Is it your
24 understanding that State civil servants are allowed
25 to receive alcohol, for example, free bottles of it,

1 to host parties?

2 A. I don't recall seeing that, but I don't
3 know what the rules as far as an entity receiving
4 alcohol is.

5 Q. I'm sorry. Let's say the superintendent
6 of State Police. Shipments of alcohol.

7 A. I have -- honestly, I don't know.

8 Q. Did you know whether or not --

9 MR. FALCON: Let me -- do you know --
10 the superintendent of State Police is not
11 a classified employee.

12 MS. CRAFT: Okay. Well, that's fine.
13 He's a State employee.

14 MR. FALCON: Not a classified
15 employee.

16 MS. CRAFT: Okay.

17 BY MS. CRAFT:

18 Q. Well, do you know if, ethically, the
19 superintendent of State Police, a nonclassified
20 employee, is allowed to receive shipments of alcohol
21 from the Louisiana State Troopers Association?

22 A. I have no idea.

23 Q. Do you know anything about social events
24 being hosted for the International Association of
25 Chiefs of Police with alcohol provided by the LSTA?

1 A. No, ma'am.

2 Q. Did you know anything about anyone
3 requesting Mr. Oliphant to write a report?

4 A. No, ma'am.

5 Q. Did you know anything or hear anything
6 about Mr. Young asking Mr. Oliphant to write a
7 report or otherwise document anything he may or may
8 not have witnessed?

9 A. No, ma'am.

10 Q. What did you understand the allegation as
11 it relates to Calvin Braxton to have been?

12 A. Can you clarify that?

13 Q. What was it you understood that Calvin
14 Braxton may or may not have done wrong?

15 A. In relation to Jayson Linebaugh?

16 Q. Yeah, or anything.

17 A. I think he was just upset about his
18 daughter getting a DWI and expected something to be
19 done to Linebaugh, but as what, I don't know, and I
20 was never privy to it firsthand.

21 MS. CRAFT: If we can take a short
22 break. Let me chat with my client.

23 (Recess.)

24 BY MS. CRAFT:

25 Q. Do you remember a meeting where Calvin

1 talked to you about stepping down as president of
2 the Commission?

3 A. I don't recall him asking me to do that,
4 no, ma'am.

5 Q. Do you remember when you met with him at
6 the Marriott, that Calvin suggested to you that you
7 should step down as president so the Commission can
8 move forward?

9 A. I don't remember him asking that. He may
10 have. I'm not saying he didn't. I just don't
11 remember that being in the content of the
12 conversation.

13 Q. And we talked about the Superior Grill
14 pictures, but do you recall my client telling you,
15 look, you need to watch your back because it looks
16 like someone is following you?

17 A. I don't remember how he phrased it. It
18 was just, watch your back, and I was, like, well,
19 thank you.

20 Q. Was that in conjunction with the Superior
21 Grill photographs?

22 A. I don't recall what it was in conjunction
23 with, so -- conjunction. I don't know.

24 Q. You mentioned a comment that you
25 attributed to Calvin about Trooper Linebaugh. Was

1 there any other occasion where Calvin said anything
2 about Trooper Linebaugh?

3 A. Again, it was just the time I spoke to him
4 where he was talking about how frustrated he was,
5 that he felt that Linebaugh knew him, and that he
6 had a personal issue with the way that Linebaugh had
7 effectively done -- or arrested his daughter, and I
8 think he alluded to the fact that he thought
9 Linebaugh needed additional training. I mean, that
10 was the extent of the comment.

11 Q. So that's something you've just remembered
12 about the additional training?

13 A. I'm just trying to remember how he phrased
14 it, but I don't want to misquote him.

15 Q. You didn't in any way have the perception
16 that my client was attempting to intimidate Officer
17 Linebaugh?

18 A. He wasn't -- he was not happy with Officer
19 Linebaugh when he spoke to me, but he was not
20 overtly making threats towards him. He was giving
21 me his opinion of Linebaugh's performance and his
22 dissatisfaction with it.

23 Q. Because, as a trooper, if you had thought
24 for a moment that my client was in any way
25 attempting to intimidate Office Linebaugh, you would

1 have taken action, correct?

2 A. I agree. That's -- yes, ma'am.

3 Q. And with respect to Mr. Oliphant, have you
4 told me everything that you've talked to -- with him
5 about with respect to Calvin or Linebaugh or the
6 arrest of Calvin's daughter?

7 A. Yes, ma'am.

8 MS. CRAFT: Okay. That's all I have.

9 MR. OXENHANDLER: I just have a couple
10 of questions.

11 EXAMINATION

12 BY MR. OXENHANDLER:

13 Q. Mr. Doss, my name is Steve Oxenhandler.
14 I'm a lawyer, as I said when we walked in, and I
15 represent Mr. Oliphant in this case that Calvin
16 Braxton has filed against the LSTA and Mr. Oliphant.
17 You mentioned just now about your
18 conversation with Mr. Braxton, that he was
19 frustrated. Did Mr. Braxton mention anything to you
20 during this conversation about Linebaugh being moved
21 to New Orleans?

22 A. Again --

23 MS. CRAFT: I'm going to object to the
24 form of the question, but go ahead. You
25 can answer it.

1 THE WITNESS: Okay.

2 A. Again, it goes back to, he was very
3 dissatisfied with his performance. The extent was
4 he needed additional training, and that training may
5 have displaced him from Natchitoches, but I don't
6 recall the exact phrasing of how he stated it.

7 BY MR. OXENHANDLER:

8 Q. You mentioned earlier in your testimony
9 about a telephone call you received regarding
10 Mr. Braxton going to the media outlets. Do you
11 remember that testimony today?

12 A. It was -- it was -- somebody contacted me,
13 and I don't remember if it was in person or via
14 telephone. But, yes, sir, I do know what you're
15 talking about.

16 Q. Did you -- did this person tell you that
17 Mr. Braxton had gone to the media and that
18 Mr. Braxton had some sort of video or pictures of
19 Mr. Oliphant at his house regarding payroll fraud?

20 MS. CRAFT: I'm going to object to the
21 form of the question. Go ahead.

22 BY MR. OXENHANDLER:

23 Q. You can go ahead.

24 A. When -- what I conveyed to Mr. Oliphant
25 was that I believed he was being followed and they

1 were possibly trying to either ascertain his
2 schedule or get him at home and possibly get
3 pictures of him being somewhere he's not supposed to
4 be on duty. I said, I don't know. I don't know
5 what they're trying to collect, but, to me, it seems
6 like they're trying to shop -- or what I was told is
7 they're trying to shop a story about you to the
8 media, and that would include them getting pictures
9 of you at home, to that extent. That might have
10 been the extent of my statement to him.

11 MR. OXENHANDLER: That's all the
12 questions I have. Thank you.

13 MS. CRAFT: Floyd, you got anything?

14 MR. FALCON: No.

15 MS. CRAFT: Follow-up.

16 FURTHER EXAMINATION

17 BY MS. CRAFT:

18 Q. When did you remember that part about they
19 might be trying to get pictures of Mr. Oliphant so
20 they could shop those to the media? When did you
21 remember that part?

22 A. He spoke to me outside the room and said,
23 in regards to my client, did you tell him this, and
24 it refreshed my memory. He was just being
25 clarifying on it.

1 Q. He told you what?

2 A. He just asked me, he said, in your
3 statement to Mr. Oliphant, did you tell him that
4 they had pictures or anything? I said, I -- my
5 statement to Mr. Oliphant was, I don't know why
6 they're following you, but I think they're trying to
7 get pictures of you doing something, you know, maybe
8 to that extent, but that's about it. I mean,
9 it's -- I'm hazy on what was actually said, so I
10 can't provide a quote. But, I mean, you wouldn't
11 have somebody followed and shopped to a media outlet
12 unless you had something to provide them.

13 Q. Okay. Well, that's a guess on your part,
14 sir. So what I'm trying to remember is this
15 unknown, anonymous, we don't know, in-person phone
16 call thing that you had, right?

17 A. Yes, ma'am.

18 Q. I'm trying to find out whether or not
19 anybody actually ever said pictures, or is that just
20 an assumption you made?

21 A. I don't remember the exact content of the
22 conversation. I'm just saying what I may have
23 conveyed to J.D., or Mr. Oliphant.

24 Q. But when you say, I may have conveyed,
25 that's a guess on your part, that's not a

1 recollection that you have, correct?

2 A. It is my belief I conveyed that to him.

3 Q. Okay. I get it that's your belief, but
4 can you testify unequivocally that's what you
5 conveyed to him, or was that just something you
6 talked to the lawyer outside and you came in and you
7 said, oh, yes, there might be pictures, I assume?

8 A. Again, when he asked me about it, it's
9 much like when I asked to review these documents.
10 I -- it is my statement that I did convey that to
11 Mr. Oliphant.

12 Q. You did?

13 A. Yes, based on my recollection. But,
14 again, it was a conversation two years ago, and I
15 don't remember the exact verbiage I used. In sum or
16 substance, that's what I stated.

17 Q. Okay. So then the person that talked to
18 you said what about pictures? Because I don't want
19 to beat a dead horse. As Mr. Falcon pointed out,
20 I've asked you some of these same questions multiple
21 times --

22 A. Yes, ma'am.

23 Q. -- and not until we take a break do you
24 come back and say, oh, yes, under some recollection,
25 because the lawyer told me, that I now remember

1 telling him --

2 A. Well, no. He didn't tell me that. He
3 just was asking for me to expand and said that, you
4 know, was there anything about this. I said, well,
5 I --

6 Q. Anything about what?

7 A. About what was said about what was being
8 shopped to the media, and I --

9 Q. He told you pictures?

10 A. I mean, he said, what was being shopped;
11 what was being sold to the media? I was, like, I
12 believe they were trying to get pictures -- that may
13 have been what I said -- of him maybe at home or
14 somewhere where he wasn't supposed to be on duty. I
15 don't know. Again, I can't clarify the statement
16 any more. It was a two-year-old conversation at --
17 probably two years old, and I don't remember exactly
18 what I conveyed to him, but I do believe I stated to
19 him, and I will testify that I stated to him, I
20 believe that they were trying to get him doing
21 something to put in the media that was detrimental
22 to his reputation.

23 Q. And the "they" being whom exactly?

24 A. Whomever was following him. Again, I
25 don't know.

1 Q. But I thought you said that you told him
2 that Calvin was having him followed. So was the
3 "they" --

4 A. You asked me if it was a PI, and I said, I
5 never said PI. I said he was being followed, but I
6 don't know who was following him.

7 Q. Well, then when you're saying that they
8 were trying to get something on him, who did you
9 tell Mr. Oliphant that they were?

10 A. I told him I believed that Calvin was
11 having him followed, but I didn't know by who.
12 They, the unknown.

13 Q. And so the "they" about the picture
14 business, that's not Mr. Braxton; that's somebody
15 you believed Calvin may have had following
16 Mr. Oliphant?

17 A. Yes, ma'am.

18 Q. And after talking with counsel outside and
19 having your memory refreshed, you, again, can't tell
20 us who this anonymous in-person or by-phone person
21 was, whether they were a trooper, they were with
22 LSTA, nothing?

23 A. I sincerely don't remember who provided me
24 the information.

25 Q. Did you tell Mr. Oliphant at the time who

1 provided you the information?

2 A. Not that I recall.

3 MS. CRAFT: Okay. That's all I have.

4 COURT REPORTER: Reading and signing?

5 THE WITNESS: Yes, ma'am. I would
6 like to read and sign.

7 (DEPOSITION CONCLUDED AT 6:17 P.M.)

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 R E P O R T E R ' S C E R T I F I C A T E

2 This transcript is valid only for a
3 transcript accompanied by my original signature and
4 original required seal on this page.

5 I, Leslie B. Doyle, Certified Court
6 Reporter (LA Certificate #93096), in and for the
7 State of Louisiana, as the officer before whom this
8 testimony was taken, do hereby certify that T.J.
9 DOSS, after having been duly sworn by me upon
10 authority of R.S. 37:2554, did testify as herein
11 before set forth in the foregoing 115 pages; that
12 this testimony was reported by me in the stenotype
13 reporting method, was prepared and transcribed by me
14 or under my personal direction and supervision, and
15 is a true and correct transcript to the best of my
16 ability and understanding; that the transcript has
17 been prepared in compliance with transcript format
18 guidelines required by statute or by rules of the
19 board, that I have acted in compliance with the
20 prohibition on contractual relationships, as defined
21 by Louisiana Code of Civil Procedure Article 1434
22 and in rules and advisory opinions of the board.

23 I further certify that I am not related to
24 counsel or to the parties herein, nor am I otherwise
25 interested in the outcome of this matter.

1 Signed this ___ day of _____, 2019.
2
3
4 _____
5 LESLIE B. DOYLE, RPR, RMR, RDR
6 Certified Court Reporter
7 LA Certificate #93096
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

WITNESS' CERTIFICATE

I, T.J. DOSS, the undersigned, do hereby
certify that I have read the foregoing deposition
taken on June 25, 2019, and it contains a true and
accurate transcript of the testimony given by me:

CHECK ONE BOX BELOW:

() Without correction.

() With corrections as reflected on the
Errata Sheet(s)

T.J. DOSS

DATE

REPORTED BY: LESLIE B. DOYLE, RPR, RMR, RDR