

10TH JUDICIAL DISTRICT COURT
PARISH OF NATCHITOCHE
STATE OF LOUISIANA

* * * * *

CALVIN W. BRAXTON, SR.

NO. C-90,284

VS.

LOUISIANA STATE TROOPERS
ASSOCIATION AND JAY
OLIPHANT

* * * * *

DEPOSITION OF JARED CARUSO-RIECKE,
taken on Wednesday, November 11, 2020, at
the Law Offices of Jill L. Craft,
329 St. Ferdinand Street, Baton Rouge,
Louisiana

REPORTED BY: TAMRA K. KENT C.C.R.

* * * * *

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1 APPEARANCES:

2 Representing the Plaintiff:

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8 BY: MS. JILL L. CRAFT

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1 APPEARANCES (CONTINUING)

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3 ALSO PRESENT:

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5 Caruso-Riecke, in his personal and Commission

6 Member capacity:

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11 BY: MS. M. LENORE FEENEY

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13 Representing Jared Caruso-Riecke, in his personal

14 capacity:

15 JOHN C. ALFORD FIRM

16 Attorneys at Law

17 410 North Jefferson Avenue

18 Covington, Louisiana 70433

19 BY: MR. JOHN ALFORD

20

21 Also Present: Mr. Calvin W. Braxton, Sr.

22 Mr. Jay O'Quinn

23

24 Reported by: Tamra K. Kent, Certified Court

25 Reporter #83070, in and for the

State of Louisiana

5

S T I P U L A T I O N

IT IS STIPULATED AND AGREED by and among

Counsel that the testimony of the witness,

JARED CARUSO-RIECKE, is hereby being taken pursuant

to Notice under the Louisiana Code of Civil

Procedure for all purposes permitted under law.

The witness reserves the right to read and

sign the deposition. The original is to be

delivered to and retained by Jill L. Craft,

Attorney, for proper filing with the Clerk of

Court.

All objections, except those as to the form

of the questions and/or responsiveness of the

answers, are reserved until the time of the trial

of this cause.

* * * * *

Tamra K. Kent, Certified Court Reporter in

and for the State of Louisiana, #83070, officiated

in administering the oath to the witness.

6
 1 JARED CARUSO-RIECKE, having been first duly
 2 sworn, was examined and testified as follows:
 3 EXAMINATION
 4 (Commencing at 9:00 a.m.)
 5 BY MS. CRAFT:
 6 **Q. Is it pronounced Riecke?**
 7 A. Yes, ma'am.
 8 **Q. Mr. Riecke, my name is Jill Craft and I**
 9 **represent Mr. Braxton seated to my left in**
 10 **connection with a lawsuit pending in Natchitoches**
 11 **Parish here in Louisiana.**
 12 **It's very important during the course of**
 13 **this deposition that you understand what I'm asking**
 14 **you, and if at any time you do not, please, tell me**
 15 **to stop and rephrase it and I'm happy to do so.**
 16 **It's also important that nods of the head**
 17 **"yes" or "no" cannot be taken down by the court**
 18 **reporter, so you need to make sure to answer out**
 19 **loud.**
 20 **My final instruction is rather unique to me**
 21 **insofar as I'm going to ask you to spell names,**
 22 **places, or things. I'm not here to test your**
 23 **spelling. It's just much easier for our reporter**
 24 **to get those as we go along.**
 25 **And the good news for you is I believe**

7
 1 **Miss Tammy as taken several depositions in this**
 2 **case thus far, so the odds of me having to stop and**
 3 **have you spell things gets significantly less as we**
 4 **go along in this process. Is that fair enough?**
 5 A. Yes, ma'am.
 6 **Q. Can you give me your full name and address**
 7 **for the record, please, sir?**
 8 A. So I've got braces. I've had them for a
 9 few months, and I'm still learning to speak through
 10 it. So if I need to say anything -- and I told the
 11 reporter the same thing.
 12 **Q. Right.**
 13 A. I'm sorry.
 14 **Q. Name and address, please, sir.**
 15 A. Jared J. Caruso-Riecke, 17940 Painters Row,
 16 Covington, Louisiana, 70435.
 17 **Q. Okay. Mr. Riecke, can you tell me where**
 18 **you graduated high school, please.**
 19 A. St. Paul's High School in Covington.
 20 **Q. And when did you graduate high school?**
 21 A. In 1989.
 22 **Q. And do you have any education beyond high**
 23 **school?**
 24 A. I went to LSU; graduated in 1994. G.S. in
 25 Political Science.

8
 1 **Q. A B.S. in Political Science?**
 2 A. A G.S.
 3 **Q. What is a G.S., general studies?**
 4 A. Yes, ma'am.
 5 **Q. And you don't actually have a political**
 6 **science degree; is that right, sir?**
 7 A. You had to tell them what your
 8 concentration was, and my concentration was
 9 political science.
 10 **Q. Okay. Do you have any education beyond**
 11 **your General Studies Degree, sir?**
 12 A. No.
 13 **Q. What is it that you do for a living?**
 14 A. I do several things. My main focus of
 15 business is real estate development.
 16 **Q. Okay.**
 17 A. And my family is also in the banking
 18 business, so I am Vice-Chairman of the board of the
 19 bank, as well as the head of the Audit Committee,
 20 head of Compliance Committee, and head of South
 21 Louisiana Loan Committee.
 22 **Q. And what bank is that?**
 23 A. American Bank & Trust.
 24 **Q. And now, correct me if I'm wrong, but you**
 25 **serve on the board of American Bank & Trust with**

9
 1 **another former member of the State Police**
 2 **Commission; is that right?**
 3 A. I do.
 4 **Q. And who is that person?**
 5 A. Franklin Kyle.
 6 **Q. And how long have you known Mr. Kyle?**
 7 A. Sometime before Katrina. I met him in his
 8 capacity as an engineer, so I don't remember if
 9 it's exactly 2002, 2003, 2004. Somewhere up in
 10 there.
 11 **Q. And how did he end up on the board of**
 12 **American Bank & Trust?**
 13 A. He was invited.
 14 **Q. By?**
 15 A. By the Board of Directors.
 16 **Q. Who in particular?**
 17 A. I don't know.
 18 **Q. Were you on the --**
 19 A. Ask my father.
 20 **Q. Okay. And were you on the board at the**
 21 **time?**
 22 A. Yes, I've been on the board since 1994.
 23 **Q. And do you know why it was that Mr. Kyle**
 24 **was invited to be on the board of American Bank &**
 25 **Trust?**

<p style="text-align: right;">10</p> <p>1 MR. ALFORD: 2 I'm going to object to that; asked and 3 answered. And then I'm not going to allow 4 you to go too far down this road. He's not 5 here to testify about American Bank & 6 Trust. 7 MS. CRAFT: 8 Counsellor, if you have an objection as 9 to form, please make it. If it's a 10 privilege issue, you can make that, too. 11 But under the rules I get to ask him 12 questions that I believe are calculated or 13 likely to lead to the discovery of relevant 14 or admissible evidence. 15 For the purposes of these depositions, 16 it's how they've been conducted. So if 17 you're going to instruct him not to answer, 18 that's fine. We'll have a problem. We'll 19 ask the judge, and then we'll have to come 20 back again and waste Mr. Riecke's time one 21 more time. 22 Are you instructing him not to answer? 23 MR. ALFORD: 24 I'm instructing him that he's 25 already -- I'm instructing you it's already</p>	<p style="text-align: right;">11</p> <p>1 been answered -- 2 MS. CRAFT: 3 I asked him why, sir. 4 MR. ALFORD: 5 -- so he's not here for you to waste 6 his time. 7 MS. CRAFT: 8 Great. 9 MR. ALFORD: 10 You've already asked that question. 11 How was he -- 12 MS. CRAFT: 13 No, I haven't. 14 MR. ALFORD: 15 How was he invited to be on the 16 board -- 17 MS. CRAFT: 18 No, I asked him why, sir, and that was 19 the question. Which has not been answered. 20 MR. ALFORD: 21 You can answer. 22 MS. CRAFT: 23 So are you instructing him to answer 24 that? 25 MR. ALFORD:</p>
<p style="text-align: right;">12</p> <p>1 He can answer that question. 2 MS. CRAFT: 3 Great. 4 BY MS. CRAFT: 5 Q. Mr. Riecke, do you know why Mr. Kyle was 6 asked to be on the board of American Bank & Trust? 7 A. Not specifically to him. The board 8 composition is made up by people in different 9 businesses from around the community that do 10 business with the bank. We try and fill seats from 11 professional backgrounds and different areas of the 12 state. 13 So there was nobody in engineering on the 14 board. The bank does a lot of real-estate type 15 lending. We're very heavy real-estate lenders, 16 both for development and construction and long-term 17 hold. So it made sense to have an engineer on the 18 board. 19 Q. Okay. Now how did you -- let me ask you 20 this question -- did you replace Mr. Kyle on the 21 board -- on the commission? 22 A. Yes. He was from the 1st Congressional 23 District, as well as I am. 24 Q. Okay. How did that come about? 25 A. I'm sorry; in what part?</p>	<p style="text-align: right;">13</p> <p>1 Q. Well, do you know how it was you got chosen 2 to replace Mr. Kyle on the State Police Commission? 3 A. Well, I had reached out to boards and 4 commissions and asked to be on the Wildlife and 5 Fisheries Commission. 6 Several months later, or some period of 7 time later, I got a phone call asking if I'd like 8 to be on the State Police Commission. It wasn't 9 what I wanted, but I said sure. 10 Q. Who was the call from? 11 A. I forget the lady's name. It was somebody 12 in the Governor's Office. 13 Q. And did you know anything about how 14 Mr. Kyle came to no longer be on the State Police 15 Commission? 16 A. What I've read in the paper -- I asked him 17 a question at one time about it, and he said, Look, 18 I really can't talk about that. Under advice of 19 counsel, I don't need to talk about these things. 20 And I respected that. 21 Q. Did he tell you which counsel told him he 22 couldn't talk about it? 23 A. No. I didn't ask which counsel. 24 I mean, the man said, Look, under advice of 25 counsel, I can't talk about this or answer those</p>

<p style="text-align: right;">14</p> <p>1 question. And so I was polite; I left it alone.</p> <p>2 Q. So what was it you were reading about in</p> <p>3 the paper relative to Mr. Kyle's departure from the</p> <p>4 commission?</p> <p>5 A. It was him and Bill Goldring. I don't</p> <p>6 remember the other individual's name. But it was</p> <p>7 in the New Orleans paper about the political</p> <p>8 donations.</p> <p>9 Q. What about political donations?</p> <p>10 A. That allegedly they had made political</p> <p>11 donations, and that wasn't allowed.</p> <p>12 Q. And so who did you reach out to on the</p> <p>13 boards and commissions you said to try to get</p> <p>14 yourself some spot on some commission or board</p> <p>15 somewhere?</p> <p>16 A. I called boards and commissions and said,</p> <p>17 "How do I go about getting on a board or a</p> <p>18 commission?"</p> <p>19 And they said, You can fill out a request</p> <p>20 form.</p> <p>21 I said, "Great."</p> <p>22 They e-mailed me the forms. I filled it</p> <p>23 out; sent it back in. And like I said, that was</p> <p>24 for Wildlife and Fisheries.</p> <p>25 Q. And do you remember to whom you had spoken</p>	<p style="text-align: right;">15</p> <p>1 to on the boards and commissions?</p> <p>2 A. No. We're talking probably 2013, 2014,</p> <p>3 2015, somewhere around in there.</p> <p>4 Q. How did you get routed to that office?</p> <p>5 A. Well, I mean, I'm born and raised in</p> <p>6 Louisiana. I have a political science -- you know,</p> <p>7 I went to LSU for political science. I had a</p> <p>8 girlfriend during college that worked on boards and</p> <p>9 commissions. I know how the system works, so</p> <p>10 that's why I called them.</p> <p>11 Q. Okay. Now, did you know anything about</p> <p>12 whether or not you were permitted to make political</p> <p>13 contributions while being a member of the State</p> <p>14 Police Commission? Did you ever learn anything</p> <p>15 about that?</p> <p>16 A. Prior to or post?</p> <p>17 Q. Both.</p> <p>18 A. Prior to I had no idea.</p> <p>19 Post, obviously because of everything that</p> <p>20 I had read in the paper, and when I first went up</p> <p>21 for my first meetings -- so I got a phone call that</p> <p>22 asked me if I'd like to be on the State Police</p> <p>23 Commission? And I said sure.</p> <p>24 And then I got a phone call. Went up there</p> <p>25 to meet with the Executive Director because I had</p>
<p style="text-align: right;">16</p> <p>1 to fill out paperwork and go get my picture taken,</p> <p>2 and there was a binder that she gave me.</p> <p>3 And she just said, Read the binder. And</p> <p>4 obviously no political donations because of</p> <p>5 everything that's going on.</p> <p>6 Q. That was Cathy Derbonne?</p> <p>7 A. Correct.</p> <p>8 MS. CRAFT:</p> <p>9 And I think you have that spelling,</p> <p>10 Miss Tammy, but it's D-E-R-B-O-N-N-E.</p> <p>11 BY MS. CRAFT:</p> <p>12 Q. Now, when you got on the board, do you know</p> <p>13 if you were nominated by any universities or</p> <p>14 colleges or systems in Louisiana?</p> <p>15 A. At the time I had no idea. After my first</p> <p>16 or second meeting -- I can't remember which -- so</p> <p>17 my first meeting was July of 2016, so it was either</p> <p>18 after my first or second meeting I had gotten a</p> <p>19 phone call after the meeting when I was driving</p> <p>20 home from Ms. Derbonne, T.J. Doss, who was the</p> <p>21 Chairman at the time, and Ms. Lenore Feeney asking</p> <p>22 me questions similar to that:</p> <p>23 How did you get on the commission? How did</p> <p>24 you -- and so we went through that, and I told him</p> <p>25 the same thing I just told you. I got a phone call</p>	<p style="text-align: right;">17</p> <p>1 from somebody in the Governor's Office saying,</p> <p>2 Would you like to be on this board?</p> <p>3 I said, Yes. I filled out all of the</p> <p>4 paperwork for that board and sent it back in and</p> <p>5 then got an e-mail back saying that I had been</p> <p>6 accepted. And I forget; it was some type of form,</p> <p>7 you know, with the State of Louisiana seals and all</p> <p>8 of that on it.</p> <p>9 Q. Okay. And so at some point in time, were</p> <p>10 you aware of a question being raised as to whether</p> <p>11 or not you had --</p> <p>12 A. Yeah, when they called --</p> <p>13 Q. Let me finish.</p> <p>14 A. Okay.</p> <p>15 Q. -- whether or not you had been legitimately</p> <p>16 appointed to the commission?</p> <p>17 A. So on that phone call, they said that there</p> <p>18 was somebody from -- I forget the gentleman's name,</p> <p>19 but he had -- he was with some type of Civil</p> <p>20 Service group, and that he had said that the</p> <p>21 commission was not filled appropriately or not</p> <p>22 filled via -- not filled according to the law.</p> <p>23 And they asked me those questions like we</p> <p>24 just talked about. And so I said, Okay.</p> <p>25 And so at some stage, I do remember Taylor</p>

<p style="text-align: right;">18</p> <p>1 Townsend, who was one of the attorneys for the 2 commission at the time, called me. We spoke pretty 3 much on the same thing. I just told -- I had told 4 them and -- that I just told you. 5 And then at one of the meetings, he said 6 that because of the time that had lapsed, we were 7 valid in serving on the commission. I forget what 8 meeting that was at, but it couldn't have been much 9 after -- like I said, I don't remember if it was 10 the July meeting -- which was my first meeting -- 11 or the August of 2016 meeting which was my second 12 meeting. It was after one of those two meetings 13 that I got the phone call. 14 And then it was if not the next meeting the 15 subsequent meeting that said -- where Taylor said 16 that we were, in fact, legitimate and legal but 17 that we did need to start doing it differently. 18 Q. Did he tell you in what respect it needed 19 to be -- being done differently? 20 A. Yeah, he said that, you know, the specific 21 colleges for a specific Congressional District, 22 that they needed to be notified when there's a 23 vacancy. And that that college would have the 24 opportunity to put forth names. And if they did 25 not put forth names, then it was up to the</p>	<p style="text-align: right;">19</p> <p>1 Governor. If they did put forth names, there are 2 three names from each college. The Governor could 3 pick from those three names. 4 Q. And did you learn what role Ms. Derbonne 5 had, if any, in insisting that the appointments 6 follow the law? 7 A. No. 8 Q. Did you learn what role, if any, 9 Ms. Derbonne had in securing Mr. Townsend to come 10 look at that issue for the commission? 11 A. All that was done before I got there. 12 Q. Did you ever hear anything about that? 13 A. Just that Taylor Townsend was brought in to 14 do an investigation into the alleged donation to 15 political parties by members, seated members of the 16 State Police Commission. 17 Q. Did you know Mr. Townsend beforehand? 18 A. No. 19 Q. Okay. Was there at some point in time when 20 Mr. Townsend you've indicated made some sort of 21 statement about we're valid, was there some sort of 22 statement about, You're grandfathered in for now 23 but going forward we have to follow the law? 24 A. I don't remember. I know it would be in 25 the minutes of whatever meeting that was at. But</p>
<p style="text-align: right;">20</p> <p>1 it was basically not really grandfathered. That 2 wasn't the word he used with me. 3 He said we're valid because the colleges 4 did not respond or -- and, again, I'm just trying 5 to remember back from -- you know, we're talking 6 2016. 7 So what I remember, it was something along 8 the lines that because we had been on the board for 9 a period of time and the colleges had not 10 responded, that the Governor's appointments were 11 valid. 12 Q. Now, you said your first meeting was in 13 July of 2016; is that correct? 14 A. Yes, ma'am. I took my oath of office in 15 June of 2016 and -- but I did not make the June 16 meeting, so my first meeting was actually in July. 17 Q. At your first meeting, was that the first 18 time you met Mr. Braxton, or did you know him from 19 before? 20 A. No. That was the first time we met. 21 Q. Did you know anything about Mr. Braxton? 22 A. Nothing at all. 23 Q. I will show you a document that we're going 24 to mark for identification and attach to the 25 deposition as Exhibit #26.</p>	<p style="text-align: right;">21</p> <p>1 (Whereupon, the document was duly marked 2 for identification as "Exhibit #26" and 3 attached hereto.) 4 This purports to be a public records 5 request from Mr. Falcon dated June 28, 2016, 6 addressed to Colonel Mike Edmonson; Ray Calvin 7 Braxton, Sr. 8 My question to you, sir, is have you ever 9 seen this document before? 10 A. No, ma'am. 11 Q. Did you see this document at any time since 12 you went to the first meeting in July of 2016? 13 A. No, ma'am. 14 Q. Was this document at all e-mailed to you in 15 any capacity? 16 A. No, ma'am. 17 Q. Were you aware of a Public Records Request 18 on behalf of the State Troopers Association for a 19 police report authored relating to Mr. Calvin 20 Braxton? 21 A. Not off the top of my head, no. 22 Q. Did you hear anything about that? 23 A. I might have heard something. The first 24 couple of meetings I went to, it was very kind of 25 -- it was getting to know people and so there</p>

22

1 wasn't like anybody other than Cathy,
 2 Ms. Derbonne -- I apologize; Ms. Derbonne -- would
 3 tell me how the -- the inner workings of everything
 4 and what was going on. So if I heard anything
 5 about it, it would have been from her.
6 Q. Well, let's not guess. So my question
7 really is simply, did you hear anything at all
8 about Calvin Braxton being involved in some sort of
9 incident with State Troopers in Natchitoches
10 Parish?
 11 MR. ALFORD:
 12 Object to form.
 13 BY MS. CRAFT:
14 Q. You can answer.
 15 A. What year?
16 Q. Any year.
 17 A. Yeah, sure, and certainly towards -- I want
 18 to say somewhere around March, April, May, June of
 19 2017, sometime in that period of time, I had heard
 20 about it.
21 Q. What did you hear?
 22 A. That there was an issue between Calvin and
 23 the State Police because his daughter had gotten a
 24 DWI.
25 Q. And who told you about that?

24

1 I'm going to say the summer of 2016 through the
2 first part of 2017 --
 3 A. Yes, ma'am.
4 Q. -- Ms. Manzella at some point in time
5 joined the commission?
 6 A. Yes.
7 Q. You were there?
 8 A. Correct.
9 Q. Mr. Braxton was there?
 10 A. Uh-huh.
11 Q. Mr. Doss was there, as well?
 12 A. Correct.
13 Q. And he became Chairman; is that right?
 14 A. Correct, at my first meeting.
15 Q. Okay, so July of 2016?
 16 A. Yes, ma'am.
17 Q. And then Donald Breaux, he was on the
18 commission?
 19 A. Yes, ma'am.
20 Q. Who else do you recall being on the
21 commission?
 22 A. Lloyd Grafton.
23 Q. And did you know Mr. Grafton?
 24 A. Prior to?
25 Q. Yes.

23

1 A. To the best of my recollection, maybe I
 2 talked to Calvin about it. Calvin and I would talk
 3 before and after meetings, which there were a lot
 4 of, you know, friendly conversations about
 5 everything. And I think that it was -- he brought
 6 it up to me.
7 Q. And do you remember discussing that with
8 T.J. Doss?
 9 A. Not specifically, but I might have during
 10 that same period of time.
11 Q. And at the time you served on the board,
12 did Monica Manzella also serve on the board?
 13 A. Yes. So she came on the latter part of
 14 2016. So I had already been on the board for
 15 several months before she came on.
16 Q. And did you know Ms. Manzella beforehand?
 17 A. No.
18 Q. And did you know a Donald Breaux?
19 B-R-E-A-U-X.
 20 A. Yeah, he was -- when I came on the
 21 commission, he actually sat to my left, so he was
 22 right next to me.
 23 I didn't know him prior but got to know him
 24 through his time on the commission.
25 Q. At the time you were on the commission and

25

1 A. No, ma'am.
2 Q. Now let's fast forward. After the spring
3 or around the spring of 2016 -- oh, at the time you
4 were on the board initially, Cathy Derbonne was the
5 Executive Director?
 6 A. Yes, ma'am.
7 Q. Okay, we fast forward. Am I correct
8 sometime in the spring of 2017, Ms. Derbonne was no
9 longer the Executive Director?
 10 A. I'm sorry, who?
11 Q. Ms. Derbonne, no longer the Executive
12 Director?
 13 A. Correct.
14 Q. Mr. Braxton is no longer on the board?
 15 A. Well, in the spring, he was still on the
 16 board.
17 Q. At some point in 2017, no longer on the
18 board?
 19 A. Okay.
20 Q. Mr. Grafton?
 21 A. No longer.
22 Q. No longer on the board.
23 And Mr. Breaux?
 24 A. I don't remember. I'm trying to think --
 25 no, he wasn't. He wasn't, because Mr. Neustrom

26

1 came on the board at the time.

2 **Q. Okay.**

3 A. So yes, about the same -- about that time

4 you're talking about, during the summer, like late

5 spring, early summer?

6 **Q. Yes.**

7 A. Yes. So Mr. Breaux would have been gone by

8 then.

9 **Q. I'd like to talk to you a little bit about**

10 **the budget process for the State Police Commission.**

11 **Were you involved in putting together the**

12 **budget? I realize they run on a fiscal-year basis.**

13 **Were you involved in putting together the budget**

14 **for the '16/'17 year?**

15 A. So to some extent, yes.

16 **Q. How so?**

17 A. So when I first came on the commission, I

18 asked to get a copy of the budget from Ms. Derbonne

19 just because I wanted to see what we were dealing

20 with.

21 And at some stage, I want to say maybe in

22 August, I got a copy of it and started asking

23 questions and kind of put things in perspective.

24 That was 2016, and so all the budget crunch was

25 going on. There were cuts across everything, so

28

1 A. No, like a deputy underneath her. We had

2 multiple conversations about that.

3 **Q. Here's why I'm asking. Did you ever make a**

4 **statement to Cathy Derbonne that the commission**

5 **needed to hire a Deputy Director in case she got in**

6 **a car accident or her husband died or something**

7 **happened to her so that there would be somebody in**

8 **place to handle her responsibilities?**

9 A. Well, I made that statement at one of the

10 commission meetings.

11 So if you read the record or listen to the

12 tapes, what I was saying is Cathy needs help.

13 There was a tremendous amount of public information

14 requests going on at that time.

15 I think the meeting, one or two meetings

16 prior to that, Cathy's husband had been sick. I

17 don't believe I said if Cathy's husband died. I

18 said Cathy's husband was sick at the last meeting.

19 She graciously chose to come be at this meeting

20 even though she had a sick husband at home.

21 And we've got to -- every organization

22 needs back-up. We need redundancy. We've got to

23 hire somebody for her. She's entitled to go on

24 vacation. She could get sick. She could get in a

25 car wreck. A number of things could happen. And

27

1 Ms. Derbonne made us aware that we had potential

2 cuts coming.

3 But Ms. Derbonne and I had been talking in

4 globo about the budget because she made me aware

5 that the commission was using hardware, computer

6 hardware from, like, 2003; that she felt as though

7 she was underpaid.

8 We had conversations about cap ex

9 expenditures that the commission needed to make.

10 The potential of hiring an assistant. She made me

11 aware that prior to some year before I got there,

12 that there was an assistant, and then that

13 assistant was gone, and that there was no -- no

14 funding in place for all of these things that we

15 needed.

16 So I said, yeah, let me -- let's dig into

17 this budget. We're going to ask, you know -- and

18 budget cuts or not, we have to be able to do what

19 we are tasked with doing, so let's start putting

20 things in the budget now. We may not get it, but

21 at least we can start putting it in the budget,

22 and, as times get better with the state, we'll get

23 what we need to.

24 **Q. You said Cathy talked to you about an**

25 **assistant. You mean like a secretary?**

29

1 without her we wouldn't have anybody basically to

2 steer the ship.

3 I don't know if I used the terminology

4 steer the ship, but to run the office, do something

5 along those lines.

6 **Q. But so you --**

7 A. So that's what I had said.

8 **Q. Which meeting was this?**

9 A. I would say either November or December of

10 2016.

11 **Q. Did you understand at any time that**

12 **Ms. Derbonne took your statements to be a threat to**

13 **her physically?**

14 A. Not until I read her pleadings for her

15 lawsuit.

16 **Q. And did she ever express to you that she**

17 **considered your comments to be a threat to her**

18 **physically?**

19 A. Not at all.

20 **Q. But you know she contends that, correct,**

21 **because you've read her lawsuit?**

22 A. I read her lawsuit, yeah.

23 **Q. Understood.**

24 **Now, sir, you've been on the board -- on**

25 **the commission -- and you're still on the**

<p style="text-align: right;">30</p> <p>1 commission; is that right? 2 A. Correct. 3 Q. And you've made no efforts to create a 4 position of Deputy Executive Director at all since 5 making those statements about whether or not 6 Ms. Derbonne might suffer some fate of a car 7 accident; is that right? 8 A. Well -- correct. 9 Q. Okay. And you have not done so because you 10 don't think that Mr. Hannaman is similarly cursed 11 insofar as he might have some car accident befall 12 him? 13 MR. ALFORD: 14 I'm going to object to this. This is 15 not relevant to what he's here to testify 16 to today. This is a totally different 17 lawsuit as you've just alleged and alluded 18 to. I don't think that lawyer was notified 19 of this deposition today. And unless 20 you're going to say that Mr. Riecke is not 21 going to have to testify at a future 22 deposition for that lawsuit, I think we 23 need to move on. 24 MS. CRAFT: 25 I'm sorry; I'm here asking the</p>	<p style="text-align: right;">31</p> <p>1 questions. And it is calculated and 2 relevant. It's highly relevant from the 3 standpoint that my client Mr. Braxton 4 testified about a lot of these incidents as 5 it related to his own claim. 6 As far as Ms. Derbonne's attorney, that 7 would be me. And no, on behalf of 8 Ms. Derbonne, I am not waiving the right to 9 depose Mr. Riecke at a future time since we 10 have now been successful in the Court of 11 Appeal in moving forward. 12 But for my purposes, I'm asking him 13 this question for the purposes of 14 Mr. Braxton's claim which I believe it has 15 relevance for. 16 MR. ALFORD: 17 I just fail to see that relevance -- 18 MR. OXENHANDLER: 19 I would like to make an objection also 20 just for relevance for Cathy Derbonne. 21 MS. CRAFT: 22 That's fine. 23 MR. OXENHANDLER: 24 That's my objection. 25 MS. CRAFT:</p>
<p style="text-align: right;">32</p> <p>1 Good. Are we objecting to relevance, 2 gentlemen? Or are we going to stick to 3 what we agreed to which was objecting to 4 the form of the question and responsiveness 5 of the answer? 6 MR. OXENHANDLER: 7 Well, I object to the form of the 8 question and relevance. 9 MS. CRAFT: 10 Okay. 11 BY MS. CRAFT: 12 Q. Do you want to answer my question, sir, 13 please? 14 A. If you could -- if you would ask it again. 15 Q. Let me get Miss Tammy to scroll back and 16 we'll get it verbatim. 17 A. Okay. 18 THE COURT REPORTER: 19 "Question: And you have not done so 20 because you don't think Mr. Hannaman is 21 similarly cursed insofar as he might have 22 some car accident befall him?" 23 THE WITNESS: 24 That's a mischaracterization. 25 Mr. Hannaman and I have had conversations</p>	<p style="text-align: right;">33</p> <p>1 about the needs for a Deputy Director. 2 We've also had conversations very recently 3 about the need to bring in another employee 4 that may split Deputy Director duties, as 5 well as investigatory duties as to what the 6 commission needs to do. 7 2020, it's not the year really to do 8 this. We've had to have special meetings 9 in the vestibule of the office. We've had 10 meetings canceled so really not the year to 11 try and do this. 12 But, yeah, we've had conversations. 13 Has it moved forward because of everything 14 that's going on this year? No. But is it 15 something that's been discussed and 16 something that I think will move forward in 17 2021? Yes, it will. 18 BY MS. CRAFT: 19 Q. So then I guess let me narrow my question. 20 Why did you take no steps after Ms. Derbonne left 21 as Executive Director to create the position of 22 Deputy Director in the at least two years that 23 ensued thereafter? 24 MR. ALFORD: 25 Object to form.</p>

34

1 THE WITNESS:
 2 I don't know. Maybe we had other
 3 things going on. I don't really know.
 4 BY MS. CRAFT:
 5 **Q. And so would there be any documents that I**
 6 **can look at at the commission that would tell me**
 7 **whether or not you and Mr. Hannaman have actually**
 8 **had discussions about creating a Deputy Director**
 9 **position presently?**
 10 MR. ALFORD:
 11 Object to form.
 12 THE WITNESS:
 13 No. Because it wouldn't have been in
 14 an open meeting. It was conversations he
 15 and I had.
 16 BY MS. CRAFT:
 17 **Q. At some point in time, sir, were you aware**
 18 **of Mr. Braxton expressing some opposition to the**
 19 **notion that the State Troopers Association was, for**
 20 **lack of a better phrase, making sham political**
 21 **donations through its Executive Director?**
 22 A. And I'm trying to think. I know that it
 23 was discussed at some of the meetings in '16, and
 24 so yeah, he very well could have said something
 25 like that.

36

1 **a finding that the State Troopers Association had,**
 2 **in fact, violated state law as it relates to those**
 3 **donations?**
 4 A. I believe it was something with the Ethics
 5 Commission, yes, ma'am.
 6 **Q. Okay. So can you tell me, leading to up**
 7 **the Ethics Commission, did you know whether or not**
 8 **either Mr. Braxton or Ms. Derbonne had filed the**
 9 **ethics complaint which resulted in that finding of**
 10 **a violation of law?**
 11 A. No, I did not know.
 12 **Q. Was that discussed at any meetings?**
 13 A. To the best of my recollection, I really
 14 don't remember as far as who might have done that.
 15 I remember LSTA conversations in front of the
 16 commission about political donations, about the
 17 former director, Mr. Young, making -- you know,
 18 writing the checks. And then I remember
 19 discussions at one of the meetings about the Ethics
 20 Commission's findings.
 21 **Q. Okay. Now, you do recall, do you not, at**
 22 **those meetings Mr. Braxton being one of the persons**
 23 **who led the charge about the concern that the State**
 24 **Troopers Association was making those political**
 25 **donations; am I correct? I think you told us that.**

35

1 **Q. And do you know whether or not there was**
 2 **opposition, for lack of a better phrase, by State**
 3 **Troopers and folks who belonged to the State**
 4 **Troopers Association to Mr. Braxton's position that**
 5 **what they were doing was against the law?**
 6 A. I don't remember. They might have come up
 7 and spoke at one of those meetings where we were
 8 having those discussions.
 9 **Q. Well, how about you? Did you have any**
 10 **conversations with any State Troopers about what**
 11 **Mr. Braxton's position was vis-a-vis the State**
 12 **Troopers Association making straw donations or sham**
 13 **donations through its Executive Director?**
 14 A. No. I had no conversations with him about
 15 that.
 16 **Q. How about with Mr. Doss?**
 17 A. I don't think we spoke about that.
 18 **Q. How about Ms. Manzella?**
 19 A. I don't think we spoke about that.
 20 **Q. How did Ms. Derbonne?**
 21 A. In the parameter of that, if it was on the
 22 agenda, I may ask her questions about what's the
 23 background on this was? What's the background on
 24 these items? I may have done that with her.
 25 **Q. You are aware, are you not, that there was**

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1 **I just want to make it clear.**
 2 A. Yeah. What I remember about that in more
 3 detail is -- so when I first started on the
 4 commission in 2016, there was a gentleman named
 5 Bucky Millet who is a retired State Trooper. And
 6 up until recently, I think basically this year
 7 because of Covid -- it's my assumption -- he would
 8 come to every meeting and he'd have something to
 9 discuss, one, two, up to ten different items about
 10 either LSTA or State Police administration or
 11 specific items.
 12 And I think he's the one that started
 13 ringing the bell about LSTA donations, the prior
 14 group of commissioners -- because he kept talking
 15 about that because he was constant in his desire to
 16 see Taylor Townsend's report. He was constant in
 17 his coming every month to talk about the LSTA
 18 items.
 19 And I remember he was almost argumentative
 20 with our attorneys, both Taylor Townsend when he
 21 was there and Ms. Feeney, about LSTA shouldn't be
 22 using this lawsuit -- and as you know, I'm not a
 23 lawyer -- but he would make reference of lawsuits.
 24 And we'd have to discuss those different lawsuits.
 25 Why LSTA should not be allowed to do anything

38

1 political.

2 And so I remember it starting there. Then

3 obviously we had to, you know, deal with these

4 issues. But at the end of the day, we had no

5 authority over LSTA.

6 So I think we had a lot of conversations

7 about it, but I really don't -- you know, to this

8 day, I still don't believe we have authority over

9 the LSTA.

10 Q. But you have authority over the troopers,

11 right?

12 A. Yeah. Then we get into the whole thing

13 that they're a member of this organization, so does

14 that automatically mean we have the authority over

15 the organization?

16 And I think that's, you know, items that

17 are still being discussed and debated right now.

18 Q. Discussed and debated right now among whom?

19 A. I would assume the attorneys. I know we

20 still have cases with LSTA. Meaning the commission

21 has at least one case with LSTA that relates to

22 political issues right now pending so...

23 Q. I'm going to show you a document which has

24 been previously introduced as Exhibit #12. It's a

25 Consent Order from the Board of Ethics, Consent

40

1 Q. This is all, correct me if I'm wrong, if

2 the dates are right on Exhibit #12, happening at

3 the same time you were talking about, the end of

4 2016 and beginning of 2017; is that right?

5 A. Yes, ma'am.

6 Q. Now, Ms. Derbonne, for lack of a better

7 phrase, resigned, did she not, in January of 2017?

8 A. January of 2017.

9 Q. Why don't you tell me how that came about.

10 MR. ALFORD:

11 Object to the form. Again, this is not

12 relevant to the suit that's been filed on

13 Mr. Braxton's behalf.

14 MS. CRAFT:

15 I understand. I disagree.

16 BY MS. CRAFT:

17 Q. Can you tell me how that came about?

18 A. In what kind of --

19 Q. What do you remember about it?

20 A. About the meeting?

21 Q. About her resigning.

22 A. Specifically we were in the meeting of

23 January 2017 and discussed maybe one or two items.

24 Taylor Townsend had asked Mr. Doss if we could take

25 a break. We took a break; probably about a half

39

1 2015-1385. And I just want you to tell me whether

2 or not you have seen that before.

3 A. I may have.

4 MR. ALFORD:

5 What number, Jill?

6 THE WITNESS:

7 Exhibit #12.

8 MS. CRAFT:

9 Exhibit #12, the Consent Order from

10 that exhibit.

11 THE WITNESS:

12 I believe I have. I think I have, yes,

13 ma'am.

14 BY MS. CRAFT:

15 Q. Do you recall who it was that first showed

16 you Exhibit #12?

17 And for the record, it is the Ethics

18 Consent Order that was signed -- it looks like it

19 was signed by the LSTA on November 9, 2016, and by

20 Mr. Young on November 9, 2016. And then I think

21 the Board of Ethics, January 20, 2017.

22 Do you remember who it was that first

23 showed that to you?

24 A. It may have been in one of our board

25 packets.

41

1 hour. At the end of that break, Mr. Townsend came

2 back and said that Ms. Derbonne has opted to resign

3 and read her resignation letter into the record.

4 Q. During the break, do you know who met with

5 Ms. Derbonne? Was that you?

6 MR. ALFORD:

7 Object to the form.

8 THE WITNESS:

9 No, absolutely not.

10 BY MS. CRAFT:

11 Q. Was it Mr. Doss?

12 A. I don't recall.

13 Q. Now, do you know whether or not there was

14 an agenda posted prior to the January 2017 meeting

15 that proposed to terminate Ms. Derbonne?

16 A. Yes, there was.

17 MR. OXENHANDLER:

18 Object to the form.

19 BY MS. CRAFT:

20 Q. You, in fact, posted that agenda; did you

21 not, sir?

22 A. No, I didn't post the agenda.

23 Q. Who posted it?

24 A. I'm assuming Ms. Derbonne because that

25 would be in her scope of duties.

42

1 **Q. Did you prepare the agenda or post that?**
 2 A. No, I did not.
 3 **Q. Do you know who did?**
 4 A. I have no clue.
 5 **Q. Did you see that agenda?**
 6 A. Yeah, sure.
 7 **Q. Whose idea was it to put that item on the**
 8 **agenda?**
 9 A. It was -- well, you've got to back up.
 10 What was on the agenda was not what I had asked.
 11 What I had asked was to go into Executive Session
 12 to discuss Ms. Derbonne's competency as Executive
 13 Director.
 14 I was told by counsel that she had to be
 15 given the opportunity whether or not that that
 16 hearing would be public, and she opted for it to be
 17 public, so that's why the posted agenda has a
 18 Public Meeting; not Executive Session.
 19 **Q. How do you know that?**
 20 A. What do you mean, how do I know that?
 21 **Q. That she opted for it to be public?**
 22 A. Because she sent an e-mail to the
 23 commission saying that she opted for the hearing to
 24 be public, not in Executive Session.
 25 **Q. So how did the commission come about, I'm**

44

1 the budget. I wanted to see detail in the budget.
 2 I wanted to be -- I believe that the commission
 3 should be more involved, the commissioners should
 4 be more involved in the budget.
 5 And I had numerous conversations with her
 6 about it. I even brought it to her attention at
 7 one time that part of her duties, as was listed in
 8 Chapter 3, was to provide a monthly budget to the
 9 -- a monthly expenditures of the budget to the
 10 commission to be discussed at every meeting. And
 11 she wasn't doing that.
 12 Fast forward to November 2016. There were
 13 multiple e-mails that I had sent that I asked Cathy
 14 to send -- I'm sorry; Ms. Derbonne -- to send me
 15 the working budget that we were working on -- or
 16 that she was working on, that the commission was
 17 working on to -- that needed to be put forth
 18 December or January for Appropriations.
 19 I'm trying to think how long it took me to
 20 get it. There were multiple e-mails back and forth
 21 between commission members and Ms. Derbonne where
 22 she said, I haven't slept in three days; I've been
 23 working on this budget.
 24 I think that it was -- I'm trying to
 25 think -- it's the House Legislative, some committee

43

1 coming up with this item? Was Mr. Braxton
 2 involved?
 3 A. No, not at all.
 4 **Q. So who on the commission proposed putting**
 5 **the item on the agenda relative to Ms. Derbonne?**
 6 A. Me.
 7 MR. OXENHANDLER:
 8 Object to form.
 9 BY MS. CRAFT:
 10 **Q. Only you? Or you and someone else?**
 11 A. No, me.
 12 **Q. Okay. Now, can you tell me, sir, was your**
 13 **decision motivated -- in your mind, anyway -- in**
 14 **any way by Mr. Braxton and Ms. Derbonne's concerns,**
 15 **if you will, over the LSTA straw-donation gig?**
 16 A. In my mind?
 17 **Q. Yes.**
 18 A. Absolutely not.
 19 **Q. Okay.**
 20 A. Not in the least.
 21 **Q. So why were you motivated to put an item on**
 22 **the agenda relative to Ms. Derbonne's continued**
 23 **employment?**
 24 A. So from the beginning of my tenure on the
 25 commission, I had asked multiple questions about

45

1 that had asked for updated budgets due to the
 2 potential budget cuts.
 3 So we're moving forward with the budget
 4 very slowly, very erratically. And the budget was
 5 very important to me because, as I said earlier,
 6 there were certain things that we needed, that the
 7 commission needed.
 8 The commission needed new hardware. The
 9 commission -- we had been tasked by -- who was it?
 10 -- either Representative or Senator Barrow to go to
 11 digital, electronic testing instead of the style of
 12 testing when I first got there which was the
 13 handwritten type. We needed to spend money to do
 14 that. We needed to buy more hardware for that.
 15 And so there were a lot of issues as
 16 related to what the commission needed to do to do
 17 its job.
 18 At the same time, if you go back and look
 19 at the minutes, you'll see I was moving forward
 20 because with Cathy -- with Ms. Derbonne -- to try
 21 and institute a pay raise for her. She had told me
 22 that her pay had been cut before I got there.
 23 And we had multiple discussions about,
 24 well, we should set ranges for your pay. And I
 25 remember asking her at one time, Is there a way to

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1 tie it to, like, one of the rank structures at
 2 State Police? There's got to be a way to set
 3 what's fair for the Executive Director to get and
 4 put a range on it so, you know, there's increases
 5 for performance and those kinds of evaluations.
 6 So there were a lot of moving parts to this
 7 budget at that time. And I felt as though I was
 8 getting -- I don't want to necessarily use the word
 9 "stonewalled" by Ms. Derbonne -- but she wasn't
 10 very forthcoming with the information.
 11 Again, the whole time I'm basically a fan
 12 of Ms. Derbonne. I'm trying to move forward with
 13 her, getting her everything she's asking and
 14 requesting. Trying to get her pay set properly at
 15 a range that's fair for her, or what she thought
 16 was fair for her.
 17 But all of this had to be in the budget
 18 before we submit it. So we get an e-mail about the
 19 Legislative -- I'm trying to remember the name of
 20 the committee -- there was a Legislative Budget
 21 Committee meeting I want to say sometime in early
 22 December, December -- December 7th.
 23 MR. ALFORD:
 24 The fall of 2016.
 25 THE WITNESS:

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1 December, maybe the middle of December, and have
 2 meetings with them.
 3 We were going, like, one or two of us at a
 4 time because, as you know, we can't have more than
 5 so many commissioners at one time going to have
 6 meetings.
 7 **Q. You said "we" had meetings. You mean you**
 8 **and Cathy and somebody else?**
 9 A. No, it was the commissioners. And the
 10 gentleman's name was Chaz something or another. I
 11 don't remember.
 12 **Q. Uh-huh.**
 13 A. I'm sorry; I didn't -- I'm not being a
 14 smart ass -- I didn't prepare for all this with
 15 Ms. Derbonne, so some of my recollection may need
 16 to be refreshed.
 17 But at some of these meetings, one of these
 18 meetings, I believe it was -- I was there by
 19 myself, but I know Mr. Simien and I forget who
 20 else -- one of the commissioners had gone right
 21 before me to these meetings, and it was told to me
 22 then that Ms. Derbonne, on that December 7th
 23 meeting, had said that we'd already voted on the --
 24 and approved -- a budget, and that was just
 25 absolutely incorrect.

47

1 I'm sorry?
 2 MR. ALFORD:
 3 December of 2016.
 4 THE WITNESS:
 5 Yes, sir, I'm sorry.
 6 BY MS. CRAFT:
 7 **Q. Yes.**
 8 A. So December 7th of '16. I remember because
 9 I wanted to go but I was sick so I didn't go.
 10 And then the December meeting we had on
 11 December 8th the next day, more discussions about
 12 the budget, really getting into what was needed
 13 cap-ex wise for improvements in the office.
 14 That's where we had the discussion about
 15 needing a Deputy Director, and that's where I used
 16 the analogy or used the hypothetical that, you
 17 know, people get sick, people go on vacation, Cathy
 18 could get in a car wreck, whatever. We need more
 19 labor. We had a big discussion about that. And I
 20 think, if you look at the minutes, it was a very
 21 detailed discussion about budget.
 22 Great; I move forward. There's some more
 23 meetings that are set up with budget officials at
 24 the legislative -- more staffers, not elected
 25 officials. Thinking this is sometime at the end of

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1 So I went and pulled the video. I went
 2 online to the Legislative website to see all the
 3 old videos and watched the video. And she did; she
 4 said the budget had been -- the question was
 5 specifically asked: Has this budget been approved
 6 by your commission?
 7 And she says yes, she reviewed it and
 8 approved it. She said yes. I forgot the state
 9 representative's name. I would have to go see who
 10 was asking very specific questions about oversight.
 11 And she said, yes.
 12 And that bothered me. That bothered me a
 13 lot. That bothered me because the whole time I've
 14 been on the commission, I've been trying to get
 15 more deeply involved in the budget and understand
 16 what's going on, and what are our true needs.
 17 And, again, I don't want to use the phrase
 18 "stonewalled," but I felt as though I wasn't being
 19 given the budget and the information as I had asked
 20 for.
 21 And then she goes in front of a hearing --
 22 Appropriations, that's what it was, the Legislative
 23 Appropriations Committee, and she's saying that the
 24 commission voted on and agreed to a budget. And we
 25 hadn't even seen it yet.

50

1 **Q. Okay, I'm sorry. Did she use the word**
 2 **"voted on"?**
 3 A. The question was asked of her, "Did your
 4 commission vote and approve this budget?"
 5 **Q. Are you sure of that, sir?**
 6 A. No, not a hundred percent. We can go look
 7 at the tapes.
 8 **Q. Let me ask you a few questions --**
 9 MR. ALFORD:
 10 Object, if you could let the witness
 11 finish answering --
 12 MS. CRAFT:
 13 I think he was way far afield but
 14 that's okay, I'll let him answer.
 15 MR. ALFORD:
 16 We're way far afield from what we're
 17 here for today already --
 18 MS. CRAFT:
 19 Sir, actually, we're not. But nice
 20 commentary.
 21 MR. ALFORD:
 22 Well, thank you.
 23 MS. CRAFT:
 24 We're here to make objections only as
 25 to form and responsiveness of the answer.

52

1 Captain Braxton's lawsuit against the State
 2 Police, the LSTA, Colonel Oliphant for
 3 defamation?
 4 MS. CRAFT:
 5 I do, Mr. Oxenhandler.
 6 So if you want to finish your answer,
 7 go ahead, sir.
 8 MR. OXENHANDLER:
 9 How?
 10 THE WITNESS:
 11 Okay.
 12 MS. CRAFT:
 13 But, again, my objection is I think it
 14 was nonresponsive. But go ahead and keep
 15 going.
 16 THE WITNESS:
 17 No, I'm fine, I'm sorry. So tell me
 18 what path I need to go back on because I
 19 thought I was answering it.
 20 BY MS. CRAFT:
 21 **Q. At the Appropriations meeting, you were**
 22 **actually invited by Ms. Derbonne to attend that**
 23 **meeting; is that correct, the one on December 7th?**
 24 A. The entire commission was invited.
 25 **Q. Yes, sir. And you said you didn't go**

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1 If you want to keep it up, I don't have a
 2 problem asking the judge to tell you what
 3 your responsibilities are in depositions.
 4 MR. ALFORD:
 5 That's okay.
 6 MS. CRAFT:
 7 I would like to get this done for this
 8 man at least sometime before lunch.
 9 MR. ALFORD:
 10 As would I. And we could do that if we
 11 stick to what we're supposed to be here for
 12 today. You could have noticed this as a
 13 dual deposition of both cases and other
 14 attorneys could be here, as well.
 15 MS. CRAFT:
 16 I am here asking questions that are
 17 relative to Mr. Braxton's case.
 18 Unfortunately, you've not had the benefit
 19 of sitting through all the depositions that
 20 we all have.
 21 MR. OXENHANDLER:
 22 But I have, and I don't see -- I don't
 23 know what this -- how does anything relate
 24 to the budget of Ms. Derbonne or the
 25 resignation of Ms. Derbonne relates to

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1 **because you were sick?**
 2 A. Correct.
 3 **Q. Do you recall sitting in some sort of**
 4 **restaurant or sports bar with Monica Manzella, T.J.**
 5 **Doss and maybe Donald Breaux watching that meeting**
 6 **on an iPad?**
 7 A. Absolutely did not happen.
 8 **Q. Did that ever happen; did you ever watch**
 9 **the iPad thing or something on an iPad with**
 10 **Ms. Manzella and Mr. Doss?**
 11 A. Absolutely did not happen.
 12 **Q. Okay. Did you know who attended with**
 13 **Ms. Derbonne at the December 7th meeting on behalf**
 14 **of the entire commission who was invited?**
 15 A. After the fact I did.
 16 **Q. And who attended?**
 17 A. Eulis Simien and Mr. Braxton.
 18 **Q. Okay. And you chose not to go because you**
 19 **were sick. Do you know why the other commission**
 20 **members didn't?**
 21 A. No clue.
 22 **Q. The day that Cathy was let go, did you know**
 23 **that there was going to be projectors set up in the**
 24 **room, and there was going to be media present?**
 25 MR. OXENHANDLER:

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1 Object to form.
 2 BY MS. CRAFT:
 3 **Q. You can answer it.**
 4 A. Well, she wasn't let go. She resigned.
 5 But, yes, I did know that they were going
 6 to be a video, like a projection set up, because I
 7 requested it.
 8 **Q. You requested it from whom?**
 9 A. The Louisiana State Police -- and I think
 10 it was Internal Affairs -- because they had the
 11 equipment.
 12 **Q. And how did you know to make that request?**
 13 A. I called. At the time, I think the
 14 Lieutenant Colonel was Charlie Dupuy.
 15 **Q. Dupuy?**
 16 A. I called him and asked him: How do I go
 17 about getting an electrical -- a big TV or
 18 something? I want to show the video from the
 19 Appropriations Committee. I need something to
 20 project that and play that.
 21 **Q. Did you know Mr. Dupuy beforehand?**
 22 A. Just in the scope of me being a
 23 commissioner and him being the Chief of Staff.
 24 **Q. Okay. And can you tell me whether or not**
 25 **you heard anyone make any statements that there**

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1 discussed it with them. I told them this is what
 2 I'm upset about.
 3 And I told them the first -- the first
 4 conversations -- or the first directive I gave
 5 Ms. Derbonne, as any commissioner can put something
 6 on the agenda, was to do it in Executive Session.
 7 And she chose to do this, not me, and this
 8 is where we are. So they both asked me before the
 9 meeting started to table that.
 10 And I said, no, I wasn't going to table it.
 11 So do I know 100 percent, beyond a reasonable
 12 doubt, that they didn't know, no. But their
 13 actions displayed to me very firmly and very
 14 strongly they did not know what was going on.
 15 Mr. Grafton was not at that meeting. And
 16 to the best of my recollection, Sheriff Breaux had
 17 asked me something that led me to believe that he
 18 didn't know what was coming on -- what I was doing,
 19 why all the equipment and cameras were there, the
 20 overhead projectors were there.
 21 **Q. Did you send out your agenda item to all**
 22 **the commission members?**
 23 A. No. So the way it works is I brought it to
 24 Ms. Derbonne to -- enough time ahead of time so it
 25 would have met the required amount of time to be

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1 **were enough votes on the commission to get rid of**
 2 **Ms. Derbonne?**
 3 MR. ALFORD:
 4 Object to form.
 5 THE WITNESS:
 6 I did not hear that at the time. I've
 7 obviously read it since then. That's news
 8 to me because I was one vote, and I hadn't
 9 even put on what was going to -- put on my
 10 reasoning, my case.
 11 As a matter of fact, I know for a fact
 12 Mr. Braxton knew nothing of it until the
 13 morning of.
 14 BY MS. CRAFT:
 15 **Q. How do you know that?**
 16 A. Because he told me. And I was going to say
 17 Eulis Simien didn't know until the morning of
 18 because he told me, as well.
 19 At one stage, Mr. Braxton and Mr. Simien
 20 asked me to go into -- there was like a little
 21 records room when you walk into our meeting room in
 22 the back right-hand corner and people would go in
 23 there and talk. So they asked me and we went in
 24 there to talk. And they wanted to know what all
 25 this was about prior to the meeting starting, so I

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1 posted and gave it to her.
 2 **Q. Okay, so I'm confused --**
 3 A. Okay.
 4 **Q. -- I thought you told me that you didn't do**
 5 **anything to post the agenda.**
 6 **But you actually brought the item to**
 7 **Ms. Derbonne, what, a day before, 24 hours**
 8 **before --**
 9 A. No, I think it was a couple of days before.
 10 **Q. Maybe 48 hours before?**
 11 A. I'm guessing if I remember.
 12 **Q. You didn't share that proposed agenda item**
 13 **with the rest of the commission?**
 14 A. No, I did not.
 15 **Q. But I thought then you told me that**
 16 **Ms. Derbonne sent out an e-mail to all the**
 17 **commission members saying that she wanted that**
 18 **agenda item to be in a public meeting?**
 19 A. She did.
 20 **Q. To all the commission members?**
 21 A. Correct.
 22 **Q. And then you're telling me, when**
 23 **Mr. Braxton showed up, he was, like, What is this?**
 24 **What is this about?**
 25 A. Uh-huh.

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1 **Q. And so you said he didn't know anything**
 2 **about it?**
 3 A. Correct.
 4 **Q. So when is it you're contending that**
 5 **Ms. Derbonne sent out the thing saying, I'd like a**
 6 **public meeting on this agenda item which you didn't**
 7 **share with the rest of the commission?**
 8 MR. OXENHANDLER:
 9 Object to form.
 10 THE WITNESS:
 11 We can go look for the e-mails. I'm
 12 sure there's an e-mail that shows it. But
 13 I don't remember the exact dates.
 14 Again, I didn't -- I'm just not ready
 15 for all of this. I didn't go look at dates
 16 and go look at agendas or anything else as
 17 related to Ms. Derbonne.
 18 BY MS. CRAFT:
 19 **Q. You understood Mr. Braxton was unhappy, for**
 20 **lack of a better phrase, about your endeavor to**
 21 **remove Ms. Derbonne; is that right?**
 22 A. Yeah, I would say that's right.
 23 Now, in all fairness, when we did take the
 24 break, again, Taylor Townsend asked Mr. Doss as
 25 Chairman to take a break. And while that was going

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1 Understood.
 2 BY MS. CRAFT:
 3 **Q. Go ahead, sir.**
 4 A. So when I was made aware of what happened
 5 about watching the video and seeing what was said,
 6 and having the meetings with the -- again, I don't
 7 remember the gentleman's name. I know I have it
 8 somewhere. His name was Chaz. He was with the
 9 House Legislative Finance Committee or something
 10 like that. I don't know. I can find that
 11 information.
 12 But after I had that conversation, I called
 13 Mr. Doss as Chairman and said, I want to have this
 14 conversation; this needs to be brought to the
 15 entire commission. How do I go about doing that?
 16 He said he wasn't sure, so we contacted
 17 Ms. Feeney, and she told us the process of how to
 18 do it, what needed to be done. And then I followed
 19 that process.
 20 **Q. What was Mr. Doss' statement about**
 21 **Ms. Derbonne?**
 22 A. As it relates to this issue?
 23 **Q. Yes.**
 24 A. If that's -- if that's what you want to do,
 25 then you're a commissioner, you have the right to

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1 on, Mr. Simien, Mr. Braxton, and myself and I think
 2 it was just the three of us -- there may have been
 3 somebody else; I don't know -- went back into that
 4 records room where we were going to talk.
 5 And at that stage, they pressed me again,
 6 Please, table it. Please, table it. Let's give
 7 her 30 days. Let's meet about this ourselves. And
 8 I had agreed to do that.
 9 So when we came back out of recess and
 10 Taylor read the resignation in, I had already told
 11 Commissioner Braxton and Simien, as a courtesy to
 12 them, if they were that insistent on a 30-day, then
 13 fine. But, you know, I told them it wasn't going
 14 to change my mind. The facts are the facts.
 15 **Q. Is it your testimony that you had not at**
 16 **any time spoken to Mr. Doss about anything relating**
 17 **to Ms. Derbonne or her potential removal or her**
 18 **resignation?**
 19 A. That's not my testimony at all.
 20 **Q. Okay. So tell me conversations you did**
 21 **have with Mr. Doss about Ms. Derbonne.**
 22 MR. ALFORD:
 23 Object to form. Irrelevant, and
 24 everything else that we've made.
 25 MS. CRAFT:

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1 do what you want to do.
 2 He said, I haven't looked at that. I
 3 didn't think about that. He wasn't really aware of
 4 it. But I told him the timeline. I told him the
 5 date of the meetings. He remembered them because
 6 it was the meeting that had been two or three weeks
 7 prior to that.
 8 I said -- we're sitting here having all
 9 these debates and all this discussion about this
 10 budget. And the day before, she goes in and says
 11 we've approved it. I got a problem with that.
 12 He said, I understand. He said, I'll do my
 13 homework and you do what you got to do.
 14 **Q. Did Mr. Doss ever express any concern he**
 15 **had about Mr. Braxton raising an issue about there**
 16 **being an operational bar on the State Police**
 17 **training facility grounds --**
 18 A. Uh --
 19 **Q. -- and let me add to that.**
 20 **With the liquor supplied by the State**
 21 **Troopers Association?**
 22 A. Okay, so the bar issue, it came up in --
 23 I'm trying to think -- it was either September or
 24 October of 2016.
 25 Again, Mr. Bucky Millet the retired

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1 Lieutenant from State Police had, you know -- at
 2 the meetings, you have the ability to -- anybody in
 3 the public can come up and talk about anything, and
 4 he would make use of that time.
 5 He brought to the attention of the
 6 commission at that time, talking about a bar at
 7 J-Sec or J-Soc or something like that. Told us all
 8 about it. And so, I mean, yeah, there were
 9 discussions about it, sure.
10 Q. And do you --
 11 A. In open forum, yeah.
12 Q. Do you remember Mr. Braxton saying, Look,
13 I've actually there been?
 14 A. He may have told me something about that
 15 because, like I said, you know, Mr. Braxton and I
 16 were very friendly on the commission. We might
 17 have disagreed on some things, but we had a lot in
 18 common. So we talked both before and after the
 19 meetings.
 20 So yeah, he was -- he was -- Mr. Braxton
 21 was a wealth of information on that commission. He
 22 really was so...
23 Q. Do you recall Mr. Braxton expressing
24 concern that there was a bar being operated on
25 public property supplied with liquor from a union,

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1 over the United States --
2 Q. I understand.
 3 A. -- yeah, he's a gorilla.
 4 No, seriously, he owns like 20
 5 distilleries. He's vertically integrated; in total
 6 control of his operation.
7 Q. I understand that.
8 So you understand Mr. Goldring, a member of
9 the State Police Commission, was supplying the
10 liquor for a bar to be operated on state property?
 11 A. What I'm saying is I remember the
 12 allegation by Mr. Bucky Millet that Bill Goldring
 13 had provided -- now, I don't know if he was
 14 insinuating that he had provided it recently, or
 15 that he had provided it while he was a
 16 commissioner. Because, again, Mr. Goldring was
 17 gone by the time that I got there.
18 Q. And did you know anything about the
19 Superintendent, the then Superintendent of the
20 State Police, Mr. Edmonson, actually placing
21 specific liquor orders with Mr. Young at the State
22 Troopers Association? Like, I want you to bring
23 five bottles of this or six bottles of that? Do
24 you remember that being discussed?
 25 A. I don't. I remember -- I remember

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1 so to speak?
 2 A. I don't know that Mr. Braxton and I got
 3 into that kind of detail about it. He might have
 4 told me that he had been to the bar, or he had seen
 5 the bar. We might have had some conversation about
 6 it that way, but I don't have any very specific
 7 memory of it.
8 Q. Do you recall Mr. Braxton raising the
9 question that the operation of that bar at the
10 State Police Training Facility, a state facility,
11 was against the law?
 12 A. He may have. I mean, again, we can look at
 13 the minutes. The minutes are pretty detailed.
14 Q. And do you recall Mr. Braxton raising, in
15 part of that discussion, about the fact that the
16 State Troopers Association was actually supplying
17 the liquor to the bar being operated on state
18 property?
 19 A. You know, I don't remember that. I
 20 remember the allegation that Bill Goldring had
 21 supplied that. I remember that allegation. I
 22 don't remember the allegation about LSTA.
23 Q. Mr. Goldring owns a liquor distributorship
24 in New Orleans; is that right?
 25 A. No. He owns a liquor distributorship all

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1 something about Colonel Edmonson requesting
 2 alcohol. But, again, it would have been part of
 3 Mr. Millet's discussion.
4 Q. And you don't recall Mr. Braxton similarly
5 raising some alarm or concerns about --
 6 A. Again, we may have had that conversation
 7 because, I mean, the majority of the meetings --
 8 ahead of time, before the meetings, Mr. Braxton and
 9 I both generally got there pretty early before most
 10 other people and we'd talk about what's on the
 11 agenda, or we'd talk about other things.
 12 So we very easily could have had that
 13 conversation. Do I specifically remember a time
 14 and date about it? No, I don't. Is it very
 15 possible that we had conversations about all this?
 16 Absolutely.
17 Q. Did you ever talk to Mr. Young at LSTA
18 about any of the issues that Mr. Braxton raised or
19 Ms. Derbonne raised or any of the commission
20 members raised?
 21 A. No. I had very limited interaction with
 22 him, and that would have been in the scope of at
 23 the commission meeting.
 24 You know, he might walk up beforehand and
 25 explain pleasantries and niceties and stuff like

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1 that before a meeting. But no, we didn't have any
 2 kind of relationship.
 3 **Q. Did you ever go to that bar?**
 4 A. No. I still don't even know where J-Sec or
 5 J-Soc, whatever it is -- I don't know. Never seen
 6 it. Never been there.
 7 **Q. Do you know if it's still operational, or**
 8 **whether or not it was closed down as a result of**
 9 **Mr. Braxton raising the issue?**
 10 A. No clue.
 11 **Q. Any idea whether or not the troopers were**
 12 **happy or unhappy about the fact that their little**
 13 **bar got shut?**
 14 A. No clue.
 15 **Q. Yes, sir. Now, at the same time we're**
 16 **speaking about -- in the fall of 2016 -- do you**
 17 **recall there being an issue about an attempt to get**
 18 **raises only to the command staff in State Police to**
 19 **the exclusion of the rank and file troopers?**
 20 A. I was on the tail end of that. I think the
 21 bulk of those conversations and that topic had been
 22 early '16 and middle '16. I believe it was my
 23 first and second meeting there was something about
 24 trooper pay raises; that there was some debate or
 25 discussion of whether or not the order be pulled

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1 A. Yes, ma'am.
 2 **Q. And do you know who a Billy Roth is,**
 3 **William Roth?**
 4 A. No, ma'am.
 5 **Q. And do you know who hired a private**
 6 **investigator to follow Ms. Derbonne and/or**
 7 **Mr. Braxton around?**
 8 A. No clue.
 9 **Q. Did you ever hear anything about that?**
 10 A. Just in what I've read in the pleadings.
 11 **Q. In Ms. Derbonne's pleadings?**
 12 A. I guess so.
 13 **Q. And did you ever hear anyone at State**
 14 **Police talk about the fact that they had hired a**
 15 **private investigator to follow Ms. Derbonne?**
 16 A. No.
 17 MR. ALFORD:
 18 Object to form.
 19 THE WITNESS:
 20 No.
 21 BY MS. CRAFT:
 22 **Q. Now, do you know if there was anyone like**
 23 **Mr. Doss -- where does he -- where was his duty**
 24 **station; do you know?**
 25 A. For a period of time, I know he was out of,

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1 and terminated.
 2 There was a -- I remember it was -- and I'm
 3 probably messing up his rank, so I apologize. It
 4 was Trooper Rodney Hyatt came and spoke in front of
 5 the commission and basically asked that we just
 6 haven't had time -- and I'm paraphrasing it --
 7 haven't had time to have the Governor sign this.
 8 And can we have more time to get the Governor to
 9 sign it?
 10 **Q. Do you recall Mr. Braxton insisting that**
 11 **the Governor had to, in fact, sign off the pay**
 12 **raises before they went into effect?**
 13 A. I think that was -- I don't remember him
 14 specifically saying it. He might have said it in
 15 the minutes at the meeting, but I do remember he --
 16 let me rephrase that.
 17 I don't specifically remember. I believe
 18 he was actually the one that made the motion to
 19 give the 30-day extension to get the Governor to do
 20 it, so he might have said it then.
 21 **Q. Okay. And, sir, that was a meeting you**
 22 **were at so --**
 23 A. Yeah, it was my first or second meeting.
 24 **Q. So either July or maybe August or maybe**
 25 **September of 2016; is that right?**

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1 like, the Shreveport area. But for a period of
 2 time, I think he was TDY to Baton Rouge -- I'm
 3 sorry, I apologize.
 4 **Q. That's all right.**
 5 A. TDY to Baton Rouge. I forgot the name of
 6 the -- it had something to do in operations or
 7 something like that.
 8 **Q. Do you know if he was ever keeping track of**
 9 **Ms. Derbonne's comings and goings?**
 10 MR. ALFORD:
 11 Object to form.
 12 THE WITNESS:
 13 No clue.
 14 BY MS. CRAFT:
 15 **Q. Did you ever speak to him about that?**
 16 A. No.
 17 **Q. Now, sir, I don't quite know how to**
 18 **approach this question, and I'm going to be as**
 19 **quite delicate as I possibly can, and I don't mean**
 20 **to -- there's a method to my madness.**
 21 I am aware from press reports that there's
 22 been some allegation, an allegation that you were
 23 somehow involved in some sort of death -- I don't
 24 want to know about that --
 25 MR. ALFORD:

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1 Object to form. And we're not going to
 2 go there --
 3 MS. CRAFT:
 4 I'm not going there. And here's why
 5 I'm asking. You are aware that my client
 6 was accused of being involved in the death
 7 of a former friend of his by Trooper
 8 Oliphant; am I correct?
 9 MR. OXENHANDLER:
 10 Object to the form.
 11 MR. MAYEAUX:
 12 Object to the form.
 13 BY MS. CRAFT:
 14 **Q. You can answer it.**
 15 A. Okay. I'm aware in reading the information
 16 for this trial, for this case that's going on right
 17 now, yeah, I'm aware of that.
 18 **Q. Okay, and here's the reason for my**
 19 **question. How has it made you feel being an**
 20 **innocent person but, yet, having these public**
 21 **things said about you?**
 22 MR. ALFORD:
 23 Object to form.
 24 BY MS. CRAFT:
 25 **Q. How has that made you feel?**

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1 **Can you tell me what you reviewed?**
 2 A. Sure, I read the pleadings. I looked at
 3 the exhibits.
 4 **Q. Where did you get the exhibits from?**
 5 A. I don't know.
 6 **Q. Who gave them to you?**
 7 A. I'm not sure. It was in these -- I think I
 8 might have looked at them -- I don't know. It was
 9 awhile ago.
 10 But to get ready for this, more
 11 specifically recently, I read all of the agendas
 12 and the minutes from the meetings from the time I
 13 came on the commission until when Mr. Braxton
 14 resigned.
 15 **Q. And where did you get those from?**
 16 A. They're on the website.
 17 **Q. So you did --**
 18 A. For the State Police Commission website.
 19 **Q. You did that on your own?**
 20 A. Oh, yeah.
 21 **Q. Did you review anything else?**
 22 A. No. I mean, there's not anything really
 23 for me to review.
 24 **Q. And you said the pleadings. You also**
 25 **reviewed Ms. Derbonne's pleadings?**

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1 MR. OXENHANDLER:
 2 Object to form.
 3 THE WITNESS:
 4 Can I speak frankly?
 5 BY MS. CRAFT:
 6 **Q. Absolutely.**
 7 A. It's crappy --
 8 **Q. Understand.**
 9 A. -- it's absolutely the most heinous thing
 10 that can be done to somebody.
 11 **Q. That's why I was asking the question.**
 12 **Do you have any reason to think that it was**
 13 **any less crappy or heinous for Mr. Braxton to be**
 14 **accused of being involved in some sort of murder**
 15 **involving a woman 25 years earlier?**
 16 A. No, I mean --
 17 MR. OXENHANDLER:
 18 Object to form.
 19 THE WITNESS:
 20 He's a businessman. I'm a businessman.
 21 He is well known in his community. I'm
 22 well known in my community. So yeah, I
 23 understand very much what it's like.
 24 BY MS. CRAFT:
 25 **Q. You said you read materials for this case.**

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1 A. Oh, sure, absolutely.
 2 **Q. You referenced that a couple of times.**
 3 A. When the commission first got sued, we read
 4 them.
 5 **Q. And have you reviewed anything recently**
 6 **related to her case, like The Court of Appeal**
 7 **opinion?**
 8 A. No.
 9 MS. CRAFT:
 10 We can take a short break; I might
 11 almost be done.
 12 THE COURT REPORTER:
 13 We're off the record.
 14 (Brief recess taken.)
 15 We're back on the record.
 16 MS. CRAFT:
 17 I don't have any other questions. I
 18 can't speak for the rest of these people,
 19 but I don't have anything.
 20 MR. OXENHANDLER:
 21 Yes, I have a few questions.
 22 * * * * *
 23 EXAMINATION
 24 BY MR. OXENHANDLER:
 25 **Q. Good morning, Mr. Riecke, my name is Steve**

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1 Oxenhandler, and I'm a lawyer and I represent
2 Lieutenant Colonel Oliphant. Thank you for
3 appearing here today.
 4 A. Yes, sir.
5 Q. And just a couple of questions.
6 In a brief statement, what does the State
7 Police Commission do?
 8 A. We are the -- we supervise the Classified
 9 State Police Service as it relates to discipline,
 10 budget, number of employees, and basically the
 11 classified service over what is appropriate and
 12 inappropriate, what they're allowed to do. That's
 13 it in a nutshell.
14 Q. Is it fair to say the commission can make
15 rulings affecting members of the State Police Civil
16 Service?
 17 A. State Police Civil Service? Are we talking
 18 about classified State Police?
19 Q. Yes, sir.
 20 A. Yeah, we make rules.
21 Q. Do you know about how many State Police law
22 enforcement officers are subject to the potential
23 rulings and decisions of the State Police
24 Commission?
 25 A. Somewhere around 1100 at -- it could be a

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1 Q. Did Mr. Braxton ever speak to you regarding
2 the December 2015 arrest of his daughter for a DWI
3 in Natchitoches?
 4 A. Yes, he did.
5 Q. What did he tell you?
 6 A. Well, actually, he spoke to everybody on
 7 the commission about it. It was a meeting --
 8 again, I'm not exactly sure of the date. I'm going
 9 to say it was somewhere around July, June or July
 10 of 2017, where he told everybody during a
 11 commission meeting about what had happened with his
 12 daughter and the issues surrounding that.
 13 So yeah, he's -- he might have spoken to me
 14 about it once before that. As a matter of fact,
 15 I'm fairly certain we had spoken about it once
 16 before that. I want to say it was in 2017, maybe
 17 March or April of 2017.
18 Q. Do you remember specifically if Mr. Braxton
19 ever told you something to the effect that State
20 Police -- State Commissioners or the Police
21 Commissioners are somehow off limits from being
22 subject or ticketed or anything like that?
 23 A. He never told me that. He never said that
 24 to me. I'm aware that it was said, or that it was
 25 -- that there was some conversation about that with

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1 little more or little less, just depending -- but I
 2 think we're somewhere around 1150, 1175, somewhere
 3 around there.
4 Q. So would you agree with me that rulings and
5 decisions of the commission can affect the jobs and
6 careers of Louisiana State Troopers?
 7 A. Absolutely.
8 Q. Do you consider the State Police Commission
9 to be an important body?
 10 A. Very.
11 Q. And I understand and I think at the very
12 beginning of your testimony this morning you
13 testified that you've had to take an oath of office
14 before you're sworn in on the State Police
15 Commission?
 16 A. Yes. Actually, I've taken two. I took one
 17 when I was sworn in, and I took another one in
 18 January of 2019 when I was reinstated.
19 Q. Are meetings of the commission ever covered
20 by the news media?
 21 A. Sure, yeah.
22 Q. And can citizens come and make public
23 comments at police -- the State Police Commission
24 meetings?
 25 A. They can and do.

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1 other people, but he never told me that. He never
 2 said those words to me.
3 Q. What conversation are you talking about
4 with other people?
 5 A. I'm sorry; I should have phrased that
 6 better. I'm aware of the -- what was said as it
 7 relates to this case, in reading the lawsuit and
 8 the supplemental lawsuit and those items as it
 9 relates to this.
 10 But, you know, he and I speaking before or
 11 after a meeting, no, he never said that to me.
12 Q. Do you remember specifically what
13 Mr. Braxton told you about the arrest of his
14 daughter in December of 2015? You say you spoke
15 with him, and so specifically anything that he,
16 Mr. Braxton, told you?
 17 A. I don't remember specifics. I just
 18 remember the conversation of it. I really don't
 19 recall the amount of detail. He had told me --
 20 again, this wasn't something I was sitting there
 21 making notes about. This wasn't in the scope of us
 22 being commission members.
 23 This was before a meeting one day, and he
 24 told me what was -- what had happened to his
 25 daughter; that she had gotten a DWI. And he didn't

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1 necessarily think it was handled fairly, and
 2 something along those lines. That's it. Just kind
 3 of a passing conversation.
 4 **Q. When Mr. Braxton told you he didn't think**
 5 **it was handled fairly, do you remember specifically**
 6 **what he told you?**
 7 A. I don't. I don't remember specifics. I
 8 remember, like I said, we had a conversation about
 9 it and that was that. Like, I'm sorry, I mean...
 10 **Q. That's okay.**
 11 A. You don't need to be a lawyer to know what
 12 an 894 is. I might have suggested something about
 13 an 894 or something like that. It was very -- not
 14 a lot of detail. Not very memorable.
 15 **Q. Did Mr. Braxton ever mention the name to**
 16 **you Jay Oliphant or Colonel Oliphant?**
 17 A. No.
 18 **Q. Did Mr. Braxton ever mention the name**
 19 **Jayson Linebaugh to you?**
 20 A. No, sir.
 21 **Q. Did Mr. Braxton ever discuss with you**
 22 **Colonel Oliphant's June 2, 2016, incident report**
 23 **regarding the arrest of Mr. Braxton's daughter and**
 24 **other matters?**
 25 A. I don't recall any of that kind of

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1 conversation between me and Mr. Braxton.
 2 **Q. Did Mr. Braxton ever talk to you about the**
 3 **State Police Commissioners being untouchable?**
 4 A. No, he never made any kind of statement
 5 like that to me.
 6 **Q. Do you remember Mr. Braxton ever talking to**
 7 **you about moving Jayson Linebaugh to New Orleans or**
 8 **for a professional courtesy?**
 9 A. We never had that conversation that I
 10 recall.
 11 MR. OXENHANDLER:
 12 Thank you. Those are all the questions
 13 I have.
 14 MR. MAYEAUX:
 15 I have no questions.
 16 MR. ALFORD:
 17 No questions.
 18 MS. CRAFT:
 19 You are free to go.
 20 THE COURT REPORTER:
 21 How about reading and signing?
 22 MR. ALFORD:
 23 We'll read and sign.
 24 (Whereupon, the taking of the witness'
 25 testimony was concluded.)

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1
 2 I, JARED CARUSO-RIECKE, the undersigned, do
 3 hereby certify I have read the foregoing deposition
 4 taken on Wednesday, November 11, 2020, and it
 5 contains a true and accurate transcript of the
 6 testimony given by me, before Tamra K. Kent, CCR.
 7
 8 () Without Corrections
 9
 10 () With corrections as reflected on
 11 the Errata Sheet(s) prepared by
 12 me and hereto attached consisting
 13 of pages.
 14
 15 WITNESS SIGNATURE
 16 JARED CARUSO-RIECKE
 17
 18
 19 DATE SIGNED:
 20
 21
 22
 23
 24
 25

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C E R T I F I C A T E

1
 2
 3 This certification is valid only for a
 4 transcript accompanied by my original signature and
 5 original required seal on this page.
 6
 7 I, Tamra K. Kent, Certified Court Reporter
 8 in and for the State of Louisiana, as the officer
 9 before whom this testimony was taken, do hereby
 10 certify that JARED CARUSO-RIECKE, to whom the oath
 11 was administered, after having been first duly
 12 sworn by me upon authority of RS 37:2554, did
 13 testify as hereinbefore set forth in the foregoing
 14 77 pages;
 15 That this testimony was reported by me in
 16 stenographic machine shorthand, was prepared and
 17 transcribed by me or under my personal direction
 18 and supervision, and is a true and correct
 19 transcript to the best of my ability and
 20 understanding;
 21 That the transcript has been prepared in
 22 compliance with transcript format guidelines
 23 required by statute or by rules of the board, and
 24 that I am informed about the complete arrangements,
 25 financial or otherwise, with the person or entity

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1 making arrangements for deposition services; that I
 2 have acted in compliance with the prohibition on
 3 contractual relationships, as defined by Louisiana
 4 Code of Civil Procedure Article 1434 and in rules
 5 and advisory opinions of the board; that I have no
 6 actual knowledge of any prohibited employment or
 7 contractual relationship, direct or indirect,
 8 between a court reporting firm and any party
 9 litigant in this matter, nor is there any such
 10 relationship between myself and a party litigant;
 11
 12 That I am not related to counsel or to the
 13 parties herein, nor am I otherwise interested in
 14 the outcome of this matter.
 15
 16
 17
 18 Tamra K. Kent 83070
 Certified Reporter in and for
 19 the State of Louisiana
 20
 21 Date Signed:
 22
 23
 24
 25

83

1 Errata Sheet
 2
 3 NAME OF CASE: CALVIN W. BRAXTON, SR. V. LOUISIANA STATE TROOPERS ASSOCIATION, ET AL
 4 DATE OF DEPOSITION: 11/11/2020
 5 NAME OF WITNESS: Jared Caruso-Riecke
 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 _____

<p style="text-align: center;">Exhibits</p> <hr/> <p>J CARUSO-RIECKE 11 TK EX 26 2:16 20:25 21:2</p> <hr/> <p style="text-align: center;">#</p> <hr/> <p>#12 38:24 39:7,9,16 40:2 #26 20:25 21:2</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>100 56:11 1100 74:25 1150 75:2 1175 75:2 16 34:23 47:8 66:22 16/17 26:14 17940 7:15 1989 7:21 1994 7:24 9:22 1st 12:22</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 78:22 20 39:21 64:4 2002 9:9 2003 9:9 27:6 2004 9:9 2013 15:2 2014 15:2 2015 15:3 76:2 77:14 2015-1385 39:1 2016 16:17 18:11 20:6, 13,15 21:5,12 23:14 24:1,15 25:3 26:24 29:10 37:4 39:19,20 40:4 44:12 46:24 47:3 61:24 66:16 67:25 78:22 2017 22:19 24:2 25:8, 17 39:21 40:4,7,8,23 41:14 76:10,16,17 2019 75:18 2020 33:7 2021 33:17 24 57:7 25 71:15 28 21:5</p>	<p style="text-align: center;">3</p> <hr/> <p>3 44:8 30 59:7 30-day 59:12 67:19</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>48 57:10</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>70435 7:16 7th 46:22 47:8 48:22 52:23 53:13</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>894 78:12,13 8th 47:11</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 39:19,20 9:00 6:4</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>a.m. 6:4 ability 62:2 absolutely 41:9 43:18 48:25 53:7,11 65:16 71:6,9 73:1 75:7 accepted 17:6 accident 28:6 30:7,11 32:22 accused 70:6 71:14 actions 56:13 add 61:19 address 7:6,14 addressed 21:6 administration 37:10 admissible 10:14 advice 13:18,24 Affairs 54:10 affect 75:5 affecting 74:15 afield 50:13,16 agenda 35:22 41:14, 20,22 42:1,5,8,10,17 43:5,22 56:6,21 57:5, 12,18 58:6 65:11</p>	<p>agendas 58:16 72:11 agree 75:4 agreed 32:3 49:24 59:8 ahead 52:7,14 56:24 60:3 65:8 alarm 65:5 alcohol 65:2 ALFORD 10:1,23 11:4,9,14,20,25 22:11 30:13 31:16 33:24 34:10 39:4 40:10 41:6 46:23 47:2 50:9,15,21 51:4,9 55:3 59:22 68:17 69:10,25 70:22 79:16, 22 allegation 63:20,21, 22 64:12 69:22 alleged 19:14 30:17 allegedly 14:10 allowed 14:11 37:25 74:12 alluded 30:17 American 8:23,25 9:12,24 10:5 12:6 amount 28:13 56:25 77:19 analogy 47:16 and/or 68:6 answering 50:11 52:19 apologize 22:2 67:3 69:3 Appeal 31:11 73:6 appearing 74:3 appointed 17:16 appointments 19:5 20:10 approach 69:18 appropriately 17:21 Appropriations 44:18 49:22,23 52:21 54:19 approve 50:4 approved 48:24 49:5, 8 61:11 April 22:18 76:17 area 69:1 areas 12:11 argumentative 37:19 arrest 76:2 77:13 78:23 ass 48:14 assistant 27:10,12, 13,25</p>	<p>Association 21:18 34:19 35:4,12 36:1,24 61:21 63:16 64:22 assume 38:19 assuming 41:24 assumption 37:7 attach 20:24 attached 21:3 attempt 66:17 attend 52:22 attended 53:12,16 attention 44:6 62:5 attorney 31:6 attorneys 18:1 37:20 38:19 51:14 Audit 8:19 August 18:11 26:22 67:24 authored 21:19 authority 38:5,8,10, 14 automatically 38:14 aware 17:10 21:17 27:1,4,11 34:17 35:25 60:4 61:3 69:21 70:5, 15,17 76:24 77:6 awhile 72:9</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>B-R-E-A-U-X 23:19 B.S. 8:1 back 10:20 14:23 17:4, 5 20:5 32:15 41:2 42:9 44:20 45:18 52:18 55:22 59:3,9 73:15 back-up 28:22 background 35:23 backgrounds 12:11 bank 8:19,22,23,25 9:12,24 10:5 12:6,10,14 banking 8:17 bar 53:4 61:16,22 62:6, 24 63:4,5,9,17 64:10 66:3,13 Barrow 45:10 basically 20:1 29:1 37:6 46:11 67:5 74:10 basis 26:12 Baton 69:2,5 befall 30:11 32:22 beginning 40:4 43:24 75:12 behalf 21:18 31:7 40:13 53:13</p>	<p>bell 37:13 belonged 35:3 benefit 51:18 big 47:19 54:17 Bill 14:5 63:20 64:12 Billy 68:2 binder 16:2,3 bit 26:9 board 8:18,25 9:11,15, 20,22,24 11:16 12:6,7, 14,18,21 14:14,17 16:12 17:2,4 20:8 23:11,12,14 25:4,14,16, 18,22 26:1 29:24 38:25 39:21,24 boards 13:3 14:13,16 15:1,8 body 75:9 born 15:5 bothered 49:12,13 bottles 64:23 braces 7:8 Braxton 6:9 20:18,21 21:7,20 22:8 24:9 25:14 31:3 34:18 36:8,22 43:1,14 53:17 55:12,19 57:23 58:19 59:1,11 61:15 62:12,15,20,23 63:2,8,14 65:4,8,18 66:9 67:10 68:7 71:13 72:13 76:1,18 77:13,16 78:4,15,18,21 79:1,2,6 Braxton's 31:14 35:4, 11 40:13 51:17 52:1 78:23 break 40:25 41:1,4 58:24,25 73:10 Breaux 23:18 24:17 25:23 26:7 53:5 56:16 bring 33:3 64:22 brought 19:13 23:5 44:6 56:23 57:6 60:14 62:5 Bucky 37:5 61:25 64:12 budget 26:10,12,13, 18,24 27:4,17,18,20,21 44:1,4,8,9,15,23 45:2,3, 4 46:7,17,20 47:12,21, 23 48:24 49:4,5,15,19, 24 50:4 51:24 61:10 74:10 budgets 45:1 bulk 66:21 business 8:15,18 12:10 businesses 12:9</p>
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