

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

JOHN R. STELLY, II,
Plaintiff,

*
*
*
*
*
*
*
*
*
*
*

CIVIL ACTION NO. 2:23-cv-00772

Versus

JUDGE GREG G. GUIDRY

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

MAGISTRATE JUDGE
JANIS VAN MEERVELD

PLAINTIFF’S AMENDED WITNESS AND EXHIBIT LIST

Plaintiff John R. Stelly (“Stelly”) submits, pursuant to Scheduling Order (Rec. Doc. 104), this list of witnesses who will or may be called to testify at trial and this list of exhibits that may or will be used at trial.

WITNESSES:

1. Lt. John R. Stelly, II
2. Defendant State of Louisiana, Office of State Police, through 30(b)(6) deposition
3. Cpt. Donovan Archote
4. LTC. Chavez Cammon
5. LTC. Kenneth Van Buren
6. Col. Lamar Davis
7. Cpt. Hiram Mason
8. Cpt. Aaron Marcelle
9. LTC. Treone Larvadain
10. MAJ. Robert Burns
11. Cpt. Salem ElAmin

12. Col. Kevin Reeves
13. LTC Mike Noel
14. MAJ Carl Saizan
15. Cpt. Chad Guidry
16. Lt. Christopher Bodet
17. Cpt Dwight Robinette
18. Lt Troy Pichon
19. Melissa Stelly
20. Jacob Dickinson
21. Harold Asher
22. Jeff Meyers
23. Andrew Tyler Broadway
24. Any witness listed in Defendant's Witness List
25. Any witness necessary for authentication of documents
26. Any witness necessary for impeachment or rebuttal

Plaintiff reserves the right to supplement and or amend this list to include additional persons who may have information supporting his claims.

EXHIBITS:

1. LSP pay grid, effective 07-01-23, Stelly 00347.
2. LSP webpage on diversity, Stelly 00348 – 00352.
3. Article in Louisiana Illuminator titled *Louisiana State Police chief looks to reform agency with diversity and technology* by Wesley Mueller, dated November 29, 2021, Stelly 00320 – 00325.
4. Sound Off Louisiana article titled *Is LSP Col. Lamar Davis' focus on African American and*

female promotions causing a mass exodus of white male troopers at the agency?, dated 10-17-22, Stelly 00353 – 00375.

5. *Louisiana State Police Assessment Report* by The Bowman Group, dated October 2023, 00376 – 00390.
6. *Leadership Development Program, Operational Leadership – Lieutenant*, dated 12-07-13, LSP 000809 – 000996.
7. *Leadership Development Program, Operational Leadership – Lieutenant*, dated 11-12-13, Stelly 00302 – 00304.
8. *Student Workbook, Operational Leadership – Lieutenant*, dated 11-25-13, LSP_STELLY 000565 – 000672.
9. *Student Workbook, Operational Leadership – Lieutenant*, dated 02-24-21, LSP_STELLY 000001 – 000110.
10. *Performance and Evaluation System* forms and associated documents on John Stelly dated from 05-04-96 to 07-28-21, LSP_STELLY 000112 – 000192.
11. Various LSP administrative documents on John Stelly, LSP_STELLY 000371 – 000377, 000379, 000381.
12. Letters of commendation and certificates on John Stelly, LSP_STELLY 000378, 000380, 000382 – 000385.
13. LSP PO 207 Classification System, dated 09-09-13, Stelly 00326 – 00328.
14. LSP PO 229 Promotions, dated 10-15-12, LSP 000386 – 000387, Stelly 00329 – 00330.
15. LSP PO 229 Promotions, dated 02-23-24, LSP 000997 – 000998.
16. Louisiana Constitution, Section 10§45, Stelly 00393.
17. Operational Memorandum HQ-1-0896 on PO 229, dated 07-14-23, Stelly 00394 – 00397.

18. Operational Memorandum HQ-1-0935 on PO 229, dated 09-18-23, Stelly 00398 – 00401.
19. Operational Memorandums from deposition: HQ-1-0896, HQ-1-0935, Stelly 00402 – 00409.
20. LSP PO 705 Promotions, dated 07-15-12, LSP 000999 – 001000.
21. Operational Memorandum HQ-1-0897 on PO 705, dated 07-14-23, Stelly 00258 – 00261.
22. Operational Memorandum HQ-1-0936 on PO 705, dated 09-15-23, Stelly 00262 – 00265.
23. Text messages to and from Stelly, Stelly 00266 – 00281.
24. Stelly's journal, Stelly 00282 – 00289.
25. *A Study of Promotional Statistics within State Police, 2000 to Current*, by Stelly and William Moragne, dated 04-05-13, LSP 001001 – 0010024.
26. Letter of reprimand to John Stelly, dated 01-09-98, LSP_STELLY 000388.
27. Letter of reprimand to Treone Larvadain, dated 08-20-14, LSP_STELLY 000389 – 000391.
28. Notice of 64-hour suspension to Robert Burns, dated 06-13-17, LSP_STELLY 000392 – 000396.
29. Letter of reprimand to Lamar Davis, dated 03-10-00, LSP_STELLY 000397.
30. Louisiana State Civil Service, Job Aids and Resources, LSP_STELLY 000807 – 000808.
31. Official Certificates of Eligibles and Interview Summary Forms, SPC000001 – 000727, Supplemental SPC000001 – 000130.
32. Summary Sheet for Job Search Announcements, LSP_STELLY 000398 – 000428, 001066 – 001083.
33. Summary reports for certificate 17-1135, Internal Affairs, given to Chavez Cammon on 09-26-17, LSP_STELLY 000438 – 000443.
34. Official Certificate of Eligibles and Interview Summary Form for certificate 17-1135, SPC000001 – 000002.

35. Summary reports for certificate 18-1189, Gaming Enforcement, given to Kenneth VanBuren on 04-25-18, LSP_STELLY 000444 – 000448.
36. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1189, LSP_STELLY 001032, 001137 – 001138, SPC000117 – 000118.
37. Summary reports for certificate 18-1223, Technical Support Services, given to Christopher Eskew on 07-26-18, LSP_STELLY 000449 – 000459.
38. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1223, LSP_STELLY 001031, SPC 000187 – 000188.
39. Summary reports for certificate 18-1241, Troop N, given to Dean Behrens on 08-27-18, LSP_STELLY 000563, 000674 – 000678.
40. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1241, SPC 000229 – 000230.
41. Summary reports for certificate 18-1245, Technical Support Services, given to Lamar Davis on 10-03-18, LSP_STELLY 000564, 000679, 001084 - 001095.
42. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1245, LSP_STELLY 001033, SPC 000238 – 000240.
43. Summary reports for certificate 18-1250, Crime Lab, given to Kevin Marcel on 10-03-18, LSP_STELLY 000460 – 000470, 001042 – 001052.
44. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1250, SPC 000249 – 000251.
45. Summary reports for certificate 18-1251, Investigative Support Services, given to Robert Hodges on 10-03-18, LSP_STELLY 000471 – 000489.
46. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1251,

LSP_STELLY 001037, SPC 000252 – 000254.

47. Summary reports for certificate 19-1280, Public Affairs, given to J. B. Slaton on 02-06-19, LSP_STELLY 000490 – 000492.
48. Official Certificate of Eligibles and Interview Summary Form for certificate 19-1280, SPC 000320 – 000321.
49. Summary reports for certificate 20-1354, Gaming Enforcement, given to Patrick Bradley on 06-25-20, LSP_STELLY 000493 – 000499.
50. Official Certificate of Eligibles and Interview Summary Form for certificate 20-1354, LSP_STELLY 001036, Supplemental SPC 000078 – 000080.
51. Summary reports for certificate 20-1382, Troop L, given to Hiram Mason on 10-20-20, LSP_STELLY 000500 – 000505.
52. Official Certificate of Eligibles and Interview Summary Form for certificate 20-1382, SPC 000545 – 000546.
53. Summary reports for certificate 20-1383, Technical Support Services, given to Aaron Marcelle on 11-24-20, LSP_STELLY 000506 – 000514.
54. Official Certificate of Eligibles and Interview Summary Form for certificate 18-1383, SPC 000547 – 000548.
55. Official Certificate of Eligibles and Interview Summary Form for certificate 20-1386, LSP_STELLY 001034.
56. Summary reports for certificate 20-1388, Technology & Business Support, given to David Stelly on 11-24-20, LSP_STELLY 000515 – 000523.
57. Official Certificate of Eligibles and Interview Summary Form for certificate 20-1388, LSP_STELLY 001035, 001041, SPC 000557 – 000558.

58. Summary reports for certificate 20-1393, Police Logistical Services, given to Nicole Kilgore on 01-07-21, LSP_STELLY 000524 – 000532.
59. Official Certificate of Eligibles and Interview Summary Form for certificate 20-1393, SPC 000567 – 000568.
60. Summary reports for certificate 20-1394, Public Affairs, given to Nicholas Manale on 02-10-21, LSP_STELLY 000533 – 000539.
61. Official Certificate of Eligibles and Interview Summary Form for certificate 21-1394, LSP_STELLY 001030, SPC 000569 – 000570.
62. Summary reports for certificate 21-1428, Internal Affairs, given to Treone Larvadain on 05-19-21, LSP_STELLY 000540 – 000544.
63. Official Certificate of Eligibles for certificate 21-1428, LSP_STELLY 001039, SPC 000635 – 000636.
64. Stelly's Public Records Request to LSP for LSP Bulletin Board record containing the names on the Official Certificate of Eligibles for captain vacancy in Internal Affairs around 05-11-21, Stelly 00290 – 00295.
65. Summary reports for certificate 21-1450, Operational Development, given to Robert Burns on 07-09-21, LSP_STELLY 000545 – 000548.
66. Official Certificate of Eligibles and Interview Summary Form for certificate 21-1450, LSP_STELLY 001040, 001114, 001115, SPC 000639 – 000640.
67. Summary reports for certificate 21-1453, Gaming Enforcement, given to Saleem El-Amin on 07-09-21, LSP_STELLY 000549 – 000556.
68. Official Certificate of Eligibles and Interview Summary Form for certificate 21-1453, SPC 000645 – 000646.

69. Summary reports for certificate 21-1474, CID Region 1, list recalled, LSP_STELLY 001053 – 001059.
70. Official Certificate of Eligibles and Interview Summary Form for certificate 21-1474, LSP_STELLY 001038, SPC 000687.
71. Summary reports for certificate 21-1477, LCJIS, given to Jonas Martin on 08-26-21, LSP_STELLY 000557 – 000562.
72. Official Certificate of Eligibles and Interview Summary Form for certificate 21-1477, SPC 000691 – 000693.
73. Stelly's Public Records Request to LSP for LSP Bulletin Board record containing the names on the Official Certificate of Eligibles for captain vacancy in LCJIS around 08-13-21, Stelly 00296 – 00301.
74. Summary reports for certificate 22-1534, CID Major, given to Treone Larvadain, and related documents, Stelly 00410 – 00414.
75. Interview Summary Form for certificate 22-1534, 00415.
76. Official Certificate of Eligibles and Interview Summary Form for certificate 23-1628, LSP_STELLY 001118 – 001119.
77. Transfer records, LSP_STELLY 001096 – 001135, 001151 – 001156, 001193 – 001195, 001256 – 001258.
78. Analysis of transfer records, Stelly 00416.
79. EEOC Determination and Notice of Rights, dated 12-01-22, Stelly 0001 – 0004.
80. EEOC Status report, dated 12-01-22, Stelly 0005.
81. EEOC Charge of Discrimination, dated 05-05-22, Stelly 0006.
82. EEOC Notice of Charge of Discrimination, dated 05-19-22, Stelly 0007 – 00010.

83. EEOC Activity Log, Stelly 00011 – 00031.
84. EEOC email and documentation, Stelly 00032 – 00038.
85. EEOC Damages Assessment letter from Sirwanda Hall, dated 08-18-22, Stelly 00039 – 00041.
86. EEOC Damages Assessment letter from Stelly, dated 08-30-22, Stelly 00042 – 00046.
87. EEOC copy of Stelly's annual evaluations from 08-10-04 through 06-30-21, Stelly 00047 – 00189.
88. EEOC copy of Stelly's response dated 08-03-22 to LSP's response to Stelly's charge of discrimination, Stelly 00190 – 00217.
89. EEOC administrative documents, Stelly 00218 – 00221.
90. EEOC copy of Exhibit A for LSP's response to Stelly's charge of discrimination, LSPC Rules Chapter 7, Stelly 00222 – 00230, Stelly 00331 – 00338.
91. EEOC copy of Exhibit B for LSP's response to Stelly's charge of discrimination, LSPC Rules Chapter 8, Stelly 00231 – 00238, 00339 – 00346.
92. EEOC copy of Exhibit C for LSP's response to Stelly's charge of discrimination, LSP PO 229, dated 10-15-12, Stelly 00239 – 00240.
93. EEOC copy of Exhibit D for LSP's response to Stelly's charge of discrimination, LSP PO 207, dated 09-09-13, Stelly 00241 – 00243, 00326 – 00328.
94. EEOC copy of Exhibit E for LSP's response to Stelly's charge of discrimination, DPS Rules, Chapter 3, Section 03-01.15, Stelly 00244 – 00250.
95. EEOC copy of Exhibit F for LSP's response to Stelly's charge of discrimination, LSP Captain Promotion Data, Stelly 00251.
96. EEOC copy of LSP's response by Brittney Hull to Sirwanda Hall dated 06-30-22 on Stelly's charge of discrimination, Stelly 00252 – 00257.

97. All Defendant's responses to plaintiff's interrogatories and requests for production of documents.
98. E-mail from Stelly to Sirwanda Hall regarding article and video referenced therein dated October 18, 2022, Stelly 00032.
99. Stelly's Public Records Request to LSP Commission and results therefrom for list of subjects on which the 2018 LSP captain examination was based, Stelly 00417 – 00419.
100. LSP Commission video of COL Lamar Davis testifying before LSP Commission about LT Russel Graham's disciplinary appeal on 08-10-23. Link:
https://www.youtube.com/watch?v=b_mbgPHx87Q.
101. Video of COL Lamar Davis testifying at the Louisiana Legislature. Link:
<https://www.youtube.com/watch?v=VFrGbiDx5s8>.
102. Demographics of LSP captains on Jan 1 of every year. Stelly 00420.
103. Documents produced by the State Police Commission in response to a subpoena from Lt. Stelly. SPC 000001- 000727.
104. The complete file, including but not limited to the expert report, of any expert retained by any party in this matter.
105. All documents and or references on which any expert relied for his/ her report.
106. All depositions taken in this litigation, including any exhibits that were introduced during the depositions.
107. All discovery exchanged in this matter.
108. All relevant publicly available Internet information.
109. Exhibits for the impeachment of witnesses.
110. Exhibits on Defendant's Exhibit List.

111. Stelly's Cellphone Meeting Topics for Meeting with Reeves prepared by Stelly prior to meeting
Stelly 00421-00435

Plaintiff reserves the right to amend and or supplement this list.

Respectfully Submitted,

/s/Victor R. Farrugia

Victor R. Farrugia No. 19324

FARRUGIA LAW FIRM, LLC

1340 Poydras Street, Suite 2100

New Orleans, LA 70112

Telephone: (504) 525-0250

vfarrugia@farrugialawfirm.com

Labor Law Specialist and
Employment Law Specialist
Certified by the Louisiana
Board of Legal Specialization

CERTIFICATE OF SERVICE

Adams hereby certify that a copy of the above and foregoing has been electronically filed with the Clerk of Court using the CM/ECF system which will send notice of electronic FILING to all counsel of record this this 10th day of June 2024.

/s/ Victor R. Farrugia
VICTOR R. FARRUGIA