

19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

LOUISIANA STATE TROOPERS * NUMBER: 672,676
ASSOCIATION, JAMES O'QUINN, ET AL *
VERSUS * DIVISION: "24"
STATE POLICE COMMISSION, ET AL *
*

PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

AFFIDAVIT

BEFORE ME, the undersigned Notary Public, authorized and duly commissioned and qualified within the Parish and State aforesaid, personally came and appeared:

EULIS SIMIEN


who, after being first duly sworn, did depose and say of his own personal knowledge that:

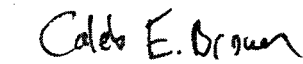
1. Affiant serves as the Chairman of the Louisiana State Police Commission.
2. On November 3, 2022, Affiant was called to testify as a witness in the trial captioned, "Louisiana State Troopers Association, James O'Quinn, et al v. State Police Commission, et al., bearing docket number 672,676, Division "24" on the docket of the Nineteenth Judicial District Court.
3. While testifying under cross examination by counsel for Plaintiffs, Mary Ann White, Affiant, was asked whether the law firm of which he is a member made political contributions, and Affiant responded, "My law firm does not make political contributions since I have been a member of the Commission." (Trial transcript page 155, lines 20-22)
4. While still under cross examination, Affiant was asked whether anyone made political contributions on his behalf during his tenure as a commissioner to which he responded, "Of course not." (Trial transcript page 155, lines 23-25)
5. Following Affiant's testimony, both sides rested and the Court adjourned with instructions for counsel to present the Court with proposed findings of fact and conclusions of law, a proposed judgment and written closing arguments.
6. As Affiant and counsel for Defendants, Lenore Feeney, were exiting the courtroom, Affiant recalled that his law partner, Jimmy Simien, had in fact made a political contribution using law firm funds.
7. As Affiant and Ms. Feeney exited the Courthouse, they encountered counsel for Plaintiffs, Mary Ann White and Floyd Falcon outside.
8. Affiant advised Ms. White and Mr. Falcon that he had forgotten that his law partner had in fact made a political contribution using law firm funds.

9. In response to Affiant, Ms. White and Mr. Falcon laughed, and Mr. Falcon stated, that he had the paperwork with him, implying that he could have impeached Affiant, but he chose not to do so.
10. On November 9, 2022, Affiant prepared and signed a letter to Judge Donald Johnson in which he apprised the Court of his failure to recall that his law partner, Jimmy Simien, had directed that a campaign contribution be made to Governor John Bel Edwards' re-election campaign be made for law firm funds. In the letter that was sent via facsimile to the Court, Affiant apologized to the Court for his unintentional error in testimony, and he advised the Court that he had apologized to counsel for Plaintiffs immediately after the trial.
11. Affiant's spouse, Tamara Simien, never made a political contribution on behalf of Affiant during his tenure on the State Police Commission.
12. Any political contribution made by Tamara Simien was made on her own behalf.
13. Tamara Simien once practiced law in a law firm with Preston Castille.
14. Affiant has not made a political contribution on his own behalf during his tenure on the State Police Commission nor has he directed anyone else to make contributions on his behalf.
15. Any political contributions made by the law firm Simien & Simien during Affiant's tenure on the State Police Commission would have been made by Jimmy Simien, who has general authority to spend law firm funds without the consent or concurrence of affiant.

WITNESSES:


 Printed Name: Connie Pruett


 Printed Name: Felix Simien


 Printed Name: Caleb E. Brown

SWORN TO AND SUBSCRIBED before me, Notary Public, on this 18th day of January 2023.


 NOTARY PUBLIC

Roy L. Bergeron, Jr.
Bar Roll No. 33726
Notary ID No. 92685
Notary Public, State of Louisiana
My Commission is for Life.