

10TH JUDICIAL DISTRICT COURT
PARISH OF NATCHITOCHEs
STATE OF LOUISIANA

NUMBER: C-90,284

CALVIN W. BRAXTON, SR.

VERSUS

LOUISIANA STATE TROOPERS ASSOCIATION AND

JAY OLIPHANT

Deposition of KEVIN W. REEVES via
videoconference, taken on Thursday, October 1, 2020,
before Leslie B. Doyle, Certified Court Reporter (LA
#93096), commencing at 11:04 a.m., Baton Rouge,
Louisiana.

COURT REPORTERS OF LOUISIANA, L.L.C.
9522 Brookline Avenue, Suite 217
Baton Rouge, Louisiana 70809
PHONE (225) 201-9650 * FAX (225) 201-9651
E-Mail: Depos@courtreportersla.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

Caption	1
Appearances	3
Agreement of Counsel	4
Examination	
BY MS. CRAFT	5, 111
BY MR. FALCON	94
BY MR. OXENHANDLER	98
Reporter's Certificate	116 - 117
Witness' Certificate	118

* * *

EXHIBITS

(None)

* * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES :

REPRESENTING THE PLAINTIFF :

JILL L. CRAFT, ESQ.
JILL L. CRAFT, ATTORNEY AT LAW, LLC
329 ST. FERDINAND STREET
BATON ROUGE, LOUISIANA 70802

REPRESENTING JAY OLIPHANT :

STEVEN M. OXENHANDLER, ESQ.
GOLD, WEEMS, BRUSER, SUES & RUNDELL
2001 MACARTHUR DRIVE
ALEXANDRIA, LOUISIANA 71301

REPRESENTING THE LOUISIANA STATE TROOPERS

ASSOCIATION :

FLOYD J. FALCON, JR., ESQ.
AVANT & FALCON
429 GOVERNMENT STREET
BATON ROUGE, LOUISIANA 70802

REPRESENTING THE LOUISIANA STATE POLICE :

BEN L. MAYEAUX, ESQ.
NEUNER PATE
ONE PETROLEUM CENTER
1001 W. PINHOOK ROAD, SUITE 200
LAFAYETTE, LOUISIANA 70503

ALSO PRESENT :

JAY OLIPHANT

JAY O'QUINN

* * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

S T I P U L A T I O N

It is stipulated and agreed by and between all Counsel that the testimony of KEVIN W. REEVES, on October 1, 2020, is hereby being taken for discovery purposes and for any and all purposes authorized under the Louisiana Code of Civil Procedure.

The witness reserves the right to read and sign the deposition. The original is to be delivered to and retained by Jill L. Craft, Esq., 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 considered reserved until trial or other use of the deposition.

* * *

Leslie B. Doyle, Certified Court Reporter in and for the State of Louisiana, officiated in administering the oath to the witness.

1 KEVIN W. REEVES,
2 having been first duly sworn, was examined
3 and testified as follows:

4 * * *

5 MS. CRAFT: And, Counsel, for the
6 record, again, I'm invoking sequestration.
7 I would further request, for the purposes
8 of the completeness of the record, that if
9 anybody enters or leaves the room, that we
10 let the court reporter audibly know that
11 so she can notate that on the deposition
12 record. Is that fair enough?

13 MR. MAYEAUX: Okay with us.

14 COURT REPORTER: That was Mr. Mayeaux?

15 MR. MAYEAUX: Yes, it was.

16 COURT REPORTER: Sorry. I may have
17 to -- since I can't see everyone on
18 camera, I may have to interrupt to
19 clarify. I apologize.

20 MS. CRAFT: Everybody else okay?

21 MR. OXENHANDLER: Yes.

22 MR. FALCON: Yes.

23 EXAMINATION

24 BY MS. CRAFT:

25 Q. All right. Mr. Reeves, as you know, my

1 name is Jill Craft, and I represent Calvin Braxton
2 in connection with a lawsuit that is currently
3 pending in Natchitoches Parish. It's very important
4 during the course of this deposition that you
5 understand what I'm asking you, and if at any time
6 you do not, please tell me to stop and rephrase it.
7 I'm happy to do so.

8 A. Yes, ma'am.

9 Q. It's also important, particularly because
10 we're doing this by Zoom, that nods of the head yes
11 or no cannot be taken down by the reporter, so you
12 need to make sure to answer out loud.

13 My final instruction is unique to me
14 insofar as I may ask you to spell names, places or
15 things. Not to test your spelling. It's just a lot
16 easier for our reporter to get those down as we go
17 along. Is that fair enough?

18 A. Yes, ma'am. I understand.

19 Q. And, finally, because we are doing this
20 deposition by Zoom, I would ask that you would take
21 a deep breath before you start answering any of my
22 questions, and I will do the same with respect to
23 you, so that we do not end up talking over each
24 other. It will accomplish two things. One, the
25 audio will cut out, and, two, the court reporter

1 will not be able to make out what we are saying. Is
2 that fair enough?

3 A. You have my word I won't talk over you.

4 Q. The other instruction is, because we're
5 here by Zoom, I'm going to ask you, sir, on your
6 oath that you will not observe any hand signals,
7 facial gestures, notes, or any other cues or prompts
8 to you giving this deposition for the purposes of
9 today. Okay, sir?

10 A. Yes, ma'am.

11 Q. Would you give me your full name and
12 address, please, sir?

13 A. Kevin Wayne Reeves, 7919 Independence
14 Boulevard, Baton Rouge, Louisiana 70806.

15 Q. And I do need you to speak up just a tad
16 more so that we can make sure we get that down. Let
17 me see if I can turn this volume up. Yeah, it's at
18 full blast.

19 All right. Mr. Reeves, would you walk me
20 through your educational background, starting with
21 where and when you graduated high school, please,
22 sir?

23 A. Graduated high school from Tara High
24 School in Baton Rouge, Louisiana, in 1986. I
25 graduated from Louisiana Tech University in 2000.

1 **Q. And what is your degree in from Louisiana**
2 **Tech?**

3 A. Sociology.

4 COURT REPORTER: I'm sorry.

5 Sociology?

6 THE WITNESS: Yes, ma'am.

7 COURT REPORTER: Thank you.

8 BY MS. CRAFT:

9 **Q. Can you walk me through your employment**
10 **history in law enforcement, please, sir?**

11 A. Yes, ma'am. I've worked -- deputy with
12 the East Baton Rouge Sheriff's Office, reserve
13 deputy with East Baton Rouge Sheriff's Office; and
14 worked as an investigator with the East Baton Rouge
15 District Attorney's Office; and, in 1990, I became
16 employed with the Louisiana State Police as a
17 trooper.

18 **Q. How long did you serve as a reserve deputy**
19 **with the East Baton Rouge Parish Sheriff's Office?**

20 A. I think maybe a year. I'm not sure.

21 **Q. I'm sorry. Eight years or one year?**

22 A. One.

23 **Q. And do you recall what year that was?**

24 A. I believe it was '89.

25 **Q. What did you do between your graduation**

1 from high school in '86 and working as a reserve
2 deputy in 1989?

3 A. Attended LSU.

4 Q. And you attended LSU for three years?

5 A. Yes, ma'am, approximately.

6 Q. And you did not obtain a degree?

7 A. No, ma'am.

8 Q. And what was your course of study?

9 A. Criminal justice.

10 Q. So why did you leave LSU without
11 completing your degree?

12 A. I left to become a trooper with the
13 Louisiana State Police.

14 Q. So you left in 1990?

15 A. Yes, ma'am.

16 Q. Did you have any jobs --

17 A. Probably part-time in 1989. I'm sorry. I
18 didn't mean to talk over you. Probably went
19 part-time in 1989 with -- I mean, in 1990, the first
20 of '90, with the District Attorney's Office, then I
21 dropped out to go to work for Louisiana State
22 Police.

23 Q. Okay. So you worked part-time as an
24 investigator with the District Attorney's Office in
25 the year 1990?

1 A. No, ma'am. I worked full-time as an
2 investigator from January of 1990 to probably May of
3 1990 with the District Attorney's Office, where I
4 also went to school part-time.

5 **Q. So what jobs did you hold between your**
6 **graduation from Tara High School and becoming a**
7 **full-time investigator with the District Attorney's**
8 **Office in January of 1990?**

9 A. I believe I worked for a hardware store.
10 I worked for a pharmacy. I worked for some law
11 firms as a runner.

12 **Q. Okay. And are you telling me that the**
13 **reason you left LSU was to become a State Police**
14 **trooper in 1990?**

15 A. Yes, ma'am.

16 **Q. How close were you to your degree then?**

17 A. I'm not really sure. I went back to
18 school in 1999 at Louisiana Tech and obtained a
19 degree in a year.

20 **Q. Okay. When you first went to State**
21 **Police, it's true, is it not, that you attended an**
22 **academy. Yes?**

23 A. Yes.

24 **Q. And was that at that time the LSU Basic**
25 **Law Enforcement Academy?**

1 A. No, ma'am. It was Louisiana State Police
2 Training Academy.

3 Q. Okay. And the training academy was how
4 many months?

5 A. Mine was 13 weeks.

6 Q. And after your graduation from the
7 academy, what did you do?

8 A. I was assigned to uniform patrol at Troop
9 A.

10 Q. And can you tell me who some of your field
11 training officers were at Troop A?

12 A. I believe a Tommy Joffrion.

13 Q. Spell that, please.

14 A. I'll do my best. J-O-F-F-R-I-O-N. Glenn
15 Verrett.

16 Q. Verrett is V-E-R-R-E-T-T?

17 A. I think so.

18 Stanley Griffin.

19 Q. Griffin is as we think, G-R-I-F-F-I-N?

20 A. Yes, ma'am.

21 Q. Okay.

22 A. And Bob Landry.

23 Q. Landry?

24 A. Yes, ma'am.

25 Q. Mr. Griffin, he went on to be in gaming;

1 is that correct?

2 A. I'm not sure. He went on to be
3 superintendent of State Police.

4 Q. Sir, once you completed your field
5 training office program, what did you do?

6 A. I was a uniform patrol trooper at Troop A.

7 Q. And how long did you do that?

8 A. Until my transfer to Troop F in 1993.

9 Q. And where is Troop F located?

10 A. Monroe.

11 Q. And how did the transfer to Troop F come
12 about?

13 A. I requested it.

14 Q. Why?

15 A. Because I wanted to transfer to Monroe.

16 Q. Was there family or something up there?

17 A. I guess that's where my wife and I were
18 going to make our home.

19 Q. Okay. And while you were at Troop A, did
20 you maintain the same rank, or has your rank
21 changed? Did it change at Troop A?

22 A. I was the same rank at Troop A.

23 Q. Which was trooper; is that right?

24 A. Yes, ma'am.

25 Q. And then when you went to Troop F, did

1 your rank stay the same?

2 A. Yes, ma'am.

3 Q. And what was your assignment at Troop F?

4 A. Uniform patrol.

5 Q. So walk me from Troop F forward, the ranks
6 and positions you've held and what years.

7 A. In 1997, I transferred into narcotics. In
8 1998, I was promoted back to uniform patrol as a
9 sergeant. In 2003, I was promoted to lieutenant.
10 In 2008, I was promoted to troop commander. In
11 2013, I was promoted to major, a region major of a
12 Region 3. And in 2017, I was promoted to
13 superintendent.

14 Q. Okay. When you were assigned to
15 narcotics, were you still working out of Troop F in
16 Monroe?

17 A. Yes, ma'am. The Monroe field office.

18 Q. I'm sorry?

19 A. The Monroe field office of the Bureau of
20 Investigation, which was located at Troop F.

21 Q. In 1998, when you were promoted to a
22 sergeant over uniform patrol, where were you
23 working?

24 A. Troop F.

25 Q. And in 2003, when you became a lieutenant,

1 where were you working?

2 A. Troop F.

3 Q. When you became a lieutenant, did you
4 remain in uniform patrol?

5 A. Yes, ma'am.

6 Q. And in 2008, as troop commander, was that
7 also at Troop F?

8 A. Yes, ma'am.

9 Q. And in 2013, you became the major over
10 Region 3?

11 A. Yes, ma'am.

12 Q. That includes what areas?

13 A. Troop E, F and G; Alexandria, Monroe and
14 Shreveport.

15 Q. Does that also include the Natchitoches
16 area?

17 A. Yes, ma'am. The Natchitoches area is in
18 the Troop E area.

19 Q. Okay. And then you became superintendent
20 in 2017. That was by appointment; is that correct?

21 A. Yes, ma'am.

22 Q. You were appointed by who?

23 A. Governor John Bel Edwards.

24 Q. And you replaced who as superintendent?

25 A. I'm sorry?

1 Q. You replaced who as superintendent?

2 A. Mike Edmonson.

3 Q. Can you tell me anything about your
4 affiliation with the Louisiana State Troopers
5 Association?

6 A. I am a member of the Louisiana State
7 Troopers Association.

8 Q. And how long have you been a member?

9 A. I believe I've been a member since I hired
10 on the job in 1990.

11 Q. Have you ever held any positions within
12 the State Troopers Association?

13 A. No, ma'am.

14 Q. Have you ever served as a representative
15 on behalf of a particular location or unit?

16 A. No, ma'am.

17 Q. Did you have any conversations with anyone
18 regarding the State Troopers Association wanting
19 some sort of affidavit as it related to a 2015
20 incident involving my client, Mr. Braxton?

21 A. I don't know if I would term it as an
22 affidavit. I did, as the region major of Region 3,
23 have the occasion to have a conversation with then
24 Captain Oliphant concerning an inquiry asking for
25 some documentation on an incident that occurred with

1 your client.

2 Q. Inquiry from whom?

3 A. The State Troopers Association is what I
4 was told.

5 Q. And who told you that?

6 A. Captain Oliphant.

7 Q. Tell me what you remember about your
8 conversation with Captain Oliphant about this
9 inquiry to him on -- by the State Troopers
10 Association.

11 A. I believe that they wanted some form of
12 documentation as memorializing a conversation that
13 he had had with Mr. Braxton.

14 Q. And when you say "they," you mean the
15 Louisiana State Troopers Association wanted that
16 documentation?

17 A. Yes, ma'am. That's my understanding.

18 Q. And did Mr. Oliphant tell you who
19 affiliated with the State Troopers Association had
20 made that request of him?

21 A. Not that I recall.

22 Q. Do you recall it being a Mr. Hyatt?

23 A. I don't recall.

24 Q. And who is Mr. Hyatt?

25 A. He was a trooper with State Police.

1 Q. And what is his position?

2 A. I believe he's in evidence.

3 Q. And do you know what position, if any, he
4 holds within the State Troopers Association?

5 A. I do not. I think he's on the board, but
6 I'm not sure what position he is.

7 Q. Did Mr. Oliphant give you any indication
8 as to who, which troopers, or whether it was the
9 executive director of the State Troopers Association
10 who was requesting that he prepare documentation?

11 A. No, ma'am. Not that I recall.

12 Q. Did you inquire of him, hey, who's asking
13 for this?

14 A. No, ma'am.

15 Q. Did you -- prior to this conversation you
16 had with Mr. Oliphant, did you hear anything about
17 some sort of alleged conversation between he and
18 Calvin Braxton?

19 A. Yes, ma'am, I did.

20 Q. Tell me what you had heard.

21 A. You're talking about prior to the request
22 for the documentation?

23 Q. Yeah. Prior to the request for
24 documentation from the State Troopers Association.

25 A. Yes, ma'am. I had heard that -- from

1 Captain Oliphant that he had had a conversation with
2 Mr. Braxton concerning the arrest of, I believe it
3 was Mr. Braxton's daughter, for DWI.

4 **Q. What did he tell you about that?**

5 A. My understanding, that in the
6 conversation, that Mr. Braxton was not very happy
7 that the State Police had arrested his daughter for
8 DWI, and that he was expressing his displeasure with
9 it, that he was on the Commission and was not
10 extended a courtesy when it came to his daughter.

11 **Q. Did you ever talk to Mr. Braxton**
12 **personally about any of this?**

13 A. Not that I recall.

14 **Q. Have you ever spoken with Mr. Braxton**
15 **personally to attempt to obtain his side of the**
16 **story?**

17 A. No, ma'am. I don't think so.

18 **Q. Have you ever spoken with Mr. Braxton?**

19 A. I have, yes.

20 **Q. In what circumstances?**

21 A. I don't remember. It wasn't anything of
22 consequential matter. He -- I think he reached out
23 to me when I became superintendent to congratulate
24 me.

25 **Q. Okay. So have you ever talked to Governor**

1 **Edwards about Mr. Braxton?**

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

3 **Q. Have you ever talked to anyone on Governor**
4 **Edwards' staff about Mr. Braxton?**

5 A. I don't think so, as specific with any --
6 I'm sorry. I don't recall with any specificity as
7 to what, other than the fact that we were under a
8 lawsuit from Mr. Braxton.

9 **Q. Okay.**

10 A. Would be the only conversation I would
11 have had with him, but I can't recall much about
12 that.

13 **Q. So can you tell me when that was?**

14 A. I really can't. I guess it would have
15 been in short term of learning that we were being
16 sued.

17 **Q. So would that have been after the State**
18 **Police was added as a defendant sometime last year,**
19 **or would it have been in 2017-2018, when the**
20 **original lawsuit was filed? Do you remember?**

21 A. I really don't recall. My conversations
22 about this have been very limited.

23 **Q. Okay. So when did you first hear from**
24 **Mr. Oliphant about some interaction he had with**
25 **Mr. Braxton?**

1 A. I don't recall the date. I would assume
2 it would have been in close proximity to the phone
3 call that they had.

4 **Q. And what makes you assume that?**

5 A. I'm sorry?

6 **Q. What makes you assume that?**

7 A. Well, I was his supervisor, and I'm sure
8 that he was making me aware of Mr. Braxton's
9 displeasure.

10 **Q. Is that something you recall, or is that**
11 **just a guess on your part, sir?**

12 A. That would be a guess on my part.

13 **Q. Okay. Let's not guess. If you don't**
14 **remember something, please tell me, I don't**
15 **remember.**

16 A. I don't recall.

17 **Q. But you do recall he indicated that he had**
18 **a conversation with my client, and my client had**
19 **expressed some dissatisfaction, for lack of a better**
20 **phrase; is that right?**

21 A. Yes, ma'am.

22 **Q. And do you recall Mr. Oliphant expressing**
23 **to you any concerns that he had relative to this**
24 **exchange with Mr. Braxton, other than Mr. Braxton**
25 **was unhappy?**

1 A. I think that Mr. Braxton had made some
2 requests that the trooper be transferred.

3 **Q. Okay. Did you ever talk to Mr. Edmonson**
4 **about the situation at all?**

5 A. No, ma'am.

6 **Q. And so when Mr. Oliphant relayed that to**
7 **you, how did he relay that to you, that Mr. Braxton**
8 **wanted the trooper, which would be Mr. Linebaugh, I**
9 **assume, transferred?**

10 A. I believe wanted him to be transferred
11 down -- we had a detail in New Orleans. Wanted him
12 transferred to New Orleans for a period of time.

13 **Q. And did Mr. Oliphant indicate to you why?**

14 A. I believe that he wanted him to get his
15 mind right.

16 **Q. Okay. What else? Anything you remember**
17 **from this conversation?**

18 A. I don't remember a whole lot from the
19 conversation.

20 **Q. Did it concern you, sir, as Mr. Oliphant's**
21 **supervisor, when he relayed this conversation to**
22 **you?**

23 A. Well, it would concern me that someone on
24 the State Police Commission, if they were making
25 statements and suggestions as to that after an

1 arrest of a family member, that would cause me some
2 concern.

3 **Q. So what exactly did you do about your**
4 **concern at that time, sir?**

5 A. I don't believe we did anything. I
6 believe that it was my understanding that -- and I'm
7 going off memory here from several years ago. It
8 was my understanding that Mr. Braxton and Captain
9 Oliphant are from the same area, and that they knew
10 who each other was, and that they were having
11 conversations.

12 **Q. So you did not have any concern about the**
13 **conversation that Mr. Oliphant relayed to you that**
14 **he had had with Mr. Braxton, or you did have**
15 **concern?**

16 A. I did have concerns, but I was under the
17 impression Mr. Braxton and Captain Oliphant were
18 working that out.

19 **Q. What gave you that impression, sir?**

20 A. Like I told you, they're associates and
21 they know each other from the same town, so I
22 figured that they knew each other and were having
23 conversations.

24 **Q. So aside from your guess at the time, did**
25 **anybody relate to you that Mr. Oliphant and**

1 Mr. Braxton had either worked it out or were in the
2 process of working it out?

3 A. No, ma'am.

4 Q. Okay. So as his supervisor,
5 Mr. Oliphant's supervisor, when he relayed this
6 conversation to you, and you said you had concerns,
7 my question originally was, what did you do? And if
8 the answer is nothing --

9 A. I answered your question and said I didn't
10 do anything. We were monitoring the situation.

11 Q. How were you monitoring the situation?

12 A. Well, I'm sure that we would have been
13 made aware if anything needed to come to our
14 attention from Captain Oliphant.

15 Q. Okay. So you weren't actually actively
16 monitoring the situation; you were just waiting for
17 Mr. Oliphant to tell you if something bad happened,
18 right?

19 A. Sure. Sure.

20 Q. And Mr. Oliphant never relayed to you that
21 anything bad happened; am I correct?

22 A. Just that Mr. Braxton had made a request
23 that -- or had made the statement that perhaps
24 Trooper Linebaugh needed to do some time in New
25 Orleans to get his mind right.

1 Q. Right. But that was in the initial
2 conversation you said you had with Mr. Oliphant.

3 A. Yes, ma'am.

4 Q. And then, after that, you said you did
5 nothing, and so then I asked you about monitoring,
6 and you said that, you know, basically, I was
7 waiting for Mr. Oliphant to tell me if something bad
8 happened after that. So my question was, am I to
9 assume --

10 A. If there was anything of note that
11 happened after that.

12 Q. Right.

13 A. It doesn't have to be if something bad
14 happened after that. If anything of note happened
15 after that.

16 Q. All right. Using your verbiage, am I
17 correct, then, sir, that nothing of note happened,
18 because Mr. Oliphant did not communicate with you
19 again about it, right?

20 A. I believe that Mr. Oliphant was having
21 conversations. They don't communicate everything to
22 the major of every conversation that they have, only
23 the ones that they make us aware of. I'm not asking
24 him every day what's going on with it.

25 Q. Okay. So then tell me what you were made

1 aware of between the initial discussions you had
2 with Mr. Oliphant about the alleged statement by
3 Mr. Braxton and fast-forward to June of 2016. In
4 that six-month period, sir, did Mr. Oliphant ever
5 express to you that he had any issues or concerns
6 about any continuing interaction with Mr. Braxton?

7 A. I'm sure we had conversations, but I don't
8 recall what they were.

9 Q. Okay. So aside from your innate feeling
10 that you're sure, do you have any documents or notes
11 that would reflect whether you had any conversations
12 with Mr. Oliphant where he expressed any concern in
13 that ensuing six-month period of time?

14 A. I have no documentation or notes.

15 Q. But the next thing that I think you did
16 tell us about was that Mr. Oliphant had been
17 approached by the Louisiana State Troopers
18 Association, who asked him to prepare documentation
19 about his interaction with Mr. Braxton; is that
20 correct?

21 A. That is correct.

22 Q. Tell me how many times in your affiliation
23 with the State Troopers that you are aware of any
24 trooper receiving an inquiry or request from the
25 State Troopers Association to provide them

1 documentation.

2 A. I'm not aware of any.

3 Q. Tell me how many times in your affiliation
4 with State Police are you aware of any situation
5 where the State Troopers Association asked a state
6 trooper to prepare some sort of incident report or
7 documentation of an alleged incident.

8 A. None that apply to me, so I'm not sure.

9 Q. With the exception of this case, correct?

10 A. I'm aware of this case, yes, ma'am.

11 Q. Okay. So am I correct, then, what your
12 understanding was, Mr. Oliphant was going to prepare
13 some sort of incident report at the request or
14 because of the request from the State Troopers
15 Association?

16 A. No, ma'am. He wasn't prepared to file any
17 kind of documentation with the State Troopers
18 Association. He made me aware that they had made a
19 request.

20 Q. Right. And his response was, he was going
21 to prepare a report; is that correct?

22 A. No, ma'am.

23 Q. Okay. What was the response?

24 A. From him?

25 Q. Yes.

1 A. His response to me was they had asked.

2 **Q. And what did you tell him?**

3 A. I told him that we did not prepare
4 correspondence for agencies that are outside or
5 entities that are outside the scope of the Louisiana
6 State Police in the hierarchy. If we were going
7 to -- if it was felt that this incident should be
8 memorialized, that we need to do it within the
9 agency.

10 **Q. Okay. So let me break that down. As I**
11 **understood it, and correct me if I'm wrong, the**
12 **original request from the State Troopers Association**
13 **was that Mr. Oliphant prepare some sort of affidavit**
14 **or document specific for the State Troopers**
15 **Association; is that right?**

16 A. That would be my understanding.

17 **Q. And Mr. Oliphant came and talked to you**
18 **about it as his commanding officer; is that correct?**

19 A. Yes, ma'am.

20 **Q. Was anyone else present when you had this**
21 **conversation with Mr. Oliphant?**

22 A. I don't think so. I don't even know that
23 I could agree with you that he came and talked to me
24 about it or whether we did it on the phone.

25 **Q. Okay. However you guys talked about it.**

1 A. Right.

2 Q. You had a conversation about it, and you
3 told Mr. Oliphant, we're not going to prepare
4 documents specifically for LSTA, but you can prepare
5 an incident report or you should prepare an incident
6 report about it?

7 A. I advised him that if there was going to
8 be any paperwork filled out on this matter to
9 memorialize the incident, it would be submitted
10 through the chain of command of State Police.

11 Q. You understand at this point in time the
12 alleged incident had occurred almost six months
13 earlier?

14 A. Yes, ma'am.

15 Q. And so, am I correct, under State Police
16 training, aren't you supposed to document incidents
17 at the time they occur?

18 A. In some cases, but there's nothing that
19 prevents us from any time passage of documenting an
20 incident.

21 Q. Well, what about if you're accusing
22 somebody of a crime, the crime of intimidation of an
23 officer? Aren't you supposed --

24 MR. MAYEAUX: Object to the form.

25 BY MS. CRAFT:

1 Q. Subject to the objection, sir, aren't you
2 supposed to document that at the time or near the
3 time it occurs?

4 MR. MAYEAUX: Object to the form.

5 BY MS. CRAFT:

6 Q. You can answer, sir.

7 A. I'm sorry. What was the question again?

8 Q. If you're accusing somebody of the crime
9 of intimidation of an officer, aren't you supposed
10 to document that at the time it occurs?

11 MR. MAYEAUX: Object to the form. You
12 can answer.

13 A. I would say that you could, but there's
14 nothing saying you couldn't document it with some
15 time passage.

16 BY MS. CRAFT:

17 Q. Six months, sir? Is that what you're
18 telling us? Six months would be an appropriate time
19 passage if the accusation is intimidation of an
20 officer?

21 MR. MAYEAUX: Object to the form.

22 A. Ma'am, I would say that that's what
23 happened here, was six months passed. Now, whether
24 or not that's what you would say is proper or not, I
25 can't answer that question.

1 BY MS. CRAFT:

2 Q. Well, let me --

3 A. That's what happened.

4 Q. Let me ask you this question, sir: How
5 many officers have you disciplined in your tenure
6 with State Police for not turning in their reports
7 timely?

8 A. I could not give an answer for that.

9 Q. I'm sorry?

10 A. I couldn't tell you an answer to that.

11 Q. You certainly have -- you certainly have
12 disciplined officers for not timely turning in their
13 reports; is that correct?

14 A. Yes, ma'am. I'm sure we have.

15 Q. And there are officers, are there not, at
16 State Police who have actually lost pay, in other
17 words, they were either suspended or even terminated
18 for not turning in their reports timely; isn't that
19 right?

20 A. I couldn't answer that question.

21 Q. How about you? What types of discipline
22 have you imposed upon officers in State Police for
23 not timely turning in their reports?

24 A. I don't recall. It's not a regular
25 occurrence that we have.

1 **Q. Understood. Is there a policy at**
2 **Louisiana State Police regarding when you are**
3 **supposed to turn in incident reports relating to**
4 **incidents?**

5 A. I -- ma'am, I think that you are -- I'm
6 asking. Are you confused that an incident report is
7 a criminal report? An incident report is just
8 memorializing -- it can be just memorializing an
9 incident. If you're thinking in terms of local
10 police departments and our criminal aspect of
11 investigation, then you have an initial report, but
12 that's a separate initial report from an incident
13 report. So we're talking about an incident report
14 where someone can memorialize something at any point
15 that they would like to in reference to any
16 incident.

17 **Q. My question was about the policy of State**
18 **Police as it relates to incident reports. Are you**
19 **telling me there's no State Police policy relating**
20 **to incident reports?**

21 A. I don't believe I said that at all. I
22 believe I said that I'd have to go back and look
23 at the -- I didn't say that, but I'm telling you,
24 I'd have to go back and look at the policy to
25 refresh my memory. That's why we have it written

1 down.

2 Q. Sitting here today, do you have any
3 recollection in general terms what the State Police
4 policy is regarding incident reports?

5 A. No, ma'am, I do not.

6 Q. Okay. Now, with respect to this
7 particular incident, did Mr. Oliphant ever express
8 to you that he believed the behavior of Mr. Braxton
9 to have been criminal in any fashion?

10 A. Not that I recall.

11 Q. Because am I correct that, if Mr. Oliphant
12 had relayed to you that he believed the behavior to
13 be criminal, you would have taken action, would you
14 not?

15 A. We would have certainly looked into it.

16 Q. And can you tell me whether or not anyone
17 ever investigated the exchange between Mr. Oliphant
18 and Mr. Braxton outside of what Mr. Oliphant told
19 you his interactions were?

20 A. No, ma'am. Not that I recall.

21 Q. Did Mr. Oliphant ever tell you why LSTA
22 wanted him to prepare documentation regarding
23 Mr. Braxton?

24 A. Not that I recall.

25 Q. Did you know why?

1 A. No, ma'am.

2 Q. Did you know at the time that there was
3 some sort of friction between the State Troopers
4 Association and Mr. Braxton?

5 A. No, ma'am. Not that I recall.

6 Q. Did you talk to anyone at the LSTA
7 regarding Mr. Braxton at that time, --

8 A. No.

9 Q. -- which would be -- let me finish -- June
10 of 2016?

11 A. No, ma'am.

12 Q. So at some point in time, you instructed
13 Mr. Oliphant to prepare an incident report; is that
14 right?

15 A. Yes. I had conversations with Lieutenant
16 Colonel David Staton, who was the deputy
17 superintendent of patrol, and we work in a chain of
18 command here in State Police, so I advised him of
19 the situation, and then advised Colonel Oliphant, I
20 mean, then Captain Oliphant, that he could write an
21 incident report for the State Police.

22 Q. What did you tell Mr. Staton?

23 A. I told Mr. Staton the request that had
24 been made of then Captain Oliphant in reference to
25 the incident.

1 Q. By the State Troopers Association; is that
2 right?

3 A. Yes, ma'am.

4 Q. And did you tell Mr. -- did Mr. Staton
5 express to you that he had had conversations with
6 anyone at State Troopers Association about getting
7 this documentation done by Mr. Oliphant?

8 A. Absolutely not, no, ma'am.

9 Q. Mr. Staton was above you in the chain of
10 command?

11 A. Yes, ma'am. He's lieutenant colonel over
12 patrol.

13 Q. And, to your knowledge, did he speak to
14 anybody above him?

15 A. I don't know.

16 Q. Do you know if he had any meetings with
17 other command staff about the request from the State
18 Troopers Association directed to Mr. Oliphant to
19 prepare documentation?

20 A. I do not know.

21 Q. At any time in your conversations with
22 either Mr. Staton or Mr. Oliphant, did it strike you
23 as odd that the request was coming six months after
24 the alleged incident had occurred?

25 A. I didn't give it that much thought. I

1 knew that we had had a request or had been told that
2 we had had a request from the State Troopers
3 Association for some documentation. My point of
4 view, which was also shared by Lieutenant Colonel
5 Staton, was, not with any other ill intent, other
6 than, if we're going to document an incident that
7 happened, it would be documented within the
8 Louisiana State Police, not for an external
9 organization.

10 Q. Well, didn't --

11 A. That was it.

12 Q. Did Mr. Oliphant tell you, for example,
13 that he knew the incident report itself would become
14 a public record?

15 MR. MAYEAUX: Object to the form. You
16 can answer.

17 BY MS. CRAFT:

18 Q. You can answer it.

19 A. You asked if Captain Oliphant told me
20 that?

21 Q. Yeah.

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

24 Q. Did anybody tell you, if you document it
25 as an incident report, it will then become a public

1 record, and the State Troopers Association can get
2 it that way?

3 A. No, ma'am.

4 Q. You never heard that before?

5 A. Not that I recall. We didn't put that
6 much thought into it. I mean, we weren't doing it
7 for someone else, for any other purpose other than
8 to document it within the confines of the Louisiana
9 State Police.

10 Q. Well, with all due respect, sir, the only
11 reason you were documenting it, as I understand your
12 testimony so far, is because the State Troopers
13 Association requested it, right?

14 A. My purpose was, is we're not going -- if
15 there's a belief that this incident should be
16 documented, we're not documenting it for someone
17 else. We're going to document it within the
18 confines of the Louisiana State Police. That's
19 just -- I can't say that six different ways.
20 There's only one way to say it, and it's the truth.

21 Q. But, sir, with respect to documentation,
22 if you had believed at the time, in December of
23 2015, that it was something that needed to be
24 documented, you would have instructed Mr. Oliphant
25 at that time to do so, correct?

1 MR. MAYEAUX: Object to the form.

2 BY MS. CRAFT:

3 Q. You can answer it.

4 A. I'd be glad to answer it. I don't --
5 whether you document something in January, you
6 document something in June, I -- in this case, it
7 didn't really make a difference.

8 Q. My question was, you did not believe in
9 December of 2015, when this happened, it was
10 something worthy of being documented at that time;
11 is that correct?

12 A. It could have been documented by Captain
13 Oliphant at the troop level of his conversation with
14 Mr. Braxton. It doesn't mean everything comes up to
15 us. Everything doesn't come up through the chain of
16 command. He could have documented on his own and
17 kept it at the troop level for his own references
18 for future knowledge, if needed.

19 Q. Yeah. But, sir, you told us that after
20 the incident happened, which was in December of
21 2015, Mr. Oliphant had a conversation with you then.
22 My question to you was, at that time, when he had
23 that conversation with you, am I correct that you
24 did not believe it was worthy of being documented;
25 otherwise, you would have instructed Mr. Oliphant to

1 **do so then, right?**

2 A. If I thought that Colonel Oliphant needed
3 to document it to go up through the chain of
4 command, I would have instructed him to do that
5 then, but it doesn't mean that I didn't think that
6 he was documenting his conversations with
7 Mr. Braxton on the local troop level, and we could
8 come back to it at some point if we needed to.

9 Q. Okay. So then, when we fast-forward into
10 June of 2016 -- and we talked about it -- was there
11 anything that happened? Did he come to you and say
12 he had any other concerns? You said no. The only
13 thing that changed was what Mr. Oliphant relayed to
14 you, which was the State Troopers Association
15 requested documentation regarding his interaction
16 with Mr. Braxton in December of 2015, right?

17 A. And you asked me for any actions that took
18 place in that amount of time. It is my
19 understanding that there were some conversations
20 that took place over that period of time between
21 Captain Oliphant and Mr. Braxton where Mr. Braxton
22 was persistent and insistent on moving forward with
23 moving the trooper.

24 Q. And you have that recollection because
25 Mr. Oliphant told you?

1 A. At that time, yes, ma'am.

2 Q. Okay. Again, so when Mr. Oliphant told
3 you those things were occurring at that time, you
4 did not, as his commanding officer, instruct him to
5 prepare an incident report or some sort of report
6 about it, correct?

7 A. Ma'am, at some point, when you look at it,
8 if someone doesn't abate in their insistence on an
9 action being taken, then you go ahead and just
10 document it. We're not going to document it for
11 another entity. We're going to document it for the
12 Louisiana State Police.

13 Q. Okay. So, sir, in this particular
14 circumstance, my question was, as Mr. Oliphant's
15 commanding officer, when, as you're saying, he told
16 you that Mr. Braxton was persistent, whenever that
17 was, and we'll defer to Mr. Oliphant, you at no time
18 instructed him to prepare an incident report or any
19 report whatsoever, not until he came to you and said
20 LSTA wants us to document this, correct?

21 A. Yes. Correct.

22 Q. Okay. Now, did you know, for example,
23 sir, at the time we're speaking about, that
24 Mr. Braxton sat on the Louisiana State Police
25 Commission?

1 A. Yes, ma'am.

2 Q. Did you know in late 2015 that there was a
3 complaint filed with the Ethics Commission regarding
4 the State Troopers Association?

5 A. I think I heard something loosely about
6 it. I'm not sure.

7 Q. And what do you remember hearing about it?

8 A. I'm not sure what I heard about it.

9 Q. Did you know that -- go ahead. I'm sorry.

10 A. It did not affect me in north Louisiana.

11 Q. Did you know, sir, that -- whether or not
12 Mr. Braxton had been involved in the investigation
13 leading up to the ethics complaint?

14 A. I did not.

15 Q. Had you talked to anybody at State Police
16 about Mr. Braxton's potential voting on things like
17 raises or things that might affect State Police?

18 A. Not that I recall.

19 Q. Have you ever seen the consent order that
20 was ultimately issued by the Board of Ethics finding
21 the State Troopers Association and Mr. Young
22 responsible for violating state law?

23 A. No, ma'am. I don't recall seeing it.

24 Q. Can you look at Exhibit #12, sir?

25 A. Yes, ma'am. I'd be glad to.

1 Q. Have you seen that document before, sir?

2 A. No, ma'am.

3 Q. If I could direct your attention to page 9
4 of 12, which is entitled, Order and Decree.

5 A. Yes, ma'am.

6 Q. In the second paragraph, it indicates, it
7 is further order, adjudged and decreed that LSTA
8 violated LA R.S. 18:1505.2A(1) by making
9 contributions -- and it has, totaling 17,500,
10 including to Governor John Bel Edwards. Do you see
11 that?

12 A. Yes, ma'am.

13 Q. At this time, in 2015, you were a member
14 of the State Troopers Association?

15 A. Sure.

16 Q. Did you know that moneys that you were
17 paying to the State Troopers Association were being
18 funneled as political donations to folks?

19 A. I did not.

20 Q. Did you ever learn that?

21 A. Yes, ma'am, of course. It was in the
22 news.

23 Q. And how did you feel about that?

24 A. I felt like I had not known that that was
25 what was going on.

1 Q. Did you know that you, as a public
2 officer, were prohibited from making political
3 donations?

4 A. Yes, ma'am.

5 Q. Did you ever have any conversations with
6 David Young?

7 A. Have I ever had any conver- -- yes, ma'am.
8 I have had conversations with David Young.

9 Q. Did you ever have any conversations with
10 David Young about this issue, the using --

11 A. Not that I recall.

12 Q. Have you ever had any conversa- -- sorry.

13 A. I apologize for cutting you off. I didn't
14 mean -- I thought you were finished.

15 Q. No. That's all right. Go ahead.

16 A. No. I don't recall having any
17 conversations with David Young about this issue.

18 Q. Did you have any conversations with David
19 Young about the Louisiana State Police Commission
20 and what they were or were not doing relative to
21 this issue?

22 A. Not that I recall. I'm not -- I think it
23 should be noted here that I'm not a very active
24 member with the Louisiana State Troopers
25 Association. I am a member, but...

1 Q. Okay. While you were at Troop F, was
2 there something called a commander log?

3 A. Commander log?

4 Q. Yes.

5 A. I'm -- not that I'm aware of.

6 Q. Did you ever -- did you ever see anything
7 called a commander log at Troop F?

8 A. No, ma'am. I'm not aware of a commander
9 log.

10 Q. In front of you, sir, if you don't mind,
11 if I can direct your attention to Exhibit #16.

12 A. Yes, ma'am.

13 Q. For the record, I'll represent it appears
14 to be an inquiry from Lee Zurik, Z-U-R-I-K, to
15 Richard Carbo, C-A-R-B-O, who is the deputy chief of
16 staff for Governor Edwards.

17 Have you ever seen this e-mail exchange or
18 any version of this e-mail exchange before today?

19 A. Not that I'm aware of.

20 Q. In the middle of the page dated July 14th,
21 2017, it looks like Mr. Zurik wrote to, I think
22 Mr. Carbo, I'm doing a story on Calvin Braxton, a
23 member of the Louisiana State Police Commission.

24 My question is: Around this time, did you
25 know anything about a letter written by the State

1 Police Commission and sent to the governor?

2 A. Not that I recall.

3 MR. MAYEAUX: Jill, by the Commission?

4 MS. CRAFT: I'm sorry. The State
5 Troopers Association.

6 A. No, ma'am. Not that I recall.

7 BY MS. CRAFT:

8 Q. In the second paragraph, it says, We
9 received a report made by Captain Jay Oliphant to
10 then Major Kevin Reeves about a December 5, 2015,
11 incident involving Mr. Braxton's daughter.

12 Is that the report that you were talking
13 about earlier that Mr. Oliphant prepared sometime in
14 June of 2016?

15 A. I have no idea.

16 Q. And then it says: We have the following
17 questions for Governor Edwards. Our deadline is
18 noon Monday. No. 1, Why has the governor not
19 responded to two letters sent by the Troopers
20 Association?

21 Do you see that part?

22 A. I see it. Yes, ma'am.

23 Q. Had you ever seen either of the two
24 letters sent by the State Troopers Association to
25 the governor?

1 A. No, ma'am.

2 Q. Have you ever seen those since?

3 A. Not that I recall.

4 Q. And were you aware whether or not the
5 State Troopers Association made a public records
6 request for Mr. Oliphant's report regarding
7 Mr. Braxton?

8 A. I am not aware.

9 Q. But in order for them to have gotten a
10 copy of the incident report, correct me if I'm
11 wrong, they would have had to have made a request
12 for it, right?

13 A. I would think so.

14 Q. Like, I can't just walk over to State
15 Police and say, hey, man, give me a copy of a
16 report, right?

17 A. Correct. Yes, ma'am.

18 Q. I either have to make a public records
19 request for it, or I have to have a legitimate law
20 enforcement reason to get it; am I correct?

21 A. Yes, ma'am. That sounds correct.

22 Q. Okay. So can you tell me how it is the
23 State Troopers Association came in possession of
24 Mr. Oliphant's report?

25 A. No, ma'am. I cannot tell you.

1 Q. Are there any other ways a private entity
2 can get a copy of a State Police incident report
3 other than for a legitimate law enforcement reason
4 or by a public records request?

5 A. No, ma'am. Not that I'm aware of.

6 Q. Or a third one, a state trooper slips them
7 a copy of it.

8 MR. MAYEAUX: Object to the form.

9 BY MS. CRAFT:

10 Q. Right?

11 A. Sure.

12 Q. And have you ever been aware of or ordered
13 any kind of investigation to determine how the State
14 Troopers Association got a copy of Mr. Oliphant's
15 report regarding Mr. Braxton?

16 A. No, ma'am.

17 Q. Did anybody ever tell you about any public
18 records requests or requests by the State Troopers
19 Association for a copy of Mr. Oliphant's completed
20 report regarding Mr. Braxton?

21 A. I don't recall.

22 Q. Can you put --

23 A. I'm not always -- I'm sorry. I'm not
24 always made aware of all public records requests.

25 Q. Okay. Can you look at Exhibit #20 for me,

1 please, sir?

2 A. Yes, ma'am.

3 Q. Now, this is dated March 2nd, 2018. It's
4 from Mr. Oliphant to Mr. Staton. Who is that?

5 A. That's Lieutenant Colonel Staton, deputy
6 superintendent over patrol.

7 Q. And what was Mr. Oliphant's position back
8 in March of 2018?

9 A. He was a region major for Region 3.

10 Q. And he reported directly to whom?

11 A. Colonel Staton.

12 Q. And you're copied on it, as is Mike Noel.
13 Who was Mike Noel at the time?

14 A. Chief of staff for Louisiana State Police.

15 Q. Was he in Mr. Oliphant's chain of command?

16 A. He would have been. Yes, ma'am. He's
17 the -- I'm the superintendent. He's the chief of
18 staff for State Police.

19 Q. So does it go from Staton, to Noel, to
20 you? Is that the chain of command?

21 A. Yes, ma'am.

22 Q. Okay. In this particular thing, it says,
23 Forward: Incident report attached. At the bottom
24 of it, there's something from Sherry Jameson,
25 J-A-M-E-S-O-N, to Jay Oliphant the same date, but at

1 **2:58 p.m. Who was Ms. Jameson?**

2 A. I believe that she is a -- is still a
3 administrative assistant at Region 3, where then
4 Major Oliphant works -- worked.

5 **Q. She's a secretary?**

6 A. Yes, ma'am.

7 **Q. So do you know why she's sending**
8 **Mr. Oliphant something dated at March 2nd at 2:58?**

9 A. No, ma'am. I have no idea.

10 **Q. Okay. Attached to this document are two**
11 **pages, and this is entitled, Initial Report by**
12 **Employee. What does the phrase "Initial Report"**
13 **mean?**

14 A. It's titled, Incident Report.

15 **Q. Right below, the box checked Initial**
16 **Report by Employee, what does that mean?**

17 A. That just means it's initiated by an
18 employee.

19 **Q. Okay. Do you recall seeing this document?**

20 A. I -- I must have, but I don't recall.

21 **Q. Do you recall this document being the**
22 **product of another request by the State Troopers**
23 **Association and Mr. Oliphant to document --**

24 A. No, ma'am.

25 **Q. -- some interactions he claims to have had**

1 with Mr. Braxton?

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

3 Q. But this incident report, correct me if
4 I'm wrong, would also be a public record; is that
5 correct?

6 A. I would assume so.

7 Q. And can you tell me to whom this document
8 was disseminated outside of State Police, if anyone?

9 A. No, ma'am, I cannot.

10 Q. In this particular incident, it says the
11 nature of the incident is public intimidation by
12 Calvin Braxton, slash, officer safety concern.

13 My first question is, isn't public
14 intimidation a crime?

15 A. It can be.

16 Q. Would you expect someone like Mr. Oliphant
17 at this time, in March of 2018 -- you said he was
18 the commander of Region 3 -- to know that public
19 intimidation is a crime in this state?

20 A. It can be.

21 Q. Well, under what circumstances do you
22 label an incident report with a definition a crime?

23 A. I don't know that he labeled it with a
24 definitive crime. He's not saying that he violated
25 Louisiana Revised Statute in it.

1 Q. But he is saying the nature of the
2 incident was public intimidation by my client,
3 right?

4 A. That's what it says.

5 Q. Had you talked to Mr. Oliphant at all
6 about an alleged public intimidation by Mr. Braxton?

7 A. I don't think that we had very much
8 conversation about that.

9 Q. Well, I'm just asking if you talked to him
10 at all. Whether it's very much, a lot or a little,
11 it doesn't matter to me.

12 A. Ma'am, I don't recall. I can't adequately
13 answer your question with any surety on that.

14 Q. Did you talk to anybody about any alleged
15 intimidation by Mr. Braxton?

16 A. I don't recall.

17 Q. Did you know that Mr. Braxton had already
18 filed suit by the time this report was prepared?

19 A. I don't recall.

20 Q. But you said you did talk to the
21 governor's office about a lawsuit, right?

22 A. I believe I made him aware that we were
23 being sued, had been added to a suit, but I don't
24 know at what time that was.

25 Q. Okay. Can you tell me whether or not you

1 **approved this incident report?**

2 A. No, ma'am. I don't know that I approved
3 it. There's no place for me to approve, so I
4 wouldn't have approved it.

5 **Q. So are you telling me, then, with an**
6 **incident report, it does not go up the chain of**
7 **command for approval?**

8 A. No, ma'am. There's no approval process
9 for these. It goes up the chain. Sometimes it can
10 be for -- an incident report can be used for
11 informational purposes. An incident report can be
12 in response to a complaint against a trooper. We
13 could ask them for an incident report on the matter
14 to get their version of what happened. It can be
15 used for several different things. It's not just a
16 one-function form. It's pretty generic.

17 **Q. All right. But are you telling me, then,**
18 **that an incident report is not the type of report**
19 **that has to be approved through the chain of**
20 **command; is that right?**

21 A. Correct.

22 **Q. So under what circumstances in creating an**
23 **incident report would someone in the chain of**
24 **command be solicited for input in the contents of**
25 **the incident report?**

1 A. I would believe that, in this case -- and
2 you asked me not to speculate, so I can't. I can
3 tell you that I was not involved in direct
4 conversations about this incident report.

5 **Q. Who was?**

6 A. I can tell you -- I would probably say
7 that it went to Lieutenant Colonel David Staton.

8 **Q. Don't you --**

9 A. That's who it's addressed to.

10 **Q. Don't you have command staff meetings like**
11 **once a week, or didn't you in 2018?**

12 A. We do. We have every Monday.

13 **Q. And did Mr. Oliphant attend those command**
14 **staff meetings?**

15 A. No, ma'am.

16 **Q. Okay. Can you tell me, in the command**
17 **staff meetings that you had, was the subject of the**
18 **allegation that Mr. Braxton was engaging in some**
19 **sort of intimidation against Mr. Oliphant ever**
20 **brought up?**

21 A. I don't recall.

22 **Q. That would seem pretty significant to me.**
23 **Correct me if I'm wrong. You have the regional**
24 **commander, who's claiming some member of the public**
25 **is engaging in intimidation towards him. Are you**

1 telling me you don't remember that ever being
2 discussed?

3 MR. MAYEAUX: Object to the form.

4 A. I do not recall it being discussed in the
5 senior command staff meeting.

6 BY MS. CRAFT:

7 Q. Do you recall it being discussed at all?

8 A. I really -- I don't recall. I'm sure it
9 was discussed, but I don't recall when, where, who.
10 This was being handled at the patrol level.

11 Q. Being handled by whom?

12 A. The report went to Lieutenant Colonel
13 David Staton. I think you need to ask him those
14 questions. You're asking for my involvement in it,
15 and I don't have answers for you.

16 Q. Are you telling me that Mr. Staton never
17 communicated to you anything that was going on or
18 what the status of this situation was?

19 A. I don't recall his conversations with me
20 on this.

21 Q. Do you recall anyone at State Police
22 making any statements about Mr. Braxton possibly
23 being involved in a homicide or some suicide that
24 was strange 25 years earlier?

25 A. I heard that there was an incident. I

1 actually had to ask my counsel --

2 MR. MAYEAUX: Well, don't -- what you
3 and I discuss is off the record.

4 THE WITNESS: No, not you.

5 MR. MAYEAUX: Oh, okay.

6 THE WITNESS: Not you.

7 MR. MAYEAUX: Well, not legal -- not
8 legal here, either.

9 THE WITNESS: Okay.

10 A. I had to get an explanation for what we
11 were talking about, what this was.

12 BY MS. CRAFT:

13 Q. What do you mean, what this was? You mean
14 the suicide from 25 years earlier?

15 A. How this pertained to State Police, yes.
16 I was not up to speed on this.

17 Q. This being Exhibit #20, the report; is
18 that correct?

19 A. Yes, ma'am. I believe that the -- part of
20 the lawsuit has to do with some allegation about
21 this, and I had to be brought up to speed on that.

22 Q. Can you tell me whether or not State
23 Police made any inquiries in the death of
24 Ms. Rachal, that's R-A-C-H-A-L, as a result of
25 information from Mr. Oliphant?

1 A. No, ma'am. I don't know.

2 Q. Would you have known whether or not State
3 Police, quote, reopened the investigation of
4 Ms. Rachal, of her death?

5 MR. MAYEAUX: Object to the form.

6 BY MS. CRAFT:

7 Q. Would you have known, sir?

8 A. No. I mean, no, ma'am.

9 Q. If you could look on the second page, the
10 first full paragraph, it says, To somewhat confirm
11 someone is watching my, slash, our every move has
12 caused great concern for my safety and the safety of
13 my family. Do you see that part?

14 A. Yes, ma'am.

15 Q. Then two sentences later, he says, What's
16 even more concerning to me is the mysterious and
17 untimely death of a woman named Lydia Rachal, whom
18 Calvin Braxton was allegedly dating at the time of
19 her death several years ago.

20 Had you ever heard about that before you
21 received this document from Mr. Oliphant in March of
22 2018?

23 A. No, ma'am.

24 Q. What involvement would State Police have
25 had in a suicide that occurred within the city

1 limits of Shreveport 25 years before 2018?

2 A. I can't answer that question.

3 Q. What authority would State Police have to
4 go reopen an investigation of a death that occurred
5 within the city limits of Shreveport years earlier?

6 MR. MAYEAUX: Object to the form.

7 BY MS. CRAFT:

8 Q. You can answer it, sir.

9 A. I know I can answer it. What is the --
10 can you rephrase the question so I can understand
11 what you're asking?

12 Q. Yes, sir. What jurisdiction or under what
13 authority would State Police have had to go back and
14 reopen an investigation that had been conducted and
15 closed by the Shreveport Police Department years
16 earlier?

17 MR. MAYEAUX: Object to the form.

18 A. State Police has statewide jurisdiction in
19 cases, and so it could be new information comes
20 forth, could be -- I don't -- I'm not aware that we
21 went back and opened an investigation.

22 BY MS. CRAFT:

23 Q. Okay. Let's read on. He says in this,
24 The fact that Calvin Braxton's name was closely
25 connected to this woman at the time of her death is

1 enough reasonable suspicion for me to be concerned
2 for my safety and the safety of my family. You see
3 that part?

4 A. Yes, ma'am.

5 Q. Am I correct that the term "reasonable
6 suspicion" is a law enforcement term?

7 A. Yes, ma'am.

8 Q. And in law enforcement world, when you
9 have reasonable suspicion, that allows you to do
10 what?

11 A. Allows you to look into something further.

12 Q. Got it. Then it says, It would be my
13 suggestion that Louisiana State Police review the
14 case file regarding the death of Lydia Rachal to
15 determine the actual manner of death and/or
16 determine if there was any possibility of foul play.
17 You see that part?

18 A. Yes, ma'am.

19 Q. Do you know that State Police did exactly
20 that?

21 MR. MAYEAUX: Object to the form.

22 A. I have been told since then that there was
23 inquiry made --

24 BY MS. CRAFT:

25 Q. Who told you that?

1 A. -- into the file.

2 Q. Sorry. Who told you that?

3 A. I don't recall.

4 Q. And am I correct that the only reason
5 there was an inquiry made was because of this
6 document prepared by Mr. Oliphant?

7 A. Ma'am, the information that I got was
8 specific to your lawsuit that you filed. It's not
9 of any firsthand knowledge of that we went and did
10 this or didn't do this.

11 Q. But you know now that State Police
12 certainly did after Mr. Oliphant authored this
13 document which he dates March 2nd, 2018; isn't that
14 right?

15 MR. MAYEAUX: Object to the form.

16 A. I do not know for a fact that we did,
17 because I haven't gone back and looked to see if we
18 did or not.

19 BY MS. CRAFT:

20 Q. Okay. Are you aware of any other evidence
21 or information regarding the death of Lydia Rachal
22 that came to light, let's say, in the last ten
23 years, other than what Mr. Oliphant has written in
24 this report?

25 A. Ma'am, I know nothing about the case of a

1 Mrs. Rachal. I know zero about it.

2 Q. Do you know what State Police did? Did
3 they contact the Shreveport Police Department and
4 make an inquiry as to the death of Ms. Rachal?

5 A. I have no idea.

6 Q. Do you know how many law enforcement
7 agencies State Police communicated with regarding an
8 inquiry of whether or not Mr. Braxton was involved
9 in Ms. Rachal's death?

10 A. No, ma'am. Ma'am, you could ask me 10 or
11 15 more questions about this, and my answer is going
12 to be the same. I don't know of -- much of anything
13 about Ms. Rachal's death, other than what I've been
14 told in reference to the lawsuit.

15 Q. I understand, Mr. Reeves, and I'm not
16 trying to, you know, repeat and beat a dead horse.
17 There's a specific --

18 A. I understand.

19 Q. -- reason for me to ask questions as it
20 relates to specific publications of this
21 information. That's why I'm asking.

22 A. Yes, ma'am. I understand.

23 Q. And, unfortunately, I have to get you on
24 record for all of those venues. Okay?

25 A. Yes, ma'am.

1 Q. Okay. After that, he writes,
2 Additionally, I am requesting the Louisiana State
3 Police conduct a personal threat assessment
4 regarding the capabilities of Calvin Braxton,
5 Gregory Friedman and Erin Friedman to potentially
6 harm me or my family.

7 First of all, what is a personal threat
8 assessment?

9 A. I believe it would be his term to see if
10 there is a true threat there to he or his family, is
11 what I'm assuming is written here.

12 Q. Are you aware of State Police conducting
13 personal threat assessments?

14 A. I'm not aware. I mean, when we -- in
15 this -- if we have a trooper who believes that they
16 are being surveilled, then we certainly would try to
17 do our best to find out if that was true or not. I
18 think that would be reasonable for the safety of
19 them and their family.

20 Q. Okay. So can you tell me, did State
21 Police ever uncover any evidence whatsoever that
22 Mr. Oliphant was being surveilled by Mr. Braxton?

23 A. I'm not aware.

24 Q. Or Mr. Friedman, Gregory Friedman?

25 A. Not aware.

1 Q. Or Ms. Erin Friedman?

2 A. I'm not aware.

3 Q. But you do know that State Police
4 conducted a threat assessment regarding Calvin
5 Braxton; isn't that right?

6 A. I mean, you asked me if we had before
7 conducted threat assessments as is termed here, and
8 I said we probably would if we had reason to believe
9 that one of our employees was being surveilled by
10 someone or some suspicious activity was going on
11 around their homes. As far as this goes, I don't
12 know that we did or we didn't.

13 Q. He writes, I was so concerned that I
14 contacted Louisiana State Police Troop E and
15 requested that they make frequent security checks
16 around my residence.

17 What was Mr. Oliphant's position in March
18 of 2018 as it relates to Troop E?

19 A. I believe he was the region major of
20 Region 3, so Troop E would have been one of the
21 troops that was under his direction.

22 Q. And who was the head of Troop E at the
23 time?

24 A. I believe it was Captain Jason Smith.

25 Q. So correct me if I'm wrong. If I looked

1 at the chain of command at that time, Captain Smith
2 would have reported directly to Mr. Oliphant; is
3 that right?

4 A. Yes, ma'am. That is correct.

5 Q. And so am I correct that the way orders
6 work is it's a superior officer giving a command or
7 a directive to a subordinate officer; is that right?

8 A. Yes, ma'am.

9 Q. Do you know whether or not Mr. Oliphant
10 gave an order or a command to Mr. Smith at Troop E
11 relative to making security checks around his house?

12 A. Well, I wouldn't -- I would be surprised
13 if he gave an order. Rather, I would think that he
14 would have a request that maybe some extra patrols
15 around his house based on what he had observed for
16 the safety of his family.

17 Q. Well, let me see if I can ferret that out.
18 Is there a difference in your mind between a request
19 from a superior officer to a subordinate as opposed
20 to an order from a superior officer to a
21 subordinate?

22 A. Yes, ma'am. There is a difference.

23 Q. So are you, then, unaware of any officers
24 who have been disciplined for denying a request by a
25 superior officer?

1 A. I'm not aware, ma'am. It depends on the
2 form of the request. The form of a request can be
3 in the form of an order, or the form of an order can
4 be in the form of a request, but it doesn't mean
5 they're always the same.

6 Q. But here, where he writes, I was so
7 concerned, I contacted the Louisiana State Police,
8 slash, Troop E, you do not know whether or not it
9 was a request in the form of an order or an order in
10 the form of a request?

11 A. I do not.

12 Q. And you certainly did not receive any
13 information from Mr. Smith, hey, I did not follow
14 the request of my superior officer, Mr. Oliphant?

15 A. No, ma'am. You're asking me to interpret
16 stuff that's in this -- here that I have no
17 firsthand information on.

18 Q. Well, with all due respect, sir, it was
19 sent directly to you, right?

20 A. I understand that. The form was, but I
21 didn't go back and go through the form.

22 Q. He writes, I've also advised LSP, slash, E
23 to contact the Natchitoches Parish Sheriff's Office
24 to conduct the security checks, as well. Do you see
25 that part?

1 A. Yes, ma'am.

2 **Q. Under what circumstances would someone**
3 **like Mr. Oliphant request a subordinate under his**
4 **command to contact another law enforcement agency**
5 **entirely?**

6 A. It wouldn't be out of the way for him to
7 do that. Law enforcement agencies -- for the State
8 Police, our troopers are routed in rural areas in
9 not close proximity to each other, so it would not
10 be uncommon to depend on a local agency to help out
11 and perform checks around houses, which I would also
12 say is not an uncommon occurrence for citizens to
13 have to call and ask for extra patrols around their
14 houses when they have an uneasy feeling about things
15 that are going on. So this wouldn't be out of the
16 ordinary, in my opinion.

17 **Q. So are you telling me that the State**
18 **Police public resources actually went by and**
19 **conducted security checks on Mr. Oliphant's**
20 **residence?**

21 A. Ma'am, again, you're asking me to testify
22 to something I have no firsthand knowledge of.

23 **Q. Well, did anybody ever tell you that**
24 **that's what happened? The State of Louisiana's**
25 **resources, through State Police, and the Sheriff's**

1 Office's resources were used to drive by and check
2 on Mr. Oliphant's personal residence?

3 A. No, ma'am. Nobody ever told me that's
4 what happened, but it wouldn't be an uncommon
5 occurrence for any citizen in the State of Louisiana
6 to request of a law enforcement agency to drive by
7 extra patrols of their residence or their business.

8 Q. And are you telling me you've never talked
9 to Mr. Oliphant about any concerns he had that
10 Calvin Braxton or Mr. Friedman or Ms. Friedman were
11 surveilling him?

12 A. I don't recall conversations specifically
13 with Colonel Oliphant. At the time, Colonel
14 Oliphant was a major with the department, and his
15 chain of command would have been conversations with
16 Lieutenant Colonel David Staton.

17 Q. Do you know who Gregory Friedman is?

18 A. I have no idea.

19 Q. Do you know he's a lawyer?

20 A. I have no idea who he is.

21 Q. You have read this report before today; am
22 I correct?

23 A. I don't recall that. I assume that I
24 have. It was addressed to me.

25 Q. Do you recall any reaction that you had to

1 this report?

2 A. No, ma'am, I do not.

3 Q. I'm going to show you another document,
4 sir, if you don't mind, and I'm going to direct your
5 attention -- let me make sure it's the right one so
6 we can kind of speed along.

7 MR. MAYEAUX: Counsel, the witness is
8 requesting -- five minutes?

9 MS. CRAFT: Sure.

10 THE WITNESS: Three.

11 MR. MAYEAUX: Three minutes?

12 THE WITNESS: Three minutes will be
13 fine.

14 MS. CRAFT: That's fine. We'll take a
15 little break.

16 MR. MAYEAUX: Thank you.

17 (Recess.)

18 BY MS. CRAFT:

19 Q. Can you look at Exhibit #24 for me, sir,
20 please?

21 A. Okay.

22 Q. Exhibit #24 appears to be a series of
23 e-mails with an attached incident report, and I'll
24 represent to you, I think there's a couple of
25 versions of the incident report, two or three.

1 Have you seen this document before, sir,
2 the e-mails and the incident report in various
3 forms?

4 A. Yes, ma'am.

5 Q. And how is it that you saw these before?

6 A. They were e-mailed to me.

7 Q. Now, at the time -- if we look at the
8 first page of Exhibit #24, that's an e-mail from Jay
9 Oliphant to you dated June 6th, 2016; is that right?

10 A. Yes, ma'am.

11 Q. And this was the incident report that you
12 told us you asked Mr. Oliphant to write; is that
13 correct?

14 A. Yes, ma'am.

15 Q. Now, in this one, if you can look, there's
16 a subject line that says, LSP Commission Member
17 Calvin Braxton. You see that?

18 A. Yes, ma'am.

19 Q. And then there's attachments, and it has
20 the heading, Calvin Braxton versus Trooper Linebaugh
21 dot doc. Do you see that?

22 A. Yes, ma'am.

23 Q. Calvin Braxton ever sue Mr. Linebaugh?

24 A. Sue him?

25 Q. Yes.

1 A. Not that I'm aware of. I don't know,
2 though.

3 Q. In June of 2016, was Mr. Braxton in any
4 way adverse to Mr. Linebaugh?

5 A. I would not have any perspective on that.

6 Q. Can you tell me whether or not
7 Mr. Linebaugh was ever disciplined for anything
8 relating to pulling over Mr. Braxton's daughter?

9 A. No, ma'am, he was not.

10 Q. And can you tell me whether or not
11 Mr. Linebaugh was ever disciplined in his career?

12 A. I can't tell you that. I don't know.

13 Q. But at State Police, you guys do have a
14 progressive disciplinary policy; is that right?

15 A. Usually.

16 Q. That means, in other words, you don't just
17 jump from zero to termination unless something is
18 really, really bad. I mean, I'll give you that.

19 A. That's why I said usually.

20 Q. And am I right that, generally speaking,
21 the only way a trooper is going to end up in front
22 of the State Police Commission is if that trooper
23 has already been disciplined by State Police and the
24 trooper takes an appeal, right?

25 A. If the trooper takes an appeal, yes,

1 ma'am.

2 Q. And the State Police Commission at the
3 time, in 2016, had how many members, like five,
4 seven; do you know?

5 A. Couldn't tell you.

6 Q. Okay. This says -- it's the first page --
7 submitted for your review. You did review this
8 document, am I right?

9 A. Yes, ma'am.

10 Q. And you did make changes to this document,
11 am I right?

12 A. If I would have made changes, and I'm
13 assuming I did because it says minor on one of the
14 subsequent ones -- it says, Minor adjustments for
15 your review. The changes I would make would be
16 those of a reviewer that reviewed a document, and
17 they would not be of any substantial nature to
18 change the content of the document. They may would
19 be for sentence structure, grammar, anything that
20 may have been missed by the person writing the
21 document.

22 Q. But, again, I think you told us, with an
23 incident report, it's not necessarily something that
24 has to be approved through the chain of command,
25 right?

1 A. I wasn't approving the document. I was
2 merely reviewing the document.

3 **Q. So why were you reviewing the document?**

4 A. I believe that it says here, Submitted for
5 your review.

6 **Q. I get that's what he said, but you tell
7 me, as the commanding officer for Mr. Oliphant, why
8 were you reviewing this particular document?**

9 A. Because it's going to go up the chain of
10 command to Lieutenant Colonel Staton, also.

11 **Q. Why?**

12 A. Because Lieutenant Colonel Staton and I
13 had a conversation about, if we were going to
14 memorialize an incident, we were going to do it
15 within the confines of the Louisiana State Police,
16 so I would submit the document up the chain of
17 command. It came to me. It goes to the next level.

18 **Q. Okay. So was that -- that was the notion
19 with this incident; the State Troopers Association
20 requested documentation; you, Mr. Staton and
21 ultimately Mr. Oliphant came to the conclusion you
22 would prepare this incident report, and this
23 incident report would go up through the chain of
24 command; is that right?**

25 A. Yes, ma'am. It was submitted through the

1 chain of command. There are levels in the chain of
2 command where things can stop or can proceed
3 forward. This was coming from a commander, so it
4 would go to his supervisor, and then I would submit
5 it to my supervisor.

6 **Q. But this particular incident report was**
7 **different from other incident reports, right; it was**
8 **treated differently?**

9 A. No, ma'am. I wouldn't say it was. Why
10 would you say that?

11 **Q. Well, you did tell me that you're unaware**
12 **in your tenure at State Police of the State Troopers**
13 **Association ever requesting documentation and then**
14 **State Police actually turning around and preparing**
15 **an incident report as a result of that request.**
16 **This was unusual; am I correct?**

17 A. Ma'am, I don't know -- maybe I didn't make
18 it clear. We did not prepare this document for the
19 Louisiana State Troopers Association. This document
20 was prepared by Colonel Oliphant for the Louisiana
21 State Police.

22 **Q. In response to the request from the State**
23 **Troopers Association, which you told us three times**
24 **before we took the break; am I correct?**

25 A. The Louisiana State Troopers Association

1 is my understanding made a request of then Captain
2 Oliphant to document conversations with Mr. Braxton
3 or the interactions or whatever the case was with
4 Mr. Braxton. Our position was, if there's going to
5 be any documentation on this, it's going to be
6 within the State Police, not for an external agency.

7 Q. Okay. So, sir, do you have any idea how
8 the State Troopers Association became aware of
9 Mr. Oliphant's interaction with Mr. Braxton if it
10 didn't come from Mr. Oliphant?

11 A. No, ma'am, I do not.

12 Q. Did you ever talk to Mr. Oliphant and ask
13 him how many conversations he had with someone
14 affiliated with the State Troopers Association about
15 what he claims to have been his interaction with
16 Mr. Braxton?

17 A. No, ma'am, I did not.

18 Q. But you understood that there were only
19 two parties to the conversation, and that being
20 Mr. Braxton and Mr. Oliphant; is that right?

21 A. Yes, ma'am.

22 Q. Okay. And you jumped ahead of me, but I
23 do see that you have an e-mail that's dated June
24 7th, 2016, at 1:29 p.m., and that one is from you to
25 Mr. Oliphant. The subject is Calvin Braxton, and

1 the attachments are referenced as Calvin Braxton
2 Incident Report 060616 document, and you said, Minor
3 adjustments for your review; is that right?

4 A. Yes, ma'am.

5 Q. So you made changes to the document that
6 had been submitted to you by Mr. Oliphant; is that
7 correct?

8 A. No substantial changes to the content of
9 the document. My changes would have been more to,
10 like I said, grammatical sentence structure, stuff
11 such as spacing that may be overlooked, that even I
12 overlook and like for people to over -- to look over
13 my work before I submit it.

14 Q. Well, with all due respect, sir, I didn't
15 ask you whether the changes were substantive. I
16 asked you simply, you did make changes to the
17 document submitted to you by Mr. Oliphant, correct?

18 A. I understand. I was just elaborating on
19 what changes means to me and to you.

20 Q. I understand. So the answer to my
21 question is, yes, you did make changes, right?

22 A. Yeah.

23 Q. Okay. Now, I know in your e-mail back to
24 Mr. Oliphant, the subject line is changed from LSP
25 Commission Member Calvin Braxton to simply Calvin

1 Braxton. The attachments are no longer referred to
2 as Calvin Braxton versus Trooper Linebaugh. They're
3 referred to as Calvin Braxton Incident Report. Do
4 you have a recollection as to why you wrote those in
5 there?

6 A. No, ma'am. The subject was -- Calvin
7 Braxton was the subject of the incident report, and
8 the attachments were Calvin Braxton Incident Report.

9 Q. Okay. And I want to ask you a question.
10 If you can look at page 4 of 5 of the one that you
11 made the adjustments to. Remember I asked you the
12 question about, did anything happen after the
13 initial interaction between Mr. Braxton and
14 Mr. Oliphant that you were aware of, and you said
15 something about Mr. Braxton was persistent. And so
16 I want to ask you about that, sir.

17 A. Ma'am?

18 Q. I want to ask you about that.

19 A. Okay.

20 Q. On page 4 of 5 of the incident report, the
21 one that you made the changes to, at the bottom of
22 the page -- well, first, it starts off in that
23 paragraph, On Monday, December 14th, I received
24 another call from Mr. Braxton. Do you see that
25 part?

1 A. Yes, ma'am.

2 Q. And then, according to this, it looks like
3 Mr. Oliphant documents the interaction he had with
4 Mr. Braxton on December 14th, 2015, right? Yes?

5 A. Yes.

6 Q. Okay. And then we go to the bottom, and
7 he writes, Our conversation ended with Mr. Braxton,
8 once again, indicating he was not finished with this
9 issue. And then he writes, Since then, I have had
10 minimal conversations with Mr. Braxton regarding
11 other matters. He has not mentioned anything else
12 concerning Trooper Linebaugh. You see that part?

13 A. Yes, ma'am.

14 Q. So here's why I'm asking you: It occurs
15 to me, based on his own writing, that the last
16 discussion that Mr. Oliphant had with Mr. Braxton
17 about Mr. Linebaugh was December -- let me get the
18 date right -- 14, 2015. Does that sound right to
19 you, too, sir?

20 A. That is what it says.

21 Q. Okay. So then my question is: When you
22 said earlier something about Mr. Braxton persisted,
23 are you referring to something else other than
24 what's documented in this document from June of
25 2016, or do you accept as true what Mr. Oliphant

1 wrote, that he had no other conversations with
2 Mr. Braxton about Mr. Linebaugh after December 14th,
3 2015?

4 A. I accept as true what Colonel Oliphant
5 states.

6 Q. So, then, am I correct that in the
7 intervening six-month period between December 14th,
8 2015, and what we're now at, June 6th -- June 7th --
9 or June 6th, 2016, you were unaware of anything else
10 that happened other than the LSTA requesting
11 documentation, right?

12 A. If I was, I don't recall. We're talking
13 four years ago.

14 Q. I understand. But you're not aware of
15 anything else happening after December 14th, 2015,
16 between Mr. Braxton and Mr. Oliphant, as
17 Mr. Oliphant wrote, correct?

18 A. That would be correct.

19 Q. Okay. Then the last thing I wanted to ask
20 you about in this particular exhibit is an e-mail at
21 the end, and it's from Jay Oliphant to you. The
22 subject is Calvin Braxton. It's dated June 8th,
23 2016, at 9:03, and at the bottom of it, it's
24 something from Latericka, L-A-T-E-R-I-C-K-A, Chatman
25 to Jay Oliphant on June 7th at 3:26.

1 **First of all, who is Latericka Chatman?**

2 A. I'm looking for your -- it's Latericka
3 (different pronunciation). It's Latericka Chatman,
4 and she's the administrative assistant at Troop E.

5 **Q. She's a secretary there?**

6 A. Yes, ma'am.

7 **Q. So do you know how what you sent back to**
8 **Mr. Oliphant on June 7th at 1:29 ended up in**
9 **Latericka's hands on June 7th at 3:26?**

10 A. She's his administrative assistant. She's
11 the administrative assistant to the troop commander.

12 **Q. So does it seem to you, sir, that there**
13 **has to be some sort of e-mail between Mr. Oliphant**
14 **and Latericka transmitting the document you sent**
15 **back to him?**

16 A. I wouldn't know.

17 **Q. Okay. And the e-mail that's up top from**
18 **Jay Oliphant to you dated June 8th, 2016, at 9:03,**
19 **it has attachments, and I wanted to ask you what**
20 **this meant. It says, B and the ampersand W to**
21 **Searchable PDF underscore 19 dot PDF. What does**
22 **that mean?**

23 A. I have no idea.

24 **Q. What does it mean to have a searchable**
25 **PDF?**

1 A. I have no idea.

2 Q. Do you know if there's a difference in the
3 computer systems at State Police between uploading a
4 PDF that's searchable as opposed to one that's not
5 searchable?

6 A. I have no idea.

7 Q. Do you know why you would prepare a
8 document in a searchable format, a searchable PDF
9 format, as opposed to locking it down as a PDF?

10 A. I don't -- I know you see me smiling here,
11 but I don't have any clue as to how to lockable --
12 lock down a PDF file or any other file. I'm
13 ignorant in those terms.

14 Q. Can you look at Exhibit #23, sir?

15 A. Yes, ma'am.

16 Q. This appears to be a series of e-mails
17 between you and Mr. Oliphant, Mr. Dupuy. It has
18 J.B. Slaton, S-L-A-T-O-N. Who is that guy?

19 A. That guy is a lieutenant with us. He's
20 the commander over our training academy now. At the
21 time, he would have been in -- I'm trying to think
22 where he was at the time. I'm not sure where he was
23 assigned at this time. What is the date on this?
24 '16. I'm not sure where he was assigned at this
25 time.

1 Q. It's dated July 8, 2016.

2 So Mr. Slaton is different from
3 Mr. Staton; is that right?

4 A. That is correct.

5 Q. And in July of 2016, Mr. Slaton would not
6 have been in Mr. Oliphant's chain of command; isn't
7 that correct?

8 A. That's correct.

9 Q. Okay. So if you look on the first page of
10 Exhibit #23, at the bottom of the page, there is an
11 e-mail from Mr. Staton dated June 10th, 2016, to
12 Charlie Dupuy, D-U-P-U-Y. Who was he?

13 A. He was the chief of staff at the time.

14 Q. Okay. And can you tell me whether or not
15 he had any role with the State Troopers Association?

16 A. No, ma'am, I cannot.

17 Q. Here's why I'm asking, sir: Because this
18 is an e-mail from Mr. Staton to Mr. Dupuy. The
19 subject is Calvin Braxton. And it says: Lieutenant
20 Colonel Dupuy, I am forwarding this incident report
21 up the chain of command for review and
22 consideration. Captain Oliphant Oliphant -- and
23 that's a typo, I'll give you -- did the right thing
24 in supporting his trooper in the appropriate
25 performance of his duties, but the report raises

1 serious concerns about possible inappropriate
2 attempt to influence the public safety mission of
3 the department. Thank you. Dave.

4 Can you tell me why it is you did not
5 forward this report up the chain of command?

6 MR. MAYEAUX: Object to the form.

7 A. I did forward this report up the chain of
8 command.

9 BY MS. CRAFT:

10 Q. You sent it --

11 A. If you'll look on the second page of that
12 e-mail chain there, you'll see that it came from
13 J.D. Oliphant to Kevin Reeves, from Kevin Reeves to
14 David Staton, then from David Staton to Charlie
15 Dupuy, which would have been a perfect line in our
16 chain of command.

17 Q. And then should it have gone from
18 Mr. Dupuy to the colonel at the time?

19 A. I wouldn't know.

20 Q. Well, Mr. Slaton was not in Mr. Dupuy's --
21 above him in the chain of command?

22 A. I'm not sure what Mr. Slaton's role was at
23 the time, so --

24 Q. I get it.

25 A. -- I can't answer that question.

1 Q. But Mr. Dupuy was a lieutenant colonel,
2 right?

3 A. He was the chief of staff. He was the
4 number two in command.

5 Q. Well, when it says "LTC," that's
6 lieutenant colonel, right?

7 A. That's his title, yes. That's his role,
8 but his title is chief of staff.

9 Q. Did Mr. Slaton ever hold the rank of
10 lieutenant colonel?

11 A. No, ma'am.

12 Q. What was the highest rank Mr. Slaton ever
13 held?

14 A. He's a captain.

15 Q. Okay. So if I look at simply ranks, a
16 captain is below a lieutenant colonel; isn't that
17 right?

18 A. Yes, ma'am.

19 Q. So under what circumstances --

20 A. If I'm not mistaken -- if I'm not
21 mistaken -- I may be able to clear this up for you.
22 J.B. Slaton may have been in public affairs at the
23 time.

24 Q. Oh, the public relations guy?

25 A. Yes, ma'am.

1 Q. The public information officer who
2 disseminates information to the media, correct?

3 A. Upon request.

4 Q. Got it. So tell me why Mr. Dupuy would
5 then be sending the incident report regarding Calvin
6 Braxton to the State Police's media guy.

7 MR. MAYEAUX: Objection; form.

8 BY MS. CRAFT:

9 Q. How come?

10 A. That would be more of a question for
11 Lieutenant Colonel Dupuy, who is retired now. I
12 don't have a perspective on that. You can see where
13 my chain of command was met and where I sent my
14 information to and where Captain Oliphant sent his
15 to.

16 Q. Okay. And you said Mr. Dupuy is retired.
17 I understand that. You do know that we've been
18 trying to take his deposition, right?

19 A. No, ma'am, I did not know.

20 Q. When was the last time you saw or talked
21 to Mr. Dupuy?

22 A. It's been a while.

23 Q. A while being what?

24 A. It's been a while.

25 Q. Have you been to his house?

1 A. Can you narrow it down to days, months,
2 weeks? Not very often.

3 Q. Have you been to his house?

4 A. No, ma'am.

5 Q. Have you seen him around the State Police
6 compound in the last four weeks?

7 A. No, ma'am.

8 Q. Do you know what he does for a living now?

9 A. No, ma'am.

10 Q. Okay. So Mr. Slaton, was he in charge of
11 the public information office at State Police?

12 A. Ma'am, I don't know at this time what he
13 was doing. I was in north Louisiana.

14 Q. And then right above that, it's an e-mail
15 from Mr. Slaton dated July 8th, 2016, to Michele
16 Giroir; is that right?

17 A. Yes, ma'am.

18 Q. And Ms. Giroir was the legal counsel for
19 State Police; is that right?

20 A. Ms. Giroir (different pronunciation)?
21 Yes, she is, one of them.

22 Q. And am I also correct that, in 2016,
23 Ms. Giroir was in charge of public records requests?

24 A. I wouldn't know.

25 Q. And then Ms. Giroir sends it to a Gaytha,

1 G-A-Y-T-H-A, Bynum, B-Y-N-U-M, on July 8th, 2016.

2 Who is Ms. Bynum?

3 A. I believe she works in our legal affairs
4 section.

5 Q. So she's in the law section, too? Do you
6 know if she has public records responsibilities?

7 A. No, ma'am, I do not.

8 Q. And on the attachment on this one, it's
9 got that same thing, B&W to Searchable PDF. Do you
10 know, is that something that was searched for and
11 produced, or do you know?

12 A. I have no idea.

13 Q. If you flip three pages in to Exhibit #23,
14 there's an e-mail from Michele to Gaytha which is
15 July 8th at 1:45 p.m. It's one minute after the
16 first page of Exhibit #23, and it's got an
17 attachment with a nonsearchable parameter. Do you
18 see that?

19 A. At the top of the page?

20 Q. Yes.

21 A. Where it says, ATT00001?

22 Q. Yes.

23 A. I see it.

24 Q. Do you know why that's different one
25 minute earlier?

1 A. No, ma'am, I do not.

2 Q. Sir, did you know that in July of 2016,
3 that the incident report that you had reviewed was
4 being disseminated?

5 A. No, ma'am.

6 Q. Did you hear anything at all about whether
7 or not State Police had prepared some sort of media
8 strategy as it related to the Calvin Braxton
9 incident report?

10 A. No, ma'am, I did not. I would not have
11 been included in those conversations if they were
12 had.

13 Q. Now, if, as is written on the front of
14 Exhibit #23, there were serious concerns about
15 possible influence -- possible inappropriate attempt
16 to influence the public safety mission of the
17 department, wouldn't you have expected State Police
18 to have done something?

19 A. And would forward it up the chain of
20 command, and the chain of command makes the
21 decisions, and they come back to us.

22 Q. Okay. So did the chain of command make
23 any decisions about this whatsoever?

24 A. I don't know. I was in north Louisiana.
25 I was a region major. I was not involved in those

1 conversations.

2 Q. Did you recommend at the time, when you
3 saw the incident report and you made changes to the
4 incident report, that there be some sort of
5 investigation?

6 A. I did not make that recommendation.

7 Q. Were you aware of anybody making that
8 recommendation?

9 A. No, ma'am. I believe that, based on the
10 incident report that was filed, that I agreed with
11 Lieutenant Colonel Staton that there would be
12 concerns about that kind of behavior.

13 Q. Okay. So, again, as an officer with the
14 State Police of high rank, what exactly did State
15 Police do about those concerns?

16 A. You would have to ask someone above my pay
17 grade.

18 Q. You certainly, in your position as a
19 region major, had the authority to initiate, at a
20 minimum, some sort of inquiry, right?

21 A. I would have the authority to recommend.

22 Q. And you did not make that recommendation?

23 A. As I said, I agree with what -- how
24 Lieutenant Colonel Staton phrased his information
25 that he sent up to Lieutenant Colonel Dupuy.

1 Q. I get it, sir, but for the record, you did
2 not make that recommendation that there even be an
3 inquiry; is that right?

4 MR. MAYEAUX: Object to the form;
5 asked and answered. Answer it again.

6 A. I would agree with what Lieutenant Colonel
7 Staton said in his forwarding up to Lieutenant
8 Colonel Dupuy, chief of staff.

9 BY MS. CRAFT:

10 Q. I get it, sir.

11 MR. MAYEAUX: That's not the question.
12 Did you recommend an investigation is the
13 pending question.

14 MS. CRAFT: No. My thing was even
15 simpler.

16 BY MS. CRAFT:

17 Q. Did you even recommend some sort of
18 inquiry into the situation?

19 A. I don't recall the conversations that were
20 had surrounding this.

21 Q. Okay. But did you make any
22 recommendations at all?

23 A. I just said I don't recall the
24 conversations that were had surrounding this.

25 Q. Well, who were you having conversations

1 **with surrounding this?**

2 A. Well, when I say I don't recall the
3 conversations that were being had, then, obviously,
4 I would have had conversations with Captain -- then
5 Captain Oliphant and then Lieutenant Colonel David
6 Staton. That would have been the confines of my
7 conversations, because that's my chain of command,
8 one below and one above.

9 **Q. Okay.**

10 A. I wouldn't have conversations above
11 Lieutenant Colonel Staton, and I sure as heck
12 wouldn't have talked about this with anybody below
13 Colonel Oliphant.

14 **Q. Did you ever talk to anyone at the**
15 **Sheriff's Office in Natchitoches Parish about this**
16 **allegation involving Calvin Braxton?**

17 A. No, ma'am.

18 **Q. In your position as the region commander,**
19 **did you interact with the local sheriffs in those**
20 **troops, troop areas?**

21 A. I have.

22 **Q. Have you ever --**

23 A. (Simultaneous cross-talk.)

24 **Q. I'm sorry. I missed that.**

25 A. Not on a daily basis, no, ma'am, but I

1 have. We certainly have integrated
2 responsibilities.

3 Q. Have you ever discussed Calvin Braxton
4 with any of the sheriffs in that area or that
5 region?

6 A. No, ma'am. Not that I recall.

7 Q. You said at the beginning of your
8 deposition that you had conversations with someone
9 in the governor's office regarding being sued, State
10 Police being sued. Can you remember anything more
11 about who you talked to or what you talked about?

12 A. No, ma'am. I believe it would probably
13 just be a informational conversation, and I don't
14 remember who it was with. I'm telling you that I'm
15 sure that I did have one. I don't remember who it
16 was with. And it would be because Calvin Braxton
17 had sat on the State Police Commission, and he was
18 suing the State Police, so it would just be for
19 informational purposes. I keep my boss's staff in
20 the know.

21 Q. Okay. What did you know about Calvin
22 Braxton before you had the first conversation with
23 Mr. Oliphant in December of 2015?

24 A. I did not know anything about him other
25 than he was a State Police Commissioner.

1 COURT REPORTER: Commission member?

2 BY MS. CRAFT:

3 Q. She's asking. Was that commission member
4 or commissioner?

5 A. Commissioner. Either one.

6 Q. Okay. The court reporter was asking
7 because she missed it, and she wanted to make sure
8 she was accurate.

9 A. I understand. No, I wasn't trying to be
10 smart. It could be referred to either way.

11 Q. We understand.

12 Did you know anything about his
13 involvement in the community prior to December of
14 2015?

15 A. No, ma'am.

16 Q. How about afterwards? Have you learned
17 anything about Calvin Braxton's community
18 involvement, some of the things that he's done, his
19 reputation --

20 A. No, ma'am.

21 Q. -- as a business person?

22 A. No, ma'am, I have not.

23 Q. You mentioned in your deposition something
24 about press reports. Have you read press reports
25 regarding the allegations against Mr. Braxton?

1 A. I remember -- I don't know if I read it or
2 heard it on the news or whatever. There was
3 obviously some news around Mr. Braxton at some point
4 in time when he was leaving the Commission, so I
5 don't -- I mean, you showed me there as an exhibit
6 that Lee Zurik had made an inquiry, a public records
7 request as to information, so I...

8 **Q. Well, sir, you do have people on your**
9 **staff that pull articles that pertain to the State**
10 **Police, don't they -- don't you?**

11 A. That do what, now?

12 **Q. Pertain to the State Police. You've got**
13 **people on your staff whose job it is to look through**
14 **all the media reports for anything relating to the**
15 **State Police, right?**

16 A. Yes, ma'am. We have a public affairs
17 section.

18 **Q. Right. And they compile that information**
19 **and present it to you so you know what's going on;**
20 **am I correct?**

21 A. No, ma'am. You're not correct. We're not
22 quite that sophisticated with it. They don't --
23 they don't compile a list of news stories that
24 involve State Police.

25 **Q. Do they share information that they garner**

1 from local media coverage with you?

2 A. On occasion.

3 Q. And did that ever happen --

4 A. (Simultaneous cross-talk.)

5 Q. Excuse me?

6 A. I said, but not on every story that's done
7 on State Police. No, ma'am.

8 Q. Well, how about with respect to Calvin
9 Braxton, when you took over in 2017?

10 A. Yes, ma'am. I don't recall. I don't
11 recall. I'm not going to tell you I haven't been
12 briefed. I'm not going to tell you I have. I don't
13 recall.

14 Q. In what media venues do you recall there
15 being a reference to Mr. Oliphant's report involving
16 Calvin Braxton?

17 A. I don't recall any media venues of when it
18 was -- there was a reference to Mr. Oliphant's
19 incident report or otherwise.

20 Q. But you do --

21 A. But I knew that there was media coverage
22 of the incident, but I can't specifically tell you
23 who did it, when they did it and what the content of
24 it was. I mean, we all know there was media
25 coverage.

1 Q. Okay. Sir, can you tell me whether or not
2 State Police has taken any action since the filing
3 of Mr. Braxton's lawsuit to either recant the
4 allegations contained in Mr. Oliphant's 2018
5 incident report and his 2016 incident report?

6 A. I don't really understand what you're
7 asking.

8 Q. Have there been any actions taken by State
9 Police to recant any of the statements that
10 Mr. Oliphant made in his 2016 incident report and
11 his 2018 incident report regarding Mr. Braxton?

12 A. I don't believe so. When you say
13 "recant," you mean get him to take back what he
14 said?

15 Q. Yes.

16 A. I don't recall. No.

17 Q. Did you see the Facebook posting that
18 Mr. Oliphant made in 2018 about Mr. Braxton?

19 A. I did subsequently, yes, ma'am. I don't
20 have Facebook.

21 Q. So who showed it to you?

22 A. I don't recall who showed it to me.

23 Q. Was there any action taken against
24 Mr. Oliphant regarding his Facebook posting about
25 Mr. Braxton?

1 A. I don't recall if there was or not.

2 Q. Do you know if he was counseled in any
3 fashion?

4 A. I don't recall.

5 Q. Do you know if he was asked to take that
6 Facebook posting about Mr. Braxton down?

7 A. I don't.

8 MS. CRAFT: That's all I have, sir.
9 Thank you. The other lawyers may or may
10 not have questions for you.

11 MR. FALCON: Just a couple. I have a
12 couple.

13 EXAMINATION

14 BY MR. FALCON:

15 Q. Colonel Reeves, do you know whether or
16 not -- or have you heard whether or not Mr. Braxton
17 at any time since 2016 made any complaint to the
18 internal affairs section relative to Colonel
19 Oliphant or anything Colonel Oliphant might have
20 said?

21 A. No, sir. I don't recall that.

22 Q. Do you -- are you aware of any
23 professional courtesy that a state policeman owes to
24 an individual member of the State Police Commission?

25 A. No, sir.

1 Q. Do you believe it appropriate for a State
2 Police commissioner to use his position for his
3 personal benefit?

4 MS. CRAFT: I'm going to object to the
5 form.

6 A. (Simultaneous cross-talk.)

7 MS. CRAFT: Sorry. Hold on. Let me
8 object to the form. And, Mr. Reeves, your
9 voice is a lot quieter than when you were
10 answering my questions, and I think the
11 court reporter is having difficulty
12 hearing your response.

13 THE WITNESS: I apologize for that. I
14 think it's because I'm looking at him and
15 he's right here in the room, so I
16 apologize. I'll speak up.

17 MS. CRAFT: No. I fully understand.
18 And so you know for the record, I have
19 objected to all this business on partial
20 Zoom. But I have made an objection, so I
21 think you need to respond to Mr. Falcon's
22 question so she can hear it.

23 THE WITNESS: Ask the question again.

24 MR. FALCON: Sure.

25 BY MR. FALCON:

1 Q. Are you aware of any professional courtesy
2 that state troopers owe to individual Commission
3 members?

4 A. No, sir.

5 Q. Would it be appropriate for a Commission
6 member to use his position for their personal
7 benefit?

8 A. I would not think that is appropriate.

9 MS. CRAFT: Object to the form. Hold
10 on. Hold on. I'm objecting to that
11 question to the form. Now if you can
12 answer it so the court reporter can hear
13 your answer, that would be helpful.

14 A. I would not think that was appropriate.

15 BY MR. FALCON:

16 Q. Would it be appropriate for the Louisiana
17 State Police to transfer a trooper because he gave a
18 relative of a public official a DWI?

19 A. No, sir. That would not be appropriate.

20 Q. Would it be appropriate for the Louisiana
21 State Police to send a trooper to additional
22 training to get his mind right because that trooper
23 gave a DWI to a relative of a public official?

24 A. No, sir. That would not be appropriate.

25 MS. CRAFT: Object to the form. Hold

1 on, Mr. Reeves. Object to the form.

2 COURT REPORTER: I'm sorry. Your
3 answer, sir?

4 A. No, that would not be appropriate.

5 COURT REPORTER: Thank you.

6 BY MR. FALCON:

7 Q. Have you ever heard any discussions, sir,
8 or been aware of a claim that Commission members,
9 referring to State Police Commission members, were
10 untouchable insofar as law enforcement is concerned?

11 MS. CRAFT: Object to the form. Go
12 ahead.

13 THE WITNESS: I like the way you did
14 that that time. It stopped me --

15 MS. CRAFT: I got you.

16 THE WITNESS: -- because you held your
17 hand up.

18 Okay. Can you ask it one more time?

19 MR. FALCON: Yes, sir.

20 BY MR. FALCON:

21 Q. Have you ever heard any discussion or know
22 of any provision that would -- that Commission
23 members, the Louisiana State Police Commission
24 members, were -- and I'm using the word
25 "untouchable" by State Police or by law enforcement

1 in general?

2 MS. CRAFT: Same objection. Go ahead.

3 A. No.

4 BY MR. FALCON:

5 Q. Have you ever discussed with Mr. Oliphant
6 the Facebook posting itself?

7 A. I don't recall.

8 Q. Have you ever heard or do you recall any
9 discussion about Mr. Braxton and/or Ms. Derbonne
10 using State Police Commission stationary to seek an
11 adjustment in traffic tickets that Mr. Braxton or
12 members of his family might have received?

13 MS. CRAFT: Object to the form. Go
14 ahead.

15 A. I'm not familiar.

16 MR. FALCON: I think that's all I
17 have. Thank you, sir.

18 MR. MAYEAUX: Steve?

19 MR. OXENHANDLER: Yes, I have a couple
20 questions.

21 EXAMINATION

22 BY MR. OXENHANDLER:

23 Q. Colonel, again, I'm Steve Oxenhandler, and
24 I have Colonel Oliphant here with me.

25 In this lawsuit, Calvin Braxton has argued

1 that an incident report is only to document crimes
2 or trooper misconduct contemporaneously as it
3 occurs. In your experience, are incident reports
4 used only to document crimes or trooper misconduct?

5 MS. CRAFT: Object to the form.

6 A. No, sir. I'm sorry.

7 MS. CRAFT: Object to the form.

8 MR. OXENHANDLER: What's wrong with
9 the form, Ms. Craft? What's wrong with
10 the form of that question?

11 MS. CRAFT: The form of that question
12 is your predicate is inappropriate as it
13 relates to the evidence we submitted.
14 Argument set forth in memorandum is also
15 supported by evidence. We cited
16 deposition testimony and evidence in
17 support of various propositions. That's
18 my objection.

19 MR. OXENHANDLER: I made an exact
20 quote. There's nothing wrong with the
21 form of the question.

22 BY MR. OXENHANDLER:

23 Q. You go ahead and answer it, Mr. -- Colonel
24 Reeves.

25 A. Could you ask me one more time?

1 Q. Yes. In your experience, are incident
2 reports used only to document crimes or trooper
3 misconduct?

4 A. No, sir. That's not my experience.

5 Q. And I think you testified earlier, in your
6 experience, there is no Louisiana State Police rule
7 or requirement that incident reports are to be
8 prepared contemporaneously as the event occurs,
9 right?

10 MS. CRAFT: I'm objecting to the form.
11 It's been asked and answered.

12 BY MR. OXENHANDLER:

13 Q. You can go ahead and answer again.

14 A. I would have to go back and refer to our
15 procedural order, but I don't...

16 COURT REPORTER: I'm sorry. Refer
17 back to your what, sir?

18 THE WITNESS: Procedural order.

19 COURT REPORTER: Okay. Thank you.

20 THE WITNESS: Yes, ma'am.

21 BY MR. OXENHANDLER:

22 Q. You know Jason Starns, correct, Colonel?

23 A. Yes, sir.

24 Q. In his testimony, Jason Starns testified
25 that an incident report is a very versatile tool.

1 **Would you agree with that assessment?**

2 A. Yes, sir.

3 MS. CRAFT: Object to the form.

4 THE WITNESS: I'm sorry.

5 MS. CRAFT: That's all right. You
6 can answer.

7 A. Yes, sir. I would agree.

8 BY MR. OXENHANDLER:

9 **Q. I'd like you to turn to the actual**
10 **incident -- I think it's on Exhibit #24, which was a**
11 **series of -- looks like a series of June 2nd, 2016,**
12 **incident reports that you reviewed. I want to go in**
13 **the final one that was actually signed by Colonel**
14 **Oliphant, which is towards the end, the last few**
15 **pages of the Exhibit #24. Do you see it, sir?**

16 A. Yes, sir, I do.

17 **Q. When you reviewed this incident report,**
18 **did you see any -- anything about Colonel Oliphant's**
19 **June 2nd, 2016, incident report that violated any**
20 **State Police procedures regarding preparation of the**
21 **report?**

22 MS. CRAFT: Object to the form.

23 BY MR. OXENHANDLER:

24 **Q. Go ahead.**

25 A. I did not.

1 Q. Did you see anything in Colonel Oliphant's
2 June 2nd, 2016, incident report that violated any
3 State Police procedures regarding the content of the
4 incident report?

5 MS. CRAFT: Object to the form.

6 A. I did not.

7 BY MR. OXENHANDLER:

8 Q. Did you interpret, when you were reviewing
9 and sent up chain of command the -- Colonel
10 Oliphant's June 2nd, 2016, incident report to
11 contain accusations that Calvin Braxton had
12 committed any violations of Louisiana criminal
13 statutes?

14 MS. CRAFT: Object to the form.

15 A. I did not.

16 BY MR. OXENHANDLER:

17 Q. If Colonel Oliphant's June 2nd, 2016,
18 incident report had contained accusations -- I'm
19 sorry. Strike that.

20 If Colonel Oliphant's June 2nd, 2016,
21 incident report had contained criminal accusations
22 against Calvin Braxton, what would have occurred in
23 relation to those criminal accusations?

24 MS. CRAFT: Same objection.

25 A. I would assume those criminal accusations

1 would have been forwarded to the criminal inves- --
2 Bureau of Investigation, our criminal side, to be
3 looked into.

4 BY MR. OXENHANDLER:

5 Q. Did that happen in this case, sir?

6 A. Not that I'm aware of.

7 Q. If you could go now to Exhibit #20. This
8 is the May -- March 2nd, 2018, incident report, the
9 request for the personal threat assessment. You've
10 seen this report before today, sir; is that correct?

11 A. I'm assuming, yes, sir, I have. I'm
12 assuming so. It's addressed to me, so...

13 Q. On page 2 of this report, Colonel Oliphant
14 requests that the State Police conduct a personal
15 threat assessment regarding the capabilities of
16 Calvin Braxton and others to potentially harm
17 Colonel Oliphant or his family.

18 With regard to that request, what is a --
19 or what is a personal threat assessment?

20 MS. CRAFT: Objection; asked and
21 answered.

22 A. I would say that -- and I'm not familiar
23 with what happened here. I would say that it would
24 be an assessment to see if there is a threat there
25 to Colonel Oliphant or his family.

1 BY MR. OXENHANDLER:

2 Q. I think you've termed it -- you've termed
3 it something else before. Do you remember what
4 you -- I don't remember what you testified it as.
5 Do you remember what you previously testified? You
6 used some other term besides personal threat
7 assessment. I just don't remember what it was.

8 A. I don't recall.

9 Q. If a state trooper believed that he was
10 being followed and was under surveillance by some
11 person and that his life and the lives of his family
12 may be in danger, would it be proper for the
13 troopers to request a personal threat assessment or
14 something similar to that regarding the person he
15 believed might pose a threat?

16 MS. CRAFT: And I'm going to object to
17 the form and further object under 701.

18 BY MR. OXENHANDLER:

19 Q. Go ahead. You can answer.

20 A. I believe that, as an agency, we would
21 want to know that out of an abundance of caution to
22 protect our employees and their families, and we may
23 would put some extra patrols around their area.

24 Q. In this report -- I'm going to go over
25 some facts here that are listed -- Colonel Oliphant

1 has observed out-of-place vehicles near his home.
2 Colonel Oliphant has documented in this report that
3 the vehicle looked very suspicious. Colonel
4 Oliphant documented that he had information he
5 believed was credible, which said that Calvin
6 Braxton had hired a private investigation or
7 somebody to watch and follow him. Colonel Oliphant
8 alleged in this report that the suspicious vehicle
9 accelerated and fled as Colonel Oliphant's car
10 approached. As is documented also, that a license
11 check showed that the vehicle was registered to a
12 person believed to have business connections with
13 Calvin Braxton. Colonel Oliphant documented that
14 the investigation -- that Mr. Braxton's name was
15 closely associated with a woman who had a mysterious
16 and untimely death that was -- death was ruled a
17 suicide. Colonel Oliphant also documented that
18 Colonel Oliphant thought the investigation of the
19 suicide should be reopened to see if there was any
20 possibility of foul play. And Colonel Oliphant was
21 so concerned that he requested the State Police to
22 make frequent checks around his house.

23 Considering the statements made in the
24 incident report of March 2nd, 2018, and Colonel
25 Oliphant's express concerns in this report, was it

1 proper for a personal threat assessment to have been
2 requested by Colonel Oliphant?

3 MS. CRAFT: I'm going to object to the
4 form. And furthermore, Counsel, with
5 respect to your predicate about the facts
6 listed, those are highly disputed, and,
7 frankly, we don't think they're facts at
8 all. But subject to it, if he can answer
9 it.

10 A. I'm not sure what actions were taken as
11 far as a personal threat assessment were here by our
12 agency at the time, and I certainly would agree with
13 having security checks around the residence to make
14 sure that he and his family are safe.

15 BY MR. OXENHANDLER:

16 Q. Was it proper -- was it proper, though, in
17 your opinion, as superintendent of the State Police,
18 for Colonel Oliphant, knowing all the facts that we
19 just talked about, to ask for a personal threat
20 assessment to be conducted?

21 MS. CRAFT: Object to the form.

22 A. I wouldn't think -- I'm sorry.

23 MS. CRAFT: And, again, the predicate,
24 specifically counselor referring to it as
25 being facts. But you can answer it, if

1 you can, sir.

2 A. I don't think that I would think it
3 unreasonable for Colonel Oliphant to make that
4 request.

5 BY MR. OXENHANDLER:

6 **Q. Is it fair to say that you did not see**
7 **anything improper about Colonel Oliphant's request**
8 **for a personal threat assessment regarding Calvin**
9 **Braxton?**

10 A. I did not. I don't think -- can I say
11 this: I don't think that there was anything
12 improper, based on the circumstances that he was
13 observing around his home and what was going on, to
14 request that.

15 **Q. Now, in the -- on page 2 of Exhibit #20,**
16 **in the middle paragraph, could you please read that**
17 **to yourself, sir?**

18 MR. MAYEAUX: The first page of the
19 report or the second page?

20 MR. OXENHANDLER: No, the second page
21 of the report. I'm sorry.

22 A. Beginning with, somewhat confirm?

23 BY MR. OXENHANDLER:

24 **Q. To somewhat confirm, correct. Could you**
25 **read that paragraph, and I'm going to ask you some**

1 questions about that.

2 A. Yes, sir.

3 Q. Okay. As you can see, Colonel, this
4 report references Lydia Rachal, a woman allegedly
5 dated by Calvin Braxton, whose death was untimely
6 ruled to be a suicide.

7 MS. CRAFT: I'm sorry, Counselor. It
8 says, ultimately.

9 BY MR. OXENHANDLER:

10 Q. (Simultaneous cross-talk.) And I quote,
11 it would be my suggestion -- my suggestion that the
12 Louisiana State Police review the case file
13 regarding the death of Lydia Rachal to determine the
14 actual manner of death and/or determine if there was
15 any possibility of foul play. Is that correct?

16 MS. CRAFT: And, Counselor, that's not
17 what it says. It says, ultimately ruled a
18 suicide. But subject to my objection and
19 your reading of it, I think he can read it
20 for himself.

21 BY MR. OXENHANDLER:

22 Q. Isn't it true that the review of a death
23 ruled to be a suicide could determine that the death
24 was not suicide, but was, in fact, accidental?

25 MS. CRAFT: Object to the form.

1 A. I would have to know the circumstances
2 surrounding the death that was ruled as a suicide.
3 If you're asking me if it's possible, it certainly
4 is possible, but I don't have the facts in this
5 case.

6 BY MR. OXENHANDLER:

7 Q. I was asking you if it's possible.

8 MS. CRAFT: Object to the form.

9 BY MR. OXENHANDLER:

10 Q. Aren't the words "foul play" -- can't they
11 refer to a wide variety of actions?

12 A. I would assume so.

13 MS. CRAFT: Object to the form.

14 BY MR. OXENHANDLER:

15 Q. Do you know whether Colonel Oliphant sent
16 this March 2nd, 2018, incident report to anyone
17 other than the individual -- individuals named in
18 the March 2nd, 2018, e-mail, to David Staton, Kevin
19 Reeves and Mike Noel?

20 A. I do not.

21 Q. Would you be in a position to know whether
22 the March 2nd, 2018, incident report was sent to any
23 person or entity by -- any person or entity by
24 Louisiana State Police?

25 A. I am not aware of that.

1 Q. In your experience, when incident reports
2 are provided to persons as a result of a public
3 records request, are names of persons mentioned in
4 the incident report ever redacted?

5 A. Yes. I believe there are occasions when
6 they are. It would -- it would depend on the
7 circumstances surrounding the incident report.

8 Q. And, to your knowledge, did the Louisiana
9 State Police, as an organization, disseminate any
10 information from the March 2nd, 2000 [sic], incident
11 report to any individual members of the public?

12 A. Not that I'm aware of.

13 MR. OXENHANDLER: Thank you. I don't
14 have any other questions. Thank you,
15 Colonel.

16 MS. CRAFT: Thank you, sir.

17 MR. MAYEAUX: I have no questions.

18 MS. CRAFT: You have no questions,
19 Mr. Mayeaux?

20 MR. MAYEAUX: I do not.

21 MS. CRAFT: Okay. I just have a few
22 follow-ups.

23 FURTHER EXAMINATION

24 BY MS. CRAFT:

25 Q. Mr. Reeves, it would, in fact, be a

1 violation of State Police policy and procedure if
2 Mr. Oliphant lied in the June 2016 incident report
3 and the March 2018 incident reports; isn't that
4 correct?

5 A. Yes, ma'am. We do expect our troopers to
6 be -- employees to be truthful.

7 Q. Got it. On the March 2018 incident
8 report, you would have expected Mr. Oliphant to be
9 forthcoming about important details; is that
10 correct?

11 A. Yes, ma'am.

12 Q. Like, for example, he's a family member of
13 Lydia Rachal's ex-husband, right?

14 A. I'm not aware -- I'm not aware of that.

15 Q. Wouldn't you have expected him to disclose
16 in this incident report that he is Lydia Rachal's
17 ex-husband's family member?

18 A. I think that one thing you need to
19 understand about incident reports is, the incident
20 report created by the employee is the employee's
21 incident report of what happened and what their view
22 was in the incident. We don't direct them on what
23 to write or what not to write.

24 Q. Right. But you certainly direct them to
25 be thorough and complete and provide all important

1 information as it relates to the situation at hand,
2 right?

3 A. That would be our desire.

4 Q. And, certainly, in the March 2018 incident
5 report, it would have been important for you to know
6 that Mr. Oliphant had communications with
7 Ms. Rachal's husband or ex-husband, and that he was,
8 in fact, Ms. Rachal's ex-husband's family member,
9 right?

10 A. I'm not aware of any of that.

11 Q. Well, let's assume it's true. Would you
12 not have expected Mr. Oliphant to put information
13 like that in this 2018 incident report?

14 MR. OXENHANDLER: Object to the form.

15 BY MS. CRAFT:

16 Q. Wouldn't you have, sir?

17 A. I'm not aware of whether any of that is
18 true or not. This is the first I've ever heard of
19 that.

20 Q. Okay. Well, sir, with all due respect,
21 assume it is true. Wouldn't you have expected
22 Mr. Oliphant to, at least, put those two details in
23 the report; hey, I talked to Lydia Rachal's
24 ex-husband, the guy that was jilted apparently by
25 Calvin Braxton, and, B, with respect to Mr. Rachal,

1 he's my family member? Wouldn't you not have
2 expected someone in Mr. Oliphant's position to
3 disclose that?

4 MR. OXENHANDLER: Object to form.

5 BY MS. CRAFT:

6 Q. You can answer it. Go ahead.

7 A. That hasn't been disclosed to me, and I'm
8 unaware of it.

9 Q. Okay. But you would have expected, would
10 you not, for those two details to have been
11 disclosed at some point in time by Mr. Oliphant if
12 they're true?

13 A. Like I said, this is the first I've heard
14 of it. I'm not -- it has never been disclosed to
15 me.

16 Q. Got it. And you do know from the March
17 2018 incident report that, at least, Mr. Oliphant
18 communicated some information about Mr. Braxton and
19 making the house checks to the Natchitoches Parish
20 Sheriff's Office, correct?

21 MR. MAYEAUX: Object to the form.

22 A. Well, if my memory serves me right, he
23 advised -- he asked Troop E to contact the
24 Natchitoches Parish Sheriff's Office to assist with
25 that. It doesn't say that he contacted them.

1 BY MS. CRAFT:

2 Q. Okay. Sir, would you have expected
3 Mr. Oliphant to communicate to you that he did, in
4 fact, have a conversation with, at least,
5 Mr. Rachal, who happens to work for the Sheriff's
6 Office, and asked Mr. Rachal to conduct security
7 checks at his house?

8 A. No, ma'am. I wouldn't expect him to tell
9 me that.

10 Q. Would you expect him to be truthful in his
11 report that it wasn't, in fact, his communication
12 with Troop E to contact the Natchitoches Parish
13 Sheriff's Office, but it was, in fact, his direct
14 contact with the Natchitoches Parish Sheriff's
15 Office or folks who work for it?

16 MR. MAYEAUX: Object to the form.

17 A. Ma'am, we live in smaller parishes, and
18 everybody kind of knows everybody else. So if he
19 had a conversation with someone at the Sheriff's
20 Office and asked for additional patrols around his
21 house, there would be no expectation of me for him
22 to inform me of that.

23 BY MS. CRAFT:

24 Q. But you certainly would expect him, when
25 he authors a report like this one from 2018, to be

1 as forthcoming about all those details as possible,
2 correct?

3 A. I would expect him to be forthcoming about
4 the details surrounding the incident.

5 MS. CRAFT: That's all I have, sir.

6 Thank you very much.

7 THE WITNESS: Thank you, ma'am.

8 (DEPOSITION CONCLUDED AT 1:14 P.M.)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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

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

5 I, Leslie B. Doyle, Certified Court
6 Reporter (LA Certificate #93096), in and for the
7 State of Louisiana, as the officer before whom this
8 testimony was taken, do hereby certify that KEVIN W.
9 REEVES, after having been duly sworn by me upon
10 authority of R.S. 37:2554, did testify as herein
11 before set forth in the foregoing 115 pages; that
12 this testimony was reported by me in the stenotype
13 reporting method, was prepared and transcribed by me
14 or under my personal direction and supervision, and
15 is a true and correct transcript to the best of my
16 ability and understanding; that the transcript has
17 been prepared in compliance with transcript format
18 guidelines required by statute or by rules of the
19 board, that I have acted in compliance with the
20 prohibition on contractual relationships, as defined
21 by Louisiana Code of Civil Procedure Article 1434
22 and in rules and advisory opinions of the board.

23 I further certify that I am not related to
24 counsel or to the parties herein, nor am I otherwise
25 interested in the outcome of this matter.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Signed this ____ day of _____, 2020.

LESLIE B. DOYLE, RPR, RMR, RDR
Certified Court Reporter
LA Certificate #93096

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

WITNESS' CERTIFICATE

I, KEVIN W. REEVES, the undersigned, do hereby certify that I have read the foregoing deposition taken on October 1, 2020, and it contains a true and accurate transcript of the testimony given by me:

CHECK ONE BOX BELOW:

() Without correction.

() With corrections as reflected on the Errata Sheet(s)

KEVIN W. REEVES

DATE

REPORTED BY: LESLIE B. DOYLE, RPR, RMR, RDR

1 Errata Sheet

2

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

4 DATE OF DEPOSITION: 10/01/2020

5 NAME OF WITNESS: Kevin W. Reeves

6 Reason Codes:

- 7 1. To clarify the record.
- 8 2. To conform to the facts.
- 9 3. To correct transcription errors.

10 Page ____ Line ____ Reason ____

11 From _____ to _____

12 Page ____ Line ____ Reason ____

13 From _____ to _____

14 Page ____ Line ____ Reason ____

15 From _____ to _____

16 Page ____ Line ____ Reason ____

17 From _____ to _____

18 Page ____ Line ____ Reason ____

19 From _____ to _____

20 Page ____ Line ____ Reason ____

21 From _____ to _____

22 Page ____ Line ____ Reason ____

23 From _____ to _____

24

25

#				
#12 40:24	2016 25:3 33:10 38:10 44:14 67:9 68:3 69:3 72:24 75:25 76:9,23 77:18 79:1,5,11 83:15, 22 84:1 85:2 93:5,10 94:17 101:11,19 102:2, 10,17,20 111:2	8th 76:22 77:18 83:15 84:1,15	affiliated 16:19 72:14 affiliation 15:4 25:22 26:3	aspect 31:10 assessment 60:3,8 61:4 101:1 103:9,15,19, 24 104:7,13 106:1,11, 20 107:8
#16 43:11	2017 13:12 14:20 43:21 92:9	9	agencies 27:4 59:7 64:7	assessments 60:13 61:7
#20 46:25 54:17 103:7 107:15	2017-2018 19:19	9 41:3	agency 27:9 64:4,10 65:6 72:6 104:20 106:12	assigned 11:8 13:14 78:23,24
#23 78:14 79:10 84:13, 16 85:14	2018 47:3,8 49:17 52:11 55:22 56:1 58:13 61:18 93:4,11,18 103:8 105:24 109:16,18,22 111:3,7 112:4,13 113:17 114:25	90 9:20	agree 27:23 86:23 87:6 101:1,7 106:12	assignment 13:3
#24 66:19,22 67:8 101:10,15	25 53:24 54:14 56:1	9:03 76:23 77:18	agreed 86:10	assist 113:24
0	2:58 48:1,8	A	ahead 39:9 40:9 42:15 72:22 97:12 98:2,14 99:23 100:13 101:24 104:19 113:6	assistant 48:3 77:4, 10,11
060616 73:2	2nd 47:3 48:8 58:13 101:11,19 102:2,10,17, 20 103:8 105:24 109:16,18,22 110:10		Alexandria 14:13	associates 22:20
1	3		allegation 52:18 54:20 88:16	Association 15:5,7, 12,18 16:3,10,15,19 17:4,9,24 25:18,25 26:5,15,18 27:12,15 33:4 34:1,6,18 35:3 36:1,13 38:14 40:4,21 41:14,17 42:25 44:5,20, 24 45:5,23 46:14,19 48:23 70:19 71:13,19, 23,25 72:8,14 79:15
1 44:18	3 13:12 14:10 15:22 47:9 48:3 49:18 61:20		allegations 90:25 93:4	assume 20:1,4,6 21:9 24:9 49:6 65:23 102:25 109:12 112:11,21
10 59:10	3:26 76:25 77:9		alleged 17:17 25:2 26:7 28:12 34:24 50:6, 14 105:8	assuming 60:11 69:13 103:11,12
10th 79:11	4		allegedly 55:18 108:4 amount 38:18	ATT00001 84:21
12 41:4	4 74:10,20		ampersand 77:20	attached 47:23 48:10 66:23
13 11:5	5		and/or 57:15 98:9 108:14	attachment 84:8,17
14 75:18	5 44:10 74:10,20		answering 6:21 95:10	attachments 67:19 73:1 74:1,8 77:19
14th 43:20 74:23 75:4 76:2,7,15	6		answers 53:15	attempt 18:15 80:2 85:15
15 59:11	6th 67:9 76:8,9		apologize 5:19 42:13 95:13,16	attend 52:13
16 78:24	7		apparently 112:24	attended 9:3,4 10:21
17,500 41:9	7 79:1		appeal 68:24,25	attention 23:14 41:3 43:11 66:5
18:1505.2A(1) 41:8	701 104:17		appears 43:13 66:22 78:16	Attorney's 8:15 9:20, 24 10:3,7
19 77:21	70806 7:14		apply 26:8	audibly 5:10
1986 7:24	7919 7:13		appointed 14:22	audio 6:25
1989 9:2,17,19	7th 72:24 76:8,25 77:8, 9		appointment 14:20	authored 58:12
1990 8:15 9:14,19,25 10:2,3,8,14 15:10	8		approached 25:17 105:10	authority 56:3,13 86:19,21
1993 12:8	8 79:1		approval 51:7,8	authors 114:25
1997 13:7	86 9:1		approve 51:3	aware 20:8 23:13 24:23 25:1,23 26:2,4, 10,18 43:5,8,19 45:4,8 46:5,12,24 50:22 56:20 58:20 60:12,14,23,25 61:2 63:1 68:1 72:8 74:14 76:14 86:7 94:22 96:1 97:8 103:6 109:25 110:12 111:14 112:10,
1998 13:8,21	89 8:24		approved 51:1,2,4,19 69:24	
1999 10:18			approving 70:1	
1:14 115:8			approximately 9:5	
1:29 72:24 77:8			area 14:16,17,18 22:9 89:4 104:23	
1:45 84:15			areas 14:12 64:8 88:20	
2			argued 98:25	
2 103:13 107:15			Argument 99:14	
2000 7:25 110:10			arrest 18:2 22:1	
2003 13:9,25			arrested 18:7	
2008 13:10 14:6			articles 91:9	
2013 13:11 14:9				
2015 15:19 36:23 37:9, 21 38:16 40:2 41:13 44:10 75:4,18 76:3,8,15 89:23 90:14				

17

B

B&w 84:9
B-Y-N-U-M 84:1
back 10:17 13:8 31:22, 24 38:8 47:7 56:13,21 58:17 63:21 73:23 77:7, 15 85:21 93:13 100:14, 17
background 7:20
bad 23:17,21 24:7,13 68:18
based 62:15 75:15 86:9 107:12
Basic 10:24
basically 24:6
basis 88:25
Baton 7:14,24 8:12,13, 14,19
beat 59:16
beginning 89:7 107:22
behalf 15:15
behavior 32:8,12 86:12
Bel 14:23 41:10
belief 36:15
believed 32:8,12 36:22 104:9,15 105:5, 12
believes 60:15
benefit 95:3 96:7
blast 7:18
board 17:5 40:20
Bob 11:22
boss's 89:19
bottom 47:23 74:21 75:6 76:23 79:10
Boulevard 7:14
box 48:15
Braxton 6:1 15:20 16:13 17:18 18:2,6,11, 14,18 19:1,4,8,25 20:24 21:1,7 22:8,14,17 23:1, 22 25:3,6,19 32:8,18,23 33:4,7 37:14 38:7,16,21 39:16,24 40:12 43:22 45:7 46:15,20 49:1,12 50:6,15,17 52:18 53:22 55:18 59:8 60:4,22 61:5 65:10 67:17,20,23 68:3 72:2,4,9,16,20,25 73:1, 25 74:1,2,3,7,8,13,15, 24 75:4,7,10,16,22 76:2,16,22 79:19 82:6

85:8 88:16 89:3,16,22 90:25 91:3 92:9,16 93:11,18,25 94:6,16 98:9,11,25 102:11,22 103:16 105:6,13 107:9 108:5 112:25 113:18
Braxton's 18:3 20:8 40:16 44:11 56:24 68:8 90:17 93:3 105:14
break 27:10 66:15 71:24
breath 6:21
briefed 92:12
brought 52:20 54:21
Bureau 13:19 103:2
business 65:7 90:21 95:19 105:12
Bynum 84:1,2

C

C-A-R-B-O 43:15
call 20:3 64:13 74:24
called 43:2,7
Calvin 6:1 17:18 43:22 49:12 55:18 56:24 60:4 61:4 65:10 67:17,20,23 72:25 73:1,25 74:2,3,6, 8 76:22 79:19 82:5 85:8 88:16 89:3,16,21 90:17 92:8,16 98:25 102:11, 22 103:16 105:5,13 107:8 108:5 112:25
camera 5:18
capabilities 60:4 103:15
captain 15:24 16:6,8 18:1 22:8,17 23:14 33:20,24 35:19 37:12 38:21 44:9 61:24 62:1 72:1 79:22 81:14,16 82:14 88:4,5
car 105:9
Carbo 43:15,22
career 68:11
case 26:9,10 37:6 52:1 57:14 58:25 72:3 103:5 108:12 109:5
cases 28:18 56:19
caused 55:12
caution 104:21
chain 28:10 33:17 34:9 37:15 38:3 47:15,20 51:6,9,19,23 62:1 65:15 69:24 70:9,16,23 71:1 79:6,21 80:5,7,12,16,21 82:13 85:19,20,22 88:7 102:9
change 12:21 69:18
changed 12:21 38:13 73:24
charge 83:10,23
Charlie 79:12 80:14
Chatman 76:24 77:1, 3
check 65:1 105:11
checked 48:15
checks 61:15 62:11 63:24 64:11,19 105:22 106:13 113:19 114:7
chief 43:15 47:14,17 79:13 81:3,8 87:8
circumstance 39:14
circumstances 18:20 49:21 51:22 64:2 81:19 107:12 109:1 110:7
cited 99:15
citizen 65:5
citizens 64:12
city 55:25 56:5
claim 97:8
claiming 52:24
claims 48:25 72:15
clarify 5:19
clear 71:18 81:21
client 15:20 16:1 20:18 50:2
close 10:16 20:2 64:9
closed 56:15
closely 56:24 105:15
clue 78:11
colonel 33:16,19 34:11 35:4 38:2 47:5,11 52:7 53:12 65:13,16 70:10,12 71:20 76:4 79:20 80:18 81:1,6,10, 16 82:11 86:11,24,25 87:6,8 88:5,11,13 94:15,18,19 98:23,24 99:23 100:22 101:13,18 102:1,9,17,20 103:13, 17,25 104:25 105:2,3,7, 9,13,17,18,20,24 106:2, 18 107:3,7 108:3 109:15 110:15
command 28:10 33:18 34:10,17 37:16 38:4 47:15,20 51:7,20, 24 52:10,13,16 53:5 62:1,6,10 64:4 65:15 69:24 70:10,17,24 71:1, 2 79:6,21 80:5,8,16,21 81:4 82:13 85:20,22 88:7 102:9

commander 13:10 14:6 43:2,3,7,8 49:18 52:24 71:3 77:11 78:20 88:18
commanding 27:18 39:4,15 70:7
commission 18:9 21:24 39:25 40:3 42:19 43:23 44:1,3 67:16 68:22 69:2 73:25 89:17 90:1,3 91:4 94:24 96:2, 5 97:8,9,22,23 98:10
commissioner 89:25 90:4,5 95:2
committed 102:12
communicate 24:18, 21 114:3
communicated 53:17 59:7 113:18
communication 114:11
communications 112:6
community 90:13,17
compile 91:18,23
complaint 40:3,13 51:12 94:17
complete 111:25
completed 12:4 46:19
completeness 5:8
completing 9:11
compound 83:6
computer 78:3
concern 21:20,23 22:2,4,12,15 25:12 49:12 55:12
concerned 57:1 61:13 63:7 97:10 105:21
concerns 20:23 22:16 23:6 25:5 38:12 65:9 80:1 85:14 86:12,15 105:25
CONCLUDED 115:8
conclusion 70:21
conduct 60:3 63:24 103:14 114:6
conducted 56:14 61:4,7 64:19 106:20
conducting 60:12
confines 36:8,18 70:15 88:6
confirm 55:10 107:22, 24
confused 31:6
congratulate 18:23

connected 56:25
connection 6:2
connections 105:12
consent 40:19
consequential 18:22
consideration 79:22
contact 59:3 63:23 64:4 113:23 114:12,14
contacted 61:14 63:7 113:25
contained 93:4 102:18,21
contemporaneousl
y 99:2 100:8
content 69:18 73:8 92:23 102:3
contents 51:24
continuing 25:6
contributions 41:9
conver- 42:7
conversa- 42:12
conversation 15:23 16:8,12 17:15,17 18:1,6 19:10 20:18 21:17,19, 21 22:13 23:6 24:2,22 27:21 28:2 35:23 37:13, 21,23 50:8 70:13 72:19 75:7 89:13,22 114:4,19
conversations 15:17 19:21 22:11,23 24:21 25:7,11 33:15 34:5,21 38:6,19 42:5,8, 9,17,18 52:4 53:19 65:12,15 72:2,13 75:10 76:1 85:11 86:1 87:19, 24,25 88:3,4,7,10 89:8
copied 47:12
copy 45:10,15 46:2,7, 14,19
correct 12:1 14:20 23:21 24:17 25:20,21 26:9,11,21 27:11,18 28:15 30:13 32:11 36:25 37:11,23 39:6,20, 21 45:10,17,20,21 49:3, 5 51:21 52:23 54:18 57:5 58:4 61:25 62:4,5 65:22 67:13 71:16,24 73:7,17 76:6,17,18 79:4,7,8 82:2 83:22 91:20,21 100:22 103:10 107:24 108:15 111:4,10 113:20 115:2
correspondence 27:4
counsel 5:5 54:1 66:7 83:18 106:4

counseled 94:2
counselor 106:24
 108:7,16
couple 66:24 94:11,12
 98:19
court 5:10,14,16 6:25
 8:4,7 90:1,6 95:11
 96:12 97:2,5 100:16,19
courtesy 18:10 94:23
 96:1
coverage 92:1,21,25
Craft 5:5,20,24 6:1 8:8
 28:25 29:5,16 30:1
 35:17 37:2 44:4,7 46:9
 53:6 54:12 55:6 56:7,22
 57:24 58:19 66:9,14,18
 80:9 82:8 87:9,14,16
 90:2 94:8 95:4,7,17
 96:9,25 97:11,15 98:2,
 13 99:5,7,9,11 100:10
 101:3,5,22 102:5,14,24
 103:20 104:16 106:3,
 21,23 108:7,16,25
 109:8,13 110:16,18,21,
 24 112:15 113:5 114:1,
 23 115:5
created 111:20
creating 51:22
credible 105:5
crime 28:22 29:8
 49:14,19,22,24
crimes 99:1,4 100:2
criminal 9:9 31:7,10
 32:9,13 102:12,21,23,
 25 103:1,2
cross-talk 88:23 92:4
 95:6 108:10
cues 7:7
cut 6:25
cutting 42:13

D

D-U-P-U-Y 79:12
daily 88:25
danger 104:12
date 20:1 47:25 75:18
 78:23
dated 43:20 47:3 48:8
 67:9 72:23 76:22 77:18
 79:1,11 83:15 108:5
dates 58:13
dating 55:18
daughter 18:3,7,10
 44:11 68:8
Dave 80:3

David 33:16 42:6,8,10,
 17,18 52:7 53:13 65:16
 80:14 88:5 109:18
day 24:24
days 83:1
dead 59:16
deadline 44:17
death 54:23 55:4,17,19
 56:4,25 57:14,15 58:21
 59:4,9,13 105:16 108:5,
 13,14,22,23 109:2
December 36:22
 37:9,20 38:16 44:10
 74:23 75:4,17 76:2,7,15
 89:23 90:13
decisions 85:21,23
Decree 41:4
decreed 41:7
deep 6:21
defendant 19:18
defer 39:17
definition 49:22
definitive 49:24
degree 8:1 9:6,11
 10:16,19
denying 62:24
department 56:15
 59:3 65:14 80:3 85:17
departments 31:10
depend 64:10 110:6
depends 63:1
deposition 5:11 6:4,
 20 7:8 82:18 89:8 90:23
 99:16 115:8
deputy 8:11,13,18 9:2
 33:16 43:15 47:5
Derbonne 98:9
desire 112:3
detail 21:11
details 111:9 112:22
 113:10 115:1,4
determine 46:13
 57:15,16 108:13,14,23
difference 37:7
 62:18,22 78:2
differently 71:8
difficulty 95:11
direct 41:3 43:11 52:3
 66:4 111:22,24 114:13
directed 34:18
direction 61:21
directive 62:7
directly 47:10 62:2
 63:19
director 17:9
disciplinary 68:14

discipline 30:21
disciplined 30:5,12
 62:24 68:7,11,23
disclose 111:15 113:3
disclosed 113:7,11,
 14
discuss 54:3
discussed 53:2,4,7,9
 89:3 98:5
discussion 75:16
 97:21 98:9
discussions 25:1
 97:7
displeasure 18:8
 20:9
disputed 106:6
dissatisfaction
 20:19
disseminate 110:9
disseminated 49:8
 85:4
disseminates 82:2
District 8:15 9:20,24
 10:3,7
doc 67:21
document 27:14
 28:16 29:2,10,14 35:6,
 24 36:8,17 37:5,6 38:3
 39:10,11,20 41:1 48:10,
 19,21,23 49:7 55:21
 58:6,13 66:3 67:1 69:8,
 10,16,18,21 70:1,2,3,8,
 16 71:18,19 72:2 73:2,
 5,9,17 75:24 77:14 78:8
 99:1,4 100:2
documentation
 15:25 16:12,16 17:10,
 22,24 25:14,18 26:1,7,
 17 32:22 34:7,19 35:3
 36:21 38:15 70:20
 71:13 72:5 76:11
documented 35:7
 36:16,24 37:10,12,16,
 24 75:24 105:2,4,10,13,
 17
documenting 28:19
 36:11,16 38:6
documents 25:10
 28:4 75:3
donations 41:18 42:3
dot 67:21 77:21
drive 65:1,6
dropped 9:21
due 36:10 63:18 73:14
 112:20
duly 5:2
Dupuy 78:17 79:12,18,
 20 80:15,18 81:1 82:4,

11,16,21 86:25 87:8
Dupuy's 80:20
duties 79:25
DWI 18:3,8 96:18,23

E

e-mail 43:17,18 67:8
 72:23 73:23 76:20
 77:13,17 79:11,18
 80:12 83:14 84:14
 109:18
e-mailed 67:6
e-mails 66:23 67:2
 78:16
earlier 28:13 44:13
 53:24 54:14 56:5,16
 75:22 84:25 100:5
easier 6:16
East 8:12,13,14,19
Edmonson 15:2 21:3
educational 7:20
Edwards 14:23 19:1
 41:10 43:16 44:17
Edwards' 19:4
elaborating 73:18
employed 8:16
employee 48:12,16,
 18 111:20
employee's 111:20
employees 61:9
 104:22 111:6
employment 8:9
end 6:23 68:21 76:21
 101:14
ended 75:7 77:8
enforcement 8:10
 10:25 45:20 46:3 57:6,8
 59:6 64:4,7 65:6 97:10,
 25
engaging 52:18,25
ensuing 25:13
enters 5:9
entities 27:5
entitled 41:4 48:11
entity 39:11 46:1
 109:23
Erin 60:5 61:1
ethics 40:3,13,20
event 100:8
evidence 17:2 58:20
 60:21 99:13,15,16
ex-husband 111:13
 112:7,24
ex-husband's
 111:17 112:8

exact 99:19
EXAMINATION 5:23
 94:13 98:21 110:23
examined 5:2
exception 26:9
exchange 20:24
 32:17 43:17,18
Excuse 92:5
executive 17:9
exhibit 40:24 43:11
 46:25 54:17 66:19,22
 67:8 76:20 78:14 79:10
 84:13,16 85:14 91:5
 101:10,15 103:7 107:15
expect 49:16 111:5
 114:8,10,24 115:3
expectation 114:21
expected 85:17
 111:8,15 112:12,21
 113:2,9 114:2
experience 99:3
 100:1,4,6 110:1
explanation 54:10
express 25:5 32:7
 34:5 105:25
expressed 20:19
 25:12
expressing 18:8
 20:22
extended 18:10
external 35:8 72:6
extra 62:14 64:13 65:7
 104:23

F

Facebook 93:17,20,
 24 94:6 98:6
facial 7:7
fact 19:7 56:24 58:16
 108:24 110:25 112:8
 114:4,11,13
facts 104:25 106:5,7,
 18,25 109:4
fair 5:12 6:17 7:2 107:6
FALCON 5:22 94:11,
 14 95:24,25 96:15 97:6,
 19,20 98:4,16
Falcon's 95:21
familiar 98:15 103:22
families 104:22
family 12:16 22:1
 55:13 57:2 60:6,10,19
 62:16 98:12 103:17,25
 104:11 106:14 111:12,
 17 112:8 113:1

fashion 32:9 94:3
fast-forward 25:3
 38:9
feel 41:23
feeling 25:9 64:14
felt 27:7 41:24
ferret 62:17
field 11:10 12:4 13:17,
 19
figured 22:22
file 26:16 57:14 58:1
 78:12 108:12
filed 19:20 40:3 50:18
 58:8 86:10
filing 93:2
filled 28:8
final 6:13 101:13
finally 6:19
find 60:17
finding 40:20
fine 66:13,14
finish 33:9
finished 42:14 75:8
firms 10:11
firsthand 58:9 63:17
 64:22
fled 105:9
flip 84:13
folks 41:18 114:15
follow 63:13 105:7
follow-ups 110:22
form 16:11 28:24 29:4,
 11,21 35:15 37:1 46:8
 51:16 53:3 55:5 56:6,17
 57:21 58:15 63:2,3,4,9,
 10,20,21 80:6 82:7 87:4
 95:5,8 96:9,11,25 97:1,
 11 98:13 99:5,7,9,10,
 11,21 100:10 101:3,22
 102:5,14 104:17 106:4,
 21 108:25 109:8,13
 112:14 113:4,21 114:16
format 78:8,9
forms 67:3
forthcoming 111:9
 115:1,3
forward 13:5 38:22
 47:23 71:3 80:5,7 85:19
forwarded 103:1
forwarding 79:20
 87:7
foul 57:16 105:20
 108:15 109:10
frankly 106:7
frequent 61:15 105:22
friction 33:3

Friedman 60:5,24
 61:1 65:10,17
front 43:10 68:21
 85:13
full 7:11,18 55:10
full-time 10:1,7
fully 95:17
funneled 41:18
future 37:18

G

G-A-Y-T-H-A 84:1
G-R-I-F-F-I-N 11:19
gaming 11:25
garner 91:25
gave 22:19 62:10,13
 96:17,23
Gaytha 83:25 84:14
general 32:3 98:1
generally 68:20
generic 51:16
gestures 7:7
Giroir 83:16,18,20,23,
 25
give 7:11 17:7 30:8
 34:25 45:15 68:18
 79:23
giving 7:8 62:6
glad 37:4 40:25
Glenn 11:14
governor 14:23 18:25
 19:3 41:10 43:16 44:1,
 17,18,25
governor's 50:21
 89:9
grade 86:17
graduated 7:21,23,25
graduation 8:25 10:6
 11:6
grammar 69:19
grammatical 73:10
great 55:12
Gregory 60:5,24
 65:17
Griffin 11:18,19,25
guess 12:17 19:14
 20:11,12,13 22:24
guy 78:18,19 81:24
 82:6 112:24
guys 27:25 68:13

H

hand 7:6 97:17 112:1

handled 53:10,11
hands 77:9
happen 74:12 92:3
 103:5
happened 23:17,21
 24:8,11,14,17 29:23
 30:3 35:7 37:9,20 38:11
 51:14 64:24 65:4 76:10
 103:23 111:21
happening 76:15
happy 6:7 18:6
hardware 10:9
harm 60:6 103:16
head 6:10 61:22
heading 67:20
hear 17:16 19:23 85:6
 95:22 96:12
heard 17:20,25 36:4
 40:5,8 53:25 55:20 91:2
 94:16 97:7,21 98:8
 112:18 113:13
hearing 40:7 95:12
heck 88:11
held 13:6 15:11 81:13
 97:16
helpful 96:13
hey 17:12 45:15 63:13
 112:23
hierarchy 27:6
high 7:21,23 9:1 10:6
 86:14
highest 81:12
highly 106:6
hired 15:9 105:6
history 8:10
hold 10:5 81:9 95:7
 96:9,10,25
holds 17:4
home 12:18 105:1
 107:13
homes 61:11
homicide 53:23
horse 59:16
house 62:11,15 82:25
 83:3 105:22 113:19
 114:7,21
houses 64:11,14
husband 112:7
Hyatt 16:22,24

I

idea 44:15 48:9 59:5
 65:18,20 72:7 77:23
 78:1,6 84:12
ignorant 78:13

ill 35:5
important 6:3,9
 111:9,25 112:5
imposed 30:22
impression 22:17,19
improper 107:7,12
inappropriate 80:1
 85:15 99:12
incident 15:20,25
 26:6,7,13 27:7 28:5,9,
 12,20 31:3,6,7,9,12,13,
 16,18,20 32:4,7 33:13,
 21,25 34:24 35:6,13,25
 36:15 37:20 39:5,18
 44:11 45:10 46:2 47:23
 48:14 49:3,10,11,22
 50:2 51:1,6,10,11,13,
 18,23,25 52:4 53:25
 66:23,25 67:2,11 69:23
 70:14,19,22,23 71:6,7,
 15 73:2 74:3,7,8,20
 79:20 82:5 85:3,9 86:3,
 4,10 92:19,22 93:5,10,
 11 99:1,3 100:1,7,25
 101:10,12,17,19 102:2,
 4,10,18,21 103:8
 105:24 109:16,22
 110:1,4,7,10 111:2,3,7,
 16,19,21,22 112:4,13
 113:17 115:4
incidents 28:16 31:4
include 14:15
included 85:11
includes 14:12
including 41:10
Independence 7:13
indicating 75:8
indication 17:7
individual 94:24 96:2
 109:17 110:11
individuals 109:17
influence 80:2 85:15,
 16
inform 114:22
information 54:25
 56:19 58:7,21 59:21
 63:13,17 82:1,2,14
 83:11 86:24 91:7,18,25
 105:4 110:10 112:1,12
 113:18
informational 51:11
 89:13,19
initial 24:1 25:1 31:11,
 12 48:11,12,15 74:13
initiate 86:19
initiated 48:17
innate 25:9

input 51:24
inquire 17:12
inquiries 54:23
inquiry 15:24 16:2,9
 25:24 43:14 57:23 58:5
 59:4,8 86:20 87:3,18
 91:6
insistence 39:8
insistent 38:22
instruct 39:4
instructed 33:12
 36:24 37:25 38:4 39:18
instruction 6:13 7:4
integrated 89:1
intent 35:5
interact 88:19
interaction 19:24
 25:6,19 38:15 72:9,15
 74:13 75:3
interactions 32:19
 48:25 72:3
internal 94:18
interpret 63:15 102:8
interrupt 5:18
intervening 76:7
intimidation 28:22
 29:9,19 49:11,14,19
 50:2,6,15 52:19,25
inves- 103:1
investigated 32:17
investigation 13:20
 31:11 40:12 46:13 55:3
 56:4,14,21 86:5 87:12
 103:2 105:6,14,18
investigator 8:14
 9:24 10:2,7
invoking 5:6
involve 91:24
involved 40:12 52:3
 53:23 59:8 85:25
involvement 53:14
 55:24 90:13,18
involving 15:20 44:11
 88:16 92:15
issue 42:10,17,21 75:9
issued 40:20
issues 25:5

J

J-A-M-E-S-O-N
 47:25
J-O-F-F-R-I-O-N
 11:14
J.B. 78:18 81:22
J.D. 80:13

Jameson 47:24 48:1
January 10:2,8 37:5
Jason 61:24 100:22,24
Jay 44:9 47:25 67:8
 76:21,25 77:18
Jill 6:1 44:3
jilted 112:24
job 15:10 91:13
jobs 9:16 10:5
Joffrion 11:12
John 14:23 41:10
July 43:20 79:1,5 83:15
 84:1,15 85:2
jump 68:17
jumped 72:22
June 25:3 33:9 37:6
 38:10 44:14 67:9 68:3
 72:23 75:24 76:8,9,22,
 25 77:8,9,18 79:11
 101:11,19 102:2,10,17,
 20 111:2
jurisdiction 56:12,18
justice 9:9

K

Kevin 5:1 7:13 44:10
 80:13 109:18
kind 26:17 46:13 66:6
 86:12 114:18
knew 22:9,22 35:1,13
 92:21
knowing 106:18
knowledge 34:13
 37:18 58:9 64:22 110:8

L

L-A-T-E-R-I-C-K-A
 76:24
LA 41:8
label 49:22
labeled 49:23
lack 20:19
Landry 11:22,23
late 40:2
Latericka 76:24 77:1,
 2,3,14
Latericka's 77:9
law 8:10 10:10,25
 40:22 45:19 46:3 57:6,8
 59:6 64:4,7 65:6 84:5
 97:10,25
lawsuit 6:2 19:8,20
 50:21 54:20 58:8 59:14
 93:3 98:25

lawyer 65:19
lawyers 94:9
leading 40:13
learn 41:20
learned 90:16
learning 19:15
leave 9:10
leaves 5:9
leaving 91:4
Lee 43:14 91:6
left 9:12,14 10:13
legal 54:7,8 83:18 84:3
legitimate 45:19 46:3
letter 43:25
letters 44:19,24
level 37:13,17 38:7
 53:10 70:17
levels 71:1
license 105:10
lied 111:2
lieutenant 13:9,25
 14:3 33:15 34:11 35:4
 47:5 52:7 53:12 65:16
 70:10,12 78:19 79:19
 81:1,6,10,16 82:11
 86:11,24,25 87:6,7
 88:5,11

life 104:11
light 58:22
limited 19:22
limits 56:1,5
Linebaugh 21:8
 23:24 67:20,23 68:4,7,
 11 74:2 75:12,17 76:2
list 91:23
listed 104:25 106:6
live 114:17
lives 104:11
living 83:8
local 31:9 38:7 64:10
 88:19 92:1
located 12:9 13:20
location 15:15
lock 78:12
lockable 78:11
locking 78:9
log 43:2,3,7,9
long 8:18 12:7 15:8
longer 74:1
looked 32:15 58:17
 61:25 103:3 105:3
loosely 40:5
lost 30:16
lot 6:15 21:18 50:10
 95:9

loud 6:12
Louisiana 7:14,24,25
 8:1,16 9:13,21 10:18
 11:1 15:4,6 16:15 25:17
 27:5 31:2 35:8 36:8,18
 39:12,24 40:10 42:19,
 24 43:23 47:14 49:25
 57:13 60:2 61:14 63:7
 65:5 70:15 71:19,20,25
 83:13 85:24 96:16,20
 97:23 100:6 102:12
 108:12 109:24 110:8
Louisiana's 64:24
LSP 63:22 67:16 73:24
LSTA 28:4 32:21 33:6
 39:20 41:7 76:10
LSU 9:3,4,10 10:13,24
LTC 81:5
Lydia 55:17 57:14
 58:21 108:4,13 111:13,
 16 112:23

M

made 16:20 21:1
 23:13,22,23 24:25
 26:18 33:24 44:9 45:5,
 11 46:24 50:22 54:23
 57:23 58:5 69:12 72:1
 73:5 74:11,21 86:3 91:6
 93:10,18 94:17 95:20
 99:19 105:23
maintain 12:20
major 13:11 14:9
 15:22 24:22 44:10 47:9
 48:4 61:19 65:14 85:25
 86:19
make 6:12 7:1,16
 12:18 24:23 37:7 45:18
 59:4 61:15 66:5 69:10,
 15 71:17 73:16,21
 85:22 86:6,22 87:2,21
 90:7 105:22 106:13
 107:3
makes 20:4,6 85:20
making 20:8 21:24
 41:8 42:2 53:22 62:11
 86:7 113:19
man 45:15
manner 57:15 108:14
March 47:3,8 48:8
 49:17 55:21 58:13
 61:17 103:8 105:24
 109:16,18,22 110:10
 111:3,7 112:4 113:16
matter 18:22 28:8
 50:11 51:13

matters 75:11
Mayeaux 5:13,14,15
 28:24 29:4,11,21 35:15
 37:1 44:3 46:8 53:3
 54:2,5,7 55:5 56:6,17
 57:21 58:15 66:7,11,16
 80:6 82:7 87:4,11 98:18
 107:18 110:17,19,20
 113:21 114:16
means 48:17 68:16
 73:19
meant 77:20
media 82:2,6 85:7
 91:14 92:1,14,17,21,24
meeting 53:5
meetings 34:16
 52:10,14,17
member 15:6,8,9 22:1
 41:13 42:24,25 43:23
 52:24 67:16 73:25 90:1,
 3 94:24 96:6 111:12,17
 112:8 113:1
members 69:3 96:3
 97:8,9,23,24 98:12
 110:11
memorandum 99:14
memorialize 28:9
 31:14 70:14
memorialized 27:8
memorializing
 16:12 31:8
memory 22:7 31:25
 113:22
mentioned 75:11
 90:23 110:3
met 82:13
Michele 83:15 84:14
middle 43:20 107:16
Mike 15:2 47:12,13
 109:19
mind 21:15 23:25
 43:10 62:18 66:4 96:22
Mine 11:5
minimal 75:10
minimum 86:20
minor 69:13,14 73:2
minute 84:15,25
minutes 66:8,11,12
misconduct 99:2,4
 100:3
missed 69:20 88:24
 90:7
mission 80:2 85:16
mistaken 81:20,21
Monday 44:18 52:12
 74:23

moneys 41:16
monitoring 23:10,11,
 16 24:5
Monroe 12:10,15
 13:16,17,19 14:13
months 11:4 28:12
 29:17,18,23 34:23 83:1
move 55:11
moving 38:22,23
mysterious 55:16
 105:15

N

named 55:17 109:17
names 6:14 110:3
narcotics 13:7,15
narrow 83:1
Natchitoches 6:3
 14:15,17 63:23 88:15
 113:19,24 114:12,14
nature 49:11 50:1
 69:17
necessarily 69:23
needed 23:13,24
 36:23 37:18 38:2,8
news 41:22 91:2,3,23
nods 6:10
Noel 47:12,13,19
 109:19
nonsearchable
 84:17
noon 44:18
north 40:10 83:13
 85:24
notate 5:11
note 24:10,14,17
noted 42:23
notes 7:7 25:10,14
notion 70:18
number 81:4

O

oath 7:6
object 28:24 29:4,11,
 21 35:15 37:1 46:8 53:3
 55:5 56:6,17 57:21
 58:15 80:6 87:4 95:4,8
 96:9,25 97:1,11 98:13
 99:5,7 101:3,22 102:5,
 14 104:16,17 106:3,21
 108:25 109:8,13 112:14
 113:4,21 114:16
objected 95:19

objecting 96:10
100:10
objection 29:1 82:7
95:20 98:2 99:18
102:24 103:20 108:18
observe 7:6
observed 62:15 105:1
observing 107:13
obtain 9:6 18:15
obtained 10:18
occasion 15:23 92:2
occasions 110:5
occur 28:17
occurred 15:25 28:12
34:24 55:25 56:4
102:22
occurrence 30:25
64:12 65:5
occurring 39:3
occurs 29:3,10 75:14
99:3 100:8
odd 34:23
office 8:12,13,15,19
9:20,24 10:3,8 12:5
13:17,19 50:21 63:23
83:11 88:15 89:9
113:20,24 114:6,13,15,
20
Office's 65:1
officer 27:18 28:23
29:9,20 39:4,15 42:2
49:12 62:6,7,19,20,25
63:14 70:7 82:1 86:13
officers 11:11 30:5,
12,15,22 62:23
official 96:18,23
Oliphant 15:24 16:6,
8,18 17:7,16 18:1 19:24
20:22 21:6,13 22:9,13,
17,25 23:14,17,20 24:2,
7,18,20 25:2,4,12,16
26:12 27:13,17,21 28:3
32:7,11,17,18,21 33:13,
19,20,24 34:7,18,22
35:12,19 36:24 37:13,
21,25 38:2,13,21,25
39:2,17 44:9,13 47:4,25
48:4,8,23 49:16 50:5
52:13,19 54:25 55:21
58:6,12,23 60:22 62:2,9
63:14 64:3 65:9,13,14
67:9,12 70:7,21 71:20
72:2,10,12,20,25 73:6,
17,24 74:14 75:3,16,25
76:4,16,17,21,25 77:8,
13,18 78:17 79:22
80:13 82:14 88:5,13
89:23 93:10,18,24
94:19 98:5,24 101:14

103:13,17,25 104:25
105:2,4,7,13,17,18,20
106:2,18 107:3 109:15
111:2,8 112:6,12,22
113:11,17 114:3
Oliphant's 21:20 23:5
39:14 45:6,24 46:14,19
47:7,15 61:17 64:19
65:2 72:9 79:6 92:15,18
93:4 101:18 102:1,10,
17,20 105:9,25 107:7
113:2
one-function 51:16
opened 56:21
opinion 64:16 106:17
opposed 62:19 78:4,9
order 40:19 41:4,7
45:9 62:10,13,20 63:3,9
100:15,18
ordered 46:12
orders 62:5
ordinary 64:16
organization 35:9
110:9
original 19:20 27:12
originally 23:7
Orleans 21:11,12
23:25
out-of-place 105:1
overlook 73:12
overlooked 73:11
owe 96:2
owes 94:23
Oxenhandler 5:21
98:19,22,23 99:8,19,22
100:12,21 101:8,23
102:7,16 103:4 104:1,
18 106:15 107:5,20,23
108:9,21 109:6,9,14
110:13 112:14 113:4

P

p.m. 48:1 72:24 84:15
115:8
pages 48:11 84:13
101:15
paperwork 28:8
paragraph 41:6 44:8
55:10 74:23 107:16,25
parameter 84:17
Parish 6:3 8:19 63:23
88:15 113:19,24
114:12,14
parishes 114:17
part 20:11,12 44:21
54:19 55:13 57:3,17

63:25 74:25 75:12
part-time 9:17,19,23
10:4
partial 95:19
parties 72:19
passage 28:19 29:15,
19
passed 29:23
patrol 11:8 12:6 13:4,
8,22 14:4 33:17 34:12
47:6 53:10
patrols 62:14 64:13
65:7 104:23 114:20
pay 30:16 86:16
paying 41:17
PDF 77:21,25 78:4,8,9,
12 84:9
pending 6:3 87:13
people 73:12 91:8,13
perfect 80:15
perform 64:11
performance 79:25
period 21:12 25:4,13
38:20 76:7
persisted 75:22
persistent 38:22
39:16 74:15
person 69:20 90:21
104:11,14 105:12
109:23
personal 60:3,7,13
65:2 95:3 96:6 103:9,
14,19 104:6,13 106:1,
11,19 107:8
personally 18:12,15
persons 110:2,3
perspective 68:5
82:12
pertain 91:9,12
pertained 54:15
pharmacy 10:10
phone 20:2 27:24
phrase 20:20 48:12
phrased 86:24
place 38:18,20 51:3
places 6:14
play 57:16 105:20
108:15 109:10
point 28:11 31:14
33:12 35:3 38:8 39:7
91:3 113:11
police 8:16 9:13,22
10:13,21 11:1 12:3
16:25 18:7 19:18 21:24
26:4 27:6 28:10,15
30:6,16,22 31:2,10,18,
19 32:3 33:18,21 35:8

36:9,18 39:12,24 40:15,
17 42:19 43:23 44:1
45:15 46:2 47:14,18
49:8 53:21 54:15,23
55:3,24 56:3,13,15,18
57:13,19 58:11 59:2,3,7
60:3,12,21 61:3,14 63:7
64:8,18,25 68:13,22,23
69:2 70:15 71:12,14,21
72:6 78:3 83:5,11,19
85:7,17 86:14,15 89:10,
17,18,25 91:10,12,15,
24 92:7 93:2,9 94:24
95:2 96:17,21 97:9,23,
25 98:10 100:6 101:20
102:3 103:14 105:21
106:17 108:12 109:24
110:9 111:1
Police's 82:6
policeman 94:23
policy 31:1,17,19,24
32:4 68:14 111:1
political 41:18 42:2
pose 104:15
position 17:1,3,6 47:7
61:17 72:4 86:18 88:18
95:2 96:6 109:21 113:2
positions 13:6 15:11
possession 45:23
possibility 57:16
105:20 108:15
possibly 53:22
posting 93:17,24 94:6
98:6
potential 40:16
potentially 60:5
103:16
predicate 99:12
106:5,23
preparation 101:20
prepare 17:10 25:18
26:6,12,21 27:3,13
28:3,4,5 32:22 33:13
34:19 39:5,18 70:22
71:18 78:7
prepared 26:16 44:13
50:18 58:6 71:20 85:7
100:8
preparing 71:14
present 27:20 91:19
press 90:24
pretty 51:16 52:22
prevents 28:19
previously 104:5
prior 17:15,21,23
90:13
private 46:1 105:6

procedural 100:15,
18
procedure 111:1
procedures 101:20
102:3
proceed 71:2
process 23:2 51:8
produced 84:11
product 48:22
professional 94:23
96:1
program 12:5
progressive 68:14
prohibited 42:2
promoted 13:8,9,10,
11,12,21
prompts 7:7
pronunciation 77:3
83:20
proper 29:24 104:12
106:1,16
propositions 99:17
protect 104:22
provide 25:25 111:25
provided 110:2
provision 97:22
proximity 20:2 64:9
public 35:14,25 42:1
45:5,18 46:4,17,24
49:4,11,13,18 50:2,6
52:24 64:18 80:2 81:22,
24 82:1 83:11,23 84:6
85:16 91:6,16 96:18,23
110:2,11
publications 59:20
pull 91:9
pulling 68:8
purpose 36:7,14
purposes 5:7 7:8
51:11 89:19
put 36:5 46:22 104:23
112:12,22

Q

question 23:7,9 24:8
29:7,25 30:4,20 31:17
37:8,22 39:14 43:24
49:13 50:13 56:2,10
73:21 74:9,12 75:21
80:25 82:10 87:11,13
95:22,23 96:11 99:10,
11,21
questions 6:22 44:17
53:14 59:11,19 94:10
95:10 98:20 108:1
110:14,17,18

quieter 95:9
quote 55:3 99:20
108:10

R

R-A-C-H-A-L 54:24
R.S. 41:8
Rachal 54:24 55:4,17
57:14 58:21 59:1,4
108:4,13 112:25 114:5,
6
Rachal's 59:9,13
111:13,16 112:7,8,23
raises 40:17 79:25
rank 12:20,22 13:1
81:9,12 86:14
ranks 13:5 81:15
reached 18:22
reaction 65:25
read 56:23 65:21 90:24
91:1 107:16,25 108:19
reading 108:19
reason 10:13 36:11
45:20 46:3 58:4 59:19
61:8
reasonable 57:1,5,9
60:18
recall 8:23 16:21,22,23
17:11 18:13 19:2,6,11,
21 20:1,10,16,17,22
25:8 30:24 32:10,20,24
33:5 35:22 36:5 40:18,
23 42:11,16,22 44:2,6
45:3 46:21 48:19,20,21
49:2 50:12,16,19 52:21
53:4,7,8,9,19,21 58:3
65:12,23,25 76:12
87:19,23 88:2 89:6
92:10,11,13,14,17
93:16,22 94:1,4,21
98:7,8 104:8
recant 93:3,9,13
receive 63:12
received 44:9 55:21
74:23 98:12
receiving 25:24
Recess 66:17
recollection 32:3
38:24 74:4
recommend 86:2,21
87:12,17
recommendation
86:6,8,22 87:2
recommendations
87:22

record 5:6,8,12 35:14
36:1 43:13 49:4 54:3
59:24 87:1 95:18
records 45:5,18 46:4,
18,24 83:23 84:6 91:6
110:3
redacted 110:4
Reeves 5:1,25 7:13,19
44:10 59:15 80:13
94:15 95:8 97:1 99:24
109:19 110:25
refer 100:14,16 109:11
reference 31:15
33:24 59:14 92:15,18
referenced 73:1
references 37:17
108:4
referred 74:1,3 90:10
referring 75:23 97:9
106:24
reflect 25:11
refresh 31:25
regard 103:18
region 13:11,12 14:10
15:22 47:9 48:3 49:18
61:19,20 85:25 86:19
88:18 89:5
regional 52:23
registered 105:11
regular 30:24
relate 22:25
related 15:19 85:8
relates 31:18 59:20
61:18 99:13 112:1
relating 31:3,19 68:8
91:14
relation 102:23
relations 81:24
relative 20:23 42:20
62:11 94:18 96:18,23
relay 21:7
relayed 21:6,21 22:13
23:5,20 32:12 38:13
remain 14:4
remember 16:7 18:21
19:20 20:14,15 21:16,
18 40:7 53:1 74:11
89:10,14,15 91:1 104:3,
4,5,7
reopen 56:4,14
reopened 55:3
105:19
repeat 59:16
rephrase 6:6 56:10
replaced 14:24 15:1
report 26:6,13,21 28:5,
6 31:6,7,11,12,13

33:13,21 35:13,25 39:5,
18,19 44:9,12 45:6,10,
16,24 46:2,15,20 47:23
48:11,12,14,16 49:3,22
50:18 51:1,6,10,11,13,
18,23,25 52:4 53:12
54:17 58:24 65:21 66:1,
23,25 67:2,11 69:23
70:22,23 71:6,15 73:2
74:3,7,8,20 79:20,25
80:5,7 82:5 85:3,9 86:3,
4,10 92:15,19 93:5,10,
11 99:1 100:25 101:17,
19,21 102:2,4,10,18,21
103:8,10,13 104:24
105:2,8,24,25 107:19,
21 108:4 109:16,22
110:4,7,11 111:2,8,16,
20,21 112:5,13,23
113:17 114:11,25
reported 47:10 62:2
reporter 5:10,14,16
6:11,16,25 8:4,7 90:1,6
95:11 96:12 97:2,5
100:16,19
reports 30:6,13,18,23
31:3,18,20 32:4 71:7
90:24 91:14 99:3 100:2,
7 101:12 110:1 111:3,
19
represent 6:1 43:13
66:24
representative
15:14
reputation 90:19
request 5:7 16:20
17:21,23 23:22 25:24
26:13,14,19 27:12
33:23 34:17,23 35:1,2
45:6,11,19 46:4 48:22
62:14,18,24 63:2,4,9,
10,14 64:3 65:6 71:15,
22 72:1 82:3 91:7
103:9,18 104:13 107:4,
7,14 110:3
requested 12:13
36:13 38:15 61:15
70:20 105:21 106:2
requesting 17:10
60:2 66:8 71:13 76:10
requests 21:2 46:18,
24 83:23 103:14
requirement 100:7
reserve 8:12,18 9:1
residence 61:16
64:20 65:2,7 106:13
resources 64:18,25
65:1

respect 6:22 32:6
36:10,21 63:18 73:14
92:8 106:5 112:20,25
respond 95:21
responded 44:19
response 26:20,23
27:1 51:12 71:22 95:12
responsibilities
84:6 89:2
responsible 40:22
result 54:24 71:15
110:2
retired 82:11,16
review 57:13 69:7,15
70:5 73:3 79:21 108:12,
22
reviewed 69:16 85:3
101:12,17
reviewer 69:16
reviewing 70:2,3,8
102:8
Revised 49:25
Richard 43:15
role 79:15 80:22 81:7
room 5:9 95:15
Rouge 7:14,24 8:12,
13,14,19
routed 64:8
rule 100:6
ruled 105:16 108:6,17,
23 109:2
runner 10:11
rural 64:8

S

S-L-A-T-O-N 78:18
safe 106:14
safety 49:12 55:12
57:2 60:18 62:16 80:2
85:16
sat 39:24 89:17
school 7:21,23,24 9:1
10:4,6,18
scope 27:5
searchable 77:21,24
78:4,5,8 84:9
searched 84:10
secretary 48:5 77:5
section 84:4,5 91:17
94:18
security 61:15 62:11
63:24 64:19 106:13
114:6
seek 98:10
send 96:21

sending 48:7 82:5
sends 83:25
senior 53:5
sentence 69:19 73:10
sentences 55:15
separate 31:12
sequestration 5:6
sergeant 13:9,22
series 66:22 78:16
101:11
serve 8:18
served 15:14
serves 113:22
set 99:14
share 91:25
shared 35:4
Sheriff's 8:12,13,19
63:23 64:25 88:15
113:20,24 114:5,13,14,
19
sheriffs 88:19 89:4
Sherry 47:24
short 19:15
show 66:3
showed 91:5 93:21,22
105:11
Shreveport 14:14
56:1,5,15 59:3
sic 110:10
side 18:15 103:2
signals 7:6
signed 101:13
significant 52:22
similar 104:14
simpler 87:15
simply 73:16,25 81:15
simultaneous 88:23
92:4 95:6 108:10
sir 7:5,9,12,22 8:10
12:4 20:11 21:20 22:4,
19 24:17 25:4 29:1,6,17
30:4 36:10,21 37:19
39:13,23 40:11,24 41:1
43:10 47:1 55:7 56:8,12
63:18 66:4,19 67:1 72:7
73:14 74:16 75:19
77:12 78:14 79:17 85:2
87:1,10 91:8 93:1 94:8,
21,25 96:4,19,24 97:3,
7,19 98:17 99:6 100:4,
17,23 101:2,7,15,16
103:5,10,11 107:1,17
108:2 110:16 112:16,20
114:2 115:5
Sitting 32:2
situation 21:4 23:10,
11,16 26:4 33:19 53:18

87:18 112:1
six-month 25:4,13
 76:7
slash 49:12 55:11
 63:8,22
Slaton 78:18 79:2,5
 80:20 81:9,12,22 83:10,
 15
Slaton's 80:22
slips 46:6
smaller 114:17
smart 90:10
smiling 78:10
Smith 61:24 62:1,10
 63:13
Sociology 8:3,5
solicited 51:24
sophisticated 91:22
sort 15:19 17:17 26:6,
 13 27:13 33:3 39:5
 52:19 77:13 85:7 86:4,
 20 87:17
sound 75:18
sounds 45:21
spacing 73:11
speak 7:15 34:13
 95:16
speaking 39:23 68:20
specific 19:5 27:14
 58:8 59:17,20
specifically 28:4
 65:12 92:22 106:24
specificity 19:6
speculate 52:2
speed 54:16,21 66:6
spell 6:14 11:13
spelling 6:15
spoken 18:14,18
staff 19:4 34:17 43:16
 47:14,18 52:10,14,17
 53:5 79:13 81:3,8 87:8
 89:19 91:9,13
Stanley 11:18
Starns 100:22,24
start 6:21
starting 7:20
starts 74:22
state 8:16 9:13,21
 10:13,20 11:1 12:3
 15:4,6,12,18 16:3,9,15,
 19,25 17:4,9,24 18:7
 19:17 21:24 25:17,23,
 25 26:4,5,14,17 27:6,
 12,14 28:10,15 30:6,16,
 22 31:2,17,19 32:3
 33:3,18,21 34:1,6,17
 35:2,8 36:1,9,12,18

38:14 39:12,24 40:4,15,
 17,21,22 41:14,17
 42:19,24 43:23,25 44:4,
 24 45:5,14,23 46:2,6,
 13,18 47:14,18 48:22
 49:8,19 53:21 54:15,22
 55:2,24 56:3,13,18
 57:13,19 58:11 59:2,7
 60:2,12,20 61:3,14 63:7
 64:7,17,24,25 65:5
 68:13,22,23 69:2 70:15,
 19 71:12,14,19,21,22,
 25 72:6,8,14 78:3 79:15
 82:6 83:5,11,19 85:7,17
 86:14 89:9,17,18,25
 91:9,12,15,24 92:7
 93:2,8 94:23,24 95:1
 96:2,17,21 97:9,23,25
 98:10 100:6 101:20
 102:3 103:14 104:9
 105:21 106:17 108:12
 109:24 110:9 111:1
statement 23:23 25:2
statements 21:25
 53:22 93:9 105:23
states 76:5
statewide 56:18
stationary 98:10
Staton 33:16,22,23
 34:4,9,22 35:5 47:4,5,
 11,19 52:7 53:13,16
 65:16 70:10,12,20 79:3,
 11,18 80:14 86:11,24
 87:7 88:6,11 109:18
status 53:18
Statute 49:25
statutes 102:13
stay 13:1
Steve 98:18,23
stop 6:6 71:2
stopped 97:14
store 10:9
stories 91:23
story 18:16 43:22 92:6
strange 53:24
strategy 85:8
strike 34:22 102:19
structure 69:19 73:10
study 9:8
stuff 63:16 73:10
subject 29:1 52:17
 67:16 72:25 73:24 74:6,
 7 76:22 79:19 106:8
 108:18
submit 70:16 71:4
 73:13
submitted 28:9 69:7
 70:4,25 73:6,17 99:13

subordinate 62:7,19,
 21 64:3
subsequent 69:14
subsequently 93:19
substantial 69:17
 73:8
substantive 73:15
sue 67:23,24
sued 19:16 50:23 89:9,
 10
suggestion 57:13
 108:11
suggestions 21:25
suicide 53:23 54:14
 55:25 105:17,19 108:6,
 18,23,24 109:2
suing 89:18
suit 50:18,23
superintendent
 12:3 13:13 14:19,24
 15:1 18:23 33:17 47:6,
 17 106:17
superior 62:6,19,20,
 25 63:14
supervisor 20:7
 21:21 23:4,5 71:4,5
support 99:17
supported 99:15
supporting 79:24
supposed 28:16,23
 29:2,9 31:3
surety 50:13
surprised 62:12
surrounding 87:20,
 24 88:1 109:2 110:7
 115:4
surveillance 104:10
surveilled 60:16,22
 61:9
surveilling 65:11
suspended 30:17
suspicion 57:1,6,9
suspicious 61:10
 105:3,8
sworn 5:2
systems 78:3

T

tad 7:15
takes 68:24,25
talk 7:3 9:18 18:11 21:3
 33:6 50:14,20 72:12
 88:14
talked 18:25 19:3
 27:17,23,25 38:10
 40:15 50:5,9 65:8 82:20

88:12 89:11 106:19
 112:23
talking 6:23 17:21
 31:13 44:12 54:11
 76:12
Tara 7:23 10:6
Tech 7:25 8:2 10:18
telling 10:12 29:18
 31:19,23 51:5,17 53:1,
 16 64:17 65:8 89:14
ten 58:22
tenure 30:5 71:12
term 15:21 19:15 57:5,
 6 60:9 104:6
termed 61:7 104:2
terminated 30:17
termination 68:17
terms 31:9 32:3 78:13
test 6:15
testified 5:3 100:5,24
 104:4,5
testify 64:21
testimony 36:12
 99:16 100:24
thing 25:15 38:13
 47:22 76:19 79:23 84:9
 87:14 111:18
things 6:15,24 39:3
 40:16,17 51:15 64:14
 71:2 90:18
thinking 31:9
thought 34:25 36:6
 38:2 42:14 105:18
threat 60:3,7,10,13
 61:4,7 103:9,15,19,24
 104:6,13,15 106:1,11,
 19 107:8
tickets 98:11
time 6:5 10:24 21:12
 22:4,24 23:24 25:13
 28:11,17,19 29:2,3,10,
 15,18 33:2,7,12 34:21
 36:22,25 37:10,22
 38:18,20 39:1,3,17,23
 41:13 43:24 47:13
 49:17 50:18,24 55:18
 56:25 61:23 62:1 65:13
 67:7 69:3 78:21,22,23,
 25 79:13 80:18,23
 81:23 82:20 83:12 86:2
 91:4 94:17 97:14,18
 99:25 106:12 113:11
timely 30:7,12,18,23
times 25:22 26:3 71:23
title 81:7,8
titled 48:14
today 7:9 32:2 43:18
 65:21 103:10

told 16:4,5 22:20 27:3
 28:3 32:18 33:23 35:1,
 19 37:19 38:25 39:2,15
 57:22,25 58:2 59:14
 65:3 67:12 69:22 71:23
Tommy 11:12
tool 100:25
top 77:17 84:19
totaling 41:9
town 22:21
traffic 98:11
training 11:2,3,11
 12:5 28:16 78:20 96:22
transfer 12:8,11,15
 96:17
transferred 13:7
 21:2,9,10,12
transmitting 77:14
treated 71:8
troop 11:8,11 12:6,8,9,
 11,19,21,22,25 13:3,5,
 10,15,20,24 14:2,6,7,
 13,18 37:13,17 38:7
 43:1,7 61:14,18,20,22
 62:10 63:8 77:4,11
 88:20 113:23 114:12
trooper 8:17 9:12
 10:14 12:6,23 16:25
 21:2,8 23:24 25:24 26:6
 38:23 46:6 51:12 60:15
 67:20 68:21,22,24,25
 74:2 75:12 79:24 96:17,
 21,22 99:2,4 100:2
 104:9
troopers 15:4,7,12,18
 16:3,9,15,19 17:4,8,9,
 24 25:17,23,25 26:5,14,
 17 27:12,14 33:3 34:1,
 6,18 35:2 36:1,12 38:14
 40:4,21 41:14,17 42:24
 44:5,19,24 45:5,23
 46:14,18 48:22 64:8
 70:19 71:12,19,23,25
 72:8,14 79:15 96:2
 104:13 111:5
troops 61:21 88:20
true 10:21 60:10,17
 75:25 76:4 108:22
 112:11,18,21 113:12
truth 36:20
truthful 111:6 114:10
turn 7:17 31:3 101:9
turning 30:6,12,18,23
 71:14
type 51:18
types 30:21
typo 79:23

U

ultimately 40:20
70:21 108:8,17
unaware 62:23 71:11
76:9 113:8
uncommon 64:10,12
65:4
uncover 60:21
underscore 77:21
understand 6:5,18
28:11 36:11 56:10
59:15,18,22 63:20
73:18,20 76:14 82:17
90:9,11 93:6 95:17
111:19
understanding
16:17 18:5 22:6,8 26:12
27:16 38:19 72:1
understood 27:11
31:1 72:18
uneasy 64:14
unhappy 20:25
uniform 11:8 12:6
13:4,8,22 14:4
unique 6:13
unit 15:15
University 7:25
unreasonable 107:3
untimely 55:17
105:16 108:5
untouchable 97:10,
25
unusual 71:16
uploading 78:3

V

V-E-R-R-E-T-T 11:16
variety 109:11
vehicle 105:3,8,11
vehicles 105:1
venues 59:24 92:14,
17
verbiage 24:16
Verrett 11:15,16
versatile 100:25
version 43:18 51:14
versions 66:25
versus 67:20 74:2
view 35:4 111:21
violated 41:8 49:24
101:19 102:2
violating 40:22

violation 111:1
violations 102:12
voice 95:9
volume 7:17
voting 40:16

W

waiting 23:16 24:7
walk 7:19 8:9 13:5
45:14
wanted 12:15 16:11,
15 21:8,10,11,14 32:22
76:19 77:19 90:7
wanting 15:18
watch 105:7
watching 55:11
Wayne 7:13
ways 36:19 46:1
week 52:11
weeks 11:5 83:2,6
whatsoever 39:19
60:21 85:23
wide 109:11
wife 12:17
woman 55:17 56:25
105:15 108:4
word 7:3 97:24
words 30:17 68:16
109:10
work 9:21 33:17 62:6
73:13 114:5,15
worked 8:11,14 9:23
10:1,9,10 23:1 48:4
working 9:1 13:15,23
14:1 22:18 23:2
works 48:4 84:3
world 57:8
worthy 37:10,24
write 33:20 67:12
111:23
writes 60:1 61:13 63:6,
22 75:7,9
writing 69:20 75:15
written 31:25 43:25
58:23 60:11 85:13
wrong 27:11 45:11
49:4 52:23 61:25 99:8,
9,20
wrote 43:21 74:4 76:1,
17

Y

year 8:20,21,23 9:25
10:19 19:18

years 8:21 9:4 13:6
22:7 53:24 54:14 55:19
56:1,5,15 58:23 76:13
Young 40:21 42:6,8,
10,17,19

Z

Z-U-R-I-K 43:14
Zoom 6:10,20 7:5
95:20
Zurik 43:14,21 91:6