

10TH JUDICIAL DISTRICT COURT

PARISH OF NATCHITOCHE

STATE OF LOUISIANA

NO. C-90,284

CALVIN W. BRAXTON, SR.

VERSUS

LOUISIANA STATE TROOPERS ASSOCIATION AND JAY
OLIPHANT

* * * * *

VIDEO CONFERENCE DEPOSITION OF

JASON HANNAMAN

TAKEN AT THE LAW OFFICE OF JILL CRAFT, 329

ST. FERDINAND STREET, BATON ROUGE, LOUISIANA

ON SEPTEMBER 25, 2020, BEGINNING AT 9:10

A.M.

REPORTED BY:

JENNIFER W. PICKETT
CERTIFIED COURT REPORTER
CERTIFICATE NUMBER 29011

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Also present:
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I N D E X

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MARKED EXHIBITS: PAGE:

None

S T I P U L A T I O N

It is stipulated and agreed by and between counsel for the parties hereto that the deposition of the aforementioned witness is hereby being taken pursuant to the Louisiana Rules of Civil Procedure, in accordance with law;

That the formalities, of reading, signing, sealing, certification, and filing are specifically not waived;

That all objections are hereby reserved until such time as this deposition, or any part thereof, may be used or sought to be used in evidence.

* * * * *

Jennifer W. Pickett, Certified Court Reporter, in and for the State of Louisiana, officiated in administering the oath to the witness.

* * * * *

1 (JASON HANNAMAN, AFTER HAVING BEEN FIRST
2 DULY SWORN BY THE ABOVE-NAMED COURT
3 REPORTER, WAS EXAMINED AND TESTIFIED AS
4 FOLLOWS:)

5 E X A M I N A T I O N

6 BY MS. CRAFT:

7 Q Mr. Hannaman, my name is Jill Craft and I
8 represent Calvin Braxton, who is present
9 and seated in the room with the court
10 reporter today. It is very important
11 during the course of this deposition that
12 you understand what I'm asking you and if
13 at any time you do not, please tell me to
14 stop and rephrase it. It's also
15 important, particularly because this is
16 by Zoom, that you answer out loud and
17 avoid nods of the head yes or no or uh-
18 huhs and uh-uhs. And my final
19 instruction is unique to me insofar as I
20 may ask you to spell names, places or
21 things. I'm not here to test your
22 spelling. It's just much easier for our
23 reporter to get those down as we go
24 along; is that fair enough?

25 A Yes.

1 Q And because we are participating by Zoom,
2 I'm going to ask you and I will remind
3 myself to take a deep breath before we
4 start answering questions because of the
5 lag time between the video and the audio;
6 is that fair?

7 A Yes.

8 Q Would you give me your full name and
9 address please, sir?

10 A Jason Paul Hannaman and it's 8804
11 Wartelle Avenue, W-A-R-T-E-L-L-E Avenue,
12 Baton Rouge, Louisiana 70806.

13 Q Can you walk me through your educational
14 background, sir, starting with where and
15 when you graduated high school?

16 A I graduated high school in Baton Rouge,
17 Louisiana at Scotlandville Magnet High
18 School.

19 Q At which school, I'm sorry.

20 A Scotlandville Magnet High.

21 THE OFFICIAL:

22 Could I just make a suggestion
23 real quick? Anybody that's not
24 actually speaking, if you might
25 go on mute. Sometimes it cuts

1 out the audio on our end and if
2 you have to object just obviously
3 unmute and then go back. I
4 appreciate it.

5 BY MS. CRAFT:

6 **Q Okay, I'm sorry, sir. You were saying**
7 **Scotlandville Magnet High School, which**
8 **was when?**

9 A Yes, Scotlandville Magnet High School in
10 Baton Rouge and I graduated in 1996. And
11 then I attended Louisiana State
12 University Baton Rouge and graduated May
13 of 2001. Then I attended University of
14 New Orleans for graduate school. I
15 obtained my MBA in August of 2007. And
16 briefly in between finishing my MBA, I
17 attended Southern University School of
18 Law in the evening program and that was
19 2004 to 2005. So that year, but I did
20 not complete that program.

21 **Q Can you tell me about your employment**
22 **history starting with after your**
23 **graduation from LSU?**

24 A After my graduation from LSU I worked at
25 a promotional products company in New

1 Orleans. It was Joe A. Cummins, C-U-M-M-
2 I-N-S, advertising for promotional
3 products and I worked there while I also
4 attended graduate school. When I
5 returned to Baton Rouge in 2004, I began
6 work at the State Department of Labor,
7 the Workforce Commission. That was in
8 May of '05. Then I moved to the State
9 Civil Service starting August of 2005. I
10 was with State Civil Service until 2012
11 where I then moved to become the HR
12 director for the Louisiana Department of
13 Education from 2012 to 2017. I was the
14 HR director and then I was employed by
15 the State Police Commission.

16 **Q Can you tell me how you learned about the**
17 **job at the State Police Commission; how**
18 **you first learned about it?**

19 **A** Yes. I subscribe to updates from the
20 state civil service notification,
21 employment notification. So keywords
22 like director or key pay levels, they
23 would automatically be prompted. They'd
24 come to my inbox. This position was on
25 that notification as I recall.

1 Q That's the first you heard about there
2 being some sort of vacancy in the
3 executive director slot at the state
4 police commission?

5 A Correct.

6 Q Had you previously talked to anybody
7 about the executive director position at
8 the state police commission?

9 A I didn't know there was a state police
10 commission.

11 Q Okay. So, then did you apply after you
12 saw the posting or the notification?

13 A Yes. I clicked apply for position on the
14 notification. It's very easy to apply
15 for a state position with state civil
16 service. Your application is saved in
17 the system and you merely have to click
18 if you're interested and I was
19 interested.

20 Q So what happened next?

21 A I believe I was contacted for a potential
22 interview in February.

23 Q Of what year?

24 A 2017.

25 Q Who contacted you?

1 A I don't recall.

2 Q At that time in February of 2017 did you
3 know anyone or had you known anyone
4 affiliated with the Louisiana State
5 Police?

6 A Not that I'm aware, other than I knew
7 someone in high school that was a -- had
8 become a trooper. Just I had seen in
9 passing but I did not have any contact
10 with him.

11 Q Same question with respect to the LSTA.

12 A I did not know anyone or anything about
13 the LSTA.

14 Q You indicated you were contacted for an
15 interview and you could not remember who
16 that was that contacted you or you do?

17 A Correct. I don't recall who contacted me
18 for the interview. I remember that
19 Ginger Krieg, HR Director, was on the
20 posting. So, perhaps but I do not
21 recall.

22 Q Can you spell the name, please?

23 A G-I-N-G-E-R, K-R-I-E-G.

24 Q She was the HR director for the
25 commission?

1 A She was the human resources director for
2 the Department of Public Safety.

3 **Q Tell me what happened next.**

4 A I recall showing up for the interview and
5 being interviewed at the commission
6 office in the conference room. At the
7 commission office when it was located at
8 the DPS compound.

9 **Q Who were you interviewed by?**

10 A I recall Eulis Simien, Monica Manzella,
11 TJ Ellis, Commissioner Breaux. I don't
12 recall Commissioner Breaux's first name.
13 And I believe Lenore Feeney was there as
14 well but I couldn't say for certain. It
15 was sort of a blur.

16 **Q Did you know any of those people before
17 your interview?**

18 A I did not.

19 **Q You indicated that the state police
20 commission used to be on the state police
21 compound. It is no longer; is that
22 right?**

23 A That is correct.

24 **Q Where is it located now?**

25 A The commission office is located at 5825

1 Florida Boulevard, Suite 1180, and that's
2 Baton Rouge 70806. It's commonly known
3 as the agriculture and forestry building.

4 **Q Do you know why it was moved?**

5 A I moved the offices to this location.

6 **Q Why?**

7 A When I became the director, I had some
8 concern that the commission residing
9 within the same compound as the entity
10 it's supposed to be providing oversight
11 for. And also, the large room that we
12 used to meet didn't have a, in my
13 opinion, a professional appearance. So
14 in order to be more autonomous, I
15 requested from the division of
16 administration funding for rent after
17 identifying this location at the
18 agriculture and forestry building. And
19 they concurred that it was better for
20 appearance sake that we were not in the
21 same location and now we have a separate
22 office away from the compound and we have
23 a meeting room, which is again more
24 professional for the commission.

25 **Q Do you know Cathy Derbonne?**

1 A I do not.

2 Q Madame Court Reporter, that's spelled D-
3 E-R-B-O-N-N-E. Do you know what her
4 position was with the state police
5 commission before you took over?

6 A She was the executive director.

7 Q Do you know if she shared your concerns
8 as it relates to a potential conflict of
9 interest given the then location of the
10 commission?

11 A I'm not aware of her concern. I realize
12 that the commission was residing on the
13 compound without paying any sort of rent
14 and that's -- it just was unusual in my
15 opinion when I arrived, looking at the
16 situation.

17 Q After your interview, which I think you
18 indicated -- did that interview by the
19 way take place also in February of 2017?

20 A Could you repeat that?

21 Q Did the interview take place in February
22 2017?

23 A Yes.

24 Q After your interview, what happened next
25 relative to you becoming the executive

1 **director?**

2 A I received a phone call from the chairman
3 at the time, advising that the
4 commissioners were interested in pursuing
5 and offering me the position.

6 **Q And who was that?**

7 A That was TJ Doss. He was the chairman.

8 **Q Between your interview and the phone call**
9 **from Mr. Doss, did you have a**
10 **communication with anyone affiliated with**
11 **either state police, the state police**
12 **commission or the Louisiana State**
13 **Troopers Association?**

14 A I did not.

15 **Q After the phone call, what happened next?**

16 A I accepted the position and I was asked
17 how soon I could start. I advised I
18 needed to give notice to my employer, the
19 Department of Education. And I believe I
20 gave three weeks to the Department of
21 Education. My start date was May 20th, I
22 mean March 20th, 2017 with the
23 commission.

24 **Q Do you recall what your starting rate of**
25 **pay was?**

1 A Yes. The rate of pay was 109,000.

2 Q **Have you maintained that same pay or have**
3 **you received raises?**

4 A I have received two pay increases.

5 Q **What is your current rate of pay?**

6 A 113,000.

7 Q **Since you've been the executive director**
8 **of the commission, can you describe for**
9 **us what your duties are or have been if**
10 **they've changed?**

11 A Sure. Primarily the duties of the
12 director are outlined in chapter three of
13 the commission rules. However, I find
14 myself wearing many hats since we're an
15 office of three individuals.
16 Specifically, I look at the
17 classification and pay for the state
18 police service and review position
19 requests from the Office of State Police.
20 I review public records requests for the
21 state police commission. I prepare the
22 annual budget for the state police
23 commission. And I also work with IT as
24 far as I'm on-hands. I'm the IT person
25 here for our staff to ensure the

1 computers are up and running and just
2 about anything else around the office.
3 But primarily those that I mentioned
4 earlier.

5 **Q Do you have any role with respect to**
6 **ensuring that the commission members**
7 **themselves comply with the law?**

8 A When commissioners are employed or
9 nominated and then appointed, sorry, we
10 send a packet to ensure that they are
11 aware of their responsibilities under the
12 Constitution and the prohibited
13 activities under the Constitution. And
14 with regards to -- I also send reminders
15 with regards to ethics training. Annual
16 ethics and annual disclosure forms to the
17 department heads. So we send reminders;
18 however, the commissioners are
19 responsible for their own actions.

20 **Q In other words, it's not your job as the**
21 **executive director to ensure that the**
22 **individual commission members comply with**
23 **the law; is that correct?**

24 A I would say that the individual
25 commission members are responsible for

1 complying with the law. As the director,
2 I remind them and advise them of upcoming
3 deadlines for the requirement of board of
4 ethics and the provisions of the
5 Constitution.

6 **Q Right. But again, my question was it's**
7 **not part of your job responsibility to**
8 **ensure that the commission members comply**
9 **with the law; is that correct?**

10 **A Correct.**

11 **Q With respect to Mr. Braxton, can you tell**
12 **me about any interactions you had with**
13 **him?**

14 **A Commissioner Braxton?**

15 **Q Yep.**

16 **A I started in March 20th of 2017 and I**
17 **believe prior to the meetings, Mr.**
18 **Braxton would come by my office and say**
19 **hello, just pleasantries prior to**
20 **meetings. I interacted with Mr. Braxton**
21 **in the actual commission meetings and on**
22 **occasion, Commissioner Braxton would give**
23 **me a phone call when he had concerns**
24 **about something on the agenda. I believe**
25 **I was there a total of four months before**

1 Commissioner Braxton resigned.

2 **Q Do you recall my client asking you about**
3 **some hotel expenses by TJ Doss?**

4 A I'm trying to recall. I believe there
5 was a conversation that -- something to
6 the effect of TJ should watch out or TJ
7 might be in trouble for some hotel stays.
8 But that's pretty much all I recall from
9 that.

10 **Q Who is responsible for approving the**
11 **expenses by the commission members; is**
12 **that you?**

13 A The Executive Director reviews the
14 expenditure requests and signs off on the
15 signatures.

16 **Q So, did you sign -- I'm sorry, go ahead.**

17 A There's a statute which governs the
18 elected member but then also the
19 expenditures for commissioners and that
20 statute states that commissioners shall
21 receive a per diem of \$75 and actual
22 travel incurred or travel expenditures
23 incurred.

24 **Q Was that true for Mr. Doss?**

25 A It would be true if he submitted

1 expenditure requests as a commissioner.

2 **Q Was there an issue raised by Calvin**
3 **Braxton as it related to TJ Doss and**
4 **Monica Manzella staying in a hotel room**
5 **together paid for by state tax dollars?**

6 A I do not recall any conversation about
7 Commissioner Doss or Commissioner
8 Manzella staying in a room together.

9 **Q Did anyone ever raise an issue with you**
10 **as it relates to TJ Doss and Monica**
11 **Manzella and a hotel expenditure as it**
12 **related to a commission business?**

13 A Again, I don't recall any conversation
14 that included Commissioner Doss or
15 Commissioner Manzella and a hotel room
16 that was compensated by the commission.

17 **Q Was there any issue raised about Ms.**
18 **Manzella and Mr. Doss and their**
19 **relationship?**

20 A I wasn't aware that there was a
21 relationship until there were media or
22 blog reports in August. So no, there was
23 nothing brought to my attention about
24 them potentially staying in a hotel room.

25 **Q Do you recall anything more about any**

1 **issues that Mr. Braxton brought to your**
2 **attention?**

3 A I do not recall.

4 **Q Did anyone discuss with you any issues**
5 **they believed existed or that they had**
6 **with Mr. Braxton?**

7 A I do not recall any issues that anyone
8 had with Mr. Braxton.

9 **Q What conversations did you have with Mr.**
10 **Doss about Mr. Braxton?**

11 A I don't recall having specific
12 conversations with Commissioner Doss
13 about Commissioner Braxton outside of the
14 regular commission business.

15 **Q Like what?**

16 A It was during regular meetings. It was
17 just the interaction between -- I believe
18 Commissioner Braxton wished to extend the
19 promotional scores for the promotional
20 tests and I think that was something that
21 he, Commissioner Braxton, brought to my
22 attention and I'm not sure if we did it
23 that year or not but it was commission
24 business. It wasn't anything other than
25 commission usual agenda items.

1 Q Did you have any discussions with anyone
2 affiliated with the LSTA about Mr.
3 Braxton?

4 A I did not. Not that I recall.

5 Q Did you have any discussions with anyone
6 affiliated with the LSTA during the
7 period of time you became the executive
8 director and thereafter?

9 A Can you repeat your question.

10 Q Have you had any discussions with anyone
11 affiliated with the LSTA after you became
12 the executive director?

13 A Since March of 2017?

14 Q Yes.

15 A I have had conversations with Mr. Floyd
16 Falcon, attorney representing the LSTA,
17 Mr. Jay Aucoin all related to agenda
18 items primarily.

19 Q Did you have any conversations with
20 either Mr. Falcon or Mr. Aucoin as it
21 related in any manner to Mr. Braxton?

22 A Not that I recall.

23 Q Did you have any conversations with
24 either Mr. Falcon or Mr. Aucoin regarding
25 any allegations that Mr. Braxton did

1 **something with a traffic stop with his**
2 **daughter; something like that?**

3 A Not that I recall. I don't recall Mr.
4 Braxton having a daughter. I wasn't
5 aware that he had a daughter until
6 reading about it later, so after he had
7 resigned.

8 **Q Reading about it how?**

9 A In a blog or a news article, but I wasn't
10 aware that Mr. Braxton had children. I
11 wasn't aware of the other commissioners,
12 if they had children.

13 **Q Did you see any letters published by the**
14 **LSTA about Mr. Braxton?**

15 A No, I did not.

16 **Q When you're referring to media articles,**
17 **in those articles did they refer, if you**
18 **remember, to any letters issued on behalf**
19 **of the LSTA about Mr. Braxton?**

20 A Again, I believe this was after Mr.
21 Braxton had resigned. I believe one of
22 the bloggers that were covering the
23 commission at the time may have
24 referenced a traffic stop or a letter but
25 can you clarify your question?

1 Q Well, sir, is it your testimony you never
2 saw any letters that were issued by Mr.
3 Falcon on behalf of the LSTA regarding
4 Calvin Braxton?

5 A I could have reviewed it after
6 Commissioner Braxton had resigned but I
7 don't recall going through it. I might
8 have but it was after Calvin,
9 Commissioner Braxton had resigned.

10 Q I get it that you keep saying it was
11 after he resigned. I understand that.
12 I'm not limiting my timeframe. I just
13 want to know if you saw the letters?

14 A I believe there was a letter but I don't
15 recall the details of it or if I had read
16 the whole thing or if again it was in
17 passing perhaps but I could have.

18 Q Do you remember who you got it from?

19 A It would have been from one of the media
20 sources, I believe.

21 Q Do you remember which one?

22 A The two that were covering the commission
23 in 2017 were the Louisiana Voice and
24 Sound Off Louisiana. If it was on that
25 as part of an attachment, I could have

1 clicked on it but I don't recall reading
2 a full, lengthy letter or any report or
3 anything regarding the details of that.

4 **Q Do you recall anybody ever requesting**
5 **from you some sort of file relating to**
6 **Mr. Braxton?**

7 A As part of a public records request?

8 **Q No, sir. I did not limit it.**

9 A Okay. As part of a public records
10 request.

11 **Q No, sir. At any time do you recall**
12 **anybody --**

13 A That's my answer.

14 **Q Do what?**

15 A That would be my response. The only time
16 I believe there was any request for a
17 file or any information regarding
18 Commissioner Braxton was as part of a
19 public records request.

20 **Q Who was that from?**

21 A There was a public records request
22 submitted in May by Tom Wright, who was
23 an executive producer for a TV channel in
24 New Orleans.

25 **Q May of what year?**

1 A 2017.

2 Q **And what TV channel?**

3 A I believe it's WVUE.

4 Q **And what did he ask for?**

5 A There was a list of things regarding the
6 commission, commission expenditures,
7 travel and then he also asked for
8 correspondence between Commissioner
9 Braxton and my predecessor, the Executive
10 Director at the time, Cathy Derbonne.

11 Q **Were you able to locate that?**

12 A At the time I was able to work on that
13 request and it took some effort but I was
14 able to produce what was available.

15 Q **Which was what?**

16 A The records of the commission, the travel
17 that we had on hand, the expenditure
18 accounts of the commission and
19 correspondence that I was able to
20 retrieve from the executive director's
21 email account.

22 Q **Did you ever locate a file that had**
23 **Calvin Braxton's name on it?**

24 A An individual file?

25 Q **Yes.**

1 A Not that I recall.

2 Q In front of your at the beginning of your
3 deposition, I asked you to set aside
4 Exhibits 9, 10 and 11. Do you have those
5 in front of you?

6 A I do.

7 Q Exhibit 9, is that something that you
8 retrieved that you were discussing
9 earlier?

10 A It's correspondence from Cathy Derbonne
11 to Calvin Braxton. So it was produced as
12 part of the public records request, yes.

13 Q No, sir. Exhibit 9 is an email from Ms.
14 Derbonne to a Carrie, C-A-R-R-I-E,
15 Sargent, S-A-R-G-E-N-T, dated May 18,
16 2016. Are you telling me this is
17 something you retrieved and produced?

18 A Commissioner Braxton was copied on that
19 email. Yes.

20 Q How did you retrieve this from Ms.
21 Derbonne's computer?

22 A I retrieved emails from her email
23 account, which was -- I was given access
24 to as my role as executive director.
25 There was not a playbook or a guide to go

1 by when I started. And when I took over
2 in March of 2017, I was required to go to
3 the legislature and was required to do
4 other things and I needed the access to
5 information to try to understand what
6 some of the deadlines were, what some of
7 the references were and I sought access
8 to her prior emails, many of which were
9 deleted and had to be restored. But at
10 the time I had access to those restored
11 emails and this was a part of that. I
12 had not seen this email but it was
13 evidently in the email list when I
14 filtered for Cathy Derbonne and Calvin
15 Braxton to be in response of said public
16 records request.

17 **Q You said the emails had to be restored.**

18 **Tell me about that, please?**

19 **A** It appears that on her departure or I'm
20 not aware of exactly the time block, but
21 a large majority of the records contained
22 within the email files of the director,
23 her correspondence was deleted or chunks
24 of time were deleted. And the process is
25 simply to go to the deleted and hit

1 restore and I was able to restore deleted
2 files.

3 **Q Do you know when the files were allegedly**
4 **deleted?**

5 A I believe the files were deleted on her
6 last day of employment but I can't right
7 now give you a definitive time.

8 **Q When you say you went to deleted, she had**
9 **a folder of deleted emails; is that**
10 **right?**

11 A When I was granted access to the email
12 account, there was a folder of deleted
13 emails and those were then subsequently
14 restored so that they could be reviewed.

15 **Q You keep saying when I was granted**
16 **access. Tell me about that process?**

17 A Cathy used the state email domain, the
18 LA.gov and so her correspondence was
19 maintained at the office of technology
20 services downtown. So, I made a request
21 to have access to that account since I
22 was the current Executive Director and
23 needed potential access to the budget
24 documents, any correspondence that could
25 help me in my role as the Executive

1 Director.

2 **Q When was this, sir?**

3 A I don't recall when I made the request
4 but it was shortly after I started, I
5 would imagine.

6 **Q I don't want you to guess. If you don't
7 know, tell me I don't know.**

8 A Can you repeat that?

9 **Q I said I don't want you to guess. If you
10 don't know, say I don't know.**

11 A I don't recall when I asked.

12 **Q Did you have any conversations with Mr.
13 Doss or anyone on the commission about
14 recovering Cathy Derbonne's emails?**

15 A I may have referenced my need to review
16 that information or review those emails
17 just to have them in case some questions
18 came up. When I started, six days later
19 or seven days later I had to appear
20 before the budget committee and I wasn't
21 aware of what correspondence had occurred
22 between the budget office and Cathy, as
23 well as the sunset committee was coming
24 up and I was not aware of what was
25 required and what correspondence had

1 occurred. So I was, in my role, I was
2 looking for business of the commission
3 when I obtained access for those files.
4 And so I would have conceivably advised
5 the chairman of the commission that I had
6 obtained access.

7 **Q Did you and Mr. Doss have any discussions**
8 **about Calvin or any other member of the**
9 **commission asking to have tickets either**
10 **fixed or looked at or handled?**

11 A No. I do not recall any conversation
12 about tickets.

13 **Q Is it your testimony, sir, that the**
14 **restoration of the deleted email file for**
15 **Cathy Derbonne was simply so you could do**
16 **your job and was not in response to a**
17 **public records request?**

18 A The initial restoration absolutely was so
19 that I could do my job effectively as the
20 executive director. Subsequently, the
21 records request came in and I had
22 potential access to those documents to be
23 responsive to the records request.

24 **Q When you say you restored the emails, Ms.**
25 **Derbonne had simply moved emails into the**

1 deleted section but she never deleted
2 that delete box; is that right? It was
3 still there.

4 A That's my understanding is they were in
5 the deleted folder or file folder. I'm
6 not sure if it was double deleted.

7 Q You told me the way that you restored was
8 you simply went into the deleted email
9 box and you restored all emails from the
10 delete box to what, the inbox?

11 A To a restored folder. To a folder that
12 was restored emails that I could search.

13 Q Do you still have that folder?

14 A In the process of doing it, I don't
15 recall the exact steps I used to do that.

16 Q Do you still have that folder?

17 A Yes.

18 Q So, if I request a copy of the folder
19 entitled restored, are you going to know
20 what I'm talking about?

21 A If you -- yes.

22 Q In restoring the emails, was that a one-
23 time occurrence for you or is that
24 something you did over time?

25 A I have access to them over time. I

1 believe I restored them once as I recall.

2 **Q Did you ever enlist or did you have**
3 **anybody help you search the emails?**

4 A I searched the emails. I don't recall
5 having a need for anyone else to search
6 emails.

7 **Q Did you discuss what you found in the**
8 **restored emails with Mr. Doss at any**
9 **time?**

10 A I'm trying to recall what or when that
11 might have occurred. Can you repeat the
12 question?

13 **Q Did you discuss any of the emails you**
14 **found in the restored emails with Mr.**
15 **Doss at any time?**

16 A I could have.

17 **Q Okay. What did you talk to him about?**

18 A There was -- I believe I spoke to Mr.
19 Doss about the communication between
20 Cathy and Byron Decoteau, the civil
21 service director and Byron is B-Y-R-O-N
22 and Decoteau is D-E-C-O-T-E-A-U, I
23 believe. That's with regards to the fact
24 that there were many questions asked I
25 found through my communication with the

1 civil service director, Byron Decoteau at
2 the time, that if he were to provide me
3 with any assistance I may need to be
4 successful in my role and noted that
5 Cathy contacted him frequently. So I
6 noted that was the case. There were
7 emails to show that there was frequent
8 communication or questions asked of the
9 civil service director regarding
10 prohibited activity or other things that
11 she would ask about.

12 **Q And that's something you discussed with**
13 **Mr. Doss?**

14 A He was the chairman. I mentioned that I
15 see where she, she being Cathy,
16 frequently contacted civil service to ask
17 questions. But I just think it was just
18 in passing. It wasn't a detailed
19 conversation.

20 **Q Did you tell him that some of the issues**
21 **that Cathy had contacted Civil Service**
22 **about were prohibited activities by**
23 **commission members?**

24 A I believe I mentioned that. I believe I
25 referenced that.

1 Q Did you also tell him that some of the
2 matters that Cathy had contacted Civil
3 Service about were prohibited political
4 donations by the state trooper's
5 association and/or its members?

6 A That I did not believe was part of any
7 conversation.

8 Q Those prohibited activity emails, the
9 ones where you're saying she contacted
10 the civil service director, those are all
11 going to be contained in the restored
12 email file?

13 A They should be.

14 Q Were they kept somewhere else?

15 A They might be in her regular inbox or
16 they could be in the restored deleted
17 file. So, it's -- I have access to her
18 email account and some things were
19 deleted. Some things were not. I can't
20 definitively tell you where it's located
21 in her inbox or her restored, deleted,
22 sent, inbox. It could be in any one of
23 those folders of her account.

24 Q How did you come across or how did you
25 happen to locate the emails that Cathy

1 was sending and receiving from the civil
2 service director about prohibited
3 activities? How did you come to look at
4 that?

5 A Because I believe that it was relevant at
6 the time. We had Mr. Bucky Millet,
7 frequently present, talking about
8 prohibited activities and it was coming
9 up that there were ethics disclosure
10 forms that were due coming up in May and
11 again, just as part of my looking
12 through, scanning through email, the term
13 political could have been searched and
14 came across.

15 Q Millet is spelled M-I-L-L-E-T-T; is that
16 right?

17 A Yes.

18 Q So, when you're saying in your search,
19 were you deliberately picking out search
20 terms or were you just guessing for Where
21 me, Sir, as to how you happened upon the
22 emails where Cathy Derbonne to the state
23 civil service director, where she's
24 asking him questions about prohibited
25 activities by the commission?

1 A I believe I used either Byron's name or
2 political. I don't recall but I know
3 after I spoke with Byron at one of the
4 legislative committee member meetings --
5 these meetings that -- because we appear
6 at the same time and I had appeared in
7 March of 2017, again the second week of
8 my employment, and there was a mention of
9 that she frequently contacted Civil
10 Service regarding different issues and so
11 I was curious as to see what were some of
12 the topics that maybe they discussed.
13 And to see if it was helpful for me as my
14 role going forward.

15 **Q Did anybody to your knowledge also look**
16 **at Cathy's computer other than you?**

17 A Not that I'm aware.

18 **Q Was anybody present when you pulled up**
19 **emails she had sent?**

20 A No. Not that I'm aware.

21 **Q Did you provide any of those emails to**
22 **Mr. Doss or any other member of the**
23 **commission -- the ones you recovered from**
24 **Cathy's computer accessed?**

25 A The emails that I pulled up and shared

1 with the commissioners were the ones as
2 part of the public records request
3 fulfilled for Tom Wright. So any emails
4 that were produced there were shared
5 actually with the commissioners.

6 Q You said Tom Wright on behalf of WVUE
7 made a public records request and you
8 said he asked for a bunch of things and
9 then he asked specifically for documents
10 relating to Mr. Braxton. That public
11 records request was when?

12 A I believe it was May 31st, on or about
13 that time.

14 Q Of 2017; is that right?

15 A Correct.

16 Q Prior to that you had already accessed
17 Cathy's emails; is that right?

18 A Yes, I had access to Cathy's emails.

19 Q Exhibit 9, had you already pulled that
20 email?

21 A I had not seen that email.

22 Q Had anybody told you about its existence
23 before the public records request on May
24 31st, 2017?

25 A No.

1 Q Had you heard anything about it?

2 A No.

3 Q This next exhibit is Exhibit number 10,
4 which consists of ten pages. Is this
5 something you also pulled from Cathy
6 Derbonne's emails?

7 A It's from Cathy Derbonne to Calvin
8 Braxton, so it would have been part of
9 that record set.

10 Q Do you remember when it was you pulled
11 this?

12 A It would have been as part of the records
13 request. So it would have, I believe,
14 the first week of June, to be responsive
15 for the records request.

16 Q You see I notice on Exhibit 10 at the top
17 left, there's a date 6/7/2017 and it says
18 forward Louisiana State Police
19 Commission. What does that tell us, if
20 you know?

21 A That tells us that it was forwarded from,
22 I believe it could have been forwarded
23 from the deleted folder to the -- I think
24 it's the day it was printed. So that's
25 why I -- I believe it was printed on

1 6/7/2017, for the response to the
2 request.

3 **Q Do you even know where this email came**
4 **from, whether it was deleted or her**
5 **regular hard drive; any idea?**

6 A I don't know the specifics of where this
7 folder was in her emails. I don't know
8 what specific folder it was, but it was
9 in the documents that were printed in
10 response to the records request.

11 **Q So, earlier when you said this particular**
12 **Exhibit number 10 was from her deleted**
13 **emails, you can't tell us whether or not**
14 **this was any of the emails that were**
15 **deleted; correct? Or contained in the**
16 **deleted folder?**

17 A I believe they were in the deleted folder
18 but I can't definitively tell you off the
19 top of my head today if they were in the
20 regular inbox or in the deleted folder.

21 **Q And you're looking at something; are you**
22 **looking only at the exhibit, sir?**

23 A Yes.

24 **Q Okay, great. Same thing with Exhibit**
25 **number 9. Can you tell us when this**

1 document was obtained by you?

2 A That would also be in response to the
3 records request for Tom Wright.

4 Q Can you tell us where this was located;
5 in which folder on Cathy Derbonne's
6 computer?

7 A I believe it was in the deleted folder
8 but I can't be sure at this moment.

9 Q So you don't know where it was; am I
10 correct?

11 A It was in her folders. Correct.

12 Q Okay. And then Exhibit number 11, which
13 is notice of traffic hearing; where did
14 you get this from?

15 A Again, that was in the folder for Cathy,
16 the email folder.

17 Q And you don't know which email folder
18 this was contained in; is that right?

19 A I don't recall. Correct.

20 Q Was this all that you obtained as it
21 relates to Calvin Braxton that you
22 produced to WVUE?

23 A These three exhibits?

24 Q Yes.

25 A No.

1 **Q What else was there?**

2 A There were, that's I guess the, for me,
3 there were so many potential documents in
4 that stack. That's why these did not
5 stick out even when they were printed for
6 production in the request from Tom
7 Wright. There were plenty of emails
8 regarding what's your sweatshirt size or
9 hey, did you get those rules or there's
10 back and forth regarding possible rule
11 edits for the commission or general
12 correspondence related to agenda items.
13 There was a vast amount of data that was
14 printed in an attempt to be responsive to
15 the request. And again, being new in the
16 role of Executive Director and public
17 custodian of records, I have never been
18 in that capacity in my prior employment
19 so I would receive a request. It was my
20 understanding that once I receive a
21 request and review the request, I would
22 attempt to gather any information that
23 was relevant to the request. Then if I
24 had a concern, I would -- or whether or
25 not something could be privileged, I

1 would have counsel review to make sure
2 that we were producing something
3 responsive to the request. And then I
4 would advise that the individual could
5 come and review the documents. But with
6 this, there were so many pages that were
7 printed under the search term Calvin
8 Braxton that I don't recall reviewing
9 every single page. It was a hefty stack
10 of pages. So there was plenty more than
11 this, than these three items.

12 **Q Did WVUE ask only for the correspondence**
13 **regarding Calvin Braxton?**

14 **A** It was for correspondence between Calvin
15 Braxton and Cathy Derbonne as part of
16 their large request for a multitude of
17 documents. So while we were gathering
18 those documents, we were also -- I was
19 printing these to try to be responsive to
20 that request. Again, my understanding a
21 narrow timeframe because that was my
22 understanding of how records requests
23 worked, three days turnaround or a prompt
24 turnaround and it was less. It was
25 primarily between and it was for the

1 duration of time between 2014 and '16, of
2 which Commissioner Braxton wasn't a
3 member early on that timeframe, so it was
4 really focused on the time that he was a
5 commissioner to the time in the request.

6 **Q In that public records request, was there**
7 **any other commission member who was**
8 **specifically named other than Mr.**
9 **Braxton?**

10 A I do not believe any other commission
11 members were named.

12 **Q Did you have any conversations with Mr.**
13 **Wright about the public records request?**

14 A I believe Mr. Wright telephoned and I
15 advised that there are a potentially
16 large number of documents to prepare and
17 he advised that please be responsive as
18 quickly as possible but he wasn't holding
19 me to the three days as per the public
20 records request rules. So, that gave me
21 a little extra time for counsel to ensure
22 that they could vet things for being
23 responsive or not I guess.

24 **Q In your conversation with Mr. Wright or**
25 **conversations with Mr. Wright, did he**

1 ever specifically talk to you about the
2 request relating to Calvin Braxton?

3 A That that was his -- his response was --
4 you mean that particular item on his
5 request?

6 Q No, sir. I'm speaking about Calvin
7 Braxton. When you talked to Mr. Wright,
8 do you recall any portion of the
9 discussion being specific to Calvin
10 Braxton?

11 A No. I do not. It was the entire
12 request.

13 Q Did anyone ever give you a limitation on
14 what they were looking for as it related
15 to the item correspondence between Cathy
16 Derbonne and Calvin Braxton?

17 A No. There was no details with regards to
18 any particular item that was being sought
19 after. In my recollection, I don't
20 recall seeing these exhibits at the time
21 specifically. There was just a lot of
22 back and forth general correspondence but
23 they were in there. I just don't recall
24 reviewing in detail any of the exhibits
25 that are in this 9, 10 and 11 here.

1 Q But you became aware of them, did you
2 not, when a story was published in the
3 media about Calvin Braxton and some sort
4 of allegation of ticket fixing?

5 A After I was responsive to the request,
6 then once the story came out, I thumbed
7 through the documentation and saw that
8 there were details regarding that, yeah,
9 in the materials.

10 Q And sir, did you ever do a search of Ms.
11 Derbonne's computer or any of the records
12 at the state police commission to
13 determine whether or not any other
14 commission members had requested
15 assistance with any ticket matters?

16 A I did not because I wasn't looking for
17 that. As far as a, even in this regard I
18 was not looking for anything. I was just
19 being responsive to the public records
20 request. So, I don't recall doing any
21 other search terms for tickets or
22 filtering for other commission members.

23 Q Have you ever seen any of those
24 documents?

25 A Which documents?

1 Q Any documents where any other commission
2 member requested assistance or some sort
3 of inquiry about a ticket?

4 A I don't recall.

5 Q Did you talk to Mr. Doss at all about
6 these documents, Exhibits 9, 10 and 11,
7 at any time?

8 A I don't recall specifically speaking to
9 Commissioner Doss about these exhibits.

10 Q Did you talk to anyone affiliated with
11 the LSTA about Exhibits 9, 10 and 11 or
12 the contents of them?

13 A I don't recall speaking with anyone with
14 LSTA about this records request or any of
15 these exhibits.

16 Q I'm sorry, or the contents of those
17 exhibits?

18 A No. I don't recall.

19 Q Did you speak with anyone in State Police
20 about the contents of those exhibits or
21 the allegation of ticket fixing?

22 A I do not recall speaking to anyone about
23 ticket fixing or these exhibits.

24 Q Did you ever think that there was any
25 kind of ticket fixing going on?

1 A I had no reason to believe there was any
2 ticket fixing or that Cathy was sending
3 correspondence with regards to tickets
4 for any reason. I had no -- I didn't
5 know Cathy.

6 Q Sir, did you ever see any incident
7 reports that were issued by a Mr.
8 Oliphant?

9 A Say it again?

10 Q If you can, look at Exhibit number 20,
11 sir. In Exhibit number 20 starting at
12 the second page is an incident report.
13 It's got an incident date of February 21,
14 2018. My question is have you ever seen
15 this document or any version of this
16 document at any time?

17 A I've seen a lot of documents. I don't
18 recall seeing this document.

19 Q And then, Sir, is it your testimony then
20 today is the first time you've seen this
21 incident report, the contents of it or
22 any version of it?

23 A I could have seen something but some of
24 these details, if they were on one of the
25 blog sites in passing, but I don't recall

1 seeing these details.

2 **Q Do you recall seeing or hearing anything**
3 **about an allegation that Mr. Braxton was**
4 **involved in a murder?**

5 **A A murder?**

6 **Q Yes.**

7 **A No.**

8 **Q Or a suicide that was suspicious?**

9 **A No.**

10 **Q Did you hear anything about a**
11 **relationship that was alleged to have**
12 **occurred between Mr. Braxton and another**
13 **woman?**

14 **A No.**

15 **Q In the document in front of you, Exhibit**
16 **number 20, it's a report prepared by Mr.**
17 **Oliphant. On the second page he talks**
18 **about some sort of allegation that he has**
19 **involving Calvin Braxton and possibly**
20 **being involved in a murder.**

21 MR. MAYEAUX:

22 Object to the form.

23 BY MS. CRAFT:

24 **Q You can read for yourself, sir. Read**
25 **that paragraph.**

1 A I have never read this paragraph before.

2 Q **Have you ever heard anything about it?**

3 A I have not.

4 Q **With respect to Mr. Oliphant, have you
5 ever had any conversations with him?**

6 A I don't recall having any conversations
7 with Mr. Oliphant.

8 MR. OXEHANDLER:

9 I'm making an objection to the
10 form of your questions. It's
11 Colonel Oliphant, not Mr.
12 Oliphant.

13 MS. CRAFT:

14 Okay. I appreciate that, Mr.
15 Oxenhandler but I'm just asking
16 the questions and I apologize if
17 I don't get the rank right but
18 I'm not going to get the rank
19 right. That's why I used to
20 Mister.

21 BY MS. CRAFT:

22 Q **Sir, have you had any conversations with
23 anyone at State Police regarding
24 allegations involving Calvin Braxton?**

25 A I do not recall any conversations

1 regarding Calvin Braxton in the office of
2 State Police.

3 **Q I'm not asking about the office. I'm**
4 **asking about any of State Police people?**

5 **A I don't recall any conversations with**
6 **State Police troopers or people.**

7 **Q Did you hear anything about Mr. Oliphant**
8 **expressing some concerns that he thought**
9 **Calvin Braxton was involved in some sort**
10 **of following him around or public**
11 **intimidation; anything like that?**

12 **A I haven't heard of any such thing.**

13 **Q Can you look at Exhibit number 24 please,**
14 **sir? You have that in front of you?**

15 **A Yes, I do.**

16 **Q In Exhibit 24 there is an incident report**
17 **attached to that. It's got a date of**
18 **December 5 in the upper, right-hand**
19 **corner.**

20 **A Yes.**

21 **Q Do you recall seeing either this document**
22 **or any version of this document before?**

23 **A I believe this document might have been**
24 **what I saw or something of its effect on**
25 **one of the local blogs that was covering**

1 the commission. Not the previous one
2 that I couldn't recall that I hadn't seen
3 before. I might have seen this one on
4 one of those if it was released to the
5 public.

6 Q Do you recall seeing this attached to any
7 letter that was sent out by Mr. Falcon or
8 Mr. Falcon on behalf of the LSTA?

9 A I don't recall. It doesn't sound
10 familiar.

11 Q Do you recall seeing it, sir, I guess as
12 being published in the media?

13 A That would be my recollection, is that if
14 this was, if I reviewed this, I believe
15 it was in some sort of a media blog but I
16 couldn't tell you I read the whole thing.
17 I just might have opened it and moved on.

18 Q Can you look at Exhibit 16, sir? It
19 looks like some sort of request from a
20 Lee Zurik, Z-U-R-I-K, at WVUE to the
21 governor's office, I believe; have you
22 seen this document before?

23 A No.

24 Q In this document, Mr. Zurik writes on
25 July 14th, 2017, "I'm doing a story on

1 Calvin Braxton, a member of the Louisiana
2 state police commission." Do you see
3 that part?

4 A Yes.

5 Q And it says, "we've received a report
6 made by Captain Jay Oliphant to then
7 Major Kevin Reeves about a December 5,
8 2015 incident involving Mr. Braxton's
9 daughter;" do you see that part?

10 A Yes.

11 Q It says, "the report describes
12 questionable alleged actions by Mr.
13 Braxton;" do you see that part?

14 A Yes.

15 Q Do you know how WVUE or Mr. Zurik had
16 received a copy of a December 5, 2015
17 incident report?

18 A I do not.

19 Q Do you know who sent it to them?

20 A I do not.

21 Q Then it says, "We also have emails that
22 show traffic tickets received by Braxton
23 or a friend were being fixed at the
24 request of Mr. Braxton via his
25 assistant." Do you see that part?

1 A I do.

2 Q When did you respond to the public
3 records request at WVUE?

4 A I believe it was June the 8th.

5 Q Do you know if that's where this
6 information came from or somewhere else?

7 A Well, the documentation was in that large
8 volume of materials so I would imagine
9 they received it from, I assume they
10 received it at that point.

11 Q But you don't know; am I right?

12 A Correct.

13 Q You don't know if they got it from
14 somewhere else; is that right?

15 A Correct.

16 Q Then it says, "We have the following
17 questions for Governor Edwards. Our
18 deadline is noon Monday. Number one, why
19 has the governor not responded to two
20 letters sent by the Troopers
21 Association?" You see that part?

22 A Yes.

23 Q Do you know if those are the letters that
24 we've talked about that were authored on
25 behalf of the LSTA?

1 A I don't know what he's referring to.

2 Q "Number two, does Governor Edwards
3 condone the alleged activity by Braxton
4 in the police reported emails?" Do you
5 know if that's referring to the December
6 5th, 2015 incident report?

7 A I don't know what it's referring to.

8 Q "Number three, does Governor Edwards
9 think Mr. Braxton should remain on the
10 state police commission even though it
11 appears he was allegedly using his
12 position to threaten the trooper and via
13 his assistant get tickets fixed?" Do you
14 see that part?

15 A Yes.

16 Q Did you ever talk to anybody about any
17 allegation that Mr. Braxton threatened a
18 trooper at any time or intimidated some
19 sort of trooper?

20 A No.

21 Q "Number four, Governor Edwards thinks Mr.
22 Braxton should remain on the commission.
23 Please tell us why. Thanks. Lee." Did
24 anyone at the governor's office talk to
25 you about the contents of this email or

1 the requests contained therein?

2 A No.

3 Q Had you seen this email before today?

4 A No.

5 Q If you can also look at Exhibit number
6 19. Now I asked you earlier about public
7 records requests and you told me about
8 the one for WVUE. This looks like your
9 response to a public records request to
10 Mr. Mustian, M-U-S-T-I-A-N, to the
11 Advocate dated August 16, 2017. Do you
12 remember this public records request?

13 A Yes.

14 Q In this, you talk about it being a
15 response for access to public records?

16 A Yes.

17 Q Where he requested for a copy of the
18 resignation letter submitted by Mr. Doss
19 as well as any other resignation letters;
20 did you respond?

21 A I did. Yes. It said the document
22 requested is available for your review.

23 Q Did you submit also any other resignation
24 letters or just Mr. Doss's?

25 A I believe just Mr. Doss was responsive to

1 his request.

2 **Q That's the only one you have; right?**

3 A Correct. In the timeframe that he
4 requested, right? Yeah.

5 **Q Did Miss Manzella ever resign from the
6 commission?**

7 A She did.

8 **Q When?**

9 A I believe it was the 16th or the 17th.

10 **Q Did you have a copy of her resignation
11 letter, too?**

12 A I would have but I'm not sure. He had
13 requested this on to the 15th. I don't
14 believe, if I had a copy of Ms.
15 Manzella's resignation letter, I would
16 have produced it. I believe when I
17 responded at this time, I did not have a
18 copy of her resignation letter.

19 **Q Had anybody else resigned from the
20 commission around the same time period?**

21 A No.

22 **Q Do you remember what Ms. Manzella said
23 was her reason for resigning?**

24 A Allegations of -- I don't recall the
25 details of it. I believe it was

1 something to the effect of -- I mean, I
2 don't recall. There were allegations in
3 the media and she was stepping down
4 because she thought it was best for the
5 commission.

6 **Q How many other commissioners left the**
7 **state police commission since you took**
8 **over?**

9 A Good Lord, let me think. Pardon me while
10 I use my fingers. We had Commissioner
11 Breaux left.

12 **Q Let me stop you. That's Breaux with an**
13 **X, right, for the court reporter.**

14 A Yes. Commissioner Breaux, then that was
15 in April '17. Yes, I believe he resigned
16 in April of '17. I believe he was there
17 for my first commission meeting and then
18 he resigned. Then there was Commissioner
19 Braxton in July, Commissioner Doss in
20 August of '17, Commissioner Manzella in
21 August of '17, then Doctor Neustrom
22 replaced Mr. Breaux and I believe he
23 resigned in '18. Neustrom, N-E-U-S-T-R-
24 O-M.

25 **Q Who? I'm sorry.**

1 A Neustrom. He replaced Mr. Breaux.
2 Commissioner Foss resigned. He was the
3 employee representative, Jeff Foss, F-O-
4 S-S. He replaced Mr. Doss as the elected
5 member. Mr. Cantrelle just recently
6 resigned, C-A-N-T-R-E-L-L-E, Nelson
7 Cantrelle, Junior just resigned. And I
8 think that's everyone, so that makes
9 seven.

10 Q **Is Mr. Riecke still a member of the**
11 **commission, R-I-E-C-K-E?**

12 A Yes, he is.

13 Q **When was the last time he appeared at a**
14 **commission meeting?**

15 A He was in route to our commission
16 meeting, our last meeting, but was I
17 believe involved in some sort of
18 vehicular incident.

19 Q **When was that?**

20 A What month are we in? It's September. I
21 think September 10th.

22 Q **Okay.**

23 A Prior to that, we've been dealing with
24 COVID. We had some cancelled meetings.
25 I know he was at the March meeting. We

1 had an emergency meeting to establish
2 some COVID rules and a new chapter 21.
3 He was present then. I believe we
4 skipped the April meeting. We cancelled
5 the April meeting, sorry. And I can look
6 it up but I don't recall if he was, if we
7 had the May meeting if he was present at
8 the May meeting. I know he was here for
9 the March meeting when we adopted the
10 emergency rules.

11 **Q Did you know anything about my request or**
12 **my client's request for his deposition?**
13 **Had you heard anything about that?**

14 **A** Through counsel I was advised that I was
15 being requested to be deposed, Chairman
16 Simien and Commissioner Riecke.

17 **Q Did you ever speak to Commissioner Riecke**
18 **about the request for his deposition?**

19 **A** No.

20 **Q Did you ever discuss it with him?**

21 **A** No.

22 **Q Did you ever discuss the deposition**
23 **request or the depositions with Mr.**
24 **Simien?**

25 **A** Other than the timeframe where I was

1 looking to go at 9:00 and he was going to
2 go at 11:00. Other than the timing, no.

3 **Q Have the executive director duties for**
4 **the state police commission ever changed**
5 **since you took over?**

6 A Since I've taken over?

7 **Q Yes.**

8 A I don't think there's been any changes to
9 chapter three of the rules but the
10 emergency rules granted to me were -- the
11 emergency rules adopted in March granted
12 me the authority to edit the police
13 commission rules. So that, on an
14 emergency basis.

15 **Q Prior to you taking over, did you -- were**
16 **you aware of any changes to the duties of**
17 **the executive director other than what**
18 **you've described? You know, your current**
19 **duties -- had they changed before you**
20 **took over?**

21 A I believe there were some changes to
22 chapter three but those were, if so,
23 they're in the transmittal sheets that we
24 post on the website. So it would be at,
25 there's always a documentation trail with

1 regards to rule changes and so the date
2 of the rule changes would be in the
3 transmittal sheets. I believe one change
4 I do know is the commission wanted to be
5 aware of the monthly finances. I think
6 that was added to the most recent rule
7 change but I'm not sure when that change
8 occurred.

9 **Q Mr. Hannaman, you told us that when you**
10 **took over the commission you took time,**
11 **in fact you said that's why you went**
12 **through Cathy Derbonne's emails, to**
13 **figure out what you were supposed to be**
14 **doing, what your duties were, et cetera.**
15 **So my question is, in that regard, did**
16 **you go back and try to figure out what**
17 **the duties of your predecessor were and**
18 **whether or not those had changed before**
19 **you took office?**

20 **A I was looking for correspondence related**
21 **to budgeting, the communication to the**
22 **legislature, reporting, things that I had**
23 **not done previously as executive director**
24 **or in my employment. So I was looking in**
25 **those regards, looking back on some**

1 emails to our office of planning and
2 budget representatives. So I was looking
3 back to those but that wasn't the sole
4 source of my learning about what to do.
5 It was just to assist and to see what
6 maybe had been communicated to planning
7 and budget. Again, I did not prepare the
8 fiscal year's '17, '18 budget request.
9 Cathy prepared that and submitted that in
10 the fall. However, I was being
11 questioned on that in March of '17 and
12 May of '17 when the session was going on
13 regarding our expenditures, our requests
14 for funding and so I was primarily
15 focused on figuring out perhaps what
16 maybe was transpiring.

17 **Q Mr. Hannaman, I appreciate your response**
18 **but it was not responsive to my question.**
19 **My question was, you said when you took**
20 **over the office you were trying to figure**
21 **out what your duties were. And in that**
22 **regard, I asked you did you go back and**
23 **try to figure out what your predecessor's**
24 **duties were, whether or not they had been**
25 **changed and what your current duties were**

1 **supposed to be. Did you do that?**

2 A To be absolutely honest, there was so
3 much going on, I didn't have time to go
4 through every element of her emails to
5 see exactly what maybe had changed over
6 time with Cathy Derbonne's
7 responsibilities. I started on the 20th
8 and by the 27th I had to appear before
9 the firing squad of appropriations to
10 determine budget needs and be responsive.
11 So, I was aware of the duties and the
12 role the director as insofar as they were
13 in the rule book, but as far as --
14 essentially I was putting out fires as a
15 public records request would come in, as
16 a request from the legislature would come
17 in, as a request from OPD -- I was
18 juggling many things as well as issues
19 with regards to their computers and
20 things that we had in the office, the
21 day-to-day operations of the office that
22 I had just assumed, working with my new
23 staff members, working with Debbie and
24 Chrissy to ensure we were being timely,
25 being responsive and making sure that

1 everything was covered as much as
2 possible, as well as then holding
3 commission meetings. So, I didn't look
4 at potentially how agenda items were
5 communicated to the previous meetings.
6 Did she provide commissioners with
7 information and how the agenda meeting
8 minutes were prepared? Just sort of
9 looking at different things but I really
10 wasn't focused too heavily on every
11 detail of her correspondence. It was
12 just, it was an aide, an assistant,
13 assistive device so to speak.

14 **Q Mr. Hannaman, again, you're not**
15 **responding to my question so I'm going to**
16 **object. I asked if you ever determined**
17 **what Cathy Derbonne's duties are, your**
18 **predecessor's duties were prior to you.**
19 **If there had been any changes as it**
20 **relates to yours. Did you ever do that?**
21 **I don't care about the emails. I'm just**
22 **asking if you did that. I'm asking**
23 **because at the beginning of your**
24 **deposition, you said that it was**
25 **important for you to figure out what your**

1 duties were. I'm asking you did you ever
2 go back and figure out what your
3 predecessor's duties were, whether they
4 had changed as it relates to your duties?
5 I'm not asking about emails. I don't
6 care. I want to know if you did that.

7 A I thought I was responsive. Okay, can
8 you rephrase? Is there something
9 specific? I looked at the rules, I
10 looked at the emails, I looked at as
11 needed if there was correspondence that
12 could assist me.

13 Q Were there any changes to Cathy Derbonne,
14 your predecessor's job duties as
15 executive director that you saw?

16 A No. Not that I saw. The duties were in
17 the rule book as far as the rules of the
18 director and when I started, those were
19 the duties that I was expected to
20 perform.

21 Q Did you ever see any proposed changes to
22 Ms. Derbonne's or the executive
23 director's job duties prior to your
24 taking office?

25 A I did circulars, I reviewed some general

1 circulars that had occurred previously
2 but those are proposal changes. They
3 have to be promulgated and in my
4 organization of the website and making
5 sure that information is readily
6 available to the public, I came across a
7 chapter three general circular.

8 **Q That was never adopted; is that right?**

9 A I'm unaware of whether that specific
10 general circular was adopted at this
11 time.

12 **Q You indicated something about you had to**
13 **look at budget documents that Cathy --**
14 **and you said you looked at the documents**
15 **Cathy Derbonne had submitted in the fall**
16 **for the budget of the office. My**
17 **question is, did you see where she had**
18 **also circulated those budget documents to**
19 **the members of the commission?**

20 **Q She advised the commission at the**
21 **December meeting, I believe. She might**
22 **have advised the commissioners of the**
23 **budget documents but she had -- it's my**
24 **recollection that she had appeared before**
25 **the budget committee prior to that**

1 meeting.

2 Q My question wasn't that, sir. My
3 question was did you see where she had
4 emailed the commission members the
5 proposed budget documents?

6 A I don't recall seeing it in email. I
7 recall seeing that as part of the I
8 believe the meeting agenda for December,
9 so that was again, looking at the
10 minutes, looking at the previous agendas.
11 I believe that's, it could have been an
12 email where I saw the agenda but I don't
13 recall seeing where she specifically
14 emailed any budget document to the
15 commissioners.

16 Q When she met with the legislative budget
17 people, you were aware that she had
18 commission members with her; am I
19 correct?

20 A When she met before house appropriations,
21 I believe it was, I believe, Commissioner
22 Braxton was with her. That was prior to
23 the December meeting but it was, I'm
24 looking for a timeframe. I believe it was
25 a few days prior to the December

1 commission meeting when house
2 appropriations met and I believe Mr.
3 Braxton was sitting next to Cathy.

4 **Q And so was Mr. Simien; isn't that right?**

5 A He could have been. Typically, there's
6 two chairs. So, if Mr. Simien was there
7 then he could have been. I don't recall.

8 **Q Did you ever talk to either Mr. Simien or**
9 **Mr. Braxton as you described when you**
10 **took over and were getting ready to go**
11 **back to budget? Did you talk to them**
12 **about what had previously been discussed**
13 **with appropriations?**

14 A I don't recall having a conversation, no.

15 **Q Did you review the video of the**
16 **appropriations committee meeting where**
17 **Cathy appeared?**

18 A I did later review that video, yes.

19 **Q And how did you come to review that**
20 **video?**

21 A I reviewed it because as a part of
22 reading separate litigations. There was
23 litigation and allegations made on behalf
24 of Cathy. I believe you were
25 representing her in that matter and

1 that's when I went and looked at the
2 video.

3 **Q Who gave you the video?**

4 A It's a public document. It's on the
5 legislative website.

6 **Q So when you looked at it, who was with
7 Cathy at the appropriations meeting?**

8 A Now, I recall that Mr. Braxton and Mr.
9 Simien were there.

10 **Q And who else?**

11 A And Cathy. I don't recall any other
12 commissioners being there.

13 **Q When you looked at the agendas, wasn't
14 the budget stuff reflected on the agenda
15 for November as well?**

16 A I don't recall. I don't know if it was
17 on there. I don't know if they had the
18 meeting that month. I don't know if it
19 was on the agenda that month. And
20 perhaps it was November when they met or
21 I don't know if it was December or
22 November when she met at house
23 appropriations. At this moment I don't
24 recall.

25 **Q If we could take a short break, let me**

1 **confer with my client. We'll be right**
2 **back.**

3 (Off the record.)

4 MS. CRAFT:

5 Madam Court Reporter,
6 throughout this deposition, we've
7 referred to existing exhibits by
8 number. What we've done in all
9 these depositions is we have
10 Exhibits 1 through 24 that have
11 been attached to several of them
12 that we've taken. So our
13 reference, to be clear, when we
14 talk about the exhibits are
15 exhibits that have already been
16 attached to previous depositions
17 at the same number.

18 BY MS. CRAFT:

19 **Q Mr. Hannaman, I do have a couple more**
20 **questions. How did you find out Calvin**
21 **Braxton had resigned?**

22 A I recall that being a press release from
23 the governor's office I -- Ellen
24 Palmantier, I recall she circulated
25 something.

1 Q Did you ever see a copy of Mr. Braxton's
2 alleged resignation?

3 A I did not.

4 Q And Palmantier is P-A-L-M-A-N-T-I-E-R; is
5 that right?

6 A Correct.

7 Q Did you ever ask anyone in the governor's
8 office to provide you a copy of Mr.
9 Braxton's resignation?

10 A Now that I'm thinking, there was a press
11 release from the governor's office and
12 then there was also a press release from
13 Calvin Braxton and it listed, so I do
14 recall that. There were two, the press
15 release from Calvin Braxton mentioned he
16 was a family man, now I recall the
17 details of it, yes. So, I did end up
18 getting a copy of that.

19 Q Do you know if that was a release from
20 Mr. Braxton or from somebody else on his
21 behalf; do you know?

22 A I believe that was forwarded to my
23 attention from the governor's office. I
24 believe --

25 Q Did you ever talk -- I'm sorry, say that

1 **last part?**

2 A -- That's what I recall is that it was
3 forwarded from the governor's office or
4 the commission's office.

5 **Q Who in the governor's office forwarded**
6 **that?**

7 A It would have been by Ellen Palmantier or
8 someone that works for Ellen Palmantier.
9 That's what I recall of the moment, is
10 that the original press release went out
11 and then the subsequent statement from
12 Commissioner Braxton went out.

13 **Q Did you ever talk to anyone in the**
14 **governor's office about Mr. Braxton?**

15 A I did not.

16 **Q Did you ever talk to anyone on the**
17 **commission about Mr. Braxton and his**
18 **resignation?**

19 A Merely to advise that we received a
20 notice from the board and the conditions
21 that he resigned. That would be the
22 extent of my conversation.

23 **Q Who did you have the conversation with?**

24 A I believe I emailed the commissioners or
25 forwarded that statement.

1 Q Did you have any conversations with them
2 afterwards?

3 A I don't recall any specific conversation
4 afterwards.

5 Q That's all I have, sir. I don't know if
6 anybody else does.

7 MR. OXEHANDLER:

8 I'm sorry. I have a couple of
9 questions. Does anybody mind if
10 I go first?

11 CROSS EXAMINATION

12 BY MR. OXENHANDLER:

13 Q Mr. Hannaman, my name is Steve
14 Oxenhandler and I represent Colonel
15 Oliphant. Just have a couple of
16 questions. Broadly, what does the state
17 police commission do?

18 A The state police commission is the
19 governing body for the state police
20 service. So, they establish rules for
21 state police service, set pay and
22 establish job titles for the state police
23 service. They review employee
24 achievements, so if an employee is
25 disciplined, they have a right under the

1 rules to have their appeal reviewed by
2 the state police commission.

3 Q Is it fair to say that the state police
4 commission provides an independent civil
5 service system for all regularly
6 commissioned full-time law enforcement
7 and also is employed by the Louisiana
8 State Police?

9 A Yes.

10 Q Does the commission ever involve or have
11 any effect over non-commissioned state
12 police officers like secretaries or
13 dispatchers, things like that?

14 A The only employees that are classified
15 employees in the state police service
16 that have graduated the Louisiana State
17 Police Training Academy. Secretaries,
18 accountants, IT would not be under the
19 purview of the state civil service, I
20 mean, the state police commission. They
21 would be under the state civil service
22 commission.

23 Q So if I understand you correctly, the
24 state police commission, instead of me
25 saying the Louisiana state police

1 commission if I just say the commission,
2 that's what I mean; is that okay with
3 you? Is it fair to say that, if I
4 understand you correctly, the commission
5 can make rulings affecting members of the
6 state police civil service system?

7 A Say it again?

8 Q This commission can make rulings
9 affecting members of state police civil
10 service.

11 A State police service, state police civil
12 service. Correct.

13 Q Do you know about how many state police
14 law enforcement officers are subject to
15 potential rulings and decisions of the
16 state police commission?

17 A I believe there are roughly a thousand.
18 Right over a thousand.

19 Q Can rulings and decisions of the
20 commission have an effect on the jobs and
21 careers of Louisiana State Troopers?

22 A Yes.

23 Q I guess ultimately it affects the state -
24 - the commission's decisions affects the
25 classification and the pay of state

1 **troopers; right?**

2 A Correct.

3 **Q Does it also affect their longevity as**
4 **far as possibly losing their job?**

5 A Insomuch as the commission -- if the
6 employee is disciplined. Then they hear
7 the appeal and they could affirm the
8 decision to discipline.

9 **Q And you mentioned earlier that to be a**
10 **commissioner, a Louisiana State Police**
11 **Commissioner, is someone has to nominate**
12 **that person; correct?**

13 A That's correct.

14 **Q And the nomination goes to whom?**

15 A The process is outlined in the
16 constitution and in the establishment of
17 the state police service. There is one
18 elected member of the commission, it's
19 elected by the classified membership of
20 the Louisiana state police and they serve
21 on the board. Then there's six
22 individuals and each of those individuals
23 represent a congressional district in
24 Louisiana. No more than one can serve
25 from any congressional district. They're

1 nominated by the private colleges, three
2 nominees from the private colleges are
3 sent to the governor's office. The
4 governor then selects who serves on the
5 commission.

6 **Q Do you consider the state commission to**
7 **be an important body?**

8 A Absolutely.

9 **Q Why?**

10 A Again, it's the constitutional entity
11 that is governing the state police
12 service, which is one of the reasons I
13 moved our office to a location where we
14 could meet in a fashion that was more
15 representative of the important role of
16 the commission, not meeting in an
17 auditorium on the compound.

18 **Q I understand. Are meetings of the**
19 **commission covered by the news media?**

20 A It's an open meeting so media have been
21 in attendance.

22 **Q Do you know why the media would be**
23 **covering or why the media would be**
24 **interested in police -- in commission**
25 **meetings?**

1 MS. CRAFT:

2 I'll object. Speculation. If

3 he knows.

4 BY MR. OXENHANDLER:

5 **Q You can answer, sir?**

6 A The media may be interested in an appeal
7 case that's before them. The media are
8 interested in particulars of something
9 that a trooper was alleged to have done
10 that's coming before the commission.

11 **Q In your experience, do members of the**
12 **public have an interest in the state**
13 **police commission?**

14 MS. CRAFT:

15 Same objection.

16 A We have individuals that will show up and
17 review, sit and view the commission. We
18 don't have a -- it's not a sold-out
19 audience by any means but we do have
20 participants from the public that view
21 the commission meetings on a monthly
22 basis.

23 BY MR. OXENHANDLER:

24 **Q At some of your monthly meetings when you**
25 **have agenda items, do you have time for**

1 public comments?

2 A We do.

3 Q And do members of the public come up and
4 speak from time to time at commission
5 meetings?

6 A They have the opportunity to do so and
7 they have.

8 Q I'd like to turn now to some of the
9 questions I think that Ms. Craft asked
10 you but I just wanted to make sure. Did
11 Calvin Braxton ever speak to you
12 regarding the December 15th arrest of his
13 daughter for a DWI in Natchitoches?

14 A No, I do not recall any conversation.

15 Q Did Calvin Braxton ever mention the name
16 Jay Oliphant to you? Or Colonel
17 Oliphant.

18 A I do not recall that as well.

19 Q Did Calvin Braxton ever mention the name
20 Jason Linebaugh to you?

21 A I do not recall that.

22 Q I know you wear a lot of hats in your
23 position. Can you just give us a rundown
24 of your basic job duties as executive
25 director?

1 A Again, my role is the administrative
2 director of the state police commission.
3 So anything that falls under -- from
4 preparing the annual budget, presenting
5 the budget to the commissioners,
6 representing the agency hats,
7 appropriations and finance, anything
8 that's incumbent upon the agency to
9 respond to legislative inquiries. I also
10 serve as the chief fiscal officer. I'm
11 also the public communications, I respond
12 to public records requests. I also serve
13 as the compensation and classification
14 administrator. When positions come
15 before me, I review the duties and
16 establish the rank of the position and
17 the classified service. And I can make
18 recommendations to the commission
19 regarding the pay schedule or possible
20 rule edits. When the commission wishes
21 to change rules, I then publish those
22 rules for public comment, I set the
23 agenda for the commission. I serve as
24 the secretary of the commission to make
25 sure that the minutes are recorded and

1 then published. That's an overview of
2 the -- and also when there is a vacancy,
3 I notify the college presidents of the
4 vacancy because there's a narrow
5 timeframe for that college president to
6 respond. There's thirty days whenever a
7 vacancy occurs for a college, private
8 college university president to submit
9 their three names or three nominees to
10 the governor and then the governor must
11 choose from that list of nominees. So
12 that's another aspect of what I do.

13 **Q Thank you. I'd like you turn to Exhibit**
14 **number 10 if you could for a second. I'd**
15 **like you to go to the, there's a letter**
16 **from the former executive director, Cathy**
17 **Derbonne, to the Monroe Circuit Court for**
18 **Monroe County Plantation in Florida. Do**
19 **you see that letter? It's a few pages, I**
20 **think it's on page eight; do you see**
21 **that?**

22 **A Okay. It's not numbered so I'm confused.**
23 Okay.

24 **Q It's a letter from the state police**
25 **commission from December 7, 2015; do you**

1 see that, sir?

2 A I do.

3 Q Could you just read the letter for me
4 real quick and tell me when you're done.

5 I have a couple of questions for you.

6 You don't have to read it out loud.

7 A Okay, good. (Witness reviewing letter)

8 Q You ready?

9 A Yes.

10 Q Is it part of your job as executive
11 director to write a letter on behalf of
12 the commissioner from the Louisiana state
13 commission to have a ticket reduced?

14 A It is not.

15 Q Has any commissioner ever asked you to on
16 his or her behalf, to have a ticket
17 reduced?

18 A They have not.

19 Q If a commissioner asked you to do that,
20 would you write a letter like Ms.
21 Derbonne wrote on December 7, 2015?

22 MS. CRAFT:

23 Objection. Hypothetical.

24 BY MR. OXENHANDLER:

25 Q Go ahead, sir.

1 A I would not.

2 Q Basically your job is to perform work for
3 the commissioners and with the
4 commissioners in your official role as
5 executive director, not in any unofficial
6 or personal matter; is that correct?

7 A Correct.

8 Q You had mentioned earlier that a -- I'm
9 sorry, let me backup. Do you consider it
10 appropriate for on December 7, 2015, that
11 Ms. Derbonne wrote a letter on behalf of
12 Calvin Braxton to the clerk of court for
13 Monroe County Plantation Key Florida
14 requesting the private ticket that he had
15 be reduced?

16 MS. CRAFT:

17 I'm going to object. That's
18 not what the letter requests,
19 Counsel. And furthermore, you're
20 asking him to speculate. He
21 doesn't know what was going on
22 then.

23 BY MR. OXENHANDLER:

24 Q You can answer, sir.

25 A Your question again was?

1 Q Do you consider this letter to be an
2 appropriate exercise of an executive
3 director's authority under the state
4 police commission?

5 MS. CRAFT:

6 And I'll lodge the same
7 objection.

8 BY MR. OXENHANDLER:

9 Q Go ahead. You can answer.

10 A I would say that I would not issue a
11 letter from the state police commission
12 letterhead to someone in a similar
13 fashion.

14 Q Is it appropriate, Sir, for a
15 commissioner to be on the Louisiana state
16 police commission to mention that he
17 would not help a trooper if that trooper
18 comes before him or the commission on a
19 disciplinary matter?

20 MS. CRAFT:

21 I'm going to object for the
22 record.

23 BY MR. OXENHANDLER:

24 Q Go ahead sir.

25 A I wouldn't expect commissioners to

1 predetermine or make a statement of
2 predetermination about someone that might
3 come before them. I wouldn't accept that
4 as normal operation.

5 **Q In your previous testimony you mentioned**
6 **that Mr. Braxton was trying to hold**
7 **promotion scores open for a longer period**
8 **of time in about 2013; is that correct?**

9 A I had just come on board. We were
10 getting ready to administer a promotional
11 exam in May and there was some discussion
12 of whether or not some commissioners
13 wanted to declare a retest or to allow
14 promotional scores to be carried forward
15 or if a rule change or something should
16 be made, so there was discussion amongst
17 commissioners whether or not to allow
18 scores to be carried forward for the
19 upcoming promotional test.

20 **Q Do you know who initiated the discussion**
21 **you're talking about?**

22 A I know Mr. Braxton was someone in favor
23 and there might've been another
24 commissioner or two that was in favor of
25 extending those test scores an additional

1 year.

2 Q Was that leaving the test scores open in
3 relation to any particular trooper that
4 you know?

5 A Not that I'm aware.

6 Q Thank you, sir. I don't have any other
7 questions.

8 MS. CRAFT:

9 Anybody else.

10 MR. MAYEAUX:

11 I have no questions.

12 MS. CRAFT:

13 Mr. Falcon?

14 MR. FALCON:

15 No questions.

16 RE-DIRECT

17 BY MS. CRAFT:

18 Q Mr. Hannaman, I just have a few follow
19 ups. You said something about in
20 response to Mr. Oxenhandler's questions,
21 he had asked you a hypothetical about a
22 commissioner being able to affect
23 somebody of they, "came before the
24 board." It's true, is it not, that in
25 order for a trooper to, "come before the

1 **commission," that has to be as a result**
2 **of disciplinary action initiated by the**
3 **state police itself; right?**

4 A If someone can, if it's in the course of
5 a disciplinary action by the office of
6 state police, they could appeal that
7 disciplinary action and then the state
8 police commission could then determine
9 whether or not that appeal, to uphold it
10 or change it. We also have additional
11 rules regarding prohibited activity or
12 investigations where the commission could
13 investigate something that is perceived
14 to be a violation of a rule that wouldn't
15 necessarily take that same path.

16 Q **However, in order for the commission to**
17 **do anything, the whole commission has to**
18 **vote; am I correct?**

19 A A majority of a quorum.

20 Q **That's right. And in terms of any**
21 **disciplinary action, I am correct that if**
22 **an officer appeals to the commission a**
23 **disciplinary action, the disciplinary**
24 **action had to have initiated at state**
25 **police; right? In other words, the**

1 commission can't initiate disciplinary
2 action. It can only respond if an
3 officer chooses to appeal discipline
4 imposed by state police?

5 A Again, if there is a rule violation the
6 commission is aware of, under Chapter 14
7 or through an investigation under Chapter
8 16, the commission can take action.
9 However, the typical path is through a
10 disciplinary action and appeal under
11 Chapter 13.

12 Q Right. But if the commission as you
13 describe took those alternative actions,
14 again, that has to be a majority of a
15 quorum of the board, not just one person;
16 correct?

17 A Correct. A vote of a majority of a
18 quorum.

19 Q You were asked questions about actions
20 taken on tickets and I know I asked you
21 this when I was questioning you earlier
22 but you never went back to see if Ms.
23 Derbonne or any of the other predecessor
24 executive directors had as a courtesy
25 reached out to law enforcement agencies

1 **as a result of tickets; right?**

2 A I have not researched any other
3 incidents. Again, this is part of a
4 record production. I haven't researched
5 any prior activities.

6 Q **This was part of a record production**
7 **specifically targeted at Mr. Braxton and**
8 **no one else; correct?**

9 A This element of the request, this was
10 part of -- there were a multitude of
11 commission documents requested and this
12 line item on that request was regarding
13 email correspondence between the previous
14 executive director and Commissioner
15 Braxton.

16 Q **But independent of that, sir, you have**
17 **never gone back to search any**
18 **predecessor, executive director of**
19 **records or computers or the office**
20 **records themselves to determine if there**
21 **had ever been a request by any other**
22 **commissioner for some sort of assistance**
23 **with a ticket; right? You've never done**
24 **that?**

25 A I have not and I wasn't specifically

1 looking for that in this record
2 production.

3 **Q Sir, I'm not suggesting that you were.**
4 **I'm just asking in response to Mr.**
5 **Oxenhandler's question, you have no idea**
6 **whether or not any of your predecessors**
7 **ever assisted in a courtesy manner or any**
8 **manner as it related to a ticket for**
9 **someone else?**

10 **A** I am not aware. Ms. Derbonne was
11 employed for nine years prior to my
12 coming on board and I believe the
13 predecessor before Ms. Derbonne was
14 investigated by the legislative body for
15 some wrong-doings but -- and so that file
16 is available and I perused that document.
17 But as far as specifically correspondence
18 related to a speeding ticket, I haven't
19 looked at any other documents from a
20 previous executive director.

21 **Q Okay. That's all I have. Thank you,**
22 **sir.**

23 (Whereupon, the taking of the witness's
24 testimony was concluded at 11:13 A.M.)

R E P O R T E R ' S P A G E

I, Jennifer Pickett, Certified Court Reporter, in and for the State of Louisiana, the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(b) of the Louisiana Code of Civil Procedure, before whom this sworn testimony was taken, do hereby state on the record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) have been used to indicate pauses, changes in thought, and/or talk overs; that same is the proper method for a Court Reporter's transcription of proceeding; that the dashes (--) do not indicate that words or phrases have been left out of this transcript; and that any words and/or names which could not be verified through reference material have been denoted with the phrase "(phonetic)."

C E R T I F I C A T I O N

I, Jennifer Pickett, Certified Court Reporter in and for the State of Louisiana, Certificate No. 29011, which is current and in good standing, as the officer before whom this testimony was taken, do hereby certify that the above and foregoing was taken under the authority of R.S. 37:2554; that the foregoing was taken by the undersigned as hereinbefore set forth in the foregoing pages; that it was reported by me in the stenomask method, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding; and that I informed about the complete arrangement, financial or otherwise, with the person or entity making arrangements for deposition services; and that I have acted in compliance with La. Code of Civil Procedure Article 1434; that I am no actual knowledge of any prohibited employment or contractual relationship, direct or indirect, between a court reporting firm and any party litigant in this matter nor is there any such relationship between myself and a party litigant in this matter. I am not related to counsel or to the parties herein, and I am in no way concerned with the outcome thereof.

Jennifer Pickett, C.C.R.
29011

1 Errata Sheet

2

3 NAME OF CASE: CALVIN W. BRAXTON, SR. VERSUS LOUISIANA STATE TROOPERS ASSOCIATION, ET AL

4 DATE OF DEPOSITION: 09/25/2020

5 NAME OF WITNESS: Jason Hannaman

6 Reason Codes:

7 1. To clarify the record.

8 2. To conform to the facts.

9 3. To correct transcription errors.

10 Page ____ Line ____ Reason ____

11 From _____ to _____

12 Page ____ Line ____ Reason ____

13 From _____ to _____

14 Page ____ Line ____ Reason ____

15 From _____ to _____

16 Page ____ Line ____ Reason ____

17 From _____ to _____

18 Page ____ Line ____ Reason ____

19 From _____ to _____

20 Page ____ Line ____ Reason ____

21 From _____ to _____

22 Page ____ Line ____ Reason ____

23 From _____ to _____

24

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