

(1) COMES NOW Ashton R. O'Dwyer, Jr. ("AROD"), appearing in propria persona in the capacity of "Complainant" pursuant to the provisions of "the rules of the Louisiana State Police Commission, the policies and procedures of the Office of State Police, the laws of the United States and the U. S. Constitution, the laws and Constitution of the State of Louisiana and other rules and procedures that are applicable for the good manner and order of the members of the classified state police service," and more particularly the following:

UNITED STATES CODE
18 U. S. C. Section 1503

LOUISIANA REVISED STATUTES
LSA-R.S. 14 Section 130.1

LOUISIANA CONSTITUTION OF 1974
Article X, Section 41, et seq.
Article X, Section 48(A)(1)
Article X, Section 48(A)(4)
Article X, Section 48(B)

RULES OF THE LOUISIANA STATE POLICE COMMISSION
Chapter 2
Rule 2.9(a)
Rule 2.9(c)
Rule 2.9(f)

Chapter 14
Rule 14.1(c)

Chapter 16

and moves for the Louisiana State Police Commission to investigate and take appropriate action on AROD's allegations of criminal misconduct by the following current members of "the State Police Service," namely:

Doug Cain
Catherine Flinchum
Faye Morrison

who AROD avers are GUILTY of the CRIME of "obstruction of justice" by virtue of the parts they played in organizing, orchestrating and executing a "cover-up" of the violation of AROD's civil rights in the aftermath of Hurricane KATRINA, as well as other crimes that have been committed against AROD and his former clients since then.

(2) The Louisiana State Police Commission has original jurisdiction to investigate, to hear the evidence of, and to decide what remedy may be appropriate for the commission of the crimes alleged herein.

(3) The facts surrounding the violation of AROD's civil rights are set forth in AROD's E-mail to Angela Bizette, Secretary for the Louisiana Select Senate Committee on State Police Oversight, of January 23, 2022 @ 2:45 PM, a copy of which is appended hereto and made part hereof, and which is marked for identification as "AROD Exhibit No. 1."

(4) In addition to Doug Cain, Catherine Flinchum and Faye Morrison, the following individual miscreants (among many others who are not named at this time) participated in the criminal conspiracy to deprive AROD of his civil rights in violation of 18 U. S. C. Section 1983, and to commit other crimes against AROD and his former clients, which are continuing to occur to this very day:

Former Chief Justice of the Louisiana Supreme Court Catherine D. Kimball
Chief Disciplinary Counsel Charles B. Plattsmier, Jr.
Former Attorney General Charles C. Foti, Jr.
Former Chief, Criminal Division, Louisiana Department of Justice Burton P. Guidry
Former Colonel Henry Whitehorn
Former Colonel Mike Edmonson
Former Lt. Col. Charles Dupuy
Former Colonel Kevin Reeves
Former Lt. Col. Mike Noel
Former State Trooper John Nelson
Former Assistant District Attorney for Ouachita Parish Fred McGaha
Former Louisiana State Prison Warden Burl Cain

and against whom AROD reserves all rights, including those whose identities are still unknown to AROD, but whose identities will be revealed when the TRUTH about (a) what led up to the events of 9/20/05, (b) what actually transpired on 9/20/05, and (c) what has transpired since 9/20/05 (but which has been unlawfully "covered up" and hidden) is finally revealed to AROD and to the Public.

(5) The criminal misconduct complained of herein constitutes violation of "the Article and the Rules" by Cain, Flinchum and Morrison and warrants action by the Louisiana State Police Commission.

(6) AROD further invokes "the Rule of Necessity" and avers that the filing of Formal Charges against Cain, Flinchum and Morrison with the appointing authority would constitute a vain and useless exercise in futility ("another" one), because the Louisiana State Police have steadfastly STONEWALLED any and all of AROD's complaints against its members in the past. See the following E-mails from AROD to LSP Executive Officer Rhonda Fogleman:

February 3, 2015 @ 5:21 PM
February 5, 2015 @ 2:36 PM
February 10, 2015 @ 9:22 AM
February 20, 2015 @ 9:34 AM
February 23, 2015 @ 11:19 AM
March 16, 2015 @ 10:42 AM
March 30, 2015 @ 12:50 PM

See also the E-mail chain attached to the September 22, 2017 E-mail from AROD to LSP Deputy Secretary Gaytha Christmas @ 7:41 AM.

All of the above identified E-mails are appended hereto and made part hereof, and are marked for identification as "AROD Exhibit Nos. 2 through 9."

(7) NONE of the E-mails marked "AROD Exhibit Nos. 2 through 9" and claims for relief were ever acted upon by the Louisiana State Police because the LSP was and is, largely, a CORRUPT institution, whose leadership routinely engaged in obstruction of justice and "cover-up" against AROD, the very same tactics that the Public has witnessed being employed by the LSP in connection with the Ronald Greene murder case.

(8) Accordingly, AROD avers that his charges of criminal misconduct against Cain, Flinchulm and Morrison are timely. In the alternative, AROD invokes "the Doctrine of Continuing Offenses" and avers that the conspiracy to obstruct justice and to cover-up the crimes which were committed against AROD, and to deny him his civil rights, is part and parcel of an on-going conspiracy which interrupted or otherwise suspended any applicable prescriptive or time limitation period. See also AROD Exhibit No. 9, with attachments.

(9) AROD avers that, unless the Louisiana State Police Commission is willing to concede that it is, in fact, a USELESS institution, then it will investigate and act upon AROD's allegations of criminal misconduct by Cain, Flinchulm and Morrison for their commission of obstruction of justice and participation in a massive "cover-up," which included the crime of "passive cover-up" by simply doing nothing.

(10) As recently as December 16, 2022, during a Meeting of the Louisiana State Police Commission, Ms. Belinda Parker-Brown, a community activist and warrior for social justice with Louisiana United International raised existential issues to the Commission and surgically addressed the Commission's mission and powers by asking rhetorically:

"What is going on? Does this ... Is it really necessary for this Commission to exist? Because if you're not serving a purpose ... Cover-up. Do any of you know about that?"

No answers were forthcoming from the Commission to Ms. Parker-Brown's questions.

(11) On June 9, 2021, during an interview on NOATV in New Orleans, Ms. Parker-Brown had charged that the Louisiana State Police Commission is "corrupt" and that it "is a fraud."

(12) AROD avers that unless the Commission seriously investigates his allegations of criminal misconduct against Cain, Flinchulm and Morrison, and unless the Commission takes decisive disciplinary action against them (and against all others similarly situated), then the Commission will be conceding that Ms. Parker-Brown is RIGHT and that the Commission is, indeed, a more or less USELESS institution for serving the Public.

(13) The crimes that have been committed against AROD and his former clients in the "Victims of KATRINA" litigation are in no way limited to simple obstruction of justice. In December 2021, the Chief Justice of the Supreme Court of the United States was quoted in articles published by the Main Stream Media as decrying and pledging to ferret out and expose judicial misconduct by Federal Judges who harbored conflicts of interest. But the words of the Chief Justice were just so much "political rhetoric" and "pabulum for the masses," because when AROD had presented the Chief Justice and his Brothers and Sisters on the SCOTUS with a REAL case, which involved real conflicts of interest by a Federal Appellate Court Judge, who failed to disclose his conflicts to AROD prior to rendering a decision adverse to AROD, the SCOTUS "punted." More particularly, the attention of the Commission is respectfully directed to the case record in Case No. 20-1666 on the docket of the Supreme Court of the United States, which involved undisclosed conflicts of interest by Judge Stewart Kyle Duncan of the U. S. Court of Appeals for the Fifth Circuit, which is available for viewing in its entirety on the SCOTUS web-site, and which is made part hereof by reference thereto. In that case, AROD's Petition for a Writ of Certiorari was summarily disposed of by the SCOTUS in a two-word Order: "Petition Denied." See also AROD's Complaint in Civil Action No. 08-4728 on the docket of the United States District Court for the Eastern District of Louisiana, which AROD has categorized as "the largest legal malpractice Class Action lawsuit in the annals of American jurisprudence."

The many crimes that have been perpetrated against AROD and hundreds of thousands of wholly innocent "Victims of KATRINA" will be readily apparent from a review of those records, and which AROD avers constitute a STAIN on the entire Louisiana State and Federal law enforcement and legal and judicial systems.

(14) AROD does not know the mailing addresses of Doug Cain, Catherine Flinchum or Faye Morrison, but avers, upon information and belief, that they can be contacted by mail and can be served by mail, as follows: "c/o Louisiana State Police Headquarters, 7919 Independence Blvd., Baton Rouge, La. 70806."

WHEREFORE, Complainant Ashton R. O'Dwyer, Jr. prays that his formal charges of criminal misconduct be docketed, that the the Louisiana State Police Commission investigate the charges and permit Complainant to provide additional information if warranted, and that a public investigative hearing be held with Complainant giving sworn testimony and offering documentary evidence to support his charges of unlawful obstruction of justice and participation in a cover-up by Doug Cain, Catherine Flinchum and Faye Morrison.

Declared to be true and correct under penalty of perjury this 14th day of February, 2022 pursuant to 28 U. S. C. Section 1746. SIGNED: Ashton R. O'Dwyer, Jr., in propria persona, 2829 Timmons Lane, Unit 143, Houston, Texas 77027.