

ROBERT BURNS

NUMBER 717529 DOCKET: 24

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

COL. LAMAR DAVIS, IN HIS OFFICIAL CAPACITY
AND CUSTODIAN OF RECORDS FOR THE
LOUISIANA STATE POLICE

STATE OF LOUISIANA

MOTION AND ORDER FOR LEAVE TO FILE REPLY TO AMICUS CURIAE
BRIEF FILED ON BEHALF OF
THE LOUISIANA STATE POLICE COMMISSION

MAY IT PLEASE THE COURT:

Here’s the deal (Louisiana State Police Commission abbreviated as LSPC going forward):

1. Defendant LSP intentionally tried to block this Honorable Court from viewing the Letters of Counseling/Warning applicable for LSP Trooper Scott Lopez. How so?
2. By literally playing its own legal counsel, Mr. Greg Fahrenholt and exploiting his lack of knowledge of Defendant’s highly-specific classifications of “letters” and what is classified as discipline (Letters of Reprimand) and what is not (Letters of Counseling/Warning).
3. As evidenced by Defendant’s Memorandum entitled, “Memorandum Regarding June 20, 2022 Court Hearing,” (the vast majority of which has now been rendered totally moot), notwithstanding the fact that Plaintiff made it crystal clear that he sought for, “the two letters of Counseling/Warning for LSP Trooper Scott Lopez referenced in LSP Legal Counsel Gail Holland’s letter of *March 24, 2022* to be submitted for in-camera review,” Defense Counsel Fahrenholt nevertheless, having been easily bamboozled by his LSP client, submitted a **Letter of Reprimand** (not a Letter of Counseling/Warning) dated February 24, 2022. That was itemization # 3 on the list of documents filed under seal. It was not remotely pertinent to what Plaintiff sought, and this Honorable Court may feel free to disregard looking at that document in-camera because not only is it now readily available via public records request, but LSP Legal Counsel Gail Holland hinted strongly that would be the case pending the end of Trooper Lopez’s appeal period in her letter of March 24, 2022, well before

Plaintiff filed this lawsuit!

4. Defense Counsel Fahrenheit further supplied a Letter of Counseling/Warning for the court's in-camera inspection dated April 12, 2022, which is 19 days **AFTER** LSP Legal Counsel Gail Holland's letter of March 24, 2022, making it impossible for **THAT** Letter of Counseling/Warning to have existed at the time of Ms. Holland's letter. This Honorable Court is free to disregard that document as well from in-camera inspection because it too was not remotely related to what was sought by Plaintiff! Both bullet points 3 and 4 of this Reply are pure and simple straight-up efforts to perpetrate fraud upon this Honorable Court by Defendant LSP to keep this Honorable Court from **EVER** seeing Trooper Scott Lopez's Letters of Counseling/Warning in-camera or otherwise! It's literally that simple.
5. Easily recognizing the con job that Defendant LSP was playing on Defense Counsel Fahrenheit, Plaintiff sent Defense Counsel a scathing email dated Wednesday, June 15, 2022 at 2:20 p.m. Defense Counsel has supplied that email to this Honorable Court, and Plaintiff stands fully behind that email. Plaintiff will point out the fact that Defense Counsel Fahrenheit sought for "further communications about the details of this case not be shared with my paralegal," (notwithstanding that she readily invited Plaintiff to contact her with any question or concern) and Plaintiff agreed to do so and indicated that he would prefer to keep the type terse email he sent between parties, Defense Counsel Fahrenheit apparently had a 180-degree change of heart in filing the email into the public record, which is perfectly fine by Plaintiff, and Plaintiff therefore argues that opening up the totality of last week's communications is fair game for full public disclosure now.
6. In the email referenced in Itemization # 5 above, Plaintiff educated Defense Counsel on how he'd been played, and he further informed him that Defendant LSP **STILL** had not adhered to this Honorable Court's May 23, 2022 Order and that the cat was fully out of the bag that Defendant LSP hoped to bamboozle him and, further, that Defendant's effort was nothing short of a brazen attempt to keep this Honorable Court from viewing the Letters of Counseling/Warning **which plaintiff insisted existed and would be dated BEFORE March 24, 2022.**
7. Again, Plaintiff's email to Defense Counsel was very terse, but Plaintiff explained

that the Opposition Memorandum and the Subsequent Leave to File Documents Under Seal were nothing short of outright signals that Defendant LSP obviously believes that Plaintiff, “fell off the last turnip truck” that drove by LSP Headquarters.

8. Tough Plaintiff doesn't typically like to tout his credentials in an email or otherwise unless requested to do so, under these circumstances, Plaintiff felt he had little choice but to educate Defense Counsel that Plaintiff is a University Medal graduate from LSU having maintained a 4.000 GPA throughout his college career through graduation in December, 1985; that Plaintiff is an inactive CPA, having passed that exam on his first attempt (which is accomplished by only 3 percent of candidates taking that exam) with scores among the highest in the nation on Practice (92) and Theory (90); and that he served as a Fraud Examiner for the Federal Government (FDIC) in the early 90's. It was that experience and its almost-unfathomable requirements at FDIC's training facility in Arlington, Virginia (where FDIC replicates very heated bank Board of Directors' exit meetings), that a prospective bank examiner is trained extensively to pay very, very close attention to even the slightest detail! That extensive training made it an absolute piece of cake to detect Defendant LSP's very obvious attempt at perpetrating fraud upon this Honorable Court (together with dragging Defense Counsel along for the ride) to deny **even this Honorable Court from viewing Trooper Lopez's Letters of Counseling/Warning in-camera**. Instead, what Defendant LSP did was intentionally provide this Honorable Court with utterly irrelevant documents about which Defense Counsel knew, or certainly should have known (had he read Plaintiff's brief) and that Plaintiff would already have full and complete knowledge of and the content of those documents and, further, that this Honorable Court's time would be totally and completely wasted even looking at those documents in-camera or otherwise.
9. In his admittedly-terse email to Defense Counsel of Wednesday, June 15, 2022, Plaintiff further instructed Defense Counsel that, if Defendant LSP did not provide those Letters of Counseling/Warning for this Honorable Court for its in-camera inspection, then Plaintiff would most certainly file a Motion for Contempt of this Honorable Court's Order, which clearly instructed Defendant LSP to turn over Trooper Scott Lopez's two Letters of Counseling/Warning (which should be dated

BEFORE NOT AFTER March 24, 2022) to it for in-camera inspection.

10. Realizing that the proverbial gig was up (i.e. that Defendant LSP's blatant attempt to perpetrate a fraud on this Honorable Court – and apparent belief that Plaintiff is a total buffoon in attempting that sly move to deny this Honorable Court the ability to view the Letters of Counseling/Warning in-camera), Defendant LSP had little choice but to supplement its Motion for Leave to file Responsive Documents and **FINALLY** (after Plaintiff had to pry those documents from Defendant LSP's hands and force them to adhere to this Honorable Court's May 23, 2022 Order and submit the two Letters of Counseling/Warning **which had existed all along and which Defendant LSP KNEW were the documents he was seeking.**
11. The Motion for Leave to File the Two Letters of Counseling/Warning was served upon Plaintiff via First-Class Mail, and Plaintiff has yet to receive the filing through the mail and had no knowledge whatsoever of it (**NONE**) as of around 2:00 p.m. on Friday, June 17, 2022. Accordingly, having not heard the first word from LSP's Defense Counsel, Plaintiff initiated to Defense Counsel a voice mail at around 2:10 p.m. on Friday, June 17, 2022. Plaintiff sought an update from Defense Counsel so that Plaintiff could at least know where things stood on the two Letters of Counseling/Warning in order that he could formulate his oral arguments for the Court Hearing only three (3) days away (including the weekend) accordingly. Plaintiff followed that phone call up with an email immediately thereafter.
12. It was **ONLY AT THAT POINT** that Defense Counsel (through his paralegal) sent an email to Plaintiff at 2:36 p.m. on Friday, June 17, 2022 with the supplemental filing seeking Leave of Court to file the two Letters of Counseling/Warning Under Seal. In fact, since this Honorable Court was closed for Juneteenth, Defense Counsel could not provide actual evidence of filing; however, Plaintiff readily accepts that it has been filed but notes the resorting to sending via U. S. mail when sending same via email was readily available for Defense Counsel to do. Given the time-sensitive nature of the filing, Plaintiff can only assume that Defense Counsel's goal was for Plaintiff to be completely ignorant of the filing for the hearing before this Honorable Court which Defense Counsel knew was set for Monday, June 20, 2022. Irrespective of the fact that Defense Counsel has obviously gotten his feelings hurt, so to speak, by

Plaintiff's email, it does not excuse a blatant attempt to keep Plaintiff in the dark about the two Letters of Counseling/Warning being filed into the public record at the earliest possible occasion (which would have been email) and instead, forcing Plaintiff to call Defense Counsel with mere hours left to the business week. Plaintiff will also note that LSPC also mailed Plaintiff the Amicus Brief (and Plaintiff did receive it in the U. S. mail on Friday, June 17, 2022). Further, the LSPC also sent it via in-house message, and will make this Honorable Court aware that the singing up for a Taylor-Porter account to obtain the document was relatively easy.

13. At any rate, **VOILA**, it seems the two hot-potato Letters of Counseling/Warning do in fact exist just as Plaintiff had contended all along and as was memorialized by LSP's Legal Counsel, Ms. Gail Holland, in her letter of March 24, 2022; furthermore, both of those letters **are in fact dated prior to March 24, 2022** (one on an undisclosed date in 2010 and another dated August 21, 2018.) They have been filed under seal, and it is **those specific documents which Plaintiff seeks for this Honorable Court to examine (beyond the redacted documents in itemization # 1), ESPECIALLY given the extensive efforts on the part of LSP to conceal them from being viewed EVEN BY this Honorable Court in-camera!**

14. Now, on to the Amicus Brief, which this Honorable Court can rest assured was hurriedly slapped together by the LSPC once it became obvious that the ploy by Defendant LSP to directly deceive and perpetrate a fraud upon this Honorable Court imploded in Defendant's face (sort of like the Ronald Greene video suddenly leaked to the public blew up in their faces?), and Defendant LSP realized that they had no mechanism left to avoid exposure of the Letters of Counseling/Warning to this Honorable Court for in-camera inspection. Bullet points to refute Ms. Feeney, Legal Counsel, and the arguments she makes on behalf of LSPC regarding the Letters of Counseling/Warning follow:

- a. Unlike regular Civil Service for general state employees, LSP Troopers play a unique role in trying to keep the citizens of our state safe. They can and should be held to a very high standard of conduct and ethics by the public. Further, at one time in the distant past, LSP enjoyed such standing and was well-regarded by Louisiana citizens (and that included when the public passed

the Constitutional Amendment establishing the LSPC in 1991). Regrettably, the agency is an unmitigated disaster now with many retired Troopers telling Plaintiff they are now ashamed of the very uniform they once took great pride in touting; furthermore, there is scant evidence of any signs of meaningful improvement anytime soon. The proof of that fact is readily apparent in the news headlines (some of which have been exposed by Plaintiff's blog, including being the first to report on the Ronald Greene matter on September 10, 2020), which LSPC seems to go out of its way to vilify in its Amicus Brief.

- b. When bad actors, of which everyone is rapidly learning there are more and more within LSP, are permitted to continue their actions because their superiors simply deploy Letters of Counseling/Warning as a way to keep from "breaking the brotherhood," then we all lose! Unfortunately, some lose way more than others, and that regrettably includes citizens who are known to have had their civil rights blatantly and brazenly violated by LSP Troopers.
- c. Let's examine the very response a supervisor issued entailing former LSP Trooper (Dakota DeMoss) upon that supervisor's review of the details of DeMoss's vicious five-trooper beating of Antonio Harris on May 23, 2019. As mentioned in his original Petition (which Defense Counsel admitted in open court on May 23, 2022 was "too long" <for him to presumably dignify by actually reading the petition>), and for which Petitioner broke that feature to include the disgusting language used upon Harris' apprehension. Let's reproduce that disgusting language at this time: *The troopers then escorted Harris to one of their marked police vehicles. As they placed Harris in the back seat, Tpr. Harper threatened him by saying, "stupid motherfucker, I hope you act up when we get to the fucking jail. I am going to punish you, dumb bitch. What the fuck is wrong with you, stupid motherfucker."* As Plaintiff pointed out, he was first to publish the reprehensible texts sent between four LSP troopers bragging of Harris' beating. So how did Dakota DeMoss's supervisor handle disciplining DeMoss (who was later fired for his role in the Ronald Greene beating only 13 days before Harris' vicious beating)? Well, let's take a look, shall we?:

[Source: AP Article by Jim Mustian Dated March 12, 2021]:

The filings show DeMoss originally received only Counseling/Warning for his role in Harris' beating, admonished for turning his FM radio up "extremely loud" during the chase and switching stations "in order to find the right song."

The new court filings were first reported by [Sound Off Louisiana](#), a local blog.

Plaintiff largely rests his arguments of just how nearly-incomprehensible Defendant LSP has stopped to demonstrated a propensity to abuse Letters of Counseling/Warning by making the above illustration alone!

As Plaintiff pointed out to this Honorable Court at the outset of this litigation (and emphasized to this Honorable Court in oral arguments on May 23, 2022 with an emphasis that he was not being flippant), Defendant LSP views the LSPC as being above The U. S. Supreme Court. LSPC's Counsel, Ms. Feeney, acknowledges that fact as she states in her Amicus Brief: "Rules adopted hereto shall have the effect of law." Wow!

Plaintiff submits that it was never the Louisiana Legislature's intent, and it most certainly never was the intent of the people of the State of Louisiana when they passed an Amendment in 1991 to set up the LSPC, to end up putting in place a mechanism whereby LSP can 100 percent, T-totally control an out-of-control agency (the LSPC)! The LSPC, by staunchly opposing the release of Letters of Counseling/Warning, and declaring it "law" that they are off limits to the public has literally aided and abetted the kind of criminal conduct which is rampant throughout LSP.

Further, by the LSPC's steadfast resolve that, "We determine what's public record and what's not," the LSPC almost assuredly shields that criminal conduct from even being scrutinized by the public who provides both its own and LSP's funding through taxes the public pays!

What's particularly galling is that the LSPC makes that mandate sight-unseen in that not a single member of the LSPC has likely **EVER** examined a Letter of Counseling/Warning in the agency's entire existence! Thus, the LSPC has no clue whatsoever (nor does it appear to care) the massive level of exploitation that may be inherent through these Letters of Counseling/Warning as demonstrated by the Dakota DeMoss example above.

As such, the LSPC has no clue whatsoever the degree to which it may likely have inhibited the public's ability to be made aware of warning signs that major adverse episodes such as Ronald Greene, Aaron Bowman (who was making a simple return five-minute trip from his house from a Family Dollar store to buy shaving lotion and was pulled over for no apparent reason by a local Sheriff's unit when, from out of nowhere, former LSP Trooper Jacob Brown, son of former LSP

Chief of Staff Robert Brown, showed up like Rambo on the scene and beat the living daylights out of him with a flashlight), and Antonio Harris were likely to transpire in the future.

In doing so, and particularly in continuing to maintain its dogmatic approach entailing the release of Letters of Counseling/Warning, each member of the present LSPC, in fighting the public release of problematic Trooper behavior, bears some of the blood of victims who die on their own hands!

Nevertheless, all Louisiana citizens can sleep well at night knowing that the LSPC is ensuring that, although these activities have been shielded from the public via the Letters of Counseling/Warning being declared off limits when making them public may have spared needless brutality and even deaths of Louisiana citizens, the LSPC can provide a very warm and comforting feeling to all Louisiana taxpayers that they are justified in blocking the release of such Letters of Counseling/Warning from being made public helps to ensure that no LSP Trooper may endure “embarrassment to the employee” as per LSPC Defense Counsel’s Feeney’s Amicus Brief.

Perhaps Defense Counsel for LSPC, Ms. Feeney wishes to tell Ms. Mona Hardin, Ronald Greene’s mother, with whom Plaintiff has met with, enjoyed dinner with, and exchanged texts with her daughter on occasion that: “Well, I guess you may be a little disappointed in us that we only issued an initial Letter of Counseling/Warning to Trooper DeMoss when he beat Antonio Harris so viciously on May 23, 2019. We know that was only 13 days after your son was beaten to death, but we do ask you to make note of the fact that we did find him worthy of a Letter of Counseling/Warning because he was playing his FM radio too loud when riding to the scene. Now, Ms. Hardin, even though we know that former Trooper DeMoss did openly brag about that beating of Harris with four other of our other finest LSP Troopers via texts and, and while we realize that the incident, as I said, ma’am, on May 23, 2019, was only 13 days after the incident with your son, you see, Ms. Hardin, here’s the bottom line: If we would have made that Letter of Counseling/Warning for Trooper DeMoss playing his FM radio too loud and diligently searching for the right song to get pumped up to viscously beat Antonio Harris, had we made that Letter of Counseling/Warning public, well, ma’am, that just may have resulted in embarrassment to Trooper DeMoss. Surely you understand and can see where we’re coming from, can’t you, Ms. Hardin?”

When a teacher teaches a class and wants to set an example for the whole class to learn from student misconduct, does he or she simply pull that student aside and whisper in his ear, “I’d really rather you not do that, okay?” Is that likely to enhance that student’s performance and, more importantly, that of the other students in the class? Of course not! What will work, however, is

standing the student in front of the entire class and letting the entire class know that he or she will be spending the next two hours each day for a week after class writing lines each day which state that he or she will not engage in such behavior in the future and warning the other students that any such replication of that student's behavior will result in the same, if not more harsh (since they had the benefit of forewarning) treatment. Of course, that does in fact entail "embarrassment" for the offending student, but it teaches a very valuable lesson both to him or her and, importantly, to the rest of the students.

Of course, when an agency such as LSP runs a Training Academy that entails widespread cheating (wherein actual copies of the final examination are provided to near-entire-classes of Cadets going back five years (Cadet Classes 99, 98, 97, 96, and 95), perhaps Defendant LSP isn't all that interested in effective and ethical training! Hence, maybe the classroom analogy is a poor one.

The results of those frauds who cheated on the final exam to become troopers by being provided advanced copies of the actual exam (with many obtaining them from an existing LSP Captain!) and becoming full-blown troopers despite having cheated on the exam have already cost some Louisiana citizens their lives (that's no exaggeration). Further, the State of Louisiana faces ungodly liability and legal fees in litigation over these fraudster troopers, with one reported settlement offer now approaching \$5 million!

Plaintiff is working on a blockbuster feature on the LSP Cheating Scandal for release in about 10-12 days. One would have thought the LSPC would have been on top of that cheating scandal years ago, but obviously the body largely does exactly what LSP tells it to do, and this 11th hour and 59th minute Amicus Brief is proof of that point.

The example cited above on DeMoss is one point-blank example of how a Letter of Counseling/Warning was clearly inappropriate. In the present matter, LSP Troop I Captain Beau Comeaux initially issued Trooper Lopez a "Letter of Counseling/Warning" dated April 12, 2022, and that's the one Defense Counsel for LSP got played on to attempt to serve as a patsy to scam this Honorable Court.

Fortunately, the newly-installed Captain of Internal Affairs, Captain Saleem El-Amin, obviously recognized that far more serious discipline was warranted in the matter than a mere Letter of Counseling/Warning. Accordingly, he upgraded that non-discipline (Letters of Counseling/Warning are not considered discipline and have thus been shielded from public scrutiny via LSP Rule, "which has the effect of law" per Ms. Feeney's Amicus Brief) to the full-

blown disciplinary Charge of Conduct Unbecoming a Louisiana State Trooper. So, there's yet another recent exploitation of the Letters of Counseling/Warning used by Troop Level Commanders, in this case, Captain Beau Comeaux, to try and cover for egregious behavior by subordinates. Plaintiff again asserts that, had LSP Defense Counsel taken the time to read his Brief, he certainly would have known that fact and that therefore Item 4 of the initial Documents Filed Under Seal is irrelevant (and can therefore be ignored by this Honorable Court), and he should have pointed that fact out to his LSP client.

LSP, once it saw its scam was not going to work, likely went to the LSPC in sheer desperation because Defendant LSP knows there simply is no way to avoid this Honorable Court seeing the Letters of Counseling/Warning for Trooper Lopez now. Furthermore, Defendant LSP likely fears that, once Letters of Counseling/Warning become public, Pandora's Box is likely to be opened, and the full extent of the irresponsible conduct and abuses perpetrated upon the citizens of Louisiana and the ensuing coverups by Troop Commanders like Beau Comeaux will be exposed. Being blunt, the full extent that the "good ole boy network" of Troop-Level supervisors has covered up irresponsible behavior by LSP Troopers that warranted much harsher discipline is very, very likely to emerge, and LSPC is simply attempting to assist LSP in ensuring that a long-overdue measure enhancing LSP transparency is not going to transpire and the same type of abuses can just keep right on transpiring.

If LSP's system of "Counseling/Warning of its troopers to improve performance" is working so effectively, then why did the U. S. Justice Department Civil Rights' Division feel a need to, on June 9, 2022, open a "pattern and practice" investigation into its practices? That is the first state-wide pattern and practice investigation that agency has lodged against any state-wide agency in over 20 years! Defendant LSP truly has made entry into the Hall of Shame from its criminal acts, and the LSPC is still, even after that major announcement, attempting to continue to provide cover for LSP!

Plaintiff certainly plans to provide all of the filings of this litigation to that the U. S. Department of Justice and strongly encourage the agency to demand to inspect all Letters of Counseling/Warning issued by Defendant in the last 15 years. That ought to be a real eye opener and, in the firm believe of Plaintiff and many others who have followed this litigation, certainly will be if the U. S. Department of Justice follows that guidance.

This concludes Plaintiff's response to LSPC's 11th hour and 59th minute obviously horridly-slapped-together Amicus Brief once an outright fraud failed to be perpetrated on this

Honorable Court by LSP. Plaintiff can only assume based on the totality of what all has transpired that was Defendant LSP's best shot to keep this Honorable Court from ever seeing Trooper Scott Lopez's Letters of Counseling/Warning in-camera or otherwise.

Plaintiff concludes this reply by asserting to this Honorable Court that he is entitled to court costs because he has succeeded, albeit with enormous effort this past week, to force Defendant LSP to turn over Trooper Scott Lopez's Letters of Counseling/Warning for in-camera inspection. In Defendant LSP's Answer to Plaintiff's Petition, Defendant LSP indicated that "Defendant will be happy to provide the documents for in-camera inspection," and that simply was not true! It was based upon the then-stated spirit of cooperation by Defendant LSP that it contended Plaintiff should not be awarded court costs as the Order signed by this Honorable Court specified that he would obtain upon the documents being produced. Plaintiff contends that, given all of the fraud-like activity perpetrated by LSP upon this Honorable Court in last week's filings, he is entitled to court costs in full!

Respectfully submitted,

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CERTIFICATE

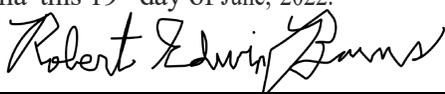
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Baton Rouge, Louisiana this 19th day of June, 2022.



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PARISH OF EAST BATON ROUGE

COL. LAMAR DAVIS, IN HIS OFFICIAL CAPACITY
AND CUSTODIAN OF RECORDS FOR THE
LOUISIANA STATE POLICE

STATE OF LOUISIANA

ORDER

Considering the foregoing Motion by Petitioner for Leave to File a Reply to *Amicus Curiae* Brief filed by the Louisiana State Police Commission:

IT IS HEREBY ORDERED that the foregoing Motion for Leave to File a Reply to *Amicus Curiae* Brief be GRANTED, and that the attached Reply to *AMICUS CURIAE* BRIEF be filed into the record of the above-captioned matter.

So ORDERED this ___ day of _____, 2022, at Baton Rouge, Louisiana.

DONALD R. JOHNSON
JUDGE, 19TH JUDICIAL DISTRICT COURT

Respectfully submitted,

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