

10TH JUDICIAL DISTRICT COURT

PARISH OF NATCHITOCHEs

STATE OF LOUISIANA

\*\*\*\*\*  
CALVIN W. BRAXTON, SR.

VS. C-90,284

LOUISIANA STATE TROOPERS ASSOCIATION  
AND JAY OLIPHANT  
\*\*\*\*\*

ZOOM DEPOSITION OF  
MONICA MANZELLA

Taken on Wednesday, February 3, 2021  
At the Law Office of  
MS. JILL CRAFT  
329 St. Ferdinand Street  
Baton Rouge, Louisiana 70802

REPORTED BY: JANICE WELCH, C.C.R.

\*\*\*\*\*

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APPEARANCES :

REPRESENTING THE PLAINTIFF :

MS. JILL CRAFT  
329 St. Ferdinand Street  
Baton Rouge, Louisiana 70802

REPRESENTING THE DEFENDANTS, MAJOR JAY OLIPHANT :

GOLD, WEEMS, BRUSER, SUES & RUNDELL  
2001 MacArthur Drive  
Alexandria, Louisiana 71301

BY: MICHAEL O'SHEE (VIA ZOOM)

REPRESENTING THE DEFENDANT, LOUISIANA STATE  
TROOPERS ASSOCIATION :

AVANT & FALCON  
429 Government Street  
Baton Rouge, Louisiana 70802

BY: MR. FLOYD FALCON (VIA ZOOM)

REPRESENTING MS. MONICA MANZELLA, STATE POLICE  
COMMISSION :

TAYLOR PORTER  
450 Laurel Street, 8th Floor  
Baton Rouge, Louisiana 70801

BY: MS. LENORE FEENEY (VIA ZOOM)

ALSO PRESENT: CALVIN BRAXTON, SR.

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S T I P U L A T I O N

It is stipulated and agreed by and between all parties that the deposition of MONICA MANZELLA is hereby being taken under the Louisiana Code of Civil Procedure for all purposes.

The witness, MONICA MANZELLA, has the right to read and sign the deposition; she chooses to reserve her right. The original is to be retained by Jill Craft for proper filing with the Clerk of Court.

All objections, except those as to the form of the question and the responsiveness of the answer, are hereby reserved until the time of the trial of the cause.

\* \* \* \*

Janice Welch, Certified Court Reporter in and for the State of Louisiana, officiated in administering the oath to the witness.

1 ZOOM DEPOSITION OF  
2 MONICA MANZELLA  
3 5940 MAGAZINE STREET, UNIT 102  
4 NEW ORLEANS, LOUISIANA 70115

5 having been first duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 (Deposition commenced at 12:35 p.m.)

9 BY MS. CRAFT:

10 Q Ms. Manzella, my name is Jill Craft and I  
11 represent Calvin Braxton, who is present and seated  
12 to my right, in connection with the lawsuit that's  
13 pending in Natchitoches Parish.

14 It's very important during the course of  
15 this deposition that you understand what I'm asking  
16 you, and if at anytime you do not, please tell me  
17 to stop and rephrase it. It's also important, nods  
18 of the head yes or no cannot be taken down by the  
19 court reporter, so you need to answer out loud.  
20 And my final instruction is you need, insofar as I  
21 may ask you to spell names of places or things, not  
22 to test your spelling, it's just a lot easier for  
23 our reporter to get those down as we go along. Is  
24 that fair enough?

25 A Yes.

1           Q       Would you give me your full name and  
2 address, please.

3           A       Monica Jean Manzella, 5940 Magazine  
4 Street, Unit 102, New Orleans, Louisiana 70115.

5           Q       Can you walk me through your educational  
6 background, starting where and when you graduated  
7 high school, please, ma'am.

8           A       I graduated from Arch Bishop Hannan High  
9 School in May of 1998.

10          Q       Is that Hannon, H-a-n-n-o-n?

11          A       I'm sorry?

12          Q       H-a-n-n-o-n?

13          A       No, it's H-a-n-n-a-n.

14          Q       Okay, thank you.

15          A       I attended and graduated from Spring Hill  
16 College in Mobile, Alabama in May of 2002, I  
17 attended and graduated from Loyola University  
18 School of Law in May of 2005, and I graduated -- I  
19 attended and graduated from the Naval Postgraduate  
20 School in March of 2016.

21          Q       And tell me what you studied at the Navel  
22 Postgraduate School.

23          A       I received a master's degree in security  
24 studies.

25          Q       And tell me what you did after your

1 **graduation from Loyola Law School in May of 2005.**

2 A I joined Leake & Andersson as an  
3 associate.

4 **Q Spell that, please.**

5 A Leake, L-e-a-k-e, and Andersson,  
6 A-n-d-e-r-s-s-o-n, a defense firm in New Orleans as  
7 an associate. I then worked as an associate at  
8 Burglass, B-u-r-g-l-a-s-s, and Tankersley,  
9 T-a-n-k-e-r-s-l-e-y, as an associate. I then  
10 joined King, Krebs, K-r-e-b-s, & Jurgens,  
11 J-u-r-g-e-n-s, as an associate. I left briefly to  
12 work for the Cleveland Browns and then returned to  
13 New Orleans. I worked in the law department for  
14 the City of New Orleans, then worked in security as  
15 chief security officer at Entergy in New Orleans,  
16 and currently work at Ready Responders.

17 **Q Okay, when did you work for Leake &**  
18 **Andersson?**

19 A 2005, after I passed the bar, until  
20 approximately the summer of 2007.

21 **Q And why did you leave them?**

22 A I was interested in doing commercial  
23 litigation.

24 **Q And so you left and went to work for**  
25 **Burglass?**

1 A Yes.

2 Q **And when did you start at Burglass?**

3 A Summer of 2007.

4 Q **Until when?**

5 A February of 2008.

6 Q **Okay, why so short?**

7 A I wanted to do more complex litigation  
8 and the work that I was doing was more of the  
9 insurance defense nature. I wanted to focus my  
10 practice on more commercial type cases.

11 Q **So you went to King, Krebs; is that**  
12 **correct?**

13 A Correct.

14 Q **And you went there when?**

15 A Beginning of 2008, I believe it was  
16 February.

17 Q **Until when?**

18 A I was there until approximately November  
19 of -- or excuse me, summer of 2014, I believe.  
20 However, there was a brief stint, I moved to  
21 Cleveland briefly from February to April of 2010.

22 Q **To do what?**

23 A Work for the Cleveland Browns in salary  
24 cap work and contract negotiations.

25 Q **So why so short?**



1           A       I was -- I had just gotten divorced and I  
2 wanted to leave New Orleans, I got a job, went to  
3 Cleveland. My dad had some heart problems and I  
4 wanted to come back home.

5           **Q       So then you returned to King, Krebs; is**  
6 **that correct?**

7           A       Correct.

8           **Q       And you remained an associate throughout?**

9           A       I remained an associate throughout.

10          **Q       So why did you leave there?**

11          A       I was approached about joining the law  
12 department at the City of New Orleans. A partner  
13 at King, Krebs had left and became head of the  
14 contracts department and she recruited me.

15          **Q       So when did you start for the City of New**  
16 **Orleans?**

17          A       The summer of, I believe, 2014.

18          **Q       And you stayed there until you left --**

19          A       I apologize, it may have been 2013. I  
20 would have to refer to my resume.

21          **Q       Okay, and then you went to Entergy, when?**

22          A       Entergy was February 2017.

23          **Q       So why did you leave the City of New**  
24 **Orleans?**

25          A       So I was with the city while I was

1 getting my master's degree in security studies and  
2 the opportunity at Entergy was to join the newly  
3 formed chief security office and to actually use my  
4 degree in security to apply that knowledge in  
5 policy work.

6 **Q So did you have a break in service**  
7 **between the City of New Orleans and Entergy?**

8 A I did not.

9 **Q Okay. And then now you're with Ready**  
10 **Responders, when did you start there?**

11 A November 12, 2018.

12 **Q So you were not with Entergy very long;**  
13 **is that right?**

14 A That is correct. I was there for about a  
15 year and -- February 2017 to November '18, so a  
16 year and some odd months.

17 **Q So why did you leave Entergy?**

18 A Because the -- a couple of friends of  
19 mine co-founded a mobile health care startup and I  
20 was hired as in-house counsel to do privacy and  
21 security work for the company. And furthered my  
22 experience that came from the master's degree.

23 **Q Okay, so that's where you are now at**  
24 **Ready Responders; is that right?**

25 A Correct.

1           Q     And you indicated that you are currently  
2 the in-house counsel there?

3           A     I am currently vice president of legal  
4 affairs.

5           Q     How many folks are employed with Ready  
6 Responders?

7           A     We had significant growth as a result of  
8 the pandemic, I believe we're now at about 750  
9 employees.

10          Q     And to whom do you report at Ready  
11 Responders?

12          A     Stephanie Noriea, the general counsel.

13          Q     Spell it, please.

14          A     N-o-r-i-e-a.

15          Q     Okay, at some point in time you served on  
16 the State Police Commission; is that right?

17          A     Correct.

18          Q     Tell me, were you nominated to your  
19 knowledge by someone or something to serve on the  
20 commission?

21          A     I don't recall that specifically, I  
22 recall being appointed by the governor.

23          Q     Okay, so how did that come about?

24          A     I filled out the general application for  
25 boards and commissions, I believe it was called,

1 with Ellen Palmantier, someone in her office and  
2 received --

3 Q Hold on, hold on, let me stop you. It's  
4 Ellen Palmantier, P-a-l-m-a-n-t-i-e-r?

5 A I believe that's how she spells it.

6 Q And I don't mean to stop you, I just want  
7 to try to get these spellings down so she's not  
8 asking me later on who are we talking about. So I  
9 don't mean to interrupt you, it's just easier.

10 A No problem.

11 Q So you filled out the general application  
12 to serve on any board or any commission; is that  
13 correct?

14 A Correct.

15 Q And did you know anything about the State  
16 Police Commission at that time?

17 A Other than that it existed, no.

18 Q Did you know anyone who served on the  
19 State Police Commission?

20 A No.

21 Q Did you know anyone who worked with the  
22 State Police Commission?

23 A No.

24 Q Did you know any state police officers?

25 A Yes.

1 Q Who?

2 A I went to school at the Navel

3 Postgraduate School with Rodney Hyatt.

4 Q Okay, were you all -- go ahead.

5 A I met Charlie Dupuy sometime during the  
6 summer before at a fund raiser.

7 Q Okay, Dupuy is D-u-p-u-y and Hyatt is  
8 H-y-a-t-t; is that correct?

9 A Correct.

10 Q Okay, you met Charlie Dupuy at a  
11 fundraiser you said the summer before, the summer  
12 before what?

13 A The summer before I was appointed to the  
14 commission, so that would have been 2016.

15 Q And --

16 A And I met Mike Edmonson once, as well.

17 Q Go ahead.

18 A I met Mike Edmonson in 2016, as well.

19 Q So when did you fill out the application?

20 A I don't recall the exact date. Perhaps  
21 the fall of 2016 or late summer of 2016, I don't  
22 recall when I did that.

23 Q So was your encounter with Mr. Dupuy  
24 and/or Mr. Edmonson the imprimatur for you to  
25 submit the application?

1           A       I'm sorry, what was the word that you  
2 used?

3           **Q       Imprimatur, encouragement for you to**  
4 **submit the application.**

5           A       No, I had met Mike Edmonson by  
6 happenstance when I was working with Rodney Hyatt  
7 on his thesis. Per our professor's recommendation,  
8 Rodney called me to help him do some editing work  
9 on his thesis. We were having lunch, Mike Edmonson  
10 happened to be passing by and stopped in and said  
11 hello, I was introduced.

12          **Q       Okay, so how long have you known Robby**  
13 **Hyatt?**

14          A       Since the beginning of the Naval  
15 Postgraduate School course, that would be September  
16 of 2014.

17          **Q       And were the two of y'all friends?**

18          A       We were classmates and we became friends.

19          **Q       Did anybody, Mr. Hyatt, Mr. Dupuy or Mr.**  
20 **Edmonson suggest to you filling out an application**  
21 **for serving on a board or commission?**

22          A       I recall being made aware that there  
23 would be an opening in my congressional district.  
24 I don't recall there being specific encouragement,  
25 it was just made known to me.

1 Q And who was it that made it known to you?

2 A I can't recall the specific individual.

3 Q Do you remember if it was one of the  
4 three folks, Hyatt, Dupuy or Edmonson?

5 A I believe, I recall it being Rodney but  
6 -- I believe it was Rodney.

7 Q And did you know anything about the  
8 opening in your district?

9 A Other than the individual who would be  
10 vacating the seat, no.

11 Q Who was that?

12 A I didn't know the individual that would  
13 be vacating the seat, no.

14 Q All right, who was it that was vacating  
15 the seat?

16 A Bill Goldring.

17 Q Do you know why Mr. Goldring was vacating  
18 the seat?

19 A Not at the time.

20 Q Do you now know why he vacated the seat?

21 A Yes.

22 Q Why?

23 A I believe that there was allegations or  
24 questions about political contributions and certain  
25 commission members at the time and certain

1 commission members elected to step down due to  
2 their choice as a result of certain restrictions  
3 put on commission members and what commission  
4 members are allowed to do with regard to political  
5 contributions.

6 **Q You said there were allegations regarding**  
7 **political contributions, what do you mean by that?**

8 A I was not on the commission or part of  
9 the investigations, so I'm not aware of them any  
10 more than allegations, I was just -- what I was  
11 aware of.

12 **Q When did you first hear about the**  
13 **Louisiana State Troopers Association?**

14 A It would have been after I became a  
15 member of the commission.

16 **Q You formally became a member of the**  
17 **commission when, ma'am?**

18 A I was appointed in October 2016 and I was  
19 sworn in in November of 2016.

20 **Q So tell me about the first meeting you**  
21 **attended, do you remember anything about it?**

22 A I remember being sworn in, I believe I  
23 signed an oath, I remember what I was wearing. I  
24 don't recall much. Honestly, at that meeting there  
25 was little -- very happy to be there and I was



1 trying to take it all in, so I don't remember  
2 specifics other than that.

3 Q Do you know at the time that you were  
4 sworn in, what Robby Hyatt's role was with either  
5 state police -- well, with state police first.

6 A No.

7 Q Did you have any understanding at any  
8 time what Mr. Hyatt's role was with state police?

9 A I know that he was above a certain rank,  
10 only because he attended Naval Postgraduate School  
11 and that was a prequalification for law enforcement  
12 officers to qualify for -- to apply for school.

13 Q Other than attending the Naval  
14 Postgraduate Academy, did you have any affiliation  
15 with any branch of military?

16 A No.

17 Q So how did you hear about that place?

18 A When I was working for the city I did  
19 contracts for New Orleans EMS, and the chief of  
20 EMS, Carl Flores, F-l-o-r-e-s, had said, you know,  
21 I see you're interested in public safety and  
22 security, there's this great course, if you are a  
23 governmental employee you qualify for a full  
24 scholarship, it's sponsored by The Center for  
25 Homeland Defense & Security through the Naval

1 Postgraduate School, you should think about  
2 applying. Thinking it would or believing it would  
3 enhance my knowledge and my career opportunities, I  
4 applied and was accepted.

5 **Q Okay, were you aware at anytime of any**  
6 **role Mr. Hyatt had with respect to the LSTA, the**  
7 **troopers' association?**

8 A At what time?

9 **Q At anytime.**

10 A I now know only through reading his  
11 deposition of his affiliation with LSTA. I know he  
12 was affiliated before but I was not aware of the  
13 specific role or title.

14 **Q What do you mean, reading his deposition?**

15 A I reviewed his deposition prior to this.

16 **Q Where did you get that from?**

17 A I was e-mailed the deposition by Lenore  
18 Feeney.

19 **Q What other depositions did you review?**

20 A I recall reviewing Rodney's, excuse me,  
21 Rodney Hyatt's, Trooper Oliphant, Mr. Braxton, T.J.  
22 Doss, Jay Aucion. I don't recall any others.  
23 There may have been but I don't recall. Excuse me,  
24 Jarod Riecke.

25 **Q And Riecke is spelled R-i-e-c-k-e?**

1           A       Yes, ma'am.

2           Q       Okay. What else did you review in terms  
3 of documents or depositions before your deposition  
4 today?

5           A       Only Mr. Braxton's petition and a  
6 supplemental petition, and a copy of  
7 interrogatories. Or excuse me, responses to  
8 interrogatories provided by Mr. Braxton that were  
9 part of the exhibits I believe that were sent over  
10 a little while ago. So I reviewed those exhibits  
11 as well.

12          Q       Okay, when did you get a copy of his  
13 petition and the supplemental petition?

14          A       This month, or excuse me, during the  
15 month of January 2021, I can't recall the exact  
16 date.

17          Q       Was that before or after you were aware  
18 of attempts to serve you at your place of  
19 employment?

20          A       I don't recall the chronology.

21          Q       But you were aware, were you not, that  
22 there were attempts to try to serve you at your  
23 place of employment, right?

24          A       No, ma'am.

25          Q       Never heard of that?

1 A No.

2 Q Were you aware of attempts to try to  
3 serve you at your residence?

4 A I only learned of that after.

5 Q After how?

6 A Excuse me, after -- I was called by your  
7 office on January 28 and was told that I was  
8 allegedly served at my home or attempted to be  
9 served at my home, and that's the first time I  
10 heard of that.

11 Q That was last week; is that right?

12 A January 28, 2021.

13 Q Right. Last week, correct?

14 A Correct.

15 Q So here's the reason for my question, you  
16 said that you received a copy of Mr. Braxton's  
17 petition and supplemental petition in January of  
18 2021, that was before my office contacted you on  
19 January 28, 2021; is that correct?

20 A Yes.

21 Q From whom did you receive a copy of Mr.  
22 Braxton's petition and supplemental petition?

23 A Lenore Feeney.

24 Q And when did you receive copies of the  
25 depositions that you referenced?

1           A       In January 2021.

2           Q       **That was before you received**  
3 **communications from my office on January 28?**

4           A       I don't recall the exact date I received  
5 all of the depositions.

6           Q       **But did you start receiving some of the**  
7 **depositions before my office contacted you on**  
8 **January 28?**

9           A       Yes.

10          Q       **So, why? Let me ask, if you didn't know**  
11 **that we were attempting to take your deposition,**  
12 **that we had pursued efforts to do so, can you tell**  
13 **me why it is you would have received copies of my**  
14 **client's petition and supplemental petition and**  
15 **some of the depositions taken in this case?**

16          A       Well, Ms. Craft, I was aware that I was  
17 on a list of potential deponents a few months ago.  
18 I was never properly served with a notice but I did  
19 want to be aware of what was going on in the case,  
20 so I wanted to review documents.

21          Q       **So, then did you reach out to Ms. Feeney**  
22 **and ask for that stuff?**

23          A       I can't recall if I reached out to her or  
24 if she called me. We have been in contact over the  
25 past few months.

1           Q       Ms. Manzella, do you have any idea how  
2 many times we have attempted to coordinate your  
3 deposition in the last four months?

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

5           Q       Do you know how many times the sheriff's  
6 department has attempted to serve you at your  
7 office and your place of employment, and copies of  
8 those notices have been served on counsel in this  
9 case?

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

11          Q       Have you talked to anybody else you  
12 served on the commission with in the last year?

13          A       Yes.

14          Q       Who?

15          A       In the last year I've spoken to T.J.  
16 Doss.

17          Q       When was the last time you spoke to Mr.  
18 Doss?

19          A       Christmas Eve of 2020.

20          Q       And what did the two of y'all talk about?

21          A       We talked about our personal  
22 relationship.

23          Q       What does that mean?

24          A       We talked about the relationship that we  
25 have separate and apart from any professional

1 relationship.

2 Q I don't know what that means, what does  
3 that mean?

4 A We talked about our desire to continue  
5 being friends, and that is the last time I spoke to  
6 him.

7 Q I don't mean to be indelicate, but when  
8 the two of you served on the commission, you and  
9 Mr. Doss together, did you have a relationship of a  
10 highly personal nature?

11 A I don't know what you mean by highly  
12 personal, we had a personal relationship.

13 Q Okay. Ma'am, there were -- go ahead.

14 A We had a personal relationship, we were  
15 always friends, we had a dating relationship and we  
16 continue to be friends today.

17 Q Okay. Have you ever discussed either Mr.  
18 Braxton's lawsuit or a lawsuit filed by Cathy  
19 Derbonne with T.J. Doss?

20 A No other than us being aware that it was  
21 filed. We did not discuss the litigation together,  
22 he and I.

23 Q Did you discuss Mr. Braxton's claims with  
24 anyone?

25 A I can't recall all of the people I may

1 have mentioned that Calvin Braxton filed a lawsuit  
2 with, I discussed the specifics with my attorney,  
3 Lenore Feeney. And other than discussing what is  
4 publicly available in a position, I don't recall  
5 everybody I mentioned to or discussed it with.

6 **Q I don't want to know what you and Ms.**  
7 **Feeney discussed but I do want to know when Ms.**  
8 **Feeney became your attorney.**

9 A A few months ago, when she first made me  
10 aware that I was a potential deponent.

11 MS. CRAFT:

12 Can we take about a three minute break?

13 I need to return a text real quick. Three  
14 minutes. Thank you.

15 (Off the record.)

16 BY MS. CRAFT:

17 **Q Okay, go ahead.**

18 A I wanted to clarify, I misspoke earlier.  
19 Just in the break thinking about, I was aware that  
20 someone went to my office with a notice but I was  
21 not at the office at the time. I've been working  
22 remotely.

23 **Q Did you know --**

24 A I just want to be --

25 **Q Go ahead.**



1           A       Sorry, I wanted to clarify my previous  
2 statement, I wanted to make sure I put that on the  
3 record.

4           Q       And did you know that that deputy left a  
5 card for you to contact him?

6           A       No, ma'am, that is -- I never got that  
7 card. I was not aware of that card.

8           Q       And you indicated that you were aware  
9 they came one time, were you aware that they came  
10 several times to try to serve you at your place of  
11 employment?

12          A       No, ma'am, I was not.

13          Q       And you were unaware of the amount of  
14 communication we had with counsel trying to set  
15 your deposition?

16          A       I was unaware, yes.

17          Q       Do you have any idea how much money was  
18 spent trying to get you served with a subpoena,  
19 ma'am?

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

21          Q       You were actually served last week; is  
22 that right?

23          A       No, ma'am, I was not.

24          Q       Okay, you have seen the sheriff's return;  
25 am I right?

1           A       No, ma'am, I have not seen the sheriff's  
2 return other than -- excuse me, let me restate  
3 that. I have not been provided with a sheriff's  
4 return from your office. I am aware of -- from the  
5 Website, from the Natchitoches Parish office that a  
6 friend of mine looked up for me, that I see where  
7 there was service at the general address but I was  
8 never personally served with a subpoena or the  
9 notice for this deposition.

10           **Q       Have you seen the sheriff's return**  
11 **executed by the sheriff's office in New Orleans**  
12 **indicating that they personally served you at your**  
13 **residence?**

14           A       No, ma'am, I haven't. I don't recall  
15 that I have. If I was properly served I would have  
16 appeared. If I was properly served with a  
17 subpoena, I would have appeared.

18           **Q       I understand, Ms. Manzella, all I'm**  
19 **asking is if you've seen it. We certainly have**  
20 **sent out --**

21           A       I don't recall that I have, no, ma'am.

22           **Q       We certainly have sent it to your**  
23 **attorney. You said that you had somebody in**  
24 **Natchitoches look up the service return?**

25           A       I'm sorry, I didn't mean to interrupt

1 you, I apologize, I know I'm not supposed to do  
2 that. I apologize.

3 Q Did you have something to say?

4 A I was answering your question before you  
5 finished, that's my fault.

6 Q Okay. You indicated that you had  
7 somebody in Natchitoches look up the service return  
8 up there, who did that for you?

9 A No, ma'am, I didn't have someone in  
10 Natchitoches, I have a friend of mine, another  
11 attorney, who had access to this site to look it up  
12 for me.

13 Q Okay. You indicated that, and correct  
14 me, kind of get me back to the thing. When were  
15 you sworn in to the board or the commission?

16 A It would have been the morning of, right  
17 before the November 2016 commission meeting. I  
18 don't recall the exact date.

19 Q And am I right that at the same meeting  
20 you were sworn in on your first day of serving on  
21 the commission, you were elected vice chair?

22 A That was not the same meeting, I don't  
23 recall that. I don't remember.

24 Q Well, when were you elected vice chair?

25 A I don't remember the date that I was

1 elected vice chair. I know that I was, I just  
2 don't remember when.

3 Q Well, how long after you served on the  
4 commission before you were elected vice chair?

5 A I don't remember.

6 Q Do you know who else was seeking to be  
7 vice chair at the same time?

8 A Mr. Braxton.

9 Q And how do you know that?

10 A Because he called me --

11 Q When did he call you?

12 A -- and he asked for my support for him to  
13 be vice chair.

14 Q And what did you tell him?

15 A I said that I had understood that I was  
16 also suggested as a possible vice chair.

17 Q Uh-huh, and then what?

18 A I don't recall anything else being said  
19 on that phone call.

20 Q Who had suggested you be vice chair?

21 A One of the other commissioners, I could  
22 not tell you which one at this time. I don't  
23 remember. I think it was either Jared Riecke or  
24 T.J. Doss, I don't recall which one.

25 Q Describe for me your relationship with

1 Mr. Riecke.

2 A A fellow commissioner.

3 Q Did you know him before you were  
4 appointed to the commission?

5 A No, ma'am.

6 Q How about after you joined the  
7 commission, did the two of y'all become friends?

8 A We became friendly but -- I would  
9 consider us friends but we're not close friends.

10 Q When was the last time you talked to him?

11 A Perhaps a year ago, maybe a little less.

12 Q Do you remember what you talked about?

13 A I don't.

14 Q Have you ever talked to Mr. Riecke about  
15 any of the claims made by Calvin Braxton or to  
16 Cathy Derbonne?

17 A I don't recall that I have.

18 Q You indicated, and again, I don't want to  
19 be indelicate, that you had a dating relationship  
20 with Mr. Doss, can you give me a time frame for  
21 that?

22 A I don't recall the exact date that we  
23 started dating but we ended our dating relationship  
24 quite recently and we remain friends today.

25 Q Did you start dating him after you got on

1 the commission or before you were on the  
2 commission?

3 A After.

4 Q And do you recall how long after?

5 A I don't.

6 Q Ma'am, did --

7 A A few months maybe, a couple of months  
8 maybe.

9 Q Can you tell me what relationship, if  
10 any, you have with Mr. Oliphant?

11 A I don't have a relationship with Mr.  
12 Oliphant, I've never met him.

13 Q Have you ever spoken to him?

14 A I don't believe I have. I don't believe  
15 I've met him.

16 Q We talked about your relationship with  
17 Mr. Hyatt, tell whether or not you ever talked to  
18 Mr. Hyatt about any activities Mr. Braxton is  
19 alleged to have undertaken, anything Mr. Braxton  
20 supposedly did.

21 A In regard to what? I just don't  
22 understand the question.

23 Q Okay. Have you ever talked to Mr. Hyatt  
24 about Mr. Braxton?

25 A I'm sorry, in what capacity?

1           **Q     In any capacity.**

2           A     I recall asking Rodney about an  
3 allegation I had heard about me being followed and  
4 my car being photographed, and the allegations were  
5 that either Mr. Braxton was facilitating it or was  
6 a part of it. And I had asked Rodney if there was  
7 a way I could -- or what was the process for me  
8 going about finding out if I was actually being  
9 followed.

10          **Q     Okay. When was that?**

11          A     I believe that was -- it was in 2017, I  
12 don't recall in what time frame but it would have  
13 been sometime between March and perhaps September  
14 of 2017. I don't recall, I apologize, I don't  
15 recall.

16          **Q     And why do you have that specific March  
17 to September 2017 time frame in your head?**

18          A     Just because I don't recall hearing the  
19 allegation prior to March 2017, but I could have,  
20 and I'm trying to remember when the internal  
21 affairs investigation took place that was  
22 precipitated by that request that I made to Mr.  
23 Hyatt, and that's why I chose that time frame, but  
24 I don't recall the exact dates.

25          **Q     Okay, you said a lot. First of all, who**

1 **did you first hear this allegation from?**

2 A It was not one specific individual that I  
3 can point to, it was general knowledge at the time  
4 amongst a lot of people speaking to each other at  
5 the time that there were allegations that Mr.  
6 Braxton had photographs of cars in front of my  
7 home, had photographs of my car in certain places  
8 around Baton Rouge, and so I became concerned.

9 Q Okay, you said it was general knowledge,  
10 I need you to tell me every person you remember  
11 repeating some allegation that Mr. Braxton had been  
12 following you and had your car photographed.

13 A I mean, I recall T.J. and I speaking  
14 about it but I don't remember who said anything --  
15 I can't guess as to who said something and I don't  
16 want to put something somebody said on someone that  
17 I can't remember. I mean, I recall T.J. and I  
18 talking about it but I don't recall who  
19 specifically told me that.

20 Q Did you ever see any photographs of your  
21 car?

22 A I believe I saw a photo when I was  
23 questioned during the internal affairs  
24 investigation, but other than that, no.

25 Q Who questioned you during the internal



1 **affairs investigation?**

2 A I don't recall the names of the two  
3 troopers, Chavez maybe was the name of one, Ms.  
4 Faye Morrison was present.

5 Q **I'm sorry, who?**

6 A Faye Morrison was present.

7 Q **Okay.**

8 A The gentleman, Chavez, and I can't recall  
9 if that's his first or last name, and then another  
10 gentleman was there as well. It took place in New  
11 Orleans but I don't recall who else was there.

12 Q **In New Orleans where?**

13 A It was in Benson Tower.

14 Q **You said you were shown a photograph,  
15 what photograph?**

16 A I believe, as I recall, I was shown a  
17 photograph I believe of my car.

18 Q **And where was your car?**

19 A In the parking lot in front of the  
20 Department of Corrections, I believe, in Baton  
21 Rouge where the commission meetings used to be  
22 held, in that parking lot in front of the building.

23 Q **So was the question, hey, is this your  
24 car, or was the question -- let me finish. Or was  
25 the question, we found this photograph, can you**

1 tell us whether or not it's your car?

2 A I don't remember.

3 Q Well, how do we get to the allegation  
4 being that Calvin Braxton had you followed as  
5 opposed to, I don't know, anybody else?

6 A Because that's the allegation that I  
7 heard, that Mr. Braxton had facilitated individuals  
8 following my car or taking photographs of my car or  
9 other cars in front of my home. It was something I  
10 heard, I was concerned, I asked the question.

11 Q Did you ever see anybody following you?

12 A I saw cars when I lived -- when I was in  
13 New Orleans I saw cars driving slowly past my  
14 house. I was on high alert at the time but I  
15 cannot corroborate that that was in fact anyone  
16 following me or that was actually something that  
17 corroborated any of my fears.

18 Q Why were you on high alert?

19 A Because I had been questioned -- my  
20 credibility, integrity and reputation had been  
21 questioned from the -- pretty close after I joined  
22 the commission, and the allegations that I had  
23 heard, like I said, started maybe March of 2017,  
24 and I was concerned, it was something I never  
25 experienced before and I was concerned.

1           **Q     How was your credibility and integrity**  
2 **being questioned?**

3           A     I believe a blog post and/or questions  
4 about my -- the propriety of me serving on the  
5 commission took place maybe at my second meeting  
6 because of my current employment with the City of  
7 New Orleans. I was quite upset about it.

8           **Q     Do you think it's not okay for somebody**  
9 **to question whether or not you can serve in two**  
10 **capacities, one for a state commission and the**  
11 **other while being actively employed for a city**  
12 **government?**

13          A     I believe it's okay to question, always;  
14 I don't believe it's okay to accuse without  
15 foundation.

16          **Q     So, who was --**

17          A     Or to intimate or suggest that I was  
18 somehow being inappropriate without foundation.

19          **Q     Okay, so who was doing that?**

20          A     I believe it was in the Louisiana Voice.

21          **Q     Okay, so that's not Calvin Braxton,**  
22 **that's the Louisiana Voice people?**

23          A     I have no idea whether, or if Mr. Braxton  
24 had any involvement with Louisiana Voice.

25          **Q     Okay. So as far as you know, Mr. Webre**

1 is at Louisiana Voice, you have no evidence that  
2 Calvin Braxton was in any way involved in the  
3 questioning or the propriety of you sitting on the  
4 commission while being employed by the City of New  
5 Orleans; is that right?

6 A No, ma'am, as I said, they were  
7 allegations.

8 Q But they weren't allegations by Mr.  
9 Braxton, correct?

10 A It was all a part of the same anxiety and  
11 fear that I had at the time. Allegations were  
12 coming across from all different places, through  
13 the media, through what I had heard in my mind they  
14 were all part and parcel of the same thing, or the  
15 same -- they were all related to the commission and  
16 my service on it. I asked questions about the  
17 veracity of what I heard.

18 Q Okay, again, you said a lot. You said  
19 there were allegations through the media, what  
20 allegations?

21 A Through the blog post that it was  
22 inappropriate for me to sit on the commission.

23 Q Okay. And is that the sum and substance  
24 of what you're claiming are questions about your  
25 credibility and integrity, the propriety --

1           A       Well, also --

2           **Q       Let me finish.  The propriety of you**  
3 **serving on the commission while also being employed**  
4 **with the City of New Orleans?**

5           A       That one blog post and the questions at  
6 the meeting or the suggestions at the meeting with  
7 regard to my employment with the City of New  
8 Orleans, yes, that specific thing, yes.

9           **Q       Who asked the questions at the meeting?**

10          A       Tom Aswell.

11          **Q       A-s-w-e-l-l, he's with the Louisiana**  
12 **Voice?**

13          A       I believe so, or he was at the time, I  
14 don't know if he still is.

15          **Q       And he was asking questions about how you**  
16 **could serve in two capacities?**

17          A       No, he was asking about the propriety of  
18 me serving on the board when I handled contracts  
19 for the New Orleans police department.

20          **Q       Okay.  Again, you have no evidence that**  
21 **Mr. Braxton was in any way involved in the**  
22 **questioning; is that right?**

23          A       That's why I said I heard allegations  
24 about Mr. Braxton's involvement, which is why I  
25 asked questions.

1           Q       Okay, you heard allegations that Mr.  
2       Braxton was involved how?

3           A       Not with regard to -- not with regard to  
4       the blog post about my position with the City of  
5       New Orleans, the allegations with Mr. Braxton  
6       concerned me being followed, pictures of my car  
7       being taken, and that is what those allegations  
8       concerned with regard to Mr. Braxton. I apologize  
9       if I misspoke and confused the two. What I meant  
10      to say is that, the allegations had been made about  
11      me from the beginning and that is what formed my  
12      mental state at the time.

13          Q       Okay, were you ever able to verify in any  
14      way, first of all, that there were pictures being  
15      taken of your car by or at the direction of Mr.  
16      Braxton?

17          A       No, I was not.

18          Q       Were you ever able to verify in any way  
19      that you were being followed by or at the direction  
20      of Mr. Braxton?

21          A       No, I was not.

22          Q       In fact, did anybody ever verify that  
23      there were ever pictures taken of your car?

24          A       I believe I saw pictures during that  
25      internal affairs investigation.

1           Q     You told me one, were there more than  
2 one?

3           A     I don't recall.

4           Q     Do you know where the pictures supposedly  
5 came from?

6           A     I don't.

7           Q     And this being followed business, did  
8 anybody ever tell you, hey, we confirmed you were  
9 being followed?

10          A     Well, I believe it was verified in the  
11 August 2017 blog post in the Louisiana Voice where  
12 I was in fact being followed and photographed.

13          Q     Verified by whom?

14          A     The pictures were on the internet.

15          Q     Pictures of what?

16          A     Of me and T.J. Doss.

17          Q     You and T.J. Doss where?

18          A     Coming out of a movie theater.

19          Q     Okay, where else?

20          A     Excuse me?

21          Q     Where else?

22          A     There were a photograph of he and I in  
23 the lobby of the Watermark Hotel, there was also a  
24 video of that in the blog post, as well.

25          Q     Okay, do you have any evidence that Mr.

1 **Braxton was in any way involved in that?**

2 A No, I don't.

3 Q **And at the time, when was it that you and**  
4 **Mr. Doss were at the lobby of the Watermark Hotel?**

5 A I'm sorry, can you repeat the question?

6 Q **When were you guys at the lobby of the**  
7 **Watermark Hotel?**

8 A I can't recall the exact date in August,  
9 but it was on the date -- it was a date in August,  
10 the afternoon or the evening of the commission  
11 meeting.

12 Q **Okay. So am I correct that you and Mr.**  
13 **Doss were at the Watermark Hotel for a commission**  
14 **meeting?**

15 A No, ma'am, you're not.

16 Q **Okay, you guys had been at the hotel**  
17 **earlier in the day?**

18 A No, ma'am, we had not. I was checking  
19 in.

20 Q **Okay, where was the commission meeting**  
21 **being held?**

22 A Where they were typically held at the  
23 time, I don't recall the name of that building, I  
24 think it was perhaps the Department of Corrections,  
25 I'm not exactly sure of the name of the building.



1 It's where the executive director's office was, all  
2 of the executive offices were at the time --

3 Q In Baton Rouge?

4 MR. FALCON:

5 Objection --

6 BY MS. CRAFT:

7 Q In Baton Rouge; is that right?

8 A Oh, yes, ma'am.

9 Q And the Watermark Hotel is?

10 A In Baton Rouge.

11 Q And so, these pictures and video of you  
12 and T.J. in the lobby, was that before or after the  
13 commission meeting?

14 A Well after.

15 Q Okay. And when you came to town, ma'am,  
16 did you get a per diem to pay for your hotel room?

17 A The per diem was for gas and food, I paid  
18 for the hotel with my own personal credit card.

19 Q Was there an ability that you had to get  
20 reimbursed for the hotel room?

21 A I did not submit a reimbursement for the  
22 hotel room.

23 Q Okay, I understand, that wasn't my  
24 question. Did you have the ability to submit a  
25 request for reimbursement for the hotel room?

1           A       There was -- I believe we got a per diem  
2 but it wasn't specified in terms of what it was  
3 used for, but I don't recall the exact amount of  
4 it.

5           Q       Was the allegation by the Louisiana Voice  
6 the fact that you and Mr. Doss both received a per  
7 diem but stayed in one hotel room together, was  
8 that the allegation?

9           A       That was the allegation. I believe for  
10 the sum and substance I would have to refer back to  
11 the article, but there was an allegation made.

12          Q       Was that a false allegation or a true  
13 one?

14          A       False.

15          Q       Okay. And were you and Mr. Doss hiding  
16 your relationship in August of 2017?

17          A       No.

18          Q       So was it well-known that you and Mr.  
19 Doss were dating each other while both of y'all  
20 served on the commission together?

21          A       I don't know if it was well-known or not.

22          Q       Did you ever deny that relationship while  
23 the two of y'all served on the commission together?

24          A       I was never asked. I had no occasion to  
25 deny it.

1 Q Okay.

2 A That I recall.

3 Q Okay. So you saw photographs on the  
4 internet, you have no idea or you don't have any  
5 evidence that Mr. Braxton was involved.

6 A No.

7 Q When did internal affairs -- and was that  
8 internal affairs for state police?

9 A Yes, ma'am.

10 Q When did they get involved?

11 A Ma'am?

12 Q When did they get involved?

13 A It was after I resigned from the  
14 commission. I believe it was at the end of 2017.

15 Q So when was that?

16 A I resigned towards the end of August  
17 2017.

18 Q When you resigned, was Cathy Derbonne  
19 still the executive director?

20 A No, ma'am.

21 Q What happened to her?

22 A She resigned in January of 2017.

23 Q Okay. So you indicated or started  
24 telling us that you talked to Mr. Hyatt about an  
25 allegation that Mr. Braxton was having you followed

1 in your car and photographed, and you said as a  
2 result of that discussion you had with Mr. Hyatt,  
3 there was an internal affairs investigation at  
4 state police; is that right?

5 A Yes. I had spoken to Mr. Hyatt about my  
6 concerns and asked him the process. He had, I  
7 believe, asked a question to his contact within  
8 state police, and quite honestly, the next thing I  
9 knew there was an internal affairs investigation  
10 happening.

11 Q When you talked to Mr. Hyatt, you  
12 specifically used Mr. Braxton's name; am I correct?

13 A I don't recall that.

14 Q But he did, he being Mr. Hyatt?

15 A I don't recall that.

16 Q When you were being questioned in the  
17 internal affairs investigation, were you questioned  
18 about your interactions with Mr. Braxton?

19 A I don't remember.

20 Q Did you tell somebody that you thought  
21 Mr. Braxton, or you had been told Mr. Braxton was  
22 behind you being followed?

23 A Can you repeat the question?

24 Q Did anybody tell you or did you tell  
25 anybody that you had been previously told Mr.

1     **Braxton was having you followed and/or**  
2     **photographed?**

3             A     I believe I discussed it with T.J.

4             Q     Well, you told me when you talked to Mr.  
5     Hyatt, and I wrote it down to make sure I didn't  
6     get it wrong, you discussed with him the allegation  
7     that you were being followed and that your car was  
8     being photographed and you said by Mr. Braxton.

9             A     Excuse me, I heard that it was -- I heard  
10    an allegation that Mr. Braxton was somehow  
11    affiliated and that's why I had the question. I  
12    did not say it was absolutely him, I did not say I  
13    had evidence, I did not say it was him, I said I  
14    had heard, I was concerned, I wanted to get to the  
15    bottom of it.

16            Q     So when you say you asked the question,  
17    you mean you asked Mr. Hyatt to have somebody at  
18    state police look into the allegation of whether or  
19    not Mr. Braxton was having you followed and/or  
20    photographed?

21            A     I asked Mr. Hyatt what the process or  
22    procedure was for me going about making a request  
23    and finding out.

24            Q     The request for what?

25            A     To find out if I was actually being

1 followed.

2 Q By Mr. Braxton?

3 A By anyone.

4 Q You never said Mr. Braxton? Because  
5 that's not what you said before.

6 A Yes, it is, ma'am. What I said was, I  
7 was aware of the allegation that Mr. Braxton was  
8 involved or had some part in me being followed by  
9 someone. I asked the question to Rodney, what was  
10 the process or procedure for finding out if anyone  
11 was following me, and then the internal affairs  
12 investigation happened.

13 Q So you never used Mr. Braxton's name in  
14 your discussion with Mr. Hyatt at all?

15 A I may have, I don't recall exactly. What  
16 I heard with the allegations were at the time, I  
17 most likely did, but I don't recall for sure that  
18 conversation's specifics of that, that was over  
19 three years ago. I don't recall.

20 Q And you can't tell us who it was that  
21 relayed these allegations that Mr. Braxton was  
22 somehow involved?

23 A It was told to me from more than one  
24 source. I recall a specific conversation that I  
25 was told about from T.J. that Mr. Braxton said that

1 I would be collateral damage and could I handle it.

2 Q Okay, who else?

3 A That's it.

4 Q Any other source about this business  
5 about Mr. Braxton somehow being involved and having  
6 you followed or photographed?

7 A I don't recall anyone specifically that I  
8 can give you the name of.

9 Q Except Mr. Doss; is that correct?

10 A Correct.

11 Q And your interactions with Mr. Braxton  
12 while he was on the commission, how would you  
13 characterize those?

14 A We didn't speak much. We had one  
15 interaction where he had said if I ever wanted to  
16 stay -- if I ever needed to stay over in Baton  
17 Rouge to let him know because he had some hotels in  
18 the area. We had perhaps a conversation about New  
19 Orleans or Mardi Gras one or two times, but that's  
20 it.

21 Q But there wasn't anything untoward or  
22 unprofessional about him telling you, hey, I own a  
23 bunch of hotels here if you need to stay over, or  
24 you and he talking about Mardi Gras; am I correct?

25 A I didn't suggest that there was.

1           Q       So would you characterize your  
2 interactions with Mr. Braxton the whole time as  
3 being businesslike, professional, friendly?

4           A       Between he and I specifically, we had  
5 nondescript discussions.

6           Q       Okay, so when did you form a negative  
7 opinion of Mr. Braxton?

8           A       I never said I had a negative opinion of  
9 Mr. Braxton.

10          Q       I'm sorry, did I misstate when you said  
11 you had anxiety because it had been related to you  
12 by several sources that Mr. Braxton was having you  
13 followed?

14          A       I had anxiety about all of the things  
15 that I was questioned about or accused of, and  
16 allegations that were made from when I joined the  
17 commission to when I resigned and thereafter. It  
18 was all part and parcel of my anxiety.

19          Q       So you never had a negative impression  
20 about Mr. Braxton; am I correct?

21          A       My impression of Mr. Braxton was neither  
22 positive or negative.

23          Q       But the only person that you can recall  
24 that told you anything negative about Mr. Braxton  
25 was T.J. Doss, who said that Mr. Braxton said you



1     **could be collateral damage; am I correct?**

2           A     I'm not saying he was the only one, I'm  
3     saying that's the only person I can absolutely  
4     recall.  There was other sources, other people that  
5     were discussing the allegation, I just can't recall  
6     exactly who they were.  I just -- I remember T.J.  
7     because we talked a lot.

8           Q     **Do you remember any of the circumstances**  
9     **when any of these discussions occurred?**

10          A     Which discussions?

11          Q     **The ones about Mr. Braxton.**

12          A     With who?

13          Q     **Ma'am, I don't know, I'm asking any of**  
14     **the circumstances.  You said the only person I can**  
15     **remember saying anything like that was T.J. Doss, I**  
16     **just remember there were these discussions, so I**  
17     **said, well, all right, if you can't remember names,**  
18     **let's talk about circumstances, what do you**  
19     **remember?**

20          A     I remember the meeting, the only specific  
21     thing I recall is that statement was made by Mr.  
22     Braxton to Mr. Doss at the Marriott, some meeting  
23     they had at the Marriott.

24          Q     **You were present?**

25          A     No, ma'am, I was not.

1           Q       So again, this is something Mr. Doss told  
2 you.

3           A       Correct.

4           Q       Did anybody else tell you that?

5           A       No, ma'am.

6           Q       Okay, do you know what the meeting at the  
7 Marriott was about?

8           A       I don't.

9           Q       Do you know if it had to do with Cathy  
10 Derbonne?

11          A       No, I don't.

12          Q       When did you first learn that Cathy  
13 Derbonne was being proposed to be removed from her  
14 position?

15          A       I am not aware that I was ever -- I ever  
16 had knowledge that she was proposed to be removed  
17 from her position.

18          Q       Or her job duties changed.

19          A       No, ma'am, I was not aware that it was  
20 being proposed that her job duties would be  
21 changed.

22          Q       Do you typically review the agendas of  
23 meetings before they occur?

24          A       Yes, ma'am, I do.

25          Q       Do you remember there being any agenda

1 **items relating to Cathy Derbonne?**

2 A I remember for the January meeting, the  
3 agenda was to discuss her professional capacity but  
4 I don't recall there being a reference to a change  
5 in duty or role.

6 Q Did you have any discussions with T.J.  
7 Doss about Cathy Derbonne's continued employment as  
8 the executive director?

9 A Not that I recall.

10 Q Did you know that he had talked to Cathy  
11 Derbonne and told her that she needed to resign or  
12 that she would be publically humiliated?

13 A No, ma'am, I'm not aware of that  
14 conversation happening.

15 Q Well, you said you were aware there was  
16 an agenda item to discuss her professional,  
17 whatever it is, competence.

18 A Capacity.

19 Q Capacity. Do you know how that item got  
20 on the agenda?

21 A I believe Mr. Riecke proposed that agenda  
22 item.

23 Q How do you know that?

24 A That's my recollection from my knowledge  
25 at the time.

1           **Q     Did you talk to Mr. Riecke about that?**

2           A     I don't recall if I spoke to him or I was  
3 just aware that he perhaps told me, I don't  
4 remember.

5           **Q     Did you speak with anyone on the**  
6 **commission, that includes Mr. Riecke or Mr. Doss or**  
7 **anybody else, about whether or not Cathy Derbonne**  
8 **should remain as the executive director?**

9           A     I recall that the agenda item was being  
10 proposed and that we discussed that that agenda  
11 item would be on the agenda, but we did not have  
12 any discussions about that determination  
13 beforehand, no, not that I recall.

14          **Q     Who is the "we" having the discussions?**

15          A     You mentioned Mr. Riecke and Mr. Doss, so  
16 that's how I was answering the question.

17          **Q     Anybody else?**

18          A     Not that I recall, no.

19          **Q     So that's the "we" that was discussing**  
20 **it, you, Mr. Doss and Mr. Riecke?**

21          A     No, ma'am, we weren't discussing it,  
22 that's not what I said. I said that I was aware  
23 that Mr. Riecke proposed that agenda item and got  
24 that agenda item put on the agenda, I was aware  
25 that it was proposed by Mr. Riecke but we did not

1 have discussions about it, no.

2 Q I'm sorry, I just am asking you about  
3 what I wrote down as I understood your testimony,  
4 "we discussed it being on the agenda," so I was  
5 simply asking, who is the "we."

6 A Oh, my apologies. I did not mean to say  
7 that -- if I said that we discussed it beyond the  
8 agenda, I did not -- that's not what I meant to  
9 say, because I did not have any discussion about it  
10 being on the agenda. I was advised that it was  
11 being put on the agenda, and I don't recall who  
12 told me but I recall that Mr. Riecke proposed it  
13 being on the agenda.

14 Q Okay. And ma'am, did you ever hear  
15 anything about either Mr. Riecke or Mr. Doss or  
16 both of them meeting with Cathy Derbonne before the  
17 January 2017 meeting?

18 A No, ma'am.

19 Q Were you aware of any allegation that  
20 Cathy Derbonne had somehow lied as it related to  
21 some budgetary item or some item?

22 A I was aware that she represented to  
23 certain members of the legislature that the  
24 commission approved the budget that she was  
25 proposing. I know that I had not approved any

1 budget being proposed.

2 Q Okay, so tell me how you learned about  
3 all of that.

4 A I watched the legislative hearing, or  
5 parts of it.

6 Q From where?

7 A My office at City Hall.

8 Q On the computer?

9 A I can't recall if it was on my work  
10 computer or my phone, I can't recall, but I watched  
11 it.

12 Q And why did you watch it?

13 A Because I couldn't attend in person.

14 Q Who from the commission attended?

15 A I believe Mr. Braxton and Mr. Simien.

16 Q And do you know where Mr. Doss watched  
17 the testimony?

18 A I don't.

19 Q Do you know if he watched it from some  
20 sort of sports bar with Mr. Riecke and others?

21 A No, I don't.

22 Q You certainly weren't there watching it  
23 with them, uh?

24 A I was not aware that they were watching  
25 it anywhere and I certainly wasn't with them

1 watching it.

2 Q Well, did you and Mr. Doss discuss Mr.  
3 Vaughn's statements in the legislative budget  
4 process?

5 A I can't recall if we discussed -- when  
6 you say discussed, I'm not exactly sure that we  
7 discussed the entirety of it. I may have asked did  
8 you approve something, did you approve the budget  
9 because I know I didn't.

10 Q Anything else?

11 A Not that I recall.

12 Q And what about with any other members of  
13 the commission, did you have a similar discussion  
14 with them?

15 A I don't recall.

16 Q Ma'am, what if anything do you know about  
17 the internal affairs investigation at state police  
18 involving Mr. Braxton, other than you being  
19 questioned at Benson Towers?

20 A Benson, B-e-n-s-o-n?

21 Q I know.

22 A I'm sorry, I thought you said Vincent.

23 Q No, I said Benson.

24 A That's all I recall.

25 Q And do you know how long Mr. Braxton was

1 **investigated by internal affairs at state police?**

2 A Excuse me, I did not say Mr. Braxton was  
3 investigated. I said the investigation was  
4 surrounding whether my car was being followed or  
5 photographed, I did not say Mr. Braxton was being  
6 investigated.

7 Q Well, when you had conversations with Mr.  
8 Hyatt, I know we've talked about this like a dead  
9 horse, I understood that you said that you  
10 mentioned to him that you thought Mr. Braxton was  
11 somehow involved based on this information you had  
12 received, and so it was just kind of a natural  
13 assumption on my part, and my apologies. Did you  
14 tell anybody else that you thought Mr. Braxton was  
15 having you followed or photographed?

16 A Not that I recall. And ma'am, I didn't  
17 say Mr. Braxton was -- what I said before is that I  
18 had heard the allegation that Mr. Braxton may have  
19 been a part of or facilitated or somehow got  
20 someone to follow me. I didn't say he was  
21 following me. I don't know the circumstances but I  
22 was aware of the allegation and I investigated, or  
23 I had it investigated.

24 Q Okay. And do you know how long the  
25 internal affairs investigation with state police



1       **lasted after your complaint?**

2           A       I apologize, I didn't mean to interrupt  
3       you. I didn't realize you weren't finished. Go  
4       ahead, I'm sorry.

5           Q       **Do you know how long the internal affairs**  
6       **investigation at state police lasted following your**  
7       **complaint?**

8           A       I don't. I was questioned for a part of  
9       the day but I don't know how long the actual  
10       investigation lasted.

11          Q       **And you said Faye Morrison was there.**  
12       **Faye is F-a-y-e, she's the legal adviser for state**  
13       **police; is that correct?**

14          A       I know she's an attorney with Department  
15       of Public Safety, I'm not sure of her exact title  
16       or affiliation.

17          Q       **Did you ever talk to anyone in the Public**  
18       **Safety & Corrections secretary's office or the**  
19       **secretary himself, Mr. LeBlanc?**

20          A       About this?

21          Q       **About your service on the commission, Mr.**  
22       **Braxton or Ms. Derbonne, any complaints you may**  
23       **have had.**

24          A       No, ma'am. I don't believe so.

25          Q       **Do you know Mr. LeBlanc?**

1           A       No, ma'am, I don't. I don't believe I  
2 do, no.

3           **Q       And so, am I correct that you resigned**  
4 **from the commission in August of 2017?**

5           A       I believe it was late August, yes, ma'am.

6           **Q       And why?**

7           A       Because of the article that came out in  
8 the Louisiana Voice that was untrue, that mismerged  
9 my reputation and I was no longer willing to put  
10 myself or my character or my reputation through  
11 that, and I did not believe that serving on the  
12 commission and having its good work detracted from  
13 by that article was in the best interest of the  
14 commission or the state police. I quite frankly  
15 didn't want to be a part of it anymore after that  
16 came out.

17           **Q       Did you hear about any allegations**  
18 **involving Mr. Braxton, like some sort of ticket**  
19 **fixing or something?**

20           A       I recall there being a public records  
21 request and a document being produced whereby a  
22 certain citation was asked to be reduced to a  
23 nonmoving violation on behalf of Mr. Braxton.

24           **Q       Have you ever asked somebody to reduce a**  
25 **violation to a nonmoving on behalf of yourself?**

1           A       I don't recall if I've done that.

2           Q       **Okay, who did you hear about the public**  
3 **records request from?**

4           A       I believe it was sent to all commission  
5 members by e-mail.

6           Q       **Had you heard anything about it**  
7 **beforehand?**

8           A       Not that I recall.

9           Q       **Was Mr. Braxton still on the commission**  
10 **at the time?**

11          A       I don't recall that.

12          Q       **Do you know if he left before or after**  
13 **you resigned?**

14          A       I believe he left before. I can't recall  
15 exactly but I don't recall if he was on the  
16 commission when I resigned.

17          Q       **Okay, and did you talk to Mr. Doss about**  
18 **any allegations regarding Mr. Braxton and trying to**  
19 **get tickets reduced or fixed or taken care of?**

20          A       I don't recall that, no.

21          Q       **Did you talk to Mr. Riecke about Mr.**  
22 **Braxton, any tickets being reduced or fixed or**  
23 **otherwise taken care of?**

24          A       I don't recall that, no.

25          Q       **Do you know if Ms. Derbonne had been**

1 asked by other commission members in the past to  
2 reach out to law enforcement agencies to see if  
3 they could have their tickets reduced?

4 A No, I'm not aware of that.

5 Q Ma'am, tell me about your relationship  
6 with Charley Dupuy. You said you met him at a  
7 fundraiser in the summer of 2016. That was a  
8 fundraiser for whom?

9 A I don't know, I don't recall.

10 Q Do you know what he was doing at a  
11 fundraiser?

12 A I think it was a fundraiser. I can't  
13 recall if it was -- I don't recall the actual party  
14 or the reason for the party. I recall it being a  
15 fundraiser but for who we were fundraising for or  
16 what it was for, I don't recall.

17 Q Where was it?

18 A It was in New Orleans.

19 Q Where in New Orleans?

20 A It was in the French Quarter but I'm not  
21 sure where, I don't recall where.

22 Q When you saw Mr. Dupuy at this  
23 fundraiser, was it your understanding he was still  
24 employed by state police?

25 A Yes.

1           Q       And can you tell me whether or not as a  
2       state police trooper, he's allowed to attend  
3       fundraisers?

4           A       Ma'am, I'm calling it a fundraiser, it  
5       may not have been a fundraiser, I'm not exactly  
6       sure. That was the first word that came to my  
7       mind. I'm not exactly sure what the party or the  
8       event was.

9           Q       Ma'am, tell me what if anything you heard  
10       about there being some sort of practice of straw  
11       donations by state troopers through the State  
12       Troopers Association?

13          A       I'm aware that there was an allegation  
14       made of that and that it was discussed during  
15       certain commission meetings, but that investigation  
16       I believe was handled by Mr. Taylor Townsend.

17          Q       Okay. Do you recall Mr. Braxton raising  
18       the issue during commission meetings about the  
19       notion that there was this straw donation process  
20       where state troopers who cannot lawfully donate  
21       money, were donating money through the State  
22       Troopers Association?

23          A       No, ma'am, I don't recall Mr. Braxton  
24       raising that, I recall Mr. Bucky Mia (Phonetic)  
25       raising that.

1           Q       Okay. Do you recall Mr. Braxton making  
2 any comments like, we need to look into this or  
3 anything like that?

4           A       I don't recall that.

5           Q       How about Cathy Derbonne, do you recall  
6 her asking for there to be an investigation of the  
7 practice of state troopers donating money  
8 surreptitiously through the State Troopers  
9 Association?

10          A       I don't recall her making that request,  
11 I'm just saying I don't remember her stating that.

12          Q       Whose idea was it to hire Taylor Townsend  
13 to conduct an investigation?

14          A       Mr. Townsend was already retained by the  
15 commission when I came on, so I don't recall how he  
16 was retained.

17          Q       You don't recall anybody telling you that  
18 Cathy was involved in getting him retained to look  
19 into it?

20          A       I don't know if it was Cathy herself who  
21 retained Mr. Townsend to look into it.

22          Q       Do you recall any discussion about how  
23 Mr. Townsend came to be retained?

24          A       I don't.

25          Q       Can you tell me whether or not you were

1 aware of any allegations that there was a problem  
2 with how the State Police Commission was handling  
3 public records?

4 A I'm sorry, can you repeat the question?

5 Q Can you tell me whether or not there was  
6 any allegation regarding how the State Police  
7 Commission handled public records.

8 A I don't remember there being a -- I don't  
9 recall the exact nature of how the issue was  
10 brought up. I remember our having a discussion  
11 about public records but I don't recall how it was  
12 initiated or where the discussion went.

13 Q Do you know whether or not it initiated  
14 as a result of Cathy Derbonne sending an e-mail  
15 inquiring, how do we handle this, especially if Mr.  
16 Braxton asks a question on the record at the  
17 meeting about the handling of public records?

18 A I don't recall that.

19 Q Do you remember Mr. Braxton raising any  
20 question about how the public records of the  
21 commission were being handled?

22 A I don't recall that.

23 Q Did you hear anything about any, and I'm  
24 going to call it noncompliance issues on the part  
25 of the State Police Commission prior to you serving

1 on the board?

2 A I'm not quite sure what you mean by  
3 noncompliance.

4 Q Like they weren't complying with legal  
5 requirements.

6 A Before I got on the commission?

7 Q Yes.

8 A I don't recall hearing that, no, ma'am.

9 Q How about after you got on the  
10 commission?

11 A When you say legal requirements, can you  
12 please explain to me what you mean so I can be sure  
13 to answer the question?

14 Q Okay, I use the phrase noncompliance.  
15 After you got on the commission did you hear  
16 anything about, in any manner, whether it's you and  
17 T.J. having discussions or you and other members of  
18 the board or at board meetings or whatever it was,  
19 any issues about the commission itself not being in  
20 compliance with the law?

21 A I'm not aware of any allegations of any  
22 inappropriate discussions, no, ma'am.

23 Q I'm not asking about inappropriate  
24 discussions. I'm asking about perhaps appropriate  
25 discussions where somebody is raising the issue



1 about the State Police Commission in some way not  
2 complying with the law.

3 A Ma'am, I don't mean to be difficult, I'm  
4 just trying to understand in what capacity you mean  
5 not complying with the law. In a general sense,  
6 I'm not aware of there being a general allegation  
7 of noncompliance with the law, but if there's a  
8 specific allegation, I can see if I recall that.

9 Q How about the manner in which you were  
10 appointed, that being that you were not actually  
11 nominated by one of the institutions from the  
12 state?

13 A So I recall -- I did not recall it being  
14 specific to me, I recall there being a question  
15 about appointments to the commission in general,  
16 and I recall that research was done and that  
17 certain appointments were right-sized or realigned  
18 and that certain terms were either shortened in  
19 accordance with that realignment, or they were  
20 essentially right-sized.

21 Q And who did the investigation?

22 A I believe Mr. Doss and Ms. Feeney.

23 Q Okay, and that was while you were serving  
24 on the commission?

25 A Yes, I believe so. I believe they also

1 consulted with Dan Sullivan.

2 **Q Who is he?**

3 A I don't know.

4 **Q Is he a lawyer?**

5 A I don't recall his title, I recall that  
6 he is affiliated -- or I recall that he's somehow  
7 affiliated with the state or is a part of the  
8 state, I'm not exactly sure what his exact title or  
9 position is. I know that they were working with  
10 him to right-size the appointment process and to  
11 ensure that all commissioners were -- their terms  
12 were proper and the appointment was proper.

13 **Q Okay. In that regard, ma'am, did you**  
14 **hear and suggested that your appointment was not**  
15 **proper?**

16 A I did not hear that it was improper but I  
17 recall that -- I received word that the term was  
18 shortened to December of 2017 as opposed to, I  
19 can't recall how long the original term was for,  
20 and that after that there would be a renomination  
21 and reappointment process.

22 **Q Okay, so when did you hear about that?**

23 A I don't recall when I heard that.

24 **Q And ma'am, do you recall there being some**  
25 **issue about the commission members themselves**

1 **having made political donations?**

2 A Which commission members, I'm sorry?

3 **Q Any commission members.**

4 A None of my co-commission members. I'm  
5 not aware of any allegations regarding them, no,  
6 ma'am.

7 **Q But you knew there was an issue with the**  
8 **predecessors, right? Which we spoke about earlier.**

9 A Yes, ma'am, predecessor, I had heard part  
10 of that after I joined the commission.

11 **Q Ma'am, did you ever have any meetings or**  
12 **conversations with Donald Breaux, and that's Breaux**  
13 **with an x, about the commission?**

14 A In general or --

15 **Q Yes, I don't know, I haven't lived in**  
16 **your shoes, so again, I need you to tell me**  
17 **everything you know.**

18 A Ma'am, I'm not trying to be difficult,  
19 I'm just making sure I'm answering your question,  
20 that's why I keep trying to clarify because I don't  
21 want to answer something that you're not asking, so  
22 I'm just trying to be precise, that's all.

23 **Q I understand.**

24 A Other than Mr. Breaux welcoming me to the  
25 commission on my first day, we did not have general

1 discussions about the commission, no, ma'am.

2 Q Did you ever have any meetings with Mr.  
3 Breaux outside of commission meetings?

4 A It was purely social, I was friends with  
5 he and his wife.

6 Q Okay, how long had you been friends with  
7 he and his wife?

8 A Only after I joined the commission.

9 Q Okay, so would you socialize with he and  
10 his wife and Mr. Doss too?

11 A I believe we had at least one meal  
12 together.

13 Q And can you tell me, did you ever discuss  
14 with Mr. Breaux anything relating to Calvin  
15 Braxton?

16 A I don't recall that.

17 Q Did you ever hear Mr. Breaux make any  
18 comments about Calvin Braxton?

19 A I don't recall that.

20 Q Did you ever hear Mr. Breaux make any  
21 comments about Cathy Derbonne?

22 A No, ma'am, I don't recall that.

23 Q Did you ever make any comments about  
24 Cathy Derbonne?

25 A In connection with what?

1           **Q     Anything.**

2           A     I mean, I may have asked the question  
3 about when we were discussing the budget, I asked  
4 questions, but as far as making comments about her,  
5 I'm not exactly sure what you mean. I questioned  
6 the process and protocol of the budget, and I did  
7 that on the record to her during a commission  
8 meeting, and I asked other questions about the  
9 budget when we worked with members of the  
10 legislature to fix it, but that's it.

11           **Q     When you say you questioned her about the**  
12 **process, was that before or after she went to the**  
13 **Legislative Budget Committee?**

14           A     I believe I personally asked her on the  
15 record after she testified before the legislature,  
16 but I believe that I was in the discussion or was  
17 simply present when the budget was discussed prior  
18 to that.

19           **Q     What do you mean?**

20           A     I was aware of questions asked about the  
21 budget, I believe a draft was discussed but that's  
22 all I recall.

23           **Q     Okay, who was asking or making the stuff,**  
24 **who was circulating the draft?**

25           A     I recall Jarod Riecke asking questions

1 about receiving a draft of the budget or asking for  
2 a draft or asking questions about certain items in  
3 the budget, and I don't recall when the draft was  
4 circulated.

5 Q Was that before or after her testimony or  
6 her statements at the legislature in connection  
7 with the budget process?

8 A I don't recall that.

9 Q You said you asked her questions on the  
10 record, what did you ask her?

11 A I know -- I can't recall the exact  
12 question that I asked but I recall that I was  
13 concerned about her representation to the  
14 legislature that the board had approved the budget  
15 when I had not given my approval for the budget.  
16 My question was about that concern.

17 Q Was that in the January 2017 meeting?

18 A No, that was before that, I believe that  
19 was the December meeting.

20 Q Did you guys even have a December  
21 meeting, ma'am?

22 A I believe so, yes.

23 Q And ma'am, can you tell me, who was it  
24 that arranged for the media to be present at the  
25 January 2017 meeting?

1 A I cannot tell you that, I have no idea.

2 Q Can you tell me whether or not there were  
3 more media present at the January 2017 meeting than  
4 you had seen at any other commission meeting?

5 A I can't recall specifically.

6 Q Well, who do you remember being at the  
7 January 2017 meeting, who do you remember seeing?

8 A I mean, I recall seeing members of the  
9 media there and I recall the projector.

10 Q And who brought the projector?

11 A I believe I had learned that Mr. Riecke  
12 had procured the projector.

13 Q You learned that how?

14 A I remember hearing it that day and I  
15 think I read it in his deposition.

16 Q Ma'am, do you know what the purpose of  
17 the projector was?

18 A I believe it was, at least in part, to  
19 show or for people to view the legislative session.

20 Q Ma'am, let's be clear.

21 A Or parts thereof. Ma'am?

22 Q It wasn't to view the legislative  
23 session, it was to view Cathy Derbonne's testimony  
24 that you referred to; isn't that right?

25 A Excuse me, I misspoke, yes, that's what I

1 meant, parts of that.

2 Q And you knew that before the meeting,  
3 that was pre-arranged, that there was going to be a  
4 projector and there was going to be a playing of  
5 portions of her statements at the legislature for  
6 that meeting; is that correct?

7 A No, ma'am, I don't recall that I knew  
8 that before.

9 Q But you certainly knew that that morning,  
10 didn't you?

11 A I don't know at what point during that  
12 day that I learned of it, but I did not know it  
13 before the meeting, no, ma'am.

14 Q Okay. And who did you learn it from?

15 A I don't recall.

16 Q And ma'am, did somebody tell you what the  
17 point was in playing what she had said before the  
18 legislature? I mean, what was the point of it?

19 A I don't know what the point or intent  
20 would be. I know what was on the agenda.

21 Q So did you have an understanding that  
22 whatever was going to be played on the projector  
23 procured by Mr. Riecke, was going to relate to my  
24 client's professional capacity?

25 A I am aware that what was going --



1 MR. FALCON:

2 Object --

3 BY MS. CRAFT:

4 Q I'm sorry, Ms. Derbonne's professional  
5 capacity.

6 MR. FALCON:

7 Yes.

8 A I'm sorry, I apologize, can you repeat  
9 the question?

10 Q Yes. Did you have an understanding that  
11 whatever was going to be played on the projector  
12 procured by Mr. Riecke, was going to have a  
13 relation to Ms. Derbonne's professional capacity,  
14 which you said was on the agenda?

15 A I don't know if -- I don't have an  
16 understanding or recollection of whether the  
17 projector was going to be used for any other item  
18 on the agenda, but I had an understanding at some  
19 point that the projector would be used in part in  
20 relation to that agenda. I don't regarding Ms.  
21 Derbonne's -- I believe it was professional  
22 capacity, but I would defer to the wording on the  
23 agenda.

24 Q And ma'am, are you telling me under oath  
25 that you and Mr. Doss never discussed Ms.

1 **Derbonne's professional capacity or her continuing**  
2 **as an executive director?**

3 A I'm telling you under oath that we  
4 discussed the budget and her representation to the  
5 legislature, but we did not discuss her continuing  
6 as the executive director, no, ma'am.

7 Q **Did you and Mr. Doss or you and any**  
8 **member of the commission ever discuss changing Ms.**  
9 **Derbonne's duties?**

10 A No, ma'am, I don't have a recollection of  
11 that.

12 Q **Did you ever hear anybody make any kind**  
13 **of statement about hiring some assistant for Ms.**  
14 **Derbonne in case she got in a car accident or her**  
15 **husband got in a car accident?**

16 A I don't recall that at the time, no,  
17 ma'am.

18 Q **What do you mean, at the time?**

19 A I apologize, I didn't mean to misspeak.  
20 I read it in the depositions that I reviewed but I  
21 recall the general suggestion but I don't recall  
22 the specifics of that discussion during the  
23 meeting.

24 Q **The general suggestion of what?**

25 A The assistant piece.

1           Q     Did you understand that that assistant  
2 piece was a proposal by Mr. Doss?

3           A     No, ma'am, I don't recall that.

4           Q     And you're telling me that you and Mr.  
5 Doss never discussed that outside of a meeting?

6           A     Yes, ma'am, that's what I'm telling you,  
7 we did not discuss that outside of a meeting.

8           Q     Did you and Mr. Doss ever discuss any  
9 concerns that either of you had relative to Ms.  
10 Derbonne, other than you said you had some concerns  
11 about her statements before the legislature?

12          A     The concerns that Mr. Doss and I  
13 discussed were concerning the budget and the  
14 testimony before the legislature and general  
15 commission things that we discussed as chair and  
16 vice chair and in connection with the commission  
17 meetings, but we had meetings with certain  
18 representatives who was the budget, I don't know if  
19 it was the budget committee or certain members --  
20 as I understand it, each commission or board had a  
21 representative with the legislature that worked  
22 with the budget to help each board or commission  
23 develop its budget or present the budget. We had  
24 conversations with our representatives about the  
25 budget and making sure what we proposed was the

1 right budget to propose, but that's the only  
2 discussions that we had.

3 Q Okay, I just want to be clear and so I  
4 need a direct answer.

5 A Okay.

6 Q You are telling me that you and Mr. Doss  
7 never expressed to each other any negative  
8 impression about Ms. Derbonne?

9 A The only thing I expressed to Mr. Doss, I  
10 asked the question whether he approved the budget  
11 because I know I didn't, that's the only thing I  
12 asked him.

13 Q Okay. So other than that, it's your  
14 testimony that neither you nor Mr. Doss discussed  
15 with each other any negative impressions you had  
16 about Cathy Derbonne?

17 A I don't recall that. I mean, my  
18 discussions with Mr. Doss regarding Ms. Derbonne  
19 was regarding the budget.

20 Q And the same question with respect to Mr.  
21 Braxton, is it your testimony that you and Mr. Doss  
22 and any discussions you ever had, never expressed  
23 any negative impressions about Mr. Braxton?

24 A Well, I believe I testified earlier about  
25 what I was told about Mr. Braxton saying I was

1 collateral damage, I would be collateral damage.  
2 And I can't recall specifics of everything I  
3 discussed with Mr. Doss at all times over the past  
4 four years, but I may have mentioned Mr. Braxton at  
5 some point. We certainly were aware of this  
6 lawsuit being filed but nothing else that I can  
7 recall.

8 **Q Did he talk to you about his deposition,**  
9 **Mr. Doss?**

10 A He did not.

11 **Q Did he provide you a copy of it?**

12 A No, he didn't.

13 **Q What did you think after you read it?**

14 A I had no thought one way or the other.

15 **Q Ma'am, with respect to Mr. Braxton, did**  
16 **you hear anything about some allegation that he had**  
17 **tried to improperly influence a state trooper or**  
18 **punish a state trooper for a DWI arrest of his**  
19 **daughter?**

20 A Sorry, the first part of your question,  
21 did I hear of it? I apologize.

22 **Q Yes.**

23 A As I sit here today I've heard of it now,  
24 yes.

25 **Q Okay, when was the first time you heard**

1     **about it?**

2           A     I can't recall, I believe I was on the  
3     commission at the time but I can't recall 100  
4     percent for sure.

5           **Q     Okay, what do you remember hearing about**  
6     **it?**

7           A     I recall being made aware that his  
8     daughter was stopped or perhaps arrested, I can't  
9     recall for sure, for suspicion of a DWI and there  
10    was an allegation of intimidation of a trooper as a  
11    result. That's all I recall.

12          **Q     Do you have a sense as to when that DWI**  
13    **arrest occurred?**

14          A     It was before my time on the commission.

15          **Q     Do you have a sense that it occurred in**  
16    **December of 2015?**

17          A     That sounds -- as I recall, that sounds  
18    accurate but I would have to refresh my  
19    recollection of relevant documentation.

20          **Q     How about any conversations with Mr.**  
21    **Hyatt, did you have any conversations with Mr.**  
22    **Hyatt about somebody writing a report as it related**  
23    **to Mr. Braxton?**

24          A     No, ma'am, I don't recall that.

25          **Q     Did you ever see any report written about**

1 **Mr. Braxton or his daughter's DWI arrest?**

2 A Only what was provided today in the  
3 exhibits for the deposition, I see all of the  
4 iterations of that report here.

5 Q **You had never seen it before today,**  
6 **ma'am?**

7 A I don't recall if I have or not.

8 Q **You didn't receive it by e-mail in 2017?**

9 A If it was produced as part of a public  
10 records request then I would have viewed it. At  
11 the time we were getting so many at the time that I  
12 don't recall this document in particular.

13 Q **Ma'am, did you ever have any**  
14 **conversations with Mr. Doss or any other member of**  
15 **the commission about an allegation regarding Mr.**  
16 **Braxton and his daughter's DWI arrest?**

17 A I don't recall that.

18 Q **Did you ever have a discussion with Mr.**  
19 **Doss or any member of the commission about some**  
20 **allegation that Mr. Braxton had tried to punish a**  
21 **state trooper?**

22 A I don't recall having that discussion.

23 Q **Did you hear anything about Mr. Oliphant**  
24 **making acquisitions against Mr. Braxton?**

25 A Not separate and apart from my review of

1 the lawsuit.

2 **Q And that's only happened recently?**

3 A I mean, I was aware of the lawsuit when  
4 it was first filed, I was aware that it happened so  
5 I may have heard something at the time, but I don't  
6 recall having specific discussions about that.  
7 Quite frankly, after I resigned from the commission  
8 I very seldomly discuss state police or the  
9 commission.

10 **Q Did you have any conversations with**  
11 **Charley Dupuy about Mr. Braxton?**

12 A Not that I -- not that I recall. I mean,  
13 other than like the general statement that he was  
14 on the commission with me, but I don't recall  
15 specific discussions.

16 **Q Were you aware or did you hear anything**  
17 **about somebody being hired to follow Cathy Derbonne**  
18 **around?**

19 A I don't recall -- I recall there being an  
20 allegation but I don't recall much more other than  
21 that. I can't recall whether I heard it or read it  
22 in a deposition, I can't remember.

23 **Q Did you ever talk to Mr. Doss about**  
24 **anybody following Cathy Derbonne around, including**  
25 **him?**



1 A No, ma'am, I haven't had that discussion.

2 Q Did you ever talk to Mr. Dupuy about  
3 anybody following Cathy Derbonne around?

4 A No, ma'am, I haven't.

5 Q Or Jarod Riecke?

6 A The same question?

7 Q Yes.

8 A No, ma'am, I don't recall that, I have  
9 not had that discussion.

10 Q Ma'am, did you ever talk to Mr. Doss  
11 about what he did at state police?

12 A His job duties you mean?

13 Q Yes.

14 A Yes, we discussed that.

15 Q And what was your understanding of what  
16 his job was at state police while you both were on  
17 the commission?

18 A He was, as I understood it, TDY to Baton  
19 Rouge and was in operational development doing  
20 research policy work for state police.

21 Q And in that capacity did you ever hear  
22 him say anything negative about Cathy Derbonne?

23 A I don't recall that, no.

24 Q Did you ever hear him say anything  
25 negative about Calvin Braxton?

1           A       I don't recall that.

2           Q       The two of you were dating when you  
3 claimed that you heard from him, or I guess  
4 somebody, about Mr. Braxton having you followed  
5 around and photographed. What was his reaction to  
6 that information?

7           A       I don't recall if we were dating at the  
8 time that I first heard it, certainly I heard it  
9 again during the time we were dating, I just don't  
10 remember which came first. I don't recall his  
11 reaction. It wasn't anything of note.

12          Q       You mean, he wasn't pissed?

13          A       T.J. was not like -- he wasn't pissed,  
14 no.

15          Q       And did he talk to anybody in internal  
16 affairs to your knowledge?

17          A       Ever or in connection with my --

18          Q       In connection with your complaint.

19          A       No, I don't believe that he did.

20          Q       Do you know if he talked to internal  
21 affairs in anything relating to Calvin Braxton?

22          A       I don't know that, no.

23          Q       Ma'am, did you hear anything about Calvin  
24 Braxton being falsely accused of being involved in  
25 a murder?

1           A       Not independently of anything that I read  
2 in the depositions, no, I didn't.

3           Q       You never talked about that accusation  
4 with Mr. Doss?

5           A       I don't recall that, no.

6           Q       Or anyone with state police?

7           A       I don't recall having that discussion. I  
8 don't recall being aware of that.

9           MS. CRAFT:

10                    Okay, if we can take a short break and  
11 let me visit with my client.

12           THE WITNESS:

13                    Okay.

14                    (A short break was taken.)

15           BY MS. CRAFT:

16           Q       Okay, I'm back. Ma'am, I only have a few  
17 more questions.

18           A       Okay.

19           Q       Were you aware of Mr. Braxton raising  
20 some concerns to Mr. Hanneman about T.J. Doss, his  
21 expense account or getting some reimbursements  
22 while he was staying at a hotel here in Baton  
23 Rouge?

24           A       No, ma'am, I don't recall that.

25           Q       Were you aware of my client, Mr. Braxton,

1 raising any questions about Mr. Doss and his per  
2 diem allowance and how it was being spent?

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

4 Q Do you know whether or not Mr. Hanneman  
5 told my client that he would bring it before the  
6 board and look into it?

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

8 Q Do you know why Mr. Doss is no longer on  
9 the board?

10 A He resigned.

11 Q Do you know why?

12 A I know what -- I only know what was in  
13 his resignation letter.

14 Q Okay, what do you understand his reason  
15 was?

16 A I believe he was told to resign.

17 Q By?

18 A Someone on the state police command  
19 staff.

20 Q Do you know who?

21 A I don't recall if it was Kevin Reeves or  
22 Mike Noel, but I recall it being one of those  
23 individuals.

24 Q And do you know when Mr. Doss resigned?

25 A It was within days of that August 2017

1 blog post coming out.

2 Q What blog post?

3 A On the Louisiana Voice where he and I  
4 were followed and an article was written about it,  
5 that we discussed earlier.

6 Q So he resigned at the same time you did?

7 A He resigned before I did.

8 Q Roughly in the same time period.

9 A I believe in the same month of 2017.  
10 Yes.

11 Q Okay, did you and he talk about whether  
12 or not he wanted to resign or whether it was fair  
13 or anything?

14 A No, actually we didn't. I actually did  
15 not find out that he resigned until after he had  
16 done so.

17 Q Were you guys dating at that time?

18 A Yes.

19 Q And he didn't talk to you about the fact  
20 that he was going to resign or had been asked to  
21 resign by either Mr. Reeves or Mr. Noel?

22 A He didn't.

23 Q And you didn't talk to him about your  
24 decision to resign?

25 A I told him I was going to resign.

1           Q     Did he blame anybody, he being Mr. Doss,  
2 did he blame anybody for being asked to resign?

3           A     Not that I recall.

4           Q     Did he make any statements that he  
5 thought Calvin Braxton was behind the Louisiana  
6 Voice or any of the postings on Louisiana Voice?

7           A     The only statement I'm aware of is his  
8 resignation letter.

9           Q     And does he accuse Mr. Braxton of  
10 anything in that letter to your recollection?

11          A     No, he does not.

12          Q     Ma'am, with respect to what you told me  
13 about the allegation that Calvin Braxton was having  
14 people follow you, I thought you told me that Mr.  
15 Doss was one of the people who told you that; is  
16 that right?

17          A     I'm trying to remember exactly what I  
18 said because I don't want to misspeak. I recall  
19 that T.J. told me that Mr. Braxton told him that he  
20 had photos or he was being followed and that I was  
21 collateral damage, I would be collateral damage. I  
22 had heard general allegations that there were  
23 photos of cars outside of my home, and perhaps my  
24 car, and that's what I recall.

25          Q     So can you tell me if Mr. Doss ever

1 brought any of his concerns to the state police or  
2 any law enforcement agency whatsoever, other than  
3 bringing it to you and then you bringing it to Mr.  
4 Hyatt and then Mr. Hyatt starting another internal  
5 affairs investigation involving Mr. Braxton?

6 MR. FALCON:

7 There was no testimony that Mr. Hyatt  
8 started the investigation. She testified she  
9 questioned Hyatt about the procedures and he  
10 told her about the procedures.

11 MS. CRAFT:

12 Yes, but she also testified, Mr. Falcon,  
13 with all due respect, that Hyatt contacted  
14 "somebody" at headquarters and the next thing  
15 she knew there was an internal affairs  
16 investigation.

17 MR. FALCON:

18 Yes, but you need to ask Mr. Hyatt about  
19 that.

20 MS. CRAFT:

21 Well, I believe I did and I believe Mr.  
22 Hyatt denied there was any internal affairs  
23 investigation.

24 BY MS. CRAFT:

25 Q But regardless, Ms. Manzella, my question

1 is, Mr. Doss relates this information to you, do  
2 you know whether or not he reported that to any law  
3 enforcement agency?

4 A I don't believe he did.

5 Q And did he encourage you to do so?

6 A He did not.

7 Q Do you have any explanation as to why he,  
8 a law enforcement officer, didn't report something  
9 to internal affairs when he knew about it?

10 A I don't have an explanation for that. We  
11 never discussed that. I would defer to him on  
12 that.

13 Q Did you talk to him at all about your  
14 decision to contact Mr. Hyatt?

15 A I don't recall that I did.

16 Q Did he direct you to Mr. Hyatt?

17 A No, he didn't.

18 MS. CRAFT:

19 That's all I have. Thank you, ma'am.

20 THE WITNESS:

21 Thank you.

22 MS. CRAFT:

23 Anybody else?

24 EXAMINATION

25 BY MR. O'SHEE:



1           Q       Yes, Michael O'Shee on behalf of Jay  
2       Oliphant.

3                       Yes, ma'am, just to go back to the  
4       statements regarding you being followed or possibly  
5       being followed. Did anyone other than Mr. Doss  
6       tell you about that, that Mr. Braxton may have been  
7       involved in having you followed?

8           A       Yes, that's what I was saying before,  
9       sir, I know that there were others discussing it  
10      and I know that there were other sources of that,  
11      I'm only aware specifically, he's the only one I  
12      can recall and I don't want to say another person's  
13      name without being 100 percent sure.

14          Q       Did anyone -- do you recall if anyone  
15      ever gave the source of the information that Mr.  
16      Braxton was involved in having or possibly involved  
17      in having you followed in your car and  
18      photographed?

19          A       No, sir, I don't.

20          Q       How did that come up, the subject of Mr.  
21      Braxton possibly being involved in having you  
22      followed in your car and photographed, in the  
23      several times that that was mentioned?

24          A       Right. There were discussions, I don't  
25      recall how it came up or what precipitated the

1 conversation, I recall discussions or being aware.

2 Q I'm just curious, the state police  
3 internal affairs investigation into the allegations  
4 that you were being followed, that investigation  
5 occurred after you had resigned from the  
6 commission; is that correct?

7 A Yes, sir.

8 Q And Mr. Braxton had also resigned at that  
9 point?

10 A I believe so, yes, sir.

11 Q And I just don't know, why would the  
12 state police internal affairs or why would they be  
13 involved after you were no longer a commissioner?

14 A I don't know.

15 Q Okay. Do you have any idea what the  
16 results of that internal affairs investigation was?

17 A I don't.

18 MR. O'SHEE:

19 Okay, I don't have anything else.

20 MS. CRAFT:

21 Anybody else?

22 MR. FALCON:

23 I don't have anything.

24 MS. CRAFT:

25 Lenore, is she going to read and sign?

1 MS. FEENEY:

2 Yes.

3 MS. CRAFT:

4 Do you want it sent to you?

5 MS. FEENEY:

6 Yes, that would be great.

7 COURT REPORTER:

8 Copies.

9 MS. CRAFT:

10 Oh, copies, she wants to know who needs  
11 copies.

12 MS. FEENEY:

13 We're not ordering a copy.

14 COURT REPORTER:

15 No copy, okay.

16 MS. CRAFT:

17 Floyd and Mr. O'Shee?

18 MR. O'SHEE:

19 Yes, we want one.

20 MS. CRAFT:

21 That's the Oliphant counselor with  
22 Oxehandler. Do you want it sent to Mr.  
23 Oxehandler?

24 MR. O'SHEE:

25 Yes, that will be perfect.

1 MS. CRAFT:

2       Okay, Floyd?

3 MR. FALCON:

4       Yes, I want one.

5 MS. CRAFT:

6       And I want one.

7 COURT REPORTER:

8       Okay, thank y'all.

9 MS. CRAFT:

10       All right, anything else? We're good on  
11 spellings before we get off the record?

12 COURT REPORTER:

13       We're good.

14 MS. CRAFT:

15       Okay, thank y'all.

16       (Deposition concluded at 2:30 p.m.)

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WITNESS'S CERTIFICATE

I, Monica Manzella, the undersigned, do hereby certify that I have read the foregoing deposition taken on February 3, 2021, and it contains a true and accurate transcript of the testimony given by me:

( ) Without corrections

( ) With corrections as reflected on the Errata Sheet (s) prepared by me and attached hereto consisting of 96 pages.

\_\_\_\_\_

MONICA MANZELLA

\_\_\_\_\_

DATE

REPORTED BY: JANICE WELCH, CCR

## 1 R E P O R T E R ' S C E R T I F I C A T E

2 This certification is valid only for a  
3 transcript accompanied by my original signature and  
4 original required seal on this page.

5 I, Janice Welch, Certified Court Reporter  
6 (#87172), in and for the State of Louisiana, as the  
7 officer before whom this testimony was taken, do  
8 hereby certify that Monica Manzella, after having  
9 been duly sworn by me upon authority of R.S.  
10 37:2554, did testify as hereinbefore set forth in  
11 the foregoing 91 pages;

12 That this testimony was reported by me in  
13 stenotype reporting method, was prepared and  
14 transcribed by me or under my personal direction  
15 and supervision, and is a true and correct  
16 transcript to the best of my ability and  
17 understanding;

18 That the transcript has been prepared in  
19 compliance with the transcript format guidelines  
20 required by statute or by rules of the board, and  
21 that I am informed about the complete arrangement,  
22 financial or otherwise, with the person or entity  
23 making arrangements for deposition services;

24 That I have acted in compliance with the  
25 prohibition on contractual relationships, as

1 defined by Louisiana Code of Civil Procedure  
2 Article 1434 and in the rules and advisory opinions  
3 of the board;

4 That I have no actual knowledge of any  
5 prohibited employment or contractual relationship,  
6 direct or indirect, between a court reporting firm  
7 and any party litigant in this matter nor is there  
8 any such relationship between myself and a party  
9 litigant in this matter. I am not related to  
10 counsel or to the parties herein, nor am I  
11 otherwise interested in the outcome of this matter.

12 SIGNED FEBRUARY 11, 2021

13

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JANICE WELCH, CCR

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1 Errata Sheet

2

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

4 DATE OF DEPOSITION: 02/03/2021

5 NAME OF WITNESS: Monica Manzella

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 \_\_\_\_\_

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