

Taylor Townsend

10TH JUDICIAL DISTRICT COURT  
PARISH OF NATCHITOCHEs  
STATE OF LOUISIANA

CALVIN W. BRAXTON, SR.

VERSUS

CIVIL NO: 90,284-C

LOUISIANA STATE  
TROOPERS ASSOCIATION  
AND JAY OLIPHANT

DEPOSITION OF T. TAYLOR TOWNSEND  
TAKEN FOR AND ON BEHALF OF THE PLAINTIFF  
AT 300 ST. DENIS STREET  
NATCHITOCHEs, LOUISIANA  
ON THURSDAY, JUNE 27, 2019  
BEGINNING AT 9:07 A.M.

REPORTED BY:  
ROBIN HOLLOWAY, CERTIFIED COURT REPORTER

Taylor Townsend

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APPEARANCES

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ALSO PRESENT:

MAJOR JAY OLIPHANT  
CALVIN BRAXTON, SR.  
CHRIS WRIGHT  
MICHELLE GIRIOR

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I N D E X

APPEARANCES	2
STI PULATI ON	5
EXAMI NATI ON:	5-30
BY MS. CRAFT	5-23, 30
BY MR. FALCON	23-26
BY MR. OXENHANDLER	26-30
EXHI BI TS:	NONE

Taylor Townsend

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STIPULATIONS

It is hereby stipulated by and between counsel of record for the parties hereto that the oral deposition of T. TAYLOR TOWNSEND is being taken pursuant to notice and in accordance with the Louisiana Code of Civil Procedure, and for all uses and purposes thereby provided, at the offices of McCoy, Roberts & Begnaud, 300 St. Denis, Natchitoches, Louisiana, on June 27, 2019, commencing at or about 9:07 p.m.;

That all formalities in connection with the taking of the deposition are hereby waived with the exception of the swearing of the witness and the reduction of the questions and answers to typewritten form;

That all objections, save those as to the form of the question and the responsiveness of the answer, are hereby reserved until such time as this deposition, or any part thereof, may be used or sought to be used in evidence, such objections as might have been made had the testimony been given in open court;

That Robin Holloway, CCR, officiated in administering the oath to the above-named witness.

1 T. TAYLOR TOWNSEND

2 the witness hereinbefore named, after being  
3 first duly cautioned and sworn to tell the  
4 truth, the whole truth, and nothing but the  
5 truth, testified as follows:

6 EXAMINATION

7 BY MS. CRAFT:

8 Q Mr. Townsend, as you know, my name is Jill  
9 Craft. I represent Mr. Braxton, seated to my  
10 left. I am going to -- as I indicated off the  
11 record -- steer as clear as possible from any  
12 attorney-client privilege issues. I'm here,  
13 really, just to ask you some factual questions  
14 as it relates to Mr. Braxton and his pending  
15 litigation.

16 MS. CRAFT: Before we get started, I  
17 am going to note for the record an  
18 objection to the new representative on  
19 behalf of the LSTA, Mr. Wright, who is  
20 also a witness in this case. And, again,  
21 note my objection for the record which we  
22 handle with the judge about this business  
23 of shifting corporate representatives  
24 under the sequestration order because my  
25 recollection and my understanding and

1           certainly every ruling I've ever had, is  
2           you can't pick a new one and get them to  
3           come listen to testimony just because you  
4           want to. So I'm noting that for the  
5           record.

6           I'm also going to note the presence of  
7           Ms. Giroir who I agreed to allow to sit in  
8           on the depositions as it related to her  
9           capacity on behalf of the state troopers  
10          who we have deposed with the exception of  
11          Mr. Young yesterday. I told her off the  
12          record she can remain, but we have not  
13          sued the State of Louisiana or state  
14          police. We've only sued Mr. Oliphant and  
15          didn't even do so in a representative  
16          capacity.

17 BY MS. CRAFT:

18 Q       So after those objections, Mr. Townsend, if  
19       you don't mind, would you state your full name  
20       for the record, please?

21 A       Sure. T. Taylor Townsend. 320 St. Denis  
22       Street, Natchitoches, Louisiana 71457.

23 Q       And sir, my questions are pointed to two  
24       specific areas. One is: at some point I  
25       understand that you did some work for the

1 State Police Commission; is that correct?

2 A I did.

3 Q Can you tell me the process of you getting  
4 hired to do that work?

5 A Yes. And I don't think that would violate any  
6 privilege. I will be careful not to cross the  
7 line.

8 Q Yes, sir.

9 A As best that I can recall, there were a couple  
10 of commissioners who had allegedly violated  
11 some of the rules of the state police or the  
12 constitution, and there was going to be an  
13 investigation into their activities. Mr.  
14 Braxton was on the commission at that time --  
15 referring to Calvin Braxton.

16 Q Yes, sir.

17 A And I believe that he probably initiated by  
18 saying -- you know, "If that's something you  
19 would be interested in, they're going to have  
20 to have a lawyer." So I know that I had some  
21 discussion with Mr. Braxton about that issue,  
22 and then I later became hired. I frankly  
23 don't recall the process. I'm sure at some  
24 point in time that I met with the executive  
25 director and/or talked to her. I can't -- I

1           can't tell you --

2       Q     Okay.

3       A     -- specifically about those conversations. So  
4           that's how it came about.

5       Q     That's Ms. Derbonne, and that's  
6           D-e-r-b-o-n-n-e, for the court reporter.

7       A     She was the executive director at that time.

8       Q     Yes, sir. And at some point in time as I  
9           understand it, you entered into a contract for  
10          legal services?

11      A     I'm sure that I did because I -- the State  
12          requires that.

13      Q     Yes, sir. And that was going to be my  
14          question. The contract for legal services  
15          that you entered into was with the State. Did  
16          you have an understanding it also went through  
17          several hands: the Division of Administration;  
18          I think Risk Management takes a look at it; a  
19          bunch of people signed off on it.

20      A     I don't know everyone that signs off on it,  
21          but there is a process, and it's my belief  
22          that the director, for example, Ms. Derbonne  
23          at that time, could not just unilaterally make  
24          the decision to hire me, but that -- if that's  
25          what she and the commission decide or if she



1 -- whoever decides, then there's a process  
2 where I -- the contract is given to me; I sign  
3 the contract; that contract is then processed  
4 through the Division, as I understand it, and  
5 through the Attorney General's office. So  
6 it's my belief that there are several sets of  
7 eyes or agencies or departments that look at  
8 the contract and have a hand in whether you're  
9 going to be hired or not. It's a lengthy  
10 process.

11 Q Yes, sir. And in your circumstance, you don't  
12 have any recollection of there being any  
13 shortcuts on that process. In other words,  
14 your contract went through the whole gamut, as  
15 far as you understood it?

16 A As far as I know, it did.

17 Q At some point in time, did you become aware of  
18 a gentleman by the name of T.J. Doss, who was  
19 making statements that you had been hired  
20 illegally?

21 A I know T.J. Doss. I was not -- I don't recall  
22 him ever suggesting that I was hired  
23 illegally.

24 Q Do you know whether or not he was questioning  
25 how it was you ended up getting hired?

1 A Ms. Craft, I -- I mean, I've been around  
2 politics long enough that there's always --

3 Q Yes, sir.

4 A -- you know, if I'm hired, someone's going to  
5 say I was hired because I was a friend of this  
6 one or that one. And if that person doesn't  
7 know me, they're going to say, "Well, he's  
8 hired illegally," because they want their  
9 friend Ms. Craft or Mr. Falcon to be hired.  
10 So, you know, if you have information that he  
11 said that, it may exist, but he never told me  
12 that. I did not know him until I became the  
13 lawyer, and, so --

14 Q And in all candor, we took his deposition, I  
15 think it was either yesterday or the day  
16 before; hence, the reason for my questions to  
17 you.

18 Were you aware of any efforts by Mr. Doss  
19 to go to the governor's office and try to get  
20 to the bottom of how you got hired? Anything  
21 like that?

22 A I don't recall any.

23 Q And, sir, as I understand it, you told us that  
24 the initial reason that you were hired had to  
25 do with some commission members and political

1 contributions; is that right?

2 A That's correct.

3 Q And was there a subsequent inquiry that  
4 involved -- for lack of a better phrase,  
5 "straw donations" by troopers through the  
6 executive director of the LSTA?

7 A The -- I was -- I was retained or hired to do  
8 an investigation as to conduct -- alleged  
9 conduct by certain commission members which  
10 included campaign contributions, be them made  
11 ethically, unethically, legally, illegally,  
12 just to conduct that investigation.

13 Q Yes, sir. Do you recall an occasion where you  
14 were -- for lack of a better phrase, scheduled  
15 to deliver the results of your investigation  
16 and that got delayed for lack of a quorum?

17 A I tend to recall that that might have  
18 happened, but that would be reflected in the  
19 minutes.

20 Q Yes, sir.

21 A So that would be the best -- best evidence,  
22 but I think that may be correct.

23 Q Ultimately, you delivered your findings at a  
24 public meeting; is that correct?

25 A I did.

1 Q So I only want to focus on what you recall  
2 saying with respect to your findings at that  
3 public meeting. Not any discussions you may  
4 have had with anyone else. Just what you  
5 recall delivering at the public meeting.

6 A Let me tell you, I don't recall.

7 Q Yes, sir.

8 A And I -- it was on the record, and I know  
9 there's a transcript of it. I haven't -- I  
10 say I know, there should have been --

11 Q That's okay.

12 A -- there should be. And whatever I said, I  
13 said. And I'd be happy to listen to a tape to  
14 verify and authenticate that it was me that  
15 said it. I don't want to cross the line and  
16 -- I think, again, that would be the best  
17 evidence of what I said would be the  
18 transcript or the actual cassette tape or  
19 however they recorded those meetings. I  
20 certainly don't want to do anything to violate  
21 the privilege that I --

22 Q Yes, sir.

23 A -- or the confidentiality that I have for that  
24 client.

25 Q So we will then defer, if you will, to the

Taylor Townsend

1           comments that you made publically that we do  
2           have a video of.

3           At some point in time you had a meeting,  
4           did you not, with Calvin Braxton and Katrina  
5           Jackson? Do you remember that?

6    A    I don't specifically recall it. Help me out.

7    Q    Okay.

8    A    I could have.

9    Q    Do you recall that there was some issue with  
10           respect to Mr. Oliphant, who's seated in this  
11           room, Katrina Jackson was assisting Mr.  
12           Braxton, and the three of y'all had a meeting  
13           at some point in time where you relayed to Mr.  
14           Braxton that there was some desire that going  
15           forward Mr. Braxton would agree to recuse  
16           himself from anything involving Mr. Linebaugh,  
17           and there was some sort of request that Mr.  
18           Braxton issue some sort of apology which Mr.  
19           Braxton declined to do?

20   A    I don't know that that would violate my  
21           obligation to the commission. I can tell you  
22           this just so everyone here knows, I do recall  
23           there being some discussions at some point in  
24           time. I don't know if I spoke to Katrina in  
25           person, over the phone. I did understand that

1 she might be advising Mr. Braxton, but beyond  
2 that, I'll be happy if the court orders -- I  
3 think that still was done in my capacity at  
4 that point in time as an attorney for the  
5 commission, and I don't want to cross that  
6 line --

7 Q Okay.

8 A -- without a court order.

9 Q Just so I'm clear, I'm not going to ask you  
10 the content of your discussions, but can you  
11 tell me with whom on the commission -- who on  
12 the commission was making contact with you?  
13 Does that make sense? I don't want to know  
14 what was said. In other words, was it at a  
15 public meeting? Were these phone calls  
16 outside of a public meeting?

17 A There were some issues, and I'm sure Mr.  
18 Braxton discussed those with me again. He was  
19 a commissioner at that time, and I would think  
20 that that would be privileged information.

21 As you can imagine, you get questions when  
22 you're representing -- I've not represented a  
23 bunch of commissions in my life. That's  
24 really not been the nature of my practice. I  
25 generally have a single client that I

1 represent in my type of work. But you get  
2 when you're around members of a committee or a  
3 commission, they're always asking you  
4 questions about various things. But I believe  
5 that would be covered under the privilege.

6 Q Did you, for example, ever speak to Mr. Falcon  
7 about any issues relating to Jayson Linebaugh?

8 A Again, I spoke to Mr. Falcon on numerous  
9 occasions about various things, and I very  
10 well could have. But I don't recall  
11 specifically.

12 Q Did you speak to anyone in the governor's  
13 office about Jayson Linebaugh?

14 A I don't think so.

15 Q Did you speak to anyone at the Louisiana State  
16 Troopers Association about Jayson Linebaugh?  
17 Or did they speak to you?

18 A I don't think so. I did run into David Young  
19 one time, and I don't -- we had a short  
20 conversation. I just ran into him in Baton  
21 Rouge, and so to say that there wasn't some --  
22 I would've never divulged anything to David  
23 Young. I'd have been mindful of -- you know,  
24 I try to avoid those conversations because  
25 then you never know what they're going say

1           that you said.

2       Q     Yes, sir.

3       A     I can assure you that I would have been  
4           guarded. I would have never done any -- I  
5           would have not intentionally done anything to  
6           cross the line. But I did have a conversation  
7           with David Young; I just ran into him one day.  
8           But I don't recall that being the topic of  
9           that discussion.

10      Q     Do you recall anything about Calvin Braxton  
11           being the topic of the discussion with David  
12           Young?

13      A     Not specifically. I mean, there was -- again,  
14           there was the -- there was obviously some  
15           circumstances, and again, it goes back to --  
16           you know, how everybody feels about a  
17           particular individual as to what they're  
18           saying or what someone's hearing. I generally  
19           tend to discount most of that stuff. If you  
20           get involved, as you well know, that will  
21           consume your day.

22      Q     My question was really more of a general one  
23           if you recall the nature of the discussion you  
24           had with Mr. Young?

25      A     I don't. Except that I would have not engaged



1 any conversation with him that I felt was --  
2 that shouldn't be had, you know. I don't even  
3 remember if I was still -- I probably was  
4 working as an attorney for the commission at  
5 that time, or not. It could have been right  
6 after, but I would not have -- I can tell you,  
7 I would not have crossed that line, and I  
8 would have been guarded in my communications.

9 Q Did you have any conversations with Mr.  
10 Oliphant wherein he relayed to you that he was  
11 scared of Calvin Braxton or that he thought  
12 Calvin Braxton was having him followed?

13 A Mr. Oliphant says that I did; he may -- I see  
14 J.D. from time to time here in town; I don't  
15 think he and I ever talked at any of the  
16 commission meetings. I don't think he was  
17 ever -- he was ever there, and he and I could  
18 have had a phone conversation. I'll call him  
19 from time to time if I need something in my --  
20 just like you would, you know, if you're  
21 needing information. So I've had several  
22 conversations with Mr. Oliphant. I do recall,  
23 you know, when the suit was filed by Mr.  
24 Braxton, it was -- I believe, published in  
25 some type of journal here. We have an

1 internet -- anyway, we have a newspaper, and  
2 we have a, kind of, an internet deal, and I do  
3 remember, I think, in Lasyone's one morning,  
4 Mr. Oliphant and I just made very -- you know,  
5 that was the topic at that point in time.

6 Again, no -- if he -- may have just mentioned  
7 that the suit was filed, we just, kind of,  
8 shrugged it off and laughed -- you know --

9 Q He laughed about it?

10 A No. I may have said something to the effect,  
11 "Well, you know, you're getting some free  
12 press," or -- I didn't invade. I would not  
13 have said anything disrespectful to Mr.  
14 Oliphant, just the fact that, "Hey, this was  
15 published. Here we go."

16 Q Did you know anything about a Facebook posting  
17 by Mr. Oliphant?

18 A No.

19 Q Did you ever hear Mr. Oliphant making  
20 accusations that Calvin Braxton was somehow  
21 involved in a murder?

22 A I've never heard that.

23 Q Sir, could you describe for me, you know, in  
24 general terms, I know you've been in this  
25 community a long time. You know Calvin

1 Braxton; right?

2 A I do.

3 Q Would you describe for me what his reputation  
4 is?

5 A You know, it's not what I think of him, as you  
6 well know, it's what others think, and I would  
7 say that this community -- Calvin has owned a  
8 dealership here, and he's had what appears to  
9 be some success or good success in the car  
10 business. I know that he -- or understand  
11 that he's part owner of a funeral home. Never  
12 seen any document -- you know, but -- and that  
13 that funeral home was previously owned by Ben  
14 Johnson, and it appears that that has had some  
15 success. You know, beyond that, I think  
16 people in this community know that Mr. Braxton  
17 has worked hard and that he appears to have  
18 had some success in his business endeavors.

19 Q Did you hear anything about an allegation that  
20 Mr. Braxton was trying to intimidate a trooper  
21 or troopers because they gave his daughter a  
22 DWI?

23 A I did.

24 Q And what do you recall hearing about that?

25 A Well, Mr. Braxton and I just -- he raised that

1 issue with me.

2 Q What did he tell you?

3 A If he wants to -- he never hired -- in my  
4 belief he never hired me as a lawyer. He did  
5 come talk to me at that point in time, and if  
6 he wants to waive that, I'll be happy to  
7 answer the question.

8 MS. CRAFT: That's up to you Calvin.

9 MR. BRAXTON: I don't have a problem.

10 MS. CRAFT: All right.

11 A His daughter got a DWI. The arresting trooper  
12 was Trooper Linebaugh. And, you know, there  
13 was -- Calvin and I had some discussions. I  
14 think that he was of the belief that, maybe,  
15 she shouldn't have got it, at one point in  
16 time or questioned the circumstances around  
17 which she got it. I don't want to get into  
18 his belief system --

19 BY MS. CRAFT:

20 Q Sure.

21 A -- but -- so, you know, he and I had that --  
22 or he shared that with me.

23 Q Without breaching any privilege, at some point  
24 in time, you actually represented his  
25 daughter?

Taylor Townsend

1 A I would think that our -- my discussions with  
2 Calvin, and I think the one conversation or  
3 two that I had with his daughter, even though  
4 there's no formal agreement, I think it would  
5 be protected by privilege.

6 Q Yes, sir.

7 A So I would not want to discuss anything about  
8 Brandi without her waiving that.

9 Q Understood. With respect to the DWI charge,  
10 in general, I understand that that charge was  
11 not dismissed; there was a process that had  
12 been followed, like any other DWIs; is that  
13 fair to say?

14 A Well, what I'm saying now is public -- what I  
15 believe --

16 Q Yes, sir.

17 A -- would be public record. I don't believe  
18 that Brandi was ever convicted of the DWI or  
19 has a DWI conviction on her record. At that  
20 point in time, it was not uncommon in this  
21 jurisdiction for someone who received a DWI to  
22 be placed in diversion or intervention and --

23 Q And go through the process.

24 A -- and go through that process, and it is my  
25 belief that that was done in this case. And I

Taylor Townsend

1 think that that should result in a formal  
2 dismissal. I can't tell you that I ever saw a  
3 formal dismissal. I was really acting as  
4 assisting.

5 Q Yes, sir.

6 A You do that in the country sometimes.

7 Q I'm with you, and you do that in the city,  
8 too. My point is: You have no indication  
9 that Brandi Braxton was treated differently  
10 than anybody else. In other words, there was  
11 process; you understood she went through pre-  
12 trial diversion. At that time, lots of people  
13 were offered pre-trial diversion; is that  
14 right?

15 A I think at that point in time it was a very  
16 common practice here and in, for that matter,  
17 in other jurisdictions. And, you know,  
18 whether you called it "diversion" or whether  
19 you called it, the district attorney has  
20 control of the charge, and he or she can say,  
21 "Hey, if you don't get into any more trouble  
22 for six months, I'm going to dismiss this  
23 charge." You know, as well as I do, that  
24 district attorneys have the power to pretty  
25 much handle a prosecution however they see

Taylor Townsend

1 fit. I would say that her circumstances were  
2 in keeping with the norm.

3 Q Yes, sir.

4 MS. CRAFT: Anything else?

5 MR. BRAXTON: I'm fine.

6 MS. CRAFT: That's it. I told you it  
7 would be easy.

8 MR. FALCON: We need to get somebody  
9 else here then.

10 MR. OXENHANDLER: Go ahead. I'll go  
11 after you.

12 EXAMINATION BY MR. FALCON:

13 Q Taylor, just if you recall, can you tell -- we  
14 were, kind of, searching for the time frame of  
15 your involvement with the commission. Do you  
16 remember the start and finish?

17 A Floyd, one, of course, the contract should  
18 bear it out from the start because I don't  
19 believe that I would have started before the  
20 contract was approved.

21 Q Uh-huh (affirmative).

22 A It would have been at some point in time after  
23 Governor Edwards was sworn in, and I don't --  
24 these commissioners had been there, but the  
25 allegations got raised and probably within the

1 first months of him being sworn in, that's  
2 what I'm --

3 Q Which would have been in '15?

4 A Been '16.

5 Q '16?

6 A No. He got elected in '15 and sworn in in  
7 '16.

8 Q Sworn in '16 in January. So maybe the spring  
9 of --

10 A I would think so.

11 Q -- spring of '16 would have been about the  
12 start anyway?

13 A Uh-huh (affirmative).

14 Q And Jill made a reference to your making a  
15 report to the commission in open session, and  
16 as you indicated, it's recorded in some  
17 fashion. Do you have a recollection of when  
18 that was?

19 A Your recollection would be as good as mine  
20 because you probably would have been there.  
21 No. Honestly, I don't. I mean, look, I could  
22 go back and look at --

23 Q Well, we can go back and look at all the  
24 films.

25 A Yeah.



1 Q I was trying to recall -- or trying to decide  
2 which ones to go look at.

3 A I can try and see if --

4 Q No. That's all right.

5 A -- there's something on my calendar or  
6 something that will give me -- and I'll be  
7 happy to call you all and let you know to  
8 pinpoint that down.

9 Q Okay. And the last question I think I had was  
10 I recall some discussion that, at least some  
11 commission members were expecting a written  
12 report from you, and I never knew if you ever  
13 prepared one or if there was a written report.  
14 Or was it the culmination of your  
15 investigation the presentation you made on  
16 this day in the spring of 2016?

17 MS. CRAFT: '17, I think it was.

18 BY MR. FALCON:

19 Q '17.

20 A So, if I'm understanding your question, I do  
21 recall some commissioners wanting a written  
22 report. My recollection is, I did not issue a  
23 written report, but that I compiled all of my  
24 research that I had conducted and that I  
25 verbally stated to the commission and to the

1 public what the findings were and what I  
2 concluded to be the legal effects of those  
3 findings. And all that was verbal.

4 MR. FALCON: That's all I have.

5 Steven?

6 EXAMINATION BY MR. OXENHANDLER:

7 Q Good morning.

8 A Good morning.

9 Q As you know, Mr. Townsend, I represent Colonel  
10 Oliphant. I just want to ask you a couple  
11 questions about your conversation with Mr.  
12 Braxton after his daughter's arrest. I don't  
13 want to ask you any questions about your  
14 conversations with his daughter, just what  
15 he --

16 A Okay.

17 Q -- talked about with you, where he waived the  
18 privilege. And you mentioned that in your  
19 conversation that Mr. Braxton questioned the  
20 circumstances about his daughter's arrest. Do  
21 you remember when that conversation took  
22 place? And to give you some background, the  
23 arrest took place in the early morning hours  
24 of December 5th, I think, about 3:00 in the  
25 morning, or something like that.

1 MR. FALCON: Of '15?

2 BY MR. OXENHANDLER:

3 Q Of 2015; correct.

4 A I really don't. Let me say this, you know,  
5 sometimes as lawyers we get calls from, you  
6 know, when there's -- someone's arrested in  
7 the middle of the night or at 5 o'clock in the  
8 morning, and I generally take those phone  
9 calls. I don't recall it being those exigent-  
10 type circumstances. I think it was after --  
11 it would have been, as I appreciate it, well  
12 after. It wasn't like it was, you know,  
13 within 24 hours from someone calling you and  
14 they've got a problem on their hands.

15 Q Sure.

16 A I don't recall those being the circumstances,  
17 so I think it would have been several weeks or  
18 days after.

19 Q Okay. Was it only one conversation you had,  
20 or was it more than one conversation with Mr.  
21 Braxton?

22 A Oh, I would have had more than one. I don't  
23 specifically recall how many.

24 Q And when you say he "questioned," was Mr.  
25 Braxton angry about his daughter being

1 arrested?

2 A Well, I think he was -- you know, my take on  
3 -- and again, we're still under the waiver;  
4 correct?

5 MS. CRAFT: Yes.

6 THE WITNESS: Mr. Braxton?

7 MR. BRAXTON: Yes.

8 A My take on it was that he was -- this is just  
9 me reading him, is that he had two emotions at  
10 that point in time. One, he's a father, and  
11 like any father, he was not happy that his  
12 daughter had gotten arrested. And two, I  
13 think he -- and that was my characterization,  
14 questioned the circumstances of her arrest.  
15 In other words, was it a normal arrest, a  
16 proper arrest, or was there some sinister  
17 motive. That's pretty much it.

18 BY MR. OXENHANDLER:

19 Q Did Mr. Braxton express any anger towards  
20 Trooper Linebaugh that you recall?

21 A I wouldn't characterize it as anger, but it  
22 was displeasure.

23 Q Do you remember anything specifically -- and  
24 you may not, do you remember anything  
25 specifically Mr. Braxton might have said about

1 Trooper Linebaugh?

2 A I mean, no. He just wasn't happy about it.

3 Q And were those the -- any other further  
4 conversations, can you recall any of the  
5 details that you had with Mr. Braxton about  
6 the circumstances of his daughter's arrest?

7 A No. I think that -- I think he questioned the  
8 circumstances of Trooper Linebaugh. I know  
9 that he told me, at some point in time, he had  
10 a conversation with Trooper Oliphant, and I  
11 know that he wasn't happy with his daughter.  
12 And I say that; it's just my take on --

13 Q Do you remember what, if anything that you can  
14 recall, Mr. Braxton told you about his  
15 conversation with Colonel Oliphant?

16 A As I understood it, the purpose of that call  
17 was for his inquiry as -- you know, he's  
18 curious as to the circumstances surrounding  
19 the stop and the arrest by Trooper Linebaugh  
20 so that he called Trooper Oliphant, I guess,  
21 to inquire or to question, you know, what's  
22 going on. What happened? Why did it happen?  
23 Things of that nature.

24 Q Okay. Anything else specifically you can  
25 remember other than what you told me so far?

Taylor Townsend

1 A Uh-uh (negative). No. I'm sorry.

2 Q Thank you, sir. That's all the questions I  
3 have.

4 RE-EXAMINATION BY MS. CRAFT:

5 Q Just a quick follow-up. I, like you, get the  
6 4 o'clock in the morning phone calls. The  
7 questions that you expressed by Mr. Braxton as  
8 a father of somebody who's been arrested,  
9 would you characterize those as fairly normal,  
10 "I'm pissed at my kid for getting it, and I  
11 want to know what happened."

12 A Yeah.

13 Q That's all I have. Thank you, sir.

14 (DEPOSITION CONCLUDED AT 9:37 A.M.)

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Taylor Townsend

1 C E R T I F I C A T E

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

5 I, ROBIN HOLLOWAY, Certified Court  
6 Reporter, in and for the State of Louisiana, as  
7 the officer before whom, T. TAYLOR TOWNSEND, after  
8 having been duly sworn by me upon authority of  
9 R.S. 37:2554, did testify as hereinbefore set  
10 forth in the foregoing 30 pages; that this  
11 testimony was reported by me in the stenomask  
12 reporting method, was prepared and transcribed by  
13 me or under my personal direction and supervision,  
14 and is a true and correct transcript to the best  
15 of my ability and understanding; that the  
16 transcript has been prepared in compliance with  
17 transcript format guidelines required by statute  
18 or by rules of the board; and that I am informed  
19 about the complete arrangement, financial or  
20 otherwise, with the person or entity making  
21 arrangements for deposition services; that I have  
22 acted in compliance with the prohibition on  
23 contractual relationships, as defined by Louisiana  
24 Code of Civil Procedure Article 1434 and in rules  
25 and advisory opinions of the board; that I have no

1 actual knowledge of any prohibited employment or  
 2 contractual relationship, direct or indirect,  
 3 between a court reporting firm and any party  
 4 litigant in this matter nor is there any such  
 5 relationship between myself and a party litigant  
 6 in this matter. I am not related to counsel or to  
 7 the parties herein, nor am I otherwise interested  
 8 in the outcome of this matter.

9 IN WITNESS WHEREOF, I have hereunto  
 10 affixed my signature at Shreveport, Louisiana,  
 11 this the 6th day of July, 2019.

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Robi n Hol l oway, CCR #23037