

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**JOHN R. STELLY, II,  
Plaintiff**

**VERSUS**

**STATE OF LOUISIANA, THROUGH  
DEPARTMENT OF PUBLIC SAFETY  
AND CORRECTIONS, OFFICE OF  
STATE POLICE  
Defendant**

\* \* \* \* \*

\* **CIVIL ACTION NO. 23-772**  
\*  
\* **SECTION “T”**  
\*  
\* **JUDGE GREG G. GUIDRY**  
\*  
\* **MAGISTRATE JUDGE**  
\* **JANIS VAN MEERVELD**  
\*  
\*

**AMENDED WITNESS AND EXHIBIT LIST**

Defendant, The State of Louisiana through Department of Public Safety and Corrections, Office of State Police (“Defendant” or the “LSP”) hereby identify the following witnesses and exhibits that may be used at trial:

**WITNESSES**

Defendant will call the following witnesses:

- 1. Colonel Lamar Davis
- 2. Major Robert Burns
- 3. Melissa Kovacs, Ph.D., PStat, expert statistician

Defendant may call the following witnesses:

- 1. John R. Stelly, II, Plaintiff  
1588 Zephyr Way, Bozeman, MT 59718
- 2. Melissa Stelly  
1588 Zephyr Way, Bozeman, MT 59718;
- 3. Captain Donovan Archote  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant

4. Lt. Troy Pichon,  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
5. Dwight Robinette,  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
6. LTC Chavez Cammon  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
7. LTC Kenneth Van Buren  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
8. Captain Hiram Mason  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
9. Captain Aaron Marcelle  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
10. LTC Treone Larvadain  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
11. Captain Salem El Amin  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
12. Colonel Kevin Reeves  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
13. LTC Bob Brown  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
14. LTC Adam White  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
15. LTC Lane Barnum  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant

16. LTC J.D. Oliphant  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
17. LTC Jason Starnes  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
18. Major Chuck McNeal  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
19. Major John Riles  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
20. LTC Doug Cain  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
21. Major David McClendon  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
22. Major Paul Edmonson  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
23. Chris Eskew  
7979 Independence Blvd., Baton Rouge, LA 70806  
Can be contacted through counsel for Defendant
24. Individuals with knowledge of the reasons for which Plaintiff was not promoted to Captain who have not yet been identified or deposed;
25. Any representative of any entity who received a notice of deposition or records subpoena;
26. Any and all parties deposed in this matter;
27. Any and all experts who issued opinions or written reports in this matter;
28. Any individual included on any other party during discovery or on their witness list; and
29. Any witness necessary to authenticate a document or exhibit in this matter.

**EXHIBITS**

1. (LSP\_STELLY 000001-000110) Operational Leadership Text – Lieutenant
2. (LSP\_STELLY 000111-000385) Personnel File
3. (LSP\_STELLY 000386-000387) LSP Procedural Order 229
4. (LSP\_STELLY 000388) 1998-01-09 Stelly Ltr of Reprimand
5. (LSP\_STELLY 000398-000428) Summary Sheet for Job Search Announcements
6. (LSP\_STELLY 000429) 1997-06-10 Disposition Report re Fleet Accident
7. (LSP\_STELLY 000430) 2001-08-08 Stelly Ltr of Reprimand
8. (LSP\_STELLY 000431-000433) 2017-01-24 Stelly Ltr to Reprimand
9. (LSP\_STELLY 000434-000435) 2016-07-24 Stelly Crash Report
10. (LSP\_STELLY 000436) 2017-01-18 Stelly Admin Investigation #N17-006 Findings
11. (LSP\_STELLY 000437) 1995-11-09 Disposition Report 09-29-95 Accident
12. (LSP\_STELLY 000438-000443) Certificate 17-1135
13. (LSP\_STELLY 000444-000448) Certificate 18-1189
14. (LSP\_STELLY 000449-000459) Certificate 18-1223
15. (LSP\_STELLY 000460-000470) Certificate 18-1250
16. (LSP\_STELLY 000471-000489) Certificate 18-1251
17. (LSP\_STELLY 000490-000492) Certificate 19-1280
18. (LSP\_STELLY 000493-000499) Certificate 20-1354
19. (LSP\_STELLY 000500-000505) Certificate 20-1382
20. (LSP\_STELLY 000506-000514) Certificate 20-1383
21. (LSP\_STELLY 000515-000523) Certificate 20-1388
22. (LSP\_STELLY 000524-000532) Certificate 20-1393
23. (LSP\_STELLY 000533-000539) Certificate 21-1394

24. (LSP\_STELLY 000540-000544) Certificate 21-1428
25. (LSP\_STELLY 000545-000548) Certificate 21-1450
26. (LSP\_STELLY 000549-000556) Certificate 21-1453
27. (LSP\_STELLY 000557-000562) Certificate 21-1477
28. (LSP\_STELLY 000563) Certificate 18-1241
29. (LSP\_STELLY 000564) Certificate 18-1245
30. (LSP\_STELLY 000673) Captain Demographics 01-01-2020 to 12-31-22
31. (LSP\_STELLY 000674-000679) Certificate 18-1241
32. (LSP\_STELLY 000680) 2021 Promotional Board Invitees.
33. (LSP\_STELLY 000681-000806) Personnel Demographics 2008-2019
34. (LSP\_STELLY 000807-000808) State Civil Service Documentation and Reporting Requirements, Employee File- Confidential and Public Records
35. (LSP\_STELLY 000809-000996) Leadership Development Program Operational Leadership- Lieutenant
36. (LSP\_STELLY 000997-000998) P.O. 229 Promotions
37. (LSP\_STELLY 000999-001000) P.O. 705 Promotions
38. (LSP\_STELLY 001001-001024) A Study of Promotional Statistics Within State Police
39. (LSP\_STELLY 001025-001029) Sergeant & Lieutenant Demographics 2017-2022
40. (LSP\_STELLY 001030-001041) Official Certifications of Eligibles
41. (LSP\_STELLY 001042-001052) Certificate 18-1250
42. (LSP\_STELLY 001053-001059) Certificate 21-1474
43. (LSP\_STELLY 001060-001065) LSP Demographics for Captains from 2017-2022
44. (LSP\_STELLY 001066-001083) Summary Sheet for Job Search Announcements
45. (LSP\_STELLY 001084-0001095) Certificate 18-1245
46. (LSP\_STELLY 001096-0001131) Personnel Transfer Documents for Aaron Marcelle, Chavez Cammon, Christopher Eskew, David Stelly, Jonas Martin, JB Slaton, Kevin

Marcel, Nicole Kilgore, Robert Burns, Patrick Bradley, Robert Hodges, Saleem El-Amin, Treone Larvadain,

47. (LSP\_STELLY 001132-1138; 1151-1156; 1193- 1195) - Personnel Transfer Documents for Aaron Marcelle, Kendrick Van Buren, Hiram Mason, JB Slaton, Jonas Martin, Robert Burns
48. (LSP\_STELLY 1139-1150; 1157-1192; 1196-1255) - LSP Demographics for Captains, Sergeants, Lieutenants in January of 2017, 2018, 2019, 2020, 2021, 2022
49. (LSP\_STELLY 1256-1258) Personnel Transfer Documents for Kendrick Van Buren
50. Native files of LSP Demographics for Captains, Sergeants, Lieutenants in January of 2017, 2018, 2019, 2020, 2021, 2022
51. (LSP\_STELLY 001256-1258) Personnel Transfer Documents
52. Stelly Depo, Ex. 1 - 1998-01-09 Stelly Ltr of Reprimand
53. Stelly Depo, Ex. 2 - LSP Captain Promotion Data
54. Stelly Depo, Ex. 3 - Official Certification of Eligibles, Internal Affairs
55. Stelly Depo, Ex. 4 - Official Certification of Eligibles, Gaming Enforcement
56. Stelly Depo, Ex. 5 - Official Certification of Eligibles, Technical Support Services
57. Stelly Depo, Ex. 6 - Official Certification of Eligibles, Troop N
58. Stelly Depo, Ex. 7 - Official Certification of Eligibles, Technology and Business Support
59. Stelly Depo, Ex. 8 - Official Certification of Eligibles, BOI/ISS
60. Stelly Depo, Ex. 9 – Promotional Panel Summary, Crime Lab
61. Stelly Depo, Ex. 11 – Promotional Panel Summary, Public Information Officers
62. Stelly Depo, Ex. 12 - Official Certification of Eligibles, BOI/Gaming Enforcement
63. Stelly Depo, Ex. 13 – Promotional Panel Summary, Troop L
64. Stelly Depo, Ex. 14 – Promotional Panel Summary, Technical Support Services
65. Stelly Depo, Ex. 15 - Official Certification of Eligibles, Technology and Business Support
66. Stelly Depo, Ex. 16 – Promotional Panel Summary – Police Logistical Services
67. Stelly Depo, Ex. 17 - Official Certification of Eligibles – Public Affairs/Recruiting

68. Stelly Depo, Ex. 18 – Promotional Panel Summary Sheet, Internal Affairs
69. Stelly Depo, Ex. 19 – Promotional Panel Summary Sheet, Operational Development
70. Stelly Depo, Ex. 20 – Promotional Panel Summary Sheet, BOI
71. Stelly Depo, Ex. 21 - Official Certification of Eligibles
72. Stelly Depo, Ex. 22 - P.O. 229
73. Ex. 1 Depo of Davis - 2nd Supp NOD
74. Ex. 2 Depo of Davis - Def's 3rd Supp Resps to Plaintiff's ROGs & RFPs
75. Ex. 3 Depo of Davis - P.O. 229 Promotions
76. Ex. 4 Depo of Davis - Official Certifications of Eligibles, Technology and Business Support
77. Ex. 5 Depo of Davis - La. Constitution 10§ 45
78. Ex. 6 Depo of Davis – Certification of Eligibles, Technical Support Services
79. Ex. 7 Depo of Davis - EEOC Charge of Discrimination
80. Ex. 8 Depo of Davis - Response to EEOC Charge of Discrimination
81. Ex. 9 Depo of Davis - Stelly Email to Hall re news articles
82. Ex. 10 Depo of Davis - Article re LSP reform with diversity & technology
83. Ex. 11 Depo of Davis - promotional policy changes
84. Ex. 12 Depo of Davis – Official Certification of Eligibles, Internal Affairs
85. Ex. 13 Depo of Davis – Interview Summary Form BOI
86. Ex. 14 Depo of Davis – Certification of Eligibles, Operational Development
87. Ex. 15 Depo of Davis - Certification of Eligibles, BOI GED
88. Ex. 16 Depo of Davis – Captain demographics
89. Ex. 17 Depo of Davis – Official Certification of Eligibles – Technology and Business Support
90. Ex. 1 Depo of Burns - Notice of Deposition

91. Ex. 2 Depo of Burns - 2018 LSP Captain Exam Test Plan & References
92. Ex. 3 Depo of Burns – Official Certification of Eligibles – Operational Development
93. Ex. 4 Depo of Burns - P.O. 229 & La. Constitution 10 45
94. Ex. 5 Depo of Burns - State Police Commission Performance Eval System
95. Ex. 6 Depo of Burns - Official Certification of Eligibles – Technology and Business Support
96. Ex. 8 Depo of Burns - Official Certification of Eligibles, Internal Affairs
97. Ex. 8A Depo of Burns – Official Certification of Eligibles, Internal Affairs
98. Ex. 9 Depo of Burns - Def's 3rd Supp Resps to Plaintiff's First Set ROGs & RFPs
99. Ex. 10 Depo of Burns – Official Certification of Eligibles – Technical Support Services
100. Ex. 11 Depo of Burns - Official Certification of Eligibles, Troop L
101. Ex. 12 Depo of Burns - Official Certification of Eligibles, Internal Affairs
102. Ex. 13 Depo of Burns – Official Certification of Eligibles, BOI GED
103. Ex. 14 Depo of Burns - EEOC Charge of Discrimination
104. Ex. 15 Depo of Burns - promotional policy changes
105. Ex. 19 Depo of Burns - LDPS Human Resources - Discrimination & Harassment Complaints;
106. Stelly 1-257 - EEOC documentation;
107. Stelly 258 – 265 – operational memorandum
108. Stelly 290 - 301 - DPS Records Management Division
109. Stelly 302 – 304 - operational leadership text
110. Stelly 305 – 319 – data set
111. Stelly 326 – 330 – PO 229 and 207
112. Stelly 331 -346 – Chapter 7
113. PES documentation for Aaron Marcelle, LSP\_STELLY 1259-1290



114. PES documentation for Chavez Cammon, LSP\_STELLY 1291-1319
115. PES documentation for Hiram Mason, LSP\_STELLY 1320-1343
116. PES documentation for Lamar Davis, LSP\_STELLY 1344-1358
117. PES documentation for Robert Burns, LSP\_STELLY 1414-1464
118. PES documentation for Saleem El-Amin, LSP\_STELLY 1465-1498
119. PES documentation for Treone Larvadain, LSP\_STELLY 1499-1528
120. Plaintiff's employment/personnel file with the LSP;
121. Documents bates labeled LSP\_STELLY 00001-01258;
122. Documents produced by the State Police Commission in response to a subpoena regarding same and bates labeled SPC000001-000727;
123. All documents attached to any depositions taken in this matter;
124. State Police Commission Subpoena Duces Tecum Response;
125. 2024-02-20 FirstEval, LLC Expert Report (Dr. Melissa Kovacs);
126. 2024-05-31- Supplemental Report of Dr. Melissa Kovacs;
127. The complete file, including but not limited to the Expert Report of any expert retained by any party in this matter;
128. All documents and/or references on which any expert relied for his/her report;
129. Any and all documents produced by any party to this litigation during discovery;
130. Any and all impeachment and/or rebuttal evidence concerning Plaintiff;
131. All depositions taken in this litigation, including any exhibits that were introduced during those depositions;
132. All discovery exchanged in this matter;
133. All publicly available internet information related to Plaintiff;
134. Any other exhibits listed, offered, or proffered by any other party.

Defendant reserves the right to amend and/or supplement this list as discovery progresses.

Respectfully submitted,

**LIZ MURRILL**  
**ATTORNEY GENERAL**

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