

STATE OF LOUISIANA  
PARISH OF NATCHITOCHES  
10TH JUDICIAL DISTRICT COURT

CALVIN W. BRAXTON, SR.           \*  
VERSUS                               \*     DOCKET NO.: C-90,284  
LOUISIANA STATE TROOPERS       \*  
ASSOCIATION AND JAY  
OLIPHANT                           \*  
\* \* \* \* \*

The deposition of JASON TURNER, taken in connection with the captioned cause, pursuant to the following stipulations before Kim Taylor, Certified Court Reporter, at the Law Offices of McCoy, Roberts & Begnaud, 300 St. Denis Street, Natchitoches, Louisiana, on the 2nd day of October 2020, beginning at 9:01 a.m.

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LT. MAJOR JAY OLIPHANT  
CALVIN BRAXTON, SR.

3

S T I P U L A T I O N

1 It is hereby stipulated by and among counsel  
2 for plaintiff and counsel for defense that the  
3 deposition of  
4  
5 JASON TURNER,  
6 be taken before Kim Taylor, Certified Court  
7 Reporter, by counsel for the plaintiff for all  
8 purposes, pursuant to notice and to the provisions  
9 of the appropriate statutes of the Code of Civil  
10 Procedure of the State of Louisiana.  
11 The parties hereto waive all formalities in  
12 connection with the taking of said deposition,  
13 except the reading and signing thereof, the swearing  
14 of the witness, and the reduction of the questions  
15 and answers to typewriting.  
16 Per Article 1443(D) of the Louisiana Code of  
17 Civil Procedure, counsel for all parties reserve all  
18 objections until trial or other use of the  
19 deposition.  
20 \* \* \*  
21  
22  
23  
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5

JASON TURNER,

1 after having been duly sworn, was examined and did  
2 testify as follows:  
3 EXAMINATION BY MS. CRAFT:  
4 **5 Q Mr. Turner, my name is Jill Craft, and I**  
5 **6 represent Mr. Braxton seated to my left in**  
6 **7 connection with a lawsuit that's pending here**  
7 **8 in Natchitoches Parish. It's very important**  
8 **9 during the course of this deposition that you**  
9 **10 understand what I'm asking you, and if at any**  
10 **11 time you do not, please tell me to stop and**  
11 **12 rephrase it.**  
12 **13 It's also important nods of the head "yes"**  
13 **14 or "no" cannot be taken down by our reporter,**  
14 **15 so you need to make sure to answer out loud.**  
15 **16 And my final instruction is rather unique to me**  
16 **17 insofar as I may ask you to spell names,**  
17 **18 places, or things. I'm not here to test your**  
18 **19 spelling. It's just much easier for our court**  
19 **20 reporter to get those spellings down as we go**  
20 **21 along than to try to figure out later who we**  
21 **22 were talking about. If that fair enough?**  
22 **23 A Sure.**  
23 **24 Q Would you give me your full name and address,**  
24 **25 please, sir?**

<p style="text-align: right;">6</p> <p>1 A Captain Jason Turner, Louisiana State Police, 2 4185 Viking Drive, Bossier City, Louisiana 3 71111. 4 Q <b>Would you walk me through your educational 5 background, sir, starting with where and when 6 you graduated high school, please, sir?</b> 7 A Haughton High School -- 8 Q <b>I'm sorry, what was it?</b> 9 A Haughton High School, 1988. 10 Q <b>Haughton, H-a-u-g-h-t-o-n?</b> 11 A G-h-t-o-n, yes. 12 Q <b>Uh-huh. 1988?</b> 13 A Yes. 14 Q <b>And then?</b> 15 A I eventually graduated from LSUS with a 16 Bachelor's Degree. I think it was 2001, 2003, 17 somewhere along there. It's been a while. 18 Q <b>Anything else?</b> 19 A That's it. 20 Q <b>What's your Bachelor's Degree in?</b> 21 A Psychology. 22 Q <b>I know you are currently with the state police. 23 I wanted to ask you, when did you first enter 24 law enforcement?</b> 25 A In 1997.</p>	<p style="text-align: right;">7</p> <p>1 Q <b>And that was with which agency?</b> 2 A The state police. 3 Q <b>Which academy did you attend?</b> 4 A Class 75, State Police Academy. 5 Q <b>In Baton Rouge?</b> 6 A Yes. 7 Q <b>So tell me what you did between '88 and '97.</b> 8 A I was in the military. 9 Q <b>Which branch?</b> 10 A United States Army and the Louisiana National 11 Guard. 12 Q <b>And were you on active duty?</b> 13 A For a period of time, I was. 14 Q <b>And when was that?</b> 15 A 1988 to -- for approximately a little less than 16 four years. 17 Q <b>So about '91, '92?</b> 18 A Yes. 19 Q <b>And then what did you do after that?</b> 20 A I was active duty National Guard. 21 Q <b>Were you deployed anywhere, sir?</b> 22 A No. 23 Q <b>And when you say you were active duty National 24 Guard, that was on a full-time basis?</b> 25 A Correct. Yes.</p>
<p style="text-align: right;">8</p> <p>1 Q <b>While you were in the Army, were you deployed 2 anywhere?</b> 3 A I mean, I was assigned to Europe, but I was not 4 -- no combat deployments. 5 Q <b>So where were your duty stations in Europe?</b> 6 A Kitzingen, Germany. 7 Q <b>Spell that, please.</b> 8 A K-i-t-g-i-n -- K-i-t-i-n-g-e-n [sic], Germany. 9 Q <b>And what was your job duties or functions when 10 you were in the military?</b> 11 A I was an infantryman. 12 Q <b>And after you left the National Guard, which 13 was, what, '97, '96?</b> 14 A Yeah, '97. 15 Q <b>You went directly into the State Police 16 Academy?</b> 17 A Correct. There was a little bit of overlap 18 before I went, which when I started with the 19 state police, I went off of regular or active 20 duty Guard orders and went to weekend Guard 21 orders. And then I eventually left the Guard, 22 ETS. 23 Q <b>So tell me why you decided to go the state 24 police.</b> 25 A My brother was a state trooper. Police work</p>	<p style="text-align: right;">9</p> <p>1 interested me, and I just thought the 2 profession would fit me well. 3 Q <b>And so tell me -- you graduated from the 4 academy some time in '97, right? Thirteen 5 weeks; is that right?</b> 6 A That sounds correct, yes. 7 Q <b>And then --</b> 8 A Maybe 15 weeks. 9 Q <b>And then what did you do?</b> 10 A I went to the FTO program at Troop G. 11 Q <b>Troop G is where?</b> 12 A Bossier City. 13 Q <b>And who were your field training officers?</b> 14 A Doug Pike. 15 Q <b>Pike, P-i-k-e?</b> 16 A P-i-k-e. I had quite a few. Jason Parker, 17 Michael Wilkerson, Gary Bridges. I would say 18 those four were primary -- the primary ones. 19 Q <b>Parker, Wilkerson, and Bridges are spelled the 20 way they sound; is that right?</b> 21 A Yes. 22 Q <b>And so after completing the field training 23 office program, what did you do next?</b> 24 A I started working patrol at Troop G. 25 Q <b>Did you have a particular area assignment?</b></p>

<p style="text-align: right;">10</p> <p>1 A No, just the Troop G area.  <b>2 Q And how long did you remain in patrol?</b>  3 A Four and a half years.  <b>4 Q Who was your supervisor?</b>  5 A I had quite a few over four and a half years.  <b>6 Q Walk me up the chain of command, sir.</b>  7 A When I started, Henry Whitehorn was the  8 captain.  <b>9 Q Who?</b>  10 A Henry Whitehorn.  <b>11 Q And that's white and horn for the court  12 reporter's spelling?</b>  13 A Correct. The lieutenant was -- I had several  14 different lieutenants, Charlie Webb.  <b>15 Q W-e-b-b?</b>  16 A Correct. James Pierrelee.  <b>17 Q James what?</b>  18 A Pierrelee, P-i-e-r-r-e-l-e-e.  <b>19 Q Okay.</b>  20 A William Douglas. And I don't recall the fourth  21 lieutenant.  <b>22 Q And you did report through the chain -- through  23 a sergeant; is that correct?</b>  24 A Yes, I had quite a few sergeants and --  <b>25 Q Were you assigned a particular shift?</b></p>	<p style="text-align: right;">11</p> <p>1 A Well, at a minimum, you would change every  2 year, shifts.  <b>3 Q So can you tell me some of the sergeants you do  4 remember being in your chain of command while  5 you were a trooper?</b>  6 A Sure. R.P. Johnson.  <b>7 Q And Johnson is regular way, s-o-n?</b>  8 A Yes. Don Campbell.  <b>9 Q Don Campbell?</b>  10 A Yes. C-a-m-b -- p-b-e-l-l. Jimmy Courtney.  <b>11 Q Courtney, C-o-u-r-t-n-e-y?</b>  12 A Correct. Correct.  <b>13 Q Okay.</b>  14 A And to be honest, that's so long ago. That's  15 20 years ago. That's the best I can recall.  <b>16 Q So you did patrol for four and a half years.  17 You held the rank of Trooper; is that right?</b>  18 A Yes.  <b>19 Q And what's the next rank that you held?</b>  20 A Trooper First Class.  <b>21 Q And when did you achieve that rank?</b>  22 A At five years.  <b>23 Q And were you still at Troop G?</b>  24 A Around the five-year mark, I went to  25 investigations in the gaming section.</p>
<p style="text-align: right;">12</p> <p><b>1 Q So were you relocated to Baton Rouge, or did  2 you --</b>  3 A No, not --  <b>4 Q -- provide that -- let me finish. Or just  5 supervised out of Baton Rouge?</b>  6 A Supervised out of Baton Rouge.  <b>7 Q And so your area would have been  8 Shreveport/Bossier casinos, truck stops, or  9 whatever?</b>  10 A Correct.  <b>11 Q And who was your immediate supervisor in  12 gaming?</b>  13 A Joe Ingram.  <b>14 Q Joe Ingram?</b>  15 A Ingram.  <b>16 Q How is that spelled?</b>  17 A I-n-g-r-a-m.  <b>18 Q Okay.</b>  19 A The lieutenant was Lee Cavanaugh.  <b>20 Q Cavanaugh, C-a-v-a-n-a-u-g-h?</b>  21 A Yes.  <b>22 Q Mr. Ingram was a sergeant?</b>  23 A Sergeant, correct.  <b>24 Q And who was above Mr. Cavanaugh in the chain?</b>  25 A I can see his face. I can't remember his name.</p>	<p style="text-align: right;">13</p> <p><b>1 Q Do you remember what rank he held?</b>  2 A He was a captain.  <b>3 Q Was he a captain in Baton Rouge?</b>  4 A In Baton Rouge, correct. And I had very little  5 interaction. He was eventually a lieutenant  6 colonel, and I can't remember his name.  <b>7 Q Stanley Griffin?</b>  8 A No, Stanley was before my time.  <b>9 Q And so how long did you remain in gaming  10 investigations?</b>  11 A About a year.  <b>12 Q And then where did you go?</b>  13 A I went to the criminal intelligence unit.  <b>14 Q And where is that located?</b>  15 A In the same area.  <b>16 Q And tell me what the criminal intelligence unit  17 does or did.</b>  18 A Terrorism and counter-terrorism-type  19 investigations primarily, and of course, that  20 was all shortly around 9/11. Organized crime,  21 gangs, things along those lines.  <b>22 Q Domestic terrorism; is that right?</b>  23 A Domestic, yes. International.  <b>24 Q And so what was your job in the criminal  25 intelligence unit?</b></p>

14

1 A To investigate those type -- those cases  
 2 related to those types of crimes.  
**3 Q And can you tell me how long you remained in**  
**4 the criminal intelligence unit?**  
 5 A Total as a trooper, sergeant, lieutenant  
 6 probably 15 years.  
**7 Q And was that all up in North Louisiana?**  
 8 A Primarily. When I got promoted to Sergeant, I  
 9 picked up the Monroe area. And when I was  
 10 promoted to lieutenant, I picked up the  
 11 Alexandria area also.  
**12 Q So when were you promoted to sergeant?**  
 13 A 2010.  
**14 Q And when were you promoted to lieutenant?**  
 15 A 2016, roughly.  
**16 Q And after the criminal intelligence unit, where**  
**17 did you go?**  
 18 A I spent a year -- there was a little bit of  
 19 overlap. I got promoted as lieutenant into  
 20 insurance fraud for about a year. And then I  
 21 -- after about a year, I went back to the  
 22 criminal intelligence unit as a lieutenant.  
**23 Q And then what did you do?**  
 24 A I stayed with the criminal intelligence unit  
 25 until I was promoted to Region 3 CID.

15

**1 Q And what is Region 3 CID for the record?**  
 2 A It's the detective unit, the narcotics unit,  
 3 and the insurance fraud auto theft unit for  
 4 central and north Louisiana.  
**5 Q And so what year did you become the Region 3, I**  
**6 guess it's CID --**  
 7 A CID --  
**8 Q -- head?**  
 9 A -- captain.  
**10 Q When did that happen?**  
 11 A April of 2018.  
**12 Q So prior to April of 2018, what exactly were**  
**13 you doing?**  
 14 A I was in the criminal intelligence unit.  
**15 Q As a lieutenant?**  
 16 A As a lieutenant, correct.  
**17 Q And to whom did you report prior to you**  
**18 becoming the captain over Region 3 CID?**  
 19 A Captain Chuck McNeal.  
**20 Q Spell that for me, please?**  
 21 A M-c-N-e-a-l.  
**22 Q And what happened to Captain McNeal in April of**  
**23 2018?**  
 24 A He stayed as the captain over the investigative  
 25 support section, which is part of the CID.

16

**1 Q So did he then report to you, or how did that**  
**2 work?**  
 3 A No, I was promoted to another unit as a  
 4 captain.  
**5 Q Which was the CID?**  
 6 A Yes. He stayed in his current rank for a  
 7 period of time and unit, and I was promoted to  
 8 captain in another unit.  
**9 Q In another unit, the CID?**  
 10 A Correct.  
**11 Q So what's the difference between investigative**  
**12 support unit and CID?**  
 13 A The ISS, investigative support unit, is CIU.  
 14 The fusion center and the --  
**15 Q Fusion center?**  
 16 A Yes. LASAFE.  
**17 Q What's that? LASAFE, L-A-S-A-F-E?**  
 18 A Yes.  
**19 Q What's a fusion center?**  
 20 A Each state has a fusion center. It's the hub  
 21 for really law enforcement to gather in the  
 22 distribution of intelligence and information of  
 23 crimes.  
**24 Q And then what's LASAFE?**  
 25 A That's actually the name of the fusion center.

17

**1 Q So that's what investigative support services**  
**2 does. How is that different from CID?**  
 3 A Well, one is intelligence. One works with raw  
 4 information, and one is criminal  
 5 investigations, which CID is criminal  
 6 investigations. So, for instance, my detective  
 7 unit primarily works major crimes.  
**8 Q Had you ever worked a homicide before, sir?**  
 9 A Me personally?  
**10 Q Yes.**  
 11 A No.  
**12 Q When you were in the CIU as a lieutenant, did**  
**13 you ever supervise anyone who worked a**  
**14 homicide?**  
 15 A No, we did not work homicides.  
**16 Q And is that true -- and you're in the current**  
**17 position, Region 3 CID. Is that what you have**  
**18 now?**  
 19 A Yes.  
**20 Q And is that true now, you do not supervise**  
**21 anyone who has worked a homicide?**  
 22 A No, I supervise a lot of homicides.  
**23 Q As of April of 2018?**  
 24 A Yes.  
**25 Q And that's because you picked that up by taking**

<p style="text-align: right;">18</p> <p><b>1</b> over the region; is that right?</p> <p>2 A Correct.</p> <p><b>3 Q</b> Can you tell me what conversations, if any, you</p> <p><b>4</b> had with Mr. Oliphant regarding Mr. Braxton?</p> <p>5 A In March of 2018, Captain McNeal called me and</p> <p>6 told me to contact Colonel Oliphant, who was</p> <p>7 then Major Oliphant in patrol, and that he had</p> <p>8 some concerns that he needed us to look at.</p> <p><b>9 Q</b> Did Captain McNeal tell you how he had learned</p> <p><b>10</b> about this situation or these concerns?</p> <p>11 A No, he did not tell me.</p> <p><b>12 Q</b> Did Captain McNeal tell you that Mr. Oliphant</p> <p><b>13</b> had contacted him?</p> <p>14 A He didn't explain. He just said, look, this is</p> <p>15 what I'll need you to investigate. I need you</p> <p>16 to investigate.</p> <p><b>17 Q</b> So in March of 2018, you were a lieutenant in</p> <p><b>18</b> CIU; is that correct?</p> <p>19 A Correct.</p> <p><b>20 Q</b> And can you tell me as of March of 2018, had</p> <p><b>21</b> you ever heard anything about Calvin Braxton?</p> <p>22 A Officially, no.</p> <p><b>23 Q</b> I'm not asking either way.</p> <p>24 A Had I ever heard of him? Yes, I knew he was on</p> <p>25 the State Police Commission.</p>	<p style="text-align: right;">19</p> <p><b>1 Q</b> And how did you know that?</p> <p>2 A I was previously on the State Police</p> <p>3 Commission, so I just -- I followed it. I</p> <p>4 think there was a youtube channel that I would</p> <p>5 occasionally watch.</p> <p><b>6 Q</b> Are you a member of the LSTA --</p> <p>7 A Yes.</p> <p><b>8 Q</b> -- the State Troopers Association?</p> <p>9 A Yes.</p> <p><b>10 Q</b> And how long have you been a member?</p> <p>11 A Since 1997.</p> <p><b>12 Q</b> Have you ever held any leadership positions?</p> <p>13 A Yeah, I was the secretary/treasurer for several</p> <p>14 years when I was a trooper for my local</p> <p>15 affiliate, the Troop G affiliate, not the</p> <p>16 statewide.</p> <p><b>17 Q</b> Am I right that if you're a president of a</p> <p><b>18</b> local affiliate, you serve on the Board for the</p> <p><b>19</b> LSTA?</p> <p>20 A That's my understanding, correct.</p> <p><b>21 Q</b> Did you ever serve on the Board?</p> <p>22 A No.</p> <p><b>23 Q</b> So can you tell me have you ever served on any</p> <p><b>24</b> committees for LSTA?</p> <p>25 A No.</p>
<p style="text-align: right;">20</p> <p><b>1 Q</b> And in your region now, I guess, who are the</p> <p><b>2</b> representatives to the LSTA Board?</p> <p>3 A Chris Perry is the current president.</p> <p><b>4 Q</b> Perry, P-e-r-r-y?</p> <p>5 A Correct.</p> <p><b>6 Q</b> He's the president of?</p> <p>7 A For G area.</p> <p><b>8 Q</b> So that means he serves on the LSTA Board?</p> <p>9 A Yes.</p> <p><b>10 Q</b> How about before him?</p> <p>11 A Hack Willis.</p> <p><b>12 Q</b> Hack, H-a-c-k, Willis?</p> <p>13 A Uh-huh, W-i-l-l-i-s.</p> <p><b>14 Q</b> Is that Hack Lee Willis?</p> <p>15 A Yes, Hack Lee.</p> <p><b>16 Q</b> And how long did he serve on the LSTA Board?</p> <p>17 A Quite a few years. I'm not sure of the number</p> <p>18 of years.</p> <p><b>19 Q</b> And do you remember who was before him?</p> <p>20 A I do not.</p> <p><b>21 Q</b> So when you received this call from Mr. McNeal,</p> <p><b>22</b> have you told me everything you recall about</p> <p><b>23</b> him instructing you?</p> <p>24 A To the best of my recollection, correct.</p> <p><b>25 Q</b> And his instruction to you was to contact Major</p>	<p style="text-align: right;">21</p> <p><b>1</b> Oliphant in patrol?</p> <p>2 A Yes.</p> <p><b>3 Q</b> And did he, at that time, tell you what you</p> <p><b>4</b> were supposed to contact Mr. Oliphant about?</p> <p>5 A I don't remember if he specifically told me</p> <p>6 then. At some point, I got Major Oliphant's</p> <p>7 instant report, and I don't know if that was</p> <p>8 sent to me then or if Major Oliphant actually</p> <p>9 gave me a copy. It was briefly that he had</p> <p>10 some concerns about his personal safety.</p> <p><b>11 Q</b> So that's a couple of things we need to unpack.</p> <p><b>12</b> You said there was some sort of incident</p> <p><b>13</b> report; is that correct?</p> <p>14 A Correct.</p> <p><b>15 Q</b> And you said you got it from somewhere; is that</p> <p><b>16</b> correct?</p> <p>17 A Correct.</p> <p><b>18 Q</b> And you don't recall from where you received</p> <p><b>19</b> it?</p> <p>20 A Not specifically. I don't remember if it was</p> <p>21 from Captain McNeal or Major Oliphant.</p> <p><b>22 Q</b> At that time, you were a lieutenant; is that</p> <p><b>23</b> correct?</p> <p>24 A Correct.</p> <p><b>25 Q</b> And so am I correct that Major Oliphant would</p>

22

**1 have been above you in the chain of command?**  
 2 A He was not at all in my chain of command, but  
 3 yes, he was a major and I was a lieutenant, so  
 4 yes.  
**5 Q In terms of rank structure --**  
 6 A Sure.  
**7 Q -- he certainly was above you?**  
 8 A Absolutely.  
**9 Q And so I'm clear, when we talk about somebody**  
**10 being above you in rank structure, whether**  
**11 they're on your chain of command or not, state**  
**12 police policy requires that you abide by a**  
**13 directive given by an officer of higher rank**  
**14 regardless of whether he's in your chain; is**  
**15 that right?**  
 16 A Lawful directive, correct.  
**17 Q So at that time, your captain, he would have**  
**18 been over or under Mr. Oliphant in the rank**  
**19 structure?**  
 20 A He would be under in the rank structure. He  
 21 was a captain, which is under a major.  
**22 Q And do you know if he had any reporting**  
**23 responsibilities through the chain of command**  
**24 through Mr. Oliphant?**  
 25 A He did not.

24

1 A Yes.  
**2 Q And you drove to Alexandria, and you met with**  
**3 Mr. Oliphant in his office, a person of**  
**4 superior rank to you; is that right?**  
 5 A Correct.  
**6 Q And you said, "He explained to me his**  
**7 concerns." I need you to tell me what he told**  
**8 you his concerns were, sir.**  
 9 A It's been two and a half years ago, but I did  
 10 review the incident report recently. And it --  
 11 from the incident report and from our  
 12 conversation, which my recollection were -- it  
 13 was congruent, so no -- that he had received  
 14 calls that somebody was following him.  
**15 Q He had received calls somebody was following**  
**16 him?**  
 17 A Calls from persons that he felt were credible.  
 18 And on a specific date, he noticed a car  
 19 surveilling his house or he believed they were  
 20 watching his house. And it was about the time  
 21 his young son was getting off the school bus  
 22 and caused him concern.  
**23 Q Anything else?**  
 24 A He also talked about a -- and he brought up  
 25 that Mr. Braxton was possibly involved.

23

**1 Q But again, the rule would apply? If he**  
**2 received a contact from somebody in the rank of**  
**3 major to a captain, he was required to abide by**  
**4 the directive; is that right?**  
 5 A By lawful directive. Correct.  
**6 Q And so did you and Mr. McNeal have any**  
**7 discussions at all about the content of what**  
**8 you were supposed to be doing theoretically?**  
 9 A He assigned it to me and asked me to look into  
 10 or investigate or determine if it warranted an  
 11 investigation and told me to report back to him  
 12 when I had my findings.  
**13 Q What were you supposed to be investigating?**  
 14 A Then Major Oliphant's concerns about his  
 15 personal safety.  
**16 Q Tell me the first communication you had with**  
**17 Mr. Oliphant about Mr. Braxton, please.**  
 18 A I drove to Region 3 in Alexandria, and we had a  
 19 meeting in his office. And he explained to me  
 20 his concerns and his -- for his safety and his  
 21 family's safety.  
**22 Q Let me unpack that. You drove in your state**  
**23 police unit?**  
 24 A Yes.  
**25 Q Paid for by taxpayer dollars?**

25

**1 Q In a murder?**  
 2 A Well, I was getting to that.  
**3 Q Yeah.**  
 4 A He didn't say that he was involved in a murder.  
 5 He said, look, there's rumors of a suspicious  
 6 death that occurred in Shreveport, and that  
 7 coupled with the information that I received  
 8 and the information that -- when I say "I" he  
 9 received, coupled with information he received  
 10 from the people he received credible, and he'd  
 11 seen a car watching his house.  
 12 And matter of fact, he even got the license  
 13 plate, and he believed those people were  
 14 associated with Mr. Braxton. I don't know if  
 15 they're related, business, or what. He was  
 16 concerned, and he mentioned all that together.  
 17 He said there's been rumors that Mr. Braxton  
 18 may have been involved in a suspicious death  
 19 that occurred in the Shreveport area.  
**20 Q Did you ever figure out when this alleged**  
**21 suspicious death occurred?**  
 22 A Yes.  
**23 Q Like 25 years earlier?**  
 24 A Yes.  
**25 Q Uh-huh. And so did you ask Mr. Oliphant, gee,**

26

1 how long have you had this suspicion of this  
 2 death which occurred 25 years ago may have in  
 3 some way been involved with Mr. Braxton?  
 4 A No, I did not.  
 5 Q Here's what I'm asking. I don't pretend to  
 6 know what you know as a detective. I don't  
 7 even try. I do, however, watch a lot of TV,  
 8 which is probably a very bad thing. My concern  
 9 is you have a major with the state police who  
 10 tells you there's some suspicious death in  
 11 which he thinks my client, Mr. Braxton, a  
 12 business man in this community, is involved  
 13 that occurred 25 years ago. Did you ever think  
 14 as an investigator to ask Mr. Oliphant, what  
 15 have you done for the last 25 years?  
 16 MR. FALCON:  
 17 Object to the form.  
 18 MS. CRAFT:  
 19 Q You can answer it. Go ahead.  
 20 A Well, Mr. Oliphant -- Major Oliphant at the  
 21 time was not a detective. He -- a patrol -- no  
 22 matter what your rank, you don't investigate  
 23 homicides. And I think his statement was he  
 24 felt like there was rumors that it wasn't  
 25 properly investigated.

28

1 A It would --  
 2 MS. CRAFT:  
 3 Q Go ahead. You can answer it.  
 4 A Yes, it would surprise me.  
 5 Q Wouldn't you have expected Mr. Oliphant to at  
 6 some point in time relay to you, hey, I asked  
 7 you to look into this, quote, suspicious death  
 8 from two and a half decades earlier. And by  
 9 the way, it's a guy that's suing me? Wouldn't  
 10 you have expected him at some point to share  
 11 that information with you?  
 12 A If he, in fact, knew that information, yeah, I  
 13 would expect that to be shared with me,  
 14 correct.  
 15 Q Now, sir, you said that at some point you saw  
 16 the report that Mr. Oliphant had prepared.  
 17 That's Exhibit 20. Do you have that? I've got  
 18 this one. I'm going to reach across the table.  
 19 But I was hoping perhaps you could share with  
 20 Mr. Mayeaux. You said Exhibit 20, sir, which  
 21 it consists of three pages. The first is an  
 22 email dated March 2, 2018 from Jay Oliphant to  
 23 David Staton, S-t-a-t-o-n, a copy to Kevin Reid  
 24 who is the current superintendent of state  
 25 police, and Mike Noel, N-o-e-l. Did you ever

27

1 And since, coupling all those things that I  
 2 previously mentioned together, it had become a  
 3 concern to him that he felt like it should be  
 4 at least looked at. As you know, there's no  
 5 statute of limitations on a homicide. So  
 6 that's -- he asked us -- and to be honest, I  
 7 would be concerned too if there's rumors  
 8 somebody is involved in a homicide, and I  
 9 believe that they're watching my house with my  
 10 small children. I would be concerned.  
 11 Q Let me ask you something, sir. When you had  
 12 the first conversation with Mr. Oliphant,  
 13 didn't he tell you that he knew Mr. Braxton was  
 14 about to sue him?  
 15 A No, he did not.  
 16 Q When did you find out that Mr. Braxton had sued  
 17 him?  
 18 A When did I find out that he sued him? Probably  
 19 a year, two years later. I don't know.  
 20 Q Would it surprise you that he was sued right  
 21 around the same time as he's calling you and  
 22 having a conversation with you about these  
 23 alleged rumors involving my client?  
 24 MR. FALCON:  
 25 Object to the form.

29

1 receive this email on the first page, sir?  
 2 A No.  
 3 Q The second two page appears to be a report  
 4 prepared -- well, I don't know when it was  
 5 prepared. It has a date of March 2, 2018 in  
 6 the bottom, right-hand corner. Do you see  
 7 that?  
 8 A Correct.  
 9 Q Is this the report that you were provided by  
 10 Mr. Oliphant and/or somebody else in the state  
 11 police?  
 12 A Correct.  
 13 Q And sitting here, you don't know exactly who  
 14 was the first source of the report; is that  
 15 correct?  
 16 A I do not recall.  
 17 Q But you certainly do know that you received a  
 18 copy from Mr. Oliphant; is that correct?  
 19 A I believe that's correct.  
 20 Q Now, I wanted to ask you from a law enforcement  
 21 standpoint, I know as of this time we're  
 22 speaking about, which is March of 2018, you had  
 23 never investigated a homicide, nor had you  
 24 supervised anyone who investigated a homicide.  
 25 But you do know something, do you not, about



30

1 **credible sources, informants; am I right?**  
 2 A Correct.  
 3 **Q And am I correct that in order for you, for**  
 4 **example, to go get a warrant on somebody**  
 5 **relying on an informant, you have to actually**  
 6 **verify to the judge that you have had prior**  
 7 **dealings with this informant, and they have**  
 8 **proven themselves to be credible; is that**  
 9 **right?**  
 10 A Right.  
 11 **Q So tell me what inquiries you made of Mr.**  
 12 **Oliphant when he told you -- I wrote it down.**  
 13 **Let me make sure I'm right. Somebody -- he had**  
 14 **received calls that somebody was following him**  
 15 **from a credible source. What inquiries did**  
 16 **you make of Mr. Oliphant about that?**  
 17 A Whether or not that information was credible?  
 18 **Q Yes, sir, just like a judge would if you**  
 19 **submitted a warrant for you to go investigate**  
 20 **Mr. Braxton.**  
 21 A I know Colonel Oliphant from working around  
 22 him. I've never worked directly for him, that  
 23 he's very honest, and he has a reputation for  
 24 honesty. And I think on face value I take his  
 25 word to be honest. And unless I've got

32

1 **an investigation of Calvin Braxton? Do I have**  
 2 **that right?**  
 3 A I didn't start an investigation of Calvin  
 4 Braxton.  
 5 **Q What exactly were you investigating, his claims**  
 6 **that somebody followed him?**  
 7 A Yes.  
 8 **Q His claims that he received calls from unknown**  
 9 **people that he deemed credible that he was**  
 10 **being followed, that's what you were**  
 11 **investigating?**  
 12 A Unknown people to me. I assume they're not --  
 13 they're known to him, correct.  
 14 **Q But how exactly were you going to investigate**  
 15 **who was following him if you didn't know the**  
 16 **source of the information that he was being**  
 17 **followed?**  
 18 A Before I went down that road, the first thing I  
 19 want to do is conduct a preliminary  
 20 investigation to determine if a crime, a  
 21 potential crime, had occurred.  
 22 **Q So who were you investigating for this**  
 23 **potential crime?**  
 24 A Potentially anybody who was -- and the statute  
 25 I look at was stalking. Potentially anybody

31

1 information showing something different, I  
 2 believe information coming from Colonel  
 3 Oliphant is credible.  
 4 **Q So did you ask him who the source was?**  
 5 A The people calling?  
 6 **Q Yeah.**  
 7 A No, I did not.  
 8 **Q Well, weren't you supposed to be --**  
 9 A Because --  
 10 **Q Let me finish. Weren't you supposed to be**  
 11 **investigating this?**  
 12 MR. FALCON:  
 13 Let him finish his answer, please,  
 14 counsel.  
 15 MS. CRAFT:  
 16 I'm sorry, I thought he was finished.  
 17 MS. CRAFT:  
 18 **Q Go ahead, sir.**  
 19 A I didn't ask him because I was going to start  
 20 an investigation, and when it got -- if and  
 21 when it got to that point, I would find out who  
 22 those people were. But at that point, those  
 23 rumors, second and third-hand information, are  
 24 not relevant to an investigation.  
 25 **Q But they were sufficient in your mind to start**

33

1 that could be potentially stalking him or for  
 2 another purpose.  
 3 **Q Well, you don't just run out and investigate**  
 4 **stalking in general; am I correct? You**  
 5 **actually have a target. So who was your**  
 6 **target?**  
 7 A It could have potentially been Mr. Braxton.  
 8 There was enough -- matter of fact, I would say  
 9 at that point it wasn't even Mr. Braxton. It  
 10 was whoever that license plate came back to,  
 11 which I think is Friedman.  
 12 **Q F-r-i-e-d-m-a-n. You mean Mr. Gregory**  
 13 **Friedman, a lawyer in this community, that's**  
 14 **who your target was, sir?**  
 15 A He was never --  
 16 MR. FALCON:  
 17 Object to the form.  
 18 MS. CRAFT:  
 19 **Q Excuse me. Go ahead.**  
 20 A He was never a target because when I went back  
 21 and I researched the statute, I determined  
 22 there wasn't a criminal predicate there. So at  
 23 that point with no crime being committed, I  
 24 didn't investigate that further.  
 25 **Q I'm confused. You said you looked at this**

34

1 report. You talked to Mr. Oliphant. You  
 2 talked to Mr. McNeal. Your investigation was  
 3 one of stalking. I asked you if there was a  
 4 target. You said it could have potentially  
 5 been Mr. Braxton, but that wasn't the vehicle.  
 6 It was the Friedman people.  
 7 Then I asked you, "You mean Mr. Gregory  
 8 Friedman, a prominent lawyer --" I didn't say  
 9 prominent. That's my word. "Lawyer here in  
 10 Natchitoches?" And you said, "No, I went back  
 11 and researched the statute, and I determined  
 12 there wasn't a crime." Do I have that right?  
 13 A Correct.  
 14 Q And when you say you went back and researched  
 15 the statute, what exactly do you mean? You  
 16 read it?  
 17 A I read the statute, yeah.  
 18 Q You hadn't read it when you were considering  
 19 the possibility of investigating, among others,  
 20 my client, but a lawyer in this community for  
 21 stalking?  
 22 MR. FALCON:  
 23 Object to the form.  
 24 MS. CRAFT:  
 25 Q You didn't read it, the statute, sir. You can

36

1 was true, is it not, in your discussion with  
 2 Mr. Oliphant, his target was Calvin Braxton,  
 3 right?  
 4 A I think Mr. Braxton was one of the persons he  
 5 was concerned about, correct.  
 6 Q Well, who else did he name, the lawyer or his  
 7 wife?  
 8 A Yes.  
 9 Q Did you ever go talk to the lawyer and say,  
 10 hey, are you stalking Mr. Oliphant, this member  
 11 of the Bar?  
 12 A No, I did not because there wasn't a crime.  
 13 Q But did you ever go talk to his wife, Erin, and  
 14 say, hey, lawyer's wife, were you stalking Mr.  
 15 Oliphant?  
 16 A Again, because it didn't rise to that level of  
 17 interviewing anybody.  
 18 Q So the three people that Oliphant named to you  
 19 as being responsible for allegedly following  
 20 him was Mr. Braxton, Erin Friedman, and her  
 21 husband, Gregory Friedman, the lawyer?  
 22 A And potentially private investigators.  
 23 Q What private investigators?  
 24 A I'm not sure.  
 25 Q Where did that come from?

35

1 answer it.  
 2 A Yes, I read it. I gathered the information.  
 3 And I could have come down and talked to Major  
 4 Oliphant and he gave me a completely different  
 5 potential crime. But I came down here and  
 6 spoke to him, and from that information to my  
 7 best judgement, the potential crime that most  
 8 likely he had was stalking. And once I read  
 9 the statute, I determined that that statute did  
 10 not fit. It did not meet the elements of that  
 11 statute --  
 12 Q Well, who did --  
 13 A -- for anybody.  
 14 Q Sorry. Who did Mr. Oliphant tell you he  
 15 thought was the person responsible for, I don't  
 16 know what you want to call it, following him?  
 17 Didn't he name Calvin Braxton specifically?  
 18 A He mentioned in his report and during our  
 19 conversation that he received those telephone  
 20 calls saying Calvin Braxton was watching him or  
 21 following him.  
 22 Q And, in fact, if we look at the very first page  
 23 of this incident report, he has "Nature of  
 24 incident," quote, "Public intimidation by  
 25 Calvin Braxton/officer of safety concerns." It

37

1 A I think it came from the phone calls that  
 2 Colonel Oliphant mentioned that he had gotten  
 3 from concerned friends.  
 4 Q Did he tell you who had supposedly hired these  
 5 private investigators according to these  
 6 unknown people?  
 7 A I don't recall.  
 8 Q Wouldn't you have asked?  
 9 A I may have asked, but I don't recall at this  
 10 point.  
 11 Q So as I understand it, the information that you  
 12 got was what's contained in this report, and  
 13 what I want you to tell me is the information  
 14 that Mr. Oliphant told you that's not contained  
 15 in this incident report. So let's go through  
 16 the incident report, and I'm going to ask you,  
 17 did he tell you anything different about that,  
 18 okay?  
 19 A Okay.  
 20 Q He says, "On or about the morning of Wednesday,  
 21 February 21, 2018 at approximately 16:10  
 22 hours," which is 6:10 in the morning, "I left  
 23 my residence," and it says, "En route to  
 24 Zachary, Louisiana." Did you ever verify  
 25 whether or not he was headed to Zachary,

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**1 Louisiana?**  
 2 A No, it wasn't relevant to me.  
**3 Q By the way, did you notice the title of the**  
**4 incident report, "Nature of Incident, Public**  
**5 Intimidation By Calvin Braxton," when you first**  
**6 saw this document?**  
 7 A Yes.  
**8 Q Did you and Mr. Oliphant discuss that he had**  
**9 prepared a prior incident report in 2016 at the**  
**10 request of the State Troopers Association**  
**11 involving Calvin Braxton?**  
 12 MR. FALCON:  
 13 Object to the form.  
 14 MS. CRAFT:  
**15 Q You can answer it.**  
 16 A I don't recall discussing that particular  
 17 incident report with him.  
**18 Q But you knew about it, didn't you?**  
 19 A Yes, I think it had been on -- publicly  
 20 published.  
**21 Q Published how?**  
 22 A It was in the public -- probably a website of  
 23 some sort.  
**24 Q So we're clear, that's Exhibit 24. I just want**  
**25 to make sure we're talking about the same**

40

**1 Oliphant, had prepared and a report of his had**  
**2 been disseminated, this one dated June 2, 2016;**  
**3 is that right?**  
 4 A I don't know if I described it well aware, but  
 5 I was aware.  
**6 Q And what did you understand Mr. Oliphant's**  
**7 issues were with Mr. Braxton in 2016?**  
 8 A The first incident report or the second one?  
**9 Q The first one.**  
 10 A My understanding, just going off my memory, is  
 11 that Mr. Braxton had called him demanding  
 12 Trooper Linebaugh be transferred to New Orleans  
 13 because he had arrested Mr. Braxton's daughter  
 14 for DWI.  
**15 Q And did you know Mr. Linebaugh?**  
 16 A No.  
**17 Q So did you ever take any steps to ferret out**  
**18 whether or not Mr. Oliphant was being truthful**  
**19 in his report of June of 2016, the accusations**  
**20 involving Mr. Braxton?**  
 21 A Again, my -- Mr. -- Colonel Oliphant's  
 22 reputation is -- I think a lot of him. He's  
 23 known to be credible within our agency. And  
 24 unless I'm presented information where he  
 25 wasn't, he was being dishonest, I take him at

39

**1 thing. In Exhibit 24, there is an incident**  
**2 report also prepared by Mr. Oliphant. He wrote**  
**3 in a date, June 2nd. If you look to the last**  
**4 three pages -- four pages, that's the one that**  
**5 looks like he signed. He alleges -- one more.**  
**6 Keep going. Keep going. Keep going. There**  
**7 you go. This one looks like he signed it on**  
**8 June 2, 2016, but he claims the date of the**  
**9 incident was December 5, 2015. This is the**  
**10 report you were aware of in March of 2018 that**  
**11 was, as your words said, "And the public's fear**  
**12 involving Calvin Braxton."**  
 13 A Yes, in 2016. Yes, I believe it was.  
**14 Q And did you know anything about how this report**  
**15 Mr. Oliphant wrote involving Mr. Braxton came**  
**16 about?**  
 17 A No.  
**18 Q You said it was in the public's fear. You had**  
**19 read about it in the newspaper; is that right,**  
**20 sir?**  
 21 A I don't know if it was the newspaper. It may  
 22 have been on the newspaper's website or a blog  
 23 of some sort, but yeah.  
**24 Q So when you met with Mr. Oliphant in March of**  
**25 2018, you were well aware that he, Mr.**

41

**1 his word.**  
**2 Q Let me ask you something. What was Mr.**  
**3 Braxton's reputation before Mr. Oliphant's**  
**4 information got published in 2017, 2016?**  
 5 A I have no idea.  
**6 Q Well, did you ask and say, hey, what is Mr.**  
**7 Braxton's reputation? Is he similarly enjoying**  
**8 a reputation that you claim Mr. Oliphant had of**  
**9 being credible in the community?**  
 10 A I did not ask that, no.  
**11 Q So did you ever ask Mr. Oliphant -- I'm just**  
**12 curious because his 2016 report that's written**  
**13 six months after the alleged incident, you know**  
**14 that's right, right, six months later?**  
 15 A It's my understanding, yes.  
**16 Q Yeah. Let me ask you something, by the way.**  
**17 How many times have you ever turned in an**  
**18 incident report about an incident that occurred**  
**19 six months earlier?**  
 20 A I can't recall a time.  
**21 Q How about never, sir? That's something you've**  
**22 never done.**  
 23 A I hate to say never, but I don't recall a time.  
**24 Q Doesn't the state police have a policy about**  
**25 when you're supposed to turn in incident**

42

**1 reports involving incidents or matters?**  
**2 A** I would have to refer to a policy, but probably  
**3** so.  
**4 Q** You have, in fact, disciplined troopers for not  
**5** turning in their reports timely; have you not?  
**6 A** Reports in general, yes. Incident reports, no.  
**7 Q** Well, what was the reason you disciplined these  
**8** officers for not turning in their reports  
**9** timely? Like, what do you mean timely?  
**10 A** Usually within days. I mean, on an arrest, I  
**11** mean, you've got to get -- if it's a probable  
**12** cause arrest, you're going to have a hearing a  
**13** lot of times within two weeks, so the report  
**14** needs to be turned in. But I think it would be  
**15** case-by-case basis. Some reports are very,  
**16** very extensive and may take months to write.  
**17** But an incident report, I would expect it  
**18** within, you know, several days.  
**19 Q** Do you know how this 2016 incident report came  
**20** about?  
**21 A** No.  
**22 Q** Did Mr. Oliphant ever tell you that the State  
**23** Troopers Association contacted him and they  
**24** wanted him to execute an affidavit about Mr.  
**25** Braxton or to present them some sort of

44

**1 Q** Have you talked to anyone at state police? Why  
**2** is it that the Louisiana State Police prepared  
**3** an incident report six months after an alleged  
**4** incident at the request of a private union?  
**5 A** No.  
**6 Q** In your tenure with the state police, are you  
**7** aware of any circumstance, sir, whatsoever  
**8** where any state trooper prepared a report  
**9** because the State Troopers Association asked  
**10** them to?  
**11 A** No.  
**12 Q** So again, sir, the times that you've  
**13** disciplined officers under your command for not  
**14** timely turning in their reports, I am correct  
**15** that if I go look at all those, it's going to  
**16** be because they did not turn it in within the  
**17** matter of seven days after the issue occurred?  
**18 A** I wasn't -- I think it would be case-by-case on  
**19** each report. I wouldn't set a specific date  
**20** like seven days. I wouldn't do that.  
**21 Q** But you would agree with me, would you not,  
**22** sir, that the fact somebody waited six months  
**23** to prepare a report and the first incidence  
**24** should, as a trained investigator, cast doubt  
**25** on the veracity of it, right?

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**1** documentation, and then within the state  
**2** police, including Mr. Reeves who is now the  
**3** superintendent, they came up with the idea that  
**4** Mr. Oliphant would then prepare an incident  
**5** report? It would go up the chain, and then the  
**6** State Troopers Association could get the  
**7** information by a public records request. Did  
**8** you know that?  
**9** MR. FALCON:  
**10** Object to the form.  
**11** MS. CRAFT:  
**12 Q** You can answer it.  
**13 A** I'm not sure what your question is.  
**14 Q** Did you know that the reason Mr. Oliphant wrote  
**15** this report was because at its essence, the  
**16** Louisiana State Troopers Association asked him  
**17** to?  
**18 A** I have no knowledge of that.  
**19 Q** Did you ever talk to Mr. Reeves about that?  
**20 A** No.  
**21 Q** Did you ever talk to Mr. Staton about that?  
**22 A** No.  
**23 Q** Rodney Hyant, do you know who he is?  
**24 A** I know who he is, and I've never had a  
**25** discussion.

45

**1 A** On its face, I would not agree with you, no.  
**2 Q** Well, the reason you guys have a requirement  
**3** about turning in incident reports in a, quote,  
**4** "timely fashion," is because if they involve a  
**5** crime, you know the district attorney is going  
**6** to have questions about why did y'all wait so  
**7** long to do this, right?  
**8 A** No, we don't -- if it involves a crime, we're  
**9** not going to use an incident report. So, no, I  
**10** would not agree with that.  
**11 Q** When you do the reports, the reason that you  
**12** want them to be timely is because there's not  
**13** going to be a question, right, from a  
**14** prosecuting body, why the heck did you guys  
**15** wait so long, right? It affects the  
**16** credibility of what you're trying to say.  
**17 A** I don't know it affects the credibility. The  
**18** reason to write the report is to document the  
**19** facts and to assure the facts are not lost.  
**20 Q** And sitting here today, you've never heard  
**21** anything about the fact that the State Troopers  
**22** Association requested that Mr. Oliphant execute  
**23** an affidavit and that the plan between Mr.  
**24** Oliphant and this chain of command instead was  
**25** for him to prepare this document, the June 2,

46

1 **2016 document, send it up the chain so that**  
 2 **LSTA could get the information by a public**  
 3 **records request?**  
 4 MR. OXENHANDLER:  
 5 Object to form.  
 6 MR. FALCON:  
 7 Objection. Asked and answered.  
 8 MS. CRAFT:  
 9 **Q Go ahead. You never heard anything about that,**  
 10 **sir?**  
 11 A I know nothing about that.  
 12 **Q I didn't ask you if you know anything about it.**  
 13 **I asked you if you heard anything about it.**  
 14 A No, I've never heard, and that includes I know  
 15 nothing about it.  
 16 **Q So if we go back to Exhibit 20 -- keep this one**  
 17 **out if you don't mind, which is Exhibit --**  
 18 A You want it?  
 19 **Q -- 24, Exhibit 20 where it says, "Nature of**  
 20 **incident: Public intimidation" -- that's the**  
 21 **2018 one -- "Public intimidation by Calvin**  
 22 **Braxton." You knew, did you not, that what Mr.**  
 23 **Oliphant was referring to as public**  
 24 **intimidation by Mr. Braxton had its roots in**  
 25 **this June 2016 incident report; isn't that**

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1 A I don't recall. We had a discussion, and I  
 2 don't recall specifically if that was  
 3 discussed.  
 4 **Q What generally do you recall Mr. Oliphant's**  
 5 **reasoning for why he thought Mr. Braxton was**  
 6 **trying to publicly intimidate him?**  
 7 A I know they're from the same town, from  
 8 Natchitoches, which is a relatively small town,  
 9 and I don't know what their disagreement is. I  
 10 don't know if it's something more than that or  
 11 specifically with this particular incident  
 12 or --  
 13 **Q And this would be the 2016 incident report by**  
 14 **Mr. Oliphant, just so the record is clear.**  
 15 A Yeah.  
 16 **Q So --**  
 17 A I don't really know why.  
 18 **Q So I guess my question is, did you or did you**  
 19 **not ever have a discussion with Mr. Oliphant**  
 20 **about, why do you think that Calvin Braxton is**  
 21 **trying to publicly intimidate you?**  
 22 A I'm trying to make sure I answer the question  
 23 correctly. And I don't want to conflate or mix  
 24 what potentially what my opinion after talking  
 25 to him or talking to several people and what

47

1 **right?**  
 2 A I would not describe that as my belief at the  
 3 time.  
 4 **Q Did you ever gain that belief?**  
 5 A That -- restate your question.  
 6 **Q See where it says "Public intimidation" in**  
 7 **2018?**  
 8 A Yes.  
 9 **Q I guess a better question is, did you ever ask**  
 10 **Mr. Oliphant why he thought Mr. Braxton was**  
 11 **trying to publicly intimidate him?**  
 12 A I think we had a discussion but not on that.  
 13 And I don't recall.  
 14 **Q Wouldn't you have wanted to know if you were**  
 15 **going to investigate the contents --**  
 16 A Yeah, I would --  
 17 **Q Let me finish. -- of the 2018 report, Mr.**  
 18 **Oliphant, what exactly -- why do you think he's**  
 19 **trying to publicly intimidate you?**  
 20 A Putting two and two together, I would say yes,  
 21 that would be the background of why Mr. Braxton  
 22 could potentially want to intimidate him  
 23 because he was mad about the first situation.  
 24 **Q And that's what Mr. Oliphant told you; is that**  
 25 **right?**

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1 the discussion with me and Colonel Oliphant  
 2 were.  
 3 **Q So then, I guess in response to my question as**  
 4 **to whether or not you asked Mr. Oliphant why**  
 5 **did he think Calvin Braxton was trying to**  
 6 **publicly intimidate him, your answer is, I**  
 7 **don't remember; is that right?**  
 8 A Correct.  
 9 **Q Now, you mentioned you were talking to others.**  
 10 **What others?**  
 11 A I'm recalling Thurman Miller and asking him if  
 12 he had any information, and his reply was,  
 13 "No."  
 14 **Q You asked him if he had any information about**  
 15 **what?**  
 16 A Whether Mr. Braxton was potentially bragging  
 17 about having Major Oliphant followed, and he  
 18 stated he didn't know anything about it.  
 19 **Q Where is that in this report?**  
 20 A That was during our discussion with Colonel  
 21 Oliphant.  
 22 **Q Mr. Oliphant told you that he had -- somebody**  
 23 **told him that Calvin Braxton was bragging about**  
 24 **getting Mr. Oliphant?**  
 25 A Potentially following him.

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**1 Q And so you called Thurman Miller, and who is**  
**2 he?**  
 3 A He's a trooper. At the time, he was a trooper  
 4 at Troop E.  
**5 Q Here, right?**  
 6 A Yeah.  
**7 Q And you called Mr. Miller why?**  
 8 A Because his name had been brought up by Colonel  
 9 Oliphant.  
**10 Q What did Mr. Oliphant tell you?**  
 11 A My recollection is that Mr. Braxton and Thurman  
 12 Miller frequent some type of breakfast  
 13 establishment in the morning. And potentially  
 14 Thurman Miller overheard him, Mr. Braxton,  
 15 bragging about following Colonel Oliphant.  
**16 Q So then you understood from Mr. Oliphant he**  
**17 told you that Thurman Miller was a source of**  
**18 the alleged bragging by my client about**  
**19 following Mr. Oliphant; is that right?**  
 20 A A source, correct.  
**21 Q So when I asked you earlier if Mr. Oliphant**  
**22 identified some of these rumor people, Mr.**  
**23 Miller would have been one of the people Mr.**  
**24 Oliphant identified to you as being one?**  
 25 A My opinion of that is that those are not the

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1 people that phoned him. Now, whether they are  
 2 or not, that was not my understanding. Thurman  
 3 Miller was a completely different source than  
 4 the phone calls that he mentions in his report.  
**5 Q So let's talk about sources. I'll use your**  
**6 phrase. How many sources or other folks did**  
**7 Mr. Oliphant identify as, you know, that Calvin**  
**8 is following me or he's bragging about it?**  
 9 A In his incident report, he said, "I had  
 10 received two telephone calls from fairly  
 11 credible and reliable individuals."  
**12 Q I realize that's what in here.**  
 13 A Yeah.  
**14 Q But you told me you didn't even ask him who**  
**15 those people were; is that right?**  
 16 A That's correct. And my understanding, one of  
 17 them was not Thurman. Now, if he was, that's  
 18 beyond my knowledge.  
**19 Q So my question is, you said that Mr. Oliphant**  
**20 told you, hey, Thurman Miller overheard Calvin**  
**21 Braxton in a breakfast joint bragging. Who**  
**22 else did Mr. Oliphant identify?**  
 23 A That was it.  
**24 Q So was that the only phone call you made? You**  
**25 said you talked to others, and you said Thurman**

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**1 Miller was one of those others. Who were the**  
**2 others?**  
 3 A I don't recall any other people other than  
 4 Thurman off the top of my head.  
**5 Q Let me ask you something. You had then -- at**  
**6 least at that time you were over some folks who**  
**7 do detective work; is that right?**  
 8 A I was over the criminal intelligence unit.  
**9 Q Aren't y'all trained to keep notes when you do**  
**10 investigations?**  
 11 A Yes.  
**12 Q So where are your notes of this investigation?**  
 13 A We're required to keep notes on case-related  
 14 files, and this never proceeded to the point it  
 15 was a case. It stopped really at the very  
 16 beginning, and our policy said the first thing  
 17 that you do is determine if a crime has been  
 18 committed. And when I started looking at --  
 19 when I looked at that, I determined that there  
 20 was no crime committed.  
**21 Q So are you telling me under oath, sir, you made**  
**22 no notes whatsoever regarding your inquiry?**  
 23 A No, I made a few notes.  
**24 Q Where are they?**  
 25 A I'm not required to keep those in my opinion,

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1 and I typically keep those. But I moved  
 2 offices some time after that, and I related to  
 3 our attorneys I've torn my office apart several  
 4 times, and I've not been able to locate those  
 5 notes.  
**6 Q So you know that I have been asking for those**  
**7 for about two years, right?**  
 8 A I have no idea how long. I know you asked for  
 9 them, and I thoroughly searched my office and  
 10 everywhere I could think to look and I cannot  
 11 find them.  
**12 Q When did you do that search?**  
 13 A I've done it on several occasions when I got  
 14 any type of correspondence from our legal  
 15 section.  
**16 Q When was the first time you engaged in that**  
**17 search, sir?**  
 18 A I know I received a document from you through  
 19 our legal section asking for those notes, and I  
 20 looked for them. Thoroughly looked. I tore up  
 21 every place I could think to look, and I've  
 22 spent hours looking on a couple of different --  
 23 maybe three different occasions looking for the  
 24 notes. And I don't know what happened to them.  
 25 I don't know if I --

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**1 Q What year?**  
 2 A I would have to look at your document. I don't  
 3 know.  
**4 Q Well, you might have to look at my document,**  
**5 but that might not be the same date --**  
 6 A The first time I heard about it is when I  
 7 started looking for them. When I was informed  
 8 that I had to acquire those notes, I started  
 9 looking for them, and if I had them, I'd give  
 10 them to you.  
**11 Q And you can't tell me what year that was, sir?**  
 12 A I've got your -- no, I didn't bring that. You  
 13 sent a letter to the department asking for  
 14 various things, and one of them was notes. And  
 15 that was sent to me and probably I'm sure other  
 16 people. And when I got it, I intended to  
 17 provide those notes, and I looked -- you know,  
 18 I tore my office apart, my old office that I  
 19 moved out of, and I don't know -- apparently  
 20 they were inadvertently thrown away.  
**21 Q Was that a public records request by me?**  
 22 A It was a document. No, I think it was maybe  
 23 related to a lawsuit. I don't recall off the  
 24 top of my head.  
**25 Q And you don't know --**

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1 A And to be honest, it didn't make any difference  
 2 to me because we're required to provide those  
 3 documents, and I'd provide them if I had them.  
**4 Q So that would have been some time between what,**  
**5 2018 and today, some time in the last '18, '19,**  
**6 or '20. Any idea which year?**  
 7 A No, I don't. I mean, it would have probably  
 8 have been 2019, I'm almost certain.  
**9 Q Was it before or after I began taking**  
**10 depositions in this case?**  
 11 A I have no idea. I don't know when you started,  
 12 and I would be just completely guessing if I  
 13 answered that.  
**14 Q Was it before or after Mr. Oliphant told you he**  
**15 had been sued by my client that the notes**  
**16 disappeared?**  
 17 A I don't know that Colonel Oliphant has ever  
 18 told me he's being sued by you.  
**19 Q Was it before or after you became aware that**  
**20 Mr. Oliphant had been sued by my client that**  
**21 these notes disappeared?**  
 22 A The notes didn't disappear. I guess you could  
 23 use the word disappear. Ask the question  
 24 again.  
**25 Q Was it before or after you became aware my**

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**1 client had sued Mr. Oliphant that these notes**  
**2 disappeared?**  
 3 A I don't know when the noted disappeared or were  
 4 lost. Certainly if I had known there was a --  
 5 some potential legal, I would have, you know,  
 6 put them probably in a better storage location.  
**7 Q You stored them in your office where, sir?**  
 8 A A couple of different places I place old notes  
 9 or old information that didn't result in  
 10 anything. And it would probably be in that  
 11 pile somewhere and --  
**12 Q Did you, like some detective friends of mine,**  
**13 they have, like, a little flip pad. Do you use**  
**14 one of those?**  
 15 A I've used a lot of those over the years, yes.  
**16 Q And some of my friends who are detectives, the**  
**17 reason they use the flip pads is because they**  
**18 can keep track of what they're doing, and they**  
**19 keep the flip pads in date order, like March 1,**  
**20 1990 to whatever. Is that what you do, too?**  
 21 A No. Because you get different locations and  
 22 open different flip pads, and you end up with a  
 23 half dozen or seven or eight of them. And  
 24 sometimes a particular case may take the whole  
 25 flip pad. So, I mean, it's just -- you know,

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1 it's -- I don't know how to explain it.  
**2 Q Well, let me ask you something. In your**  
**3 history of being with the state police, how**  
**4 many times have you investigated a concern by**  
**5 an existing officer that somebody else might be**  
**6 stalking them or publicly -- trying to publicly**  
**7 intimidate them?**  
 8 A It's not entirely uncommon for a police officer  
 9 to have concerns. We regularly get alerts from  
 10 various agencies, the FBI, that particular  
 11 groups or persons are stalking or looking to  
 12 retaliate against the police. I would say  
 13 that's weekly.  
**14 Q Well, how many times have you investigated**  
**15 something like that?**  
 16 A I don't recall off the top of my head.  
**17 Q How many times have you ever investigated a**  
**18 complaint or an issue like Mr. Oliphant's said,**  
**19 "Nature of incident: Public intimidation by**  
**20 Calvin Braxton/officer safety concern."**  
 21 A Ma'am, I've investigated quite a few from the  
 22 governor to private citizens to other officers,  
 23 other troopers.  
**24 Q Did you lose their notes, too?**  
 25 A I've never been asked for any other notes,

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1 especially on a case we get calls all the time  
 2 about people's concerns that never rise to a  
 3 criminal investigation.  
**4 Q How about by a superior officer of yours in**  
**5 rank who says, I believe this man, this man**  
**6 seated to my left, is engaging in public**  
**7 intimidation, and I'm hearing their rumors that**  
**8 there was a suspicious homicide in Shreveport**  
**9 that he was -- or death in Shreveport he was**  
**10 involved in.? How many times have you ever**  
**11 investigated something like that?**  
 12 MR. FALCON:  
 13 Object to the form.  
 14 MS. CRAFT:  
**15 Q You can answer it.**  
 16 A From a senior member of the state police?  
 17 Probably this is the first time. But it's not  
 18 uncommon to do those types of investigations  
 19 whatsoever.  
**20 Q So, sir, you said when we were talking about**  
**21 you talking to others and that's when you told**  
**22 me about the notes, I know you talked to Mr.**  
**23 Thurman Miller. And when you said, Colonel**  
**24 Oliphant or Mr. Oliphant says that you**  
**25 overheard Calvin Braxton in some breakfast**

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1 know is I had a reluctant witness. And his  
 2 statement to me was, "I just don't want to get  
 3 involved."  
**4 Q Then where did you get the stuff that you just**  
**5 told me ten minutes ago that when you talked to**  
**6 Thurman Miller, he told you no. That was your**  
**7 words, sir. "No, I don't have any information**  
**8 about that."**  
 9 A He said he didn't have any information, but he  
 10 also said, "Look, I don't want to get involved.  
 11 You know, I don't even want to talk about it."  
**12 Q So --**  
 13 A And I couldn't do anything to him. I couldn't  
 14 say, look, you got to tell me. I was just  
 15 like, okay, Thurman, I appreciate it. Anything  
 16 changes, give me a call.  
**17 Q So were you being dishonest with me when I**  
**18 asked you the question and you said that when**  
**19 you asked Thurman Miller if he heard it, he**  
**20 said no? Look, quotes, I wrote it down. Were**  
**21 you being dishonest with me, sir, in this**  
**22 record?**  
 23 MR. FALCON:  
 24 Object to the form. Argumentative.  
 25 A I further explained the question to you -- my

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**1 joint bragging about having him followed,**  
**2 Thurman Miller told you no; is that correct?**  
 3 A He says he's not aware of that. He's not -- he  
 4 hadn't heard that, and he didn't believe if Mr.  
 5 Braxton would have done that he would have done  
 6 it in his presence.  
**7 Q So that's one piece of information Mr. Oliphant**  
**8 gave you that was false, right?**  
 9 A I wouldn't classify it as false. I mean, it  
 10 didn't -- I wasn't able to develop anything  
 11 from that.  
**12 Q Yeah, but Mr. Oliphant told you Thurman Miller**  
**13 can tell you --**  
 14 A And to be honest --  
**15 Q Let me finish. Mr. Oliphant told you Thurman**  
**16 Miller can tell you that Calvin Braxton was in**  
**17 this breakfast place bragging about having him**  
**18 followed. When you, the investigator,**  
**19 contacted the source, Mr. Miller, Mr. Miller**  
**20 said in essence what Mr. Oliphant said was**  
**21 false. Do I have that wrong?**  
 22 A My impression at the time was talking to  
 23 Thurman Miller, he was like, "Look, I don't  
 24 want to get involved in none of that." So I  
 25 don't know if it's true or false, but all I

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1 answer to you.  
 2 MS. CRAFT:  
**3 Q No, you just now explained the answer to me.**  
**4 When you first testified twice that Thurman**  
**5 Miller told you, no, that didn't happen, were**  
**6 you just forgetting the whole part about you**  
**7 now think he's a reluctant witness, or did he,**  
**8 in fact, tell you it's not true?**  
 9 MR. FALCON:  
 10 Object to the form.  
 11 MS. CRAFT:  
 12 Which part?  
 13 MR. FALCON:  
 14 Argumentative.  
 15 A I've been honest about the entire -- I don't  
 16 know if I have your understanding or trying to  
 17 twist my statement, but everything I told you  
 18 is the best of my recollection.  
 19 MS. CRAFT:  
**20 Q Didn't Thurman Miller tell you, no, that's not**  
**21 true? I never heard that.**  
 22 A Yes. But he also said that led me to believe  
 23 that he was -- didn't want to get involved.  
**24 Q But he's a trooper. You didn't believe him**  
**25 when he told you no?**



<p style="text-align: right;">62</p> <p>1 <b>MR. FALCON</b></p> <p>2 <b>Object to the form. Argumentative.</b></p> <p>3 MS. CRAFT:</p> <p>4 <b>Q You can answer it.</b></p> <p>5 A I felt like he was reluctant to say anything.</p> <p>6 I wouldn't classify it as I didn't believe him.</p> <p>7 <b>Q But your notes would have reflected if they</b></p> <p>8 <b>still existed that you had a conversation with</b></p> <p>9 <b>Mr. Miller, when you talked to Mr. Miller, and</b></p> <p>10 <b>that he denied the statement that Mr. Oliphant</b></p> <p>11 <b>said he had said, right?</b></p> <p>12 A I don't know if I wrote that down. So there's</p> <p>13 a good chance -- I didn't just take verbatim</p> <p>14 notes, so I didn't -- I didn't take extensive</p> <p>15 notes on it because it never begot to any point</p> <p>16 -- you know, if it got to that point, I would</p> <p>17 get a written statement or recorded statement</p> <p>18 for Thurman Miller or other witnesses. And it</p> <p>19 never got even close to that point.</p> <p>20 <b>Q When you contacted Thurman Miller, you told him</b></p> <p>21 <b>that you were contacting him because Mr.</b></p> <p>22 <b>Oliphant told you that Calvin Braxton was</b></p> <p>23 <b>following him. And Mr. Oliphant told you that</b></p> <p>24 <b>Mr. Miller could verify Calvin's bragging at</b></p> <p>25 <b>some sort of breakfast joint; isn't that right?</b></p>	<p style="text-align: right;">63</p> <p>1 A Potentially. I think it was his understanding</p> <p>2 that maybe Thurman had that information.</p> <p>3 <b>Q And so who else -- you said you talked to</b></p> <p>4 <b>others, and that was plural. We know you</b></p> <p>5 <b>talked to Mr. Miller. Who else?</b></p> <p>6 A I'd like to modify that. I said others. It</p> <p>7 probably should be just singular, other.</p> <p>8 <b>Q Just Mr. Miller?</b></p> <p>9 A Yes. Correct.</p> <p>10 <b>Q What else did you do as it relates to the 2018</b></p> <p>11 <b>publication by Mr. Oliphant of this report?</b></p> <p>12 A I pulled the Shreveport Police Department</p> <p>13 report on Lydia Rachal.</p> <p>14 <b>Q Let me see. You pulled the Shreveport Police</b></p> <p>15 <b>Department report?</b></p> <p>16 A Correct.</p> <p>17 <b>Q On the suicide of Ms. Rachal; is that right?</b></p> <p>18 A On the death of Ms. Rachal, correct.</p> <p>19 <b>Q Well, let's make sure we have this correct.</b></p> <p>20 <b>The Shreveport Police Department 25 years</b></p> <p>21 <b>earlier characterized it as a suicide; did they</b></p> <p>22 <b>not?</b></p> <p>23 A Correct.</p> <p>24 <b>Q So I realize your correction to me on the death</b></p> <p>25 <b>of Ms. Rachal. You do not, sitting here today,</b></p>
<p style="text-align: right;">64</p> <p>1 <b>think for one second that there was any funny</b></p> <p>2 <b>business with her suicide, do you, sir?</b></p> <p>3 A I do not.</p> <p>4 <b>Q So I am correct in utilizing the terminology</b></p> <p>5 <b>that it was a suicide 25 years ago?</b></p> <p>6 A Suicide, correct. Suicide in a death.</p> <p>7 <b>Q So you pulled the Shreveport Police Department</b></p> <p>8 <b>report on the suicide of Ms. Rachal. Explain</b></p> <p>9 <b>to me how you got that report.</b></p> <p>10 A I asked a detective in the Bossier office to</p> <p>11 pull the report for me, which he did.</p> <p>12 <b>Q The Bossier office. Bossier office of what?</b></p> <p>13 A It's the Shreveport -- it's the Bossier City</p> <p>14 Field Office at this point.</p> <p>15 <b>Q The Bossier City Field Office for who?</b></p> <p>16 A The state police.</p> <p>17 <b>Q Oh, okay. So which state police detective did</b></p> <p>18 <b>you contact?</b></p> <p>19 A Investigator Rodney Johnson.</p> <p>20 <b>Q Rodney Johnson. And what was his rank?</b></p> <p>21 A Investigator.</p> <p>22 <b>Q So he reported to you?</b></p> <p>23 A At that time, no, he did not.</p> <p>24 <b>Q He does now?</b></p> <p>25 A He does now, correct.</p>	<p style="text-align: right;">65</p> <p>1 <b>Q And who did he report to, Mr. McNeal ultimately</b></p> <p>2 <b>in this chain?</b></p> <p>3 A No, he reported to Lieutenant Sean Joyner.</p> <p>4 <b>Q Sean Joyner?</b></p> <p>5 A Joyner.</p> <p>6 <b>Q J-o-i-n-e-r or y?</b></p> <p>7 A J-o-y-n-e-r.</p> <p>8 <b>Q Got it.</b></p> <p>9 A And Captain Bob Brown.</p> <p>10 <b>Q And who did Mr. Brown report to?</b></p> <p>11 A Major -- I can't -- he's Lieutenant Colonel</p> <p>12 now. His name escapes me.</p> <p>13 <b>Q So Mr. Johnson was a state police investigator.</b></p> <p>14 A Correct.</p> <p>15 <b>Q And you contacted him. Was that in March of</b></p> <p>16 <b>2018 or at some other time?</b></p> <p>17 A March. Probably March 2018.</p> <p>18 <b>Q Could it have been April of 2018?</b></p> <p>19 A I would have to look at the date when I talked</p> <p>20 to Colonel Oliphant, but it was within several</p> <p>21 days of that.</p> <p>22 <b>Q What date did you talk to Colonel Oliphant?</b></p> <p>23 A No, I know it was before April. March 26th.</p> <p>24 <b>Q And what are you looking at to give us the date</b></p> <p>25 <b>of March 26th?</b></p>

<p style="text-align: right;">66</p> <p>1 A Just my daily calendar.</p> <p>2 <b>Q I would like to attach that calendar, those</b></p> <p>3 <b>entries, to your deposition.</b></p> <p>4 MR. FALCON:</p> <p>5 Let me see that, please.</p> <p>6 MS. CRAFT:</p> <p>7 I think that we're at Exhibit --</p> <p>8 MR. FALCON:</p> <p>9 "Twenty-five" (25).</p> <p>10 MS. CRAFT:</p> <p>11 "Twenty-five" (25).</p> <p>12 MS. CRAFT:</p> <p>13 <b>Q You have three pages in front of you, sir.</b></p> <p>14 <b>That's calendar entries that you copied for</b></p> <p>15 <b>today's purposes; is that right?</b></p> <p>16 A It's four pages.</p> <p>17 <b>Q Four pages.</b></p> <p>18 MR. OXENHANDLER:</p> <p>19 May we take a short break so we can</p> <p>20 make copies so everybody can have a copy</p> <p>21 while you go over it?</p> <p>22 MS. CRAFT:</p> <p>23 That would be great.</p> <p>24 -- OFF THE RECORD --</p> <p>25 MS. CRAFT:</p>	<p style="text-align: right;">67</p> <p>1 <b>Q We're attaching to the deposition of "Exhibit</b></p> <p>2 <b>#25" some calendar copies that you brought with</b></p> <p>3 <b>you today.</b></p> <p>4 A Correct.</p> <p>5 <b>Q Were you ever asked to produce documents</b></p> <p>6 <b>relating to your involvement in the -- I'm</b></p> <p>7 <b>going to call it the 2018 public intimidation</b></p> <p>8 <b>incident report? I know you told me that you</b></p> <p>9 <b>knew I had asked for your notes.</b></p> <p>10 A Uh-huh.</p> <p>11 <b>Q Yes?</b></p> <p>12 A Correct. And that's when I found these.</p> <p>13 <b>Q So you have had these for a while; is that</b></p> <p>14 <b>right?</b></p> <p>15 A These?</p> <p>16 <b>Q Yes.</b></p> <p>17 A Yes. When I was instructed to produce all</p> <p>18 notes, I produced everything I could find.</p> <p>19 <b>Q What exactly did that consist of, these</b></p> <p>20 <b>calendar entries you produced at the time?</b></p> <p>21 A Yes.</p> <p>22 <b>Q What else?</b></p> <p>23 A I believe that's it.</p> <p>24 <b>Q And to whom did you produce those?</b></p> <p>25 A Ms. Fay Morrison.</p>
<p style="text-align: right;">68</p> <p>1 <b>Q Well, I hadn't seen them, so let's go through</b></p> <p>2 <b>them. The first one is March 26th --</b></p> <p>3 MR. FALCON:</p> <p>4 I actually think they were produced.</p> <p>5 MS. CRAFT:</p> <p>6 I hadn't seen them.</p> <p>7 MR. FALCON:</p> <p>8 Are you sure?</p> <p>9 MS. CRAFT:</p> <p>10 Uh-huh. The first one I have is March</p> <p>11 26, 2018, and it has ten o'clock.</p> <p>12 MS. CRAFT:</p> <p>13 <b>Q Is that 10:00 a.m.?</b></p> <p>14 A Yes, 10:00 a.m.</p> <p>15 <b>Q Meet with Major Oliphant?</b></p> <p>16 A Correct.</p> <p>17 <b>Q Does that tell us that you first met with Mr.</b></p> <p>18 <b>Oliphant on March 28, 2018?</b></p> <p>19 A March 26, 2018.</p> <p>20 <b>Q March 26, 2018.</b></p> <p>21 A Correct.</p> <p>22 <b>Q And the other note on here, "Brent SWAT, BR</b></p> <p>23 <b>decision," that has nothing to do with this</b></p> <p>24 <b>situation?</b></p> <p>25 A Yeah, zero to do with this one.</p>	<p style="text-align: right;">69</p> <p>1 <b>Q Then the second page is April 9, 2018. You</b></p> <p>2 <b>have a check mark, and you have a note, "Call</b></p> <p>3 <b>Thurman Miller."</b></p> <p>4 A Correct.</p> <p>5 <b>Q Does that tell us when you spoke with Mr.</b></p> <p>6 <b>Miller?</b></p> <p>7 A So I called him on that day, yes. And that's</p> <p>8 probably the extent of the notes I had.</p> <p>9 <b>Q And the next one is April 13. That note looks</b></p> <p>10 <b>a little different than the other two calendar</b></p> <p>11 <b>entries. Where is that from?</b></p> <p>12 A It's the same -- I'm not sure why it looks</p> <p>13 different, but it's the same calendar.</p> <p>14 <b>Q Well, with all due respect, the first two pages</b></p> <p>15 <b>have the date at the top, and then they have</b></p> <p>16 <b>lines with times. And then the third page,</b></p> <p>17 <b>which you wrote in, assuming that's your</b></p> <p>18 <b>handwriting, April; is that right?</b></p> <p>19 A Correct.</p> <p>20 <b>Q It doesn't have lines or times, and it's got an</b></p> <p>21 <b>Office Depot logo.</b></p> <p>22 A I'm not sure. Only difference -- I've still</p> <p>23 got the entire calendar sitting in my office,</p> <p>24 so, I mean.</p> <p>25 <b>Q And at the bottom it looks like it's got</b></p>

<p style="text-align: right;">70</p> <p>1 <b>Friday, and then in the middle 103, and then</b>                  2 <b>April 13th. You have more than one desk</b>                  3 <b>calendar, sir?</b>                  4 A No.                  5 <b>Q On this one, it looks like you wrote 8:00 --</b>                  6 <b>16:30. Is that 4:30 in the afternoon?</b>                  7 A Yeah, that's 4:30. That's just the hours I                  8 worked that day.                  9 <b>Q Do you do that for every day, write the hours</b>                  10 <b>you worked?</b>                  11 A Typically, I do. I'm not sure why these other                  12 days I didn't.                  13 <b>Q Your first note is, "Check IRS reports."</b>                  14 <b>What's that about?</b>                  15 A That's just daily checking reports, unrelated                  16 reports. IRS is our report system.                  17 <b>Q And it says, "Out of town reminder to Chad,</b>                  18 <b>Veronica, Rock, Steve, and Megan." Did I read</b>                  19 <b>that right?</b>                  20 A Megan. Yeah, that's just co-workers reminding                  21 them I was probably going out of town the next                  22 week.                  23 <b>Q And Megan is M-e-g-a-n. And then you have,</b>                  24 <b>"Brief Captain McNeal, threat assessment."</b>                  25 A Yes.</p>	<p style="text-align: right;">71</p> <p>1 <b>Q What's that about?</b>                  2 A That's this.                  3 <b>Q What's this?</b>                  4 A This what we're here for, the Major Oliphant,                  5 his case basically, or complaint.                  6 <b>Q So was April -- Friday, April 13, Friday the</b>                  7 <b>13th, a date that you briefed Captain McNeal on</b>                  8 <b>the progress of your investigation?</b>                  9 A Correct.                  10 <b>Q And what do you mean by, "Brief Captain McNeal,</b>                  11 <b>threat assessment?"</b>                  12 A Just tell him where I was at since March or the                  13 last -- what I'd done the last two weeks. Just                  14 a quick overview of my findings to that point.                  15 <b>Q What did you tell him?</b>                  16 A I don't recall specifically.                  17 <b>Q Well, what findings did you have as of Friday,</b>                  18 <b>April 13th?</b>                  19 A I would say I was largely done, and I briefed                  20 him on the particular -- the threat assessment                  21 and then also the Lydia Rachal death.                  22 <b>Q Tell me what you briefed him on the threat</b>                  23 <b>assessment.</b>                  24 A That I felt like there -- that nothing reached                  25 the status of a criminal violation, that there</p>
<p style="text-align: right;">72</p> <p>1 had been -- and I told Major Oliphant also that                  2 there had been no -- since he wrote that                  3 report, which was in March and now it's mid                  4 April, nothing else had happened. No other                  5 sightings or really nothing else had come                  6 forward. I followed what I felt were any                  7 credible leads, and it was really a whole lot                  8 of nothing to the complaint. I think there                  9 were legitimate concerns, but I didn't feel                  10 like there was anything to the situation.                  11 <b>Q You said you followed credible leads. What</b>                  12 <b>credible leads did you follow?</b>                  13 A Well, I mean, one of them was to look at the                  14 Shreveport Police Department report and, you                  15 know, see if it was properly investigated or                  16 was it, you know, potentially some evidence was                  17 overlooked.                  18 <b>Q In order for the state police to essentially</b>                  19 <b>reopen or open an investigation by another law</b>                  20 <b>enforcement agency, it's true, is it not, that</b>                  21 <b>you have to notify that law enforcement agency,</b>                  22 <b>right?</b>                  23 MR. FALCON:                  24 Object to the form.                  25 A If I was going to open a case, I would make a</p>	<p style="text-align: right;">73</p> <p>1 courtesy call and let them know, yes. I don't                  2 know that it's required, but I never opened a                  3 case by any means.                  4 MS. CRAFT:                  5 <b>Q But you, according to you, were looking at the</b>                  6 <b>Lydia Rachal suicide to determine if the</b>                  7 <b>Shreveport Police Department had overlooked</b>                  8 <b>evidence. That's not --</b>                  9 A I read the report, yeah. I read the report and                  10 see if there was any what I would consider                  11 shortcomings in the investigation.                  12 <b>Q And you found none, right?</b>                  13 A Correct.                  14 <b>Q In fact, you found that Ms. Rachal had been --</b>                  15 <b>she had barricaded herself in her own hotel</b>                  16 <b>room; is that right?</b>                  17 A Yes.                  18 <b>Q And, in fact, the Shreveport Police Department</b>                  19 <b>had to break down the door to get in to her; is</b>                  20 <b>that right?</b>                  21 A Yes.                  22 <b>Q So the odds of anybody being in there causing</b>                  23 <b>her death besides herself were zero, correct?</b>                  24 A That's my opinion, correct.                  25 <b>Q So Mr. Johnson you said that you contacted him</b></p>

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**1 to get the Shreveport Police Department report;**  
**2 is that right?**  
 3 A Correct.  
**4 Q Why him?**  
 5 A He worked for Shreveport. He's a homicide  
 6 detective for Shreveport for twenty-something  
 7 years. I knew he could easily pull the report.  
**8 Q How is it that you knew he could easily pull**  
**9 the report? And here's why I'm asking. As I**  
**10 understand it, I, a member of the public,**  
**11 cannot walk into the Shreveport Police**  
**12 Department and ask them even today, "Give me**  
**13 the report on the death of Lydia Rachal." It's**  
**14 not a public record, is it?**  
 15 A I would think that it's a closed investigation,  
 16 and it's a public record.  
**17 Q Well, then why would you contact Mr. Johnson as**  
**18 opposed to simply calling the Shreveport Police**  
**19 Department yourself and say, "Send me the**  
**20 report on the death of Lydia Rachal from 25**  
**21 years ago?"**  
 22 A I certainly could have, but it was an easier  
 23 route, in my opinion, to have him call the  
 24 Shreveport Police Department, which it was, and  
 25 he quickly got the report and I read it.

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1 A I think it does. Yeah, if it's a closed case  
 2 -- I mean, if he was -- if it was an open  
 3 homicide investigation from years ago, then  
 4 that would not be public record. But from my  
 5 understanding, this is a closed case. It would  
 6 be a public record.  
 7 MS. CRAFT:  
**8 Q What version of the report did you get?**  
 9 A The actual case report.  
**10 Q You got the whole case file, didn't you?**  
 11 A No, I did not get the whole case file, just the  
 12 report. And I think it was faxed or emailed,  
 13 so to get the whole file, we would have to go  
 14 over there and pick it up because most of that  
 15 can't be emailed.  
**16 Q It was faxed or emailed to who?**  
 17 A To our office.  
**18 Q Who is "our office?"**  
 19 A To the state police investigation office in  
 20 Bossier City.  
**21 Q To Mr. Johnson?**  
 22 A Yes.  
**23 Q And had Mr. Johnson worked that homicide or**  
**24 that, I'm sorry, suicide?**  
 25 A Did he work it? No.

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**1 Q Well, let me ask you something. You said you**  
**2 think it's a public record. Do you think Mr.**  
**3 Johnson on behalf of the state police employed**  
**4 the Public Records Act, or do you think Mr.**  
**5 Johnson on behalf of the state police employed**  
**6 the fact he's a state trooper to get a copy of**  
**7 that report?**  
 8 A I would say the latter. They may be certainly  
 9 available by public record, but, I mean, if  
 10 Shreveport called me and asked for a report and  
 11 I had no reason to tell them no, then I would  
 12 send them a report and it's likewise. I mean,  
 13 that's a common thing that goes on in law  
 14 enforcement.  
**15 Q You said it's a public record. Are you sure**  
**16 about that, sir?**  
 17 A In my opinion.  
 18 MR. FALCON:  
 19 There isn't a Supreme Court case on  
 20 that.  
 21 MS. CRAFT:  
 22 I want to make sure that what he's  
 23 looking at would have fallen within 44:1 as  
 24 opposed to something else. So that's why I  
 25 asked the question.

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**1 Q But he knew who did?**  
 2 A He did, that's correct.  
**3 Q And who had worked it?**  
 4 A Off the top of my head, I don't recall.  
**5 Q When you contacted Mr. Johnson, did you tell**  
**6 him why you wanted the records from the Lydia**  
**7 Rachal suicide?**  
 8 A No. No, I did not.  
**9 Q Well, what did you tell him?**  
 10 A I said, "Hey, Rod, can you pull this report on  
 11 this lady," and he said, "Sure."  
**12 Q And he didn't ask you why?**  
 13 A No.  
**14 Q Well, then how did you figure out which**  
**15 detective had investigated it? Did he tell**  
**16 you?**  
 17 A He pulled the report. It was on the report. I  
 18 read the report, and -- go ahead. You can ask  
 19 the question.  
**20 Q Did Mr. Johnson -- did you communicate at all**  
**21 with Mr. Johnson that there were some concerns**  
**22 about Calvin Braxton as it related to Ms.**  
**23 Rachal's death?**  
 24 A No, not to my knowledge. Not to my  
 25 recollection.

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**1 Q Did you tell him that you were investigating concerns by Mr. Oliphant?**  
**2**  
 3 A No.  
**4 Q Well, what did Mr. Johnson tell you when he got the report?**  
**5**  
 6 A He just brought the report to me and gave it to me and I read it. And then for a second opinion, I asked him to read it because he's a very experienced homicide detective. And I asked him, "Rod," I said, "Am I missing anything in this report?" And I further asked, "Do you know these detectives and what's their credibility?" And he knew them. He read the report, and we had the same opinion.  
**15 Q Did you have any discussions with Mr. Johnson at all about Mr. Oliphant?**  
**16**  
 17 A No.  
**18 Q Did you have any discussions with Mr. Johnson at all about Calvin Braxton?**  
**19**  
 20 A No.  
**21 Q Was there any mention of Calvin Braxton in the suicide report?**  
**22**  
 23 A Yes.  
**24 Q What was it?**  
**25**  
 25 A I think he's the owner of the vehicle that she

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1 was driving.  
**2 Q And I am right about my recitation, right? She was in a hotel. She had locked herself in the room and killed herself in the room, right?**  
**3**  
**4**  
 5 A Yeah, briefly, yes.  
**6 Q So other than Mr. Braxton being the owner of the vehicle she was driving, any other mention of him?**  
**7**  
**8**  
 9 A No.  
**10 Q So what else can you tell me about interactions you had with anyone regarding the suicide of Ms. Rachal 25 years ago?**  
**11**  
**12**  
 13 A Major Oliphant had mentioned that a particular Natchitoches Parish deputy was involved in an investigation and potentially had some information that wasn't in the report. So I thought that was important to hear that, to hear what he had to say.  
**19 Q Who was that?**  
**20**  
 20 A I don't recall his name.  
**21 Q When did Mr. Oliphant tell you that?**  
**22**  
 22 A Is it McDowell or -- I'm guessing at his name. I met him briefly, maybe 30 minutes, here in Natchitoches, and I hadn't talked to him since then.  
**23**  
**24**  
**25**

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**1 Q Wait a minute. You drove to Natchitoches to talk to a sheriff's deputy?**  
**2**  
 3 A Correct.  
**4 Q And that's because Mr. Oliphant told you what specifically?**  
**5**  
 6 A That this particular deputy -- matter of fact, the deputy's name is in the report, the SPD report. So that led some credibility that it wasn't just a random name. But, yeah, he is mentioned in the Shreveport Police Department report, so I then contacted him to see if he had, you know, potentially some information that didn't make it into a report, or he had some concerns that didn't make it into the report.  
**16 Q Well, how -- what was reflected about this Natchitoches Parish sheriff's deputy in the Shreveport Police Department report?**  
**17**  
**18**  
 19 A I think he attended the autopsy where the Shreveport police detectives --  
**21 Q And what did Mr. Oliphant tell you this guy supposedly knew?**  
**22**  
 23 A He just said, "Look, he potentially --" he didn't have any details or anything. He said, "He may know something about the death of Ms.

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1 Rachal that may be of concern."  
**2 Q So you get the report and the dude's name is there, right?**  
**3**  
 4 A Uh-huh.  
**5 Q Do you still have that report?**  
**6**  
 6 A No, I do not.  
**7 Q What did you do with it?**  
**8**  
 8 A It's with my other notes.  
**9 Q Disappeared?**  
**10**  
 10 A They were lost, correct.  
**11 Q So you read the report. The guy's name is mentioned in there as attending the autopsy. Anything else?**  
**12**  
**13**  
 14 A I drove to Natchitoches and met him.  
**15 Q But didn't Mr. Oliphant tell you that he may have information about Calvin or his involvement?**  
**16**  
**17**  
 18 A No, I don't recall that.  
**19 Q He just told you that he may have information and he didn't tell you what?**  
**20**  
 21 A Concerning Lydia Rachal's death.  
**22 Q But Mr. Oliphant didn't tell you what he thought he knew?**  
**23**  
**24**  
 24 A No.  
**25 Q So then you made another trip to Natchitoches?**

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1 A I don't know if I made -- I made a trip to  
 2 Natchitoches.  
 3 **Q So this was the same day you met with Mr.  
 4 Oliphant?**  
 5 A That's in Alexandria.  
 6 **Q Oh, Alexandria. So you drove here in your unit  
 7 again?**  
 8 A To Natchitoches, correct.  
 9 **Q And had you called this guy beforehand?**  
 10 A Yes.  
 11 **Q And you don't know his name?**  
 12 A I would have to look at the Shreveport Police  
 13 Department report to remind me of his name. I  
 14 want to say it's McDowell or something along  
 15 those lines.  
 16 **Q And so then you met him here, and what  
 17 happened?**  
 18 A We met in a parking lot near I-49, and I had  
 19 the report. And I asked him if he remembered  
 20 the case. He said yes, he did. And I just  
 21 asked him, I said, "Do you remember anything  
 22 being -- having any concerns about her death  
 23 that it was anything other than a suicide?"  
 24 And his response was, "No, I don't." You know,  
 25 he said, "I had very little involvement in the

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1 case." And I think he -- it's in the report  
 2 and he said he went to the autopsy. And he may  
 3 have drove the vehicle back, but I may be  
 4 incorrect about that. But he was like, "I  
 5 don't have any concerns about it." I said,  
 6 "Okay. I appreciate your time," and that was  
 7 the end of it.  
 8 **Q Did you tell him that this was because Mr.  
 9 Oliphant had suggested he knew something that  
 10 -- more than what might be reflected in the  
 11 report?**  
 12 A I don't think so.  
 13 **Q Did you ask him about Calvin Braxton?**  
 14 A I'm not 100 percent, but I don't think I did.  
 15 **Q So then what was the point in talking to him?**  
 16 A Well, I mean, Lydia Rachal's death. I mean, if  
 17 she died by homicide, that would be very  
 18 important. And if he had information that  
 19 could prove somebody, whoever it is, committed  
 20 the homicide, that would be very important.  
 21 But he didn't. And the report was very  
 22 thorough, and that was -- after I talked to  
 23 him, in my opinion, that whole situation was  
 24 closed.  
 25 **Q When you talked to Mr. Oliphant, he told you**

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1 that he believed Calvin Braxton had involvement  
 2 in the death of Lydia; is that right?  
 3 MR. FALCON:  
 4 Object to the form. Asked and  
 5 answered.  
 6 MS. CRAFT:  
 7 **Q Isn't that right, sir?**  
 8 A He said -- I don't know if he said by accident.  
 9 It's in whatever report. He said that there  
 10 was -- he was involved in a -- or in the  
 11 surroundings of the suspicious death of Ms.  
 12 Lydia Jackson.  
 13 **Q Rachal.**  
 14 A Yeah, I'm sorry, Rachal.  
 15 **Q When you talked to Mr. Johnson, did you ever  
 16 talk to anybody with the Shreveport Police  
 17 Department other than Mr. Johnson who was  
 18 previously affiliated with them?**  
 19 A I'm sorry, say that one more time.  
 20 **Q You said you talked to Mr. Johnson. He had a  
 21 previous affiliation with the Shreveport Police  
 22 Department.**  
 23 A Correct.  
 24 **Q Do you know if anyone with state police talked  
 25 to anybody, and I'm going to say "else" just**

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1 because I know Mr. Johnson used to be there  
 2 with the Shreveport Police Department about the  
 3 death of Lydia Rachal as a result of Mr.  
 4 Oliphant's information in March of 2018?  
 5 A Yes, we called the Shreveport detective. He  
 6 was on scene at the suicide.  
 7 **Q So then you reached out and called the  
 8 Shreveport Police Department detective --  
 9 A Correct.  
 10 -- who investigated Ms. Rachal's death?**  
 11 A He was on scene. I think he was a patrol  
 12 officer at the time. He wasn't the case agent  
 13 on it.  
 14 **Q Who is the "we" doing the call?**  
 15 A Me and Rod Johnson. We put him on speaker  
 16 phone, called him up, and we stood in his  
 17 office and asked him a couple of questions.  
 18 **Q Tell me everything you remember about that.**  
 19 A We called him. Rod called him on his desk  
 20 phone and said, "Hey," he's currently a  
 21 detective. Rodney Horton is his name.  
 22 **Q Rodney what?**  
 23 A Horton. And said, do you remember a death that  
 24 occurred at this hotel back in -- whatever year  
 25 that was. And he was, like, yeah, I remember.

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1 I do remember being there. And we asked him a  
 2 couple of questions, look, was there anything  
 3 that you were concerned about? Was there  
 4 anything to indicate there's anything other  
 5 than a suicide? And he's like, no. He said, I  
 6 don't -- you know, I remember it, and it was  
 7 pretty clearly a suicide. And that was the  
 8 extent of the conversation. We just thanked  
 9 him. We didn't explain the call. We just  
 10 asked him if he remembered a few -- if he had  
 11 any concerns about the situation, about the  
 12 death.  
 13 **Q Is it your testimony you -- neither you nor**  
 14 **Rod, your guy, mentioned anything to Mr. Horton**  
 15 **about Calvin Braxton?**  
 16 A Correct.  
 17 **Q Did you mention anything to him about there was**  
 18 **a safety concern for another state trooper?**  
 19 A No, we did not.  
 20 **Q Did he ask you, why are you looking at this?**  
 21 A He did not.  
 22 **Q So did you ever call the detective who actually**  
 23 **investigated Ms. Rachal's suicide?**  
 24 A We didn't. I think they've long since been  
 25 retired.

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1 A No.  
 2 **Q Did you ask Mr. McNeal if you needed to prepare**  
 3 **a report?**  
 4 A I think we discussed. I said, look, I really  
 5 don't have anything to write. And he agreed  
 6 with me, and that was the extent of it.  
 7 **Q So did he ask you to write a report?**  
 8 A No.  
 9 **Q Did you ask him if you should write a report?**  
 10 A I think we had a discussion, a mutual  
 11 discussion, hey, this is what I got. And to  
 12 put it pretty quickly, it's a nothing bird.  
 13 There's nothing here, and do you want me to  
 14 write a report about nothing? And we agreed  
 15 that wasn't necessary.  
 16 **Q Did you relay that information to Mr. Oliphant,**  
 17 **look, your suspicions --**  
 18 A I did.  
 19 **Q Tell me about that conversation.**  
 20 A I just told him what I had discovered, that,  
 21 you know, we pulled the report, looked at it  
 22 thoroughly. I had experienced homicide  
 23 detectives look to see if I've missed anything.  
 24 We talked to one of the officers on the scene,  
 25 and we talked to the deputies that he

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1 **Q You did not?**  
 2 A Did not.  
 3 **Q Well, who else did you talk to?**  
 4 A That's it.  
 5 **Q And did you have notes on your conversation**  
 6 **with Mr. Horton somewhere?**  
 7 A I didn't take notes at that point.  
 8 **Q Why not at that point?**  
 9 A There was just nothing to write down. No, he  
 10 said, I have no concerns.  
 11 **Q What else did you do with respect to the**  
 12 **information Mr. Oliphant provided you relative**  
 13 **to Ms. Rachal's suicide that we haven't talked**  
 14 **about so far?**  
 15 A I don't recall doing anything else. I mean, it  
 16 was pretty -- it was a very brief and  
 17 preliminary investigation, and there was no  
 18 concerns so it was closed fairly quickly.  
 19 **Q In this preliminary investigation of yours that**  
 20 **you just told us about, did you prepare a**  
 21 **report?**  
 22 A No.  
 23 **Q Doesn't the state police policy require that**  
 24 **you prepare a report even if an investigation**  
 25 **does not result in criminal charges?**

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1 specifically mentioned. And none of them had  
 2 anything to add. And it was, in my opinion,  
 3 was clearly a suicide.  
 4 **Q And what was his reaction?**  
 5 A I mean, he was appreciative and good with it.  
 6 **Q When did you tell him that?**  
 7 A The best of my recollection some time between  
 8 the 13th and the 20th of April of 2018.  
 9 **Q Did you talk to him in person about that?**  
 10 A I believe it was a phone call.  
 11 **Q And you're saying on April 13th you have,**  
 12 **"Brief Captain McNeal, threat assessment," and**  
 13 **I realize we got all the way over on the other**  
 14 **side of the world. Is threat assessment a term**  
 15 **of art?**  
 16 A I don't know. I don't know what you mean by  
 17 that.  
 18 **Q Did you perform a threat assessment on Mr.**  
 19 **Braxton?**  
 20 A On Mr. Braxton, no.  
 21 **Q Did you do anything with respect to Mr.**  
 22 **Braxton, like, I don't know, look at his**  
 23 **criminal record?**  
 24 A No, I did not.  
 25 **Q And isn't that because Mr. McNeal told you that**

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**1 if you ran a search through any database, there**  
**2 would be a record of that?**  
3 A I don't know if we had that conversation, but  
4 I've got to have a criminal predicate to run  
5 somebody's criminal history. And like I told  
6 you, I never thought it rose to that, so I  
7 didn't -- I never ran his criminal history.  
**8 Q You don't remember having a conversation with**  
**9 Mr. McNeal where the two of y'all discussed**  
**10 that if you ran Mr. Braxton's name through any**  
**11 of those databases there would be a record of**  
**12 that?**  
13 A I don't recall that --  
14 MR. FALCON:  
15 Objection. Form. Asked and answered.  
16 MS. CRAFT:  
**17 Q I'm sorry, go ahead. Your answer is?**  
18 A I don't recall that conversation, but, I mean,  
19 it's common knowledge if you run a criminal  
20 history or run anything in the database there's  
21 a record. And I had no reason to run a  
22 criminal history, so I didn't run a criminal  
23 history.  
**24 Q Well, did you try in any way to determine**  
**25 whether or not Calvin Braxton was some sort of**

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**1 assessment, "conference call."**  
2 A Uh-huh.  
**3 Q What's that?**  
4 A That was a conference call that I briefed the  
5 command staff on the information that I had.  
**6 Q I don't know what command staff is. Would you**  
**7 please tell me who you briefed?**  
8 A It's typically --  
**9 Q No, no, no, I don't want you to guess.**  
10 A Specifically who was on the call and all, I can  
11 tell you a couple. I know Captain McNeal was  
12 on there. Colonel White. And 100 percent  
13 that's something too that I recall. I think --  
14 I'd be speculating on the others, but --  
**15 Q Mr. Hyatt, was he on there?**  
16 A I'd be shocked if he was on there.  
**17 Q Mr. Edmundson?**  
18 A I think Colonel Reeves was the Colonel at this  
19 point.  
**20 Q Mr. Reeves.**  
21 A I believe he was on that, but I'm not 100  
22 percent.  
**23 Q Anyone else -- let me ask it another way. Who**  
**24 was the command staff in April of -- April 20th**  
**25 of 2018 that you're talking about? Who would**

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**1 treat to Mr. Oliphant other than what you've**  
**2 described? And I want to make sure I'm clear.**  
**3 I'm going to call it the re-investigation of**  
**4 Ms. Rachal's suicide. You told us all the**  
**5 stuff you did with that. You talked to Thurman**  
**6 Miller who said he never overheard any**  
**7 bragging. Is there anything else?**  
8 A Concerning Mr. Braxton? No.  
**9 Q Well, how about concerning this information**  
**10 that Mr. Oliphant put out?**  
11 A No. We talked about general things, personal  
12 security, personal awareness.  
**13 Q What do you mean you talked about general**  
**14 things?**  
15 A If anybody was watching him, a potential threat  
16 to him or his family, some steps that you could  
17 take to mitigate those threats, potential  
18 threats.  
**19 Q You didn't think that he knew those steps?**  
20 A I think he knows a lot of them, but I think  
21 everybody can be reminded no matter who you  
22 are.  
**23 Q Well, let's look at April 20, 2018 on your**  
**24 calendar, "Exhibit 25." At 10:30, you say,**  
**25 "Threat assess." I'm assuming that's**

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**1 you have considered to be command staff?**  
2 A Colonel Reeves, Colonel Noel, Colonel White. I  
3 don't know if Colonel Oliphant was on there. I  
4 don't recall if he was or not. I think he was  
5 a colonel at that point. Captain McNeal, and  
6 there's probably a couple more that I don't  
7 recall off the top of my head.  
**8 Q Who set up the conference call?**  
9 A I know the conference call was relayed to me  
10 from -- by Captain McNeal.  
**11 Q Relayed to you how?**  
12 A He just called me and said I need you to be on  
13 a conference call on this date and time and  
14 brief us on this information.  
**15 Q Did he email you the details for the conference**  
**16 call?**  
17 A I don't think so.  
**18 Q Did you write them down somewhere?**  
19 A I'm sure I wouldn't have.  
**20 Q Do you know if there was an email circulated**  
**21 among everyone about the conference call and**  
**22 the call-in information?**  
23 A If there was, I wasn't included.  
**24 Q I forgot to ask you, I understood, and I may be**  
**25 wrong, but when you contacted Mr. Rodney**



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1 Johnson, the investigator for the state police,  
 2 weren't you required to notify his chain of  
 3 command that you were going to be contacting  
 4 him?  
 5 A No.  
 6 Q So did you skip his chain of command and call  
 7 him directly?  
 8 A I just walked down the hall. I mean, he's  
 9 three offices down the hall.  
 10 Q So he's in your office?  
 11 A Yes.  
 12 Q Well, did you tell Mr. Joyner or Mr. Brown or  
 13 any of the other guys?  
 14 A No.  
 15 Q Do you know if Mr. Johnson did?  
 16 A I don't know what he did.  
 17 Q When you and Mr. Johnson had your conversation,  
 18 that was, you said, your office. Were there  
 19 other people around?  
 20 A No.  
 21 Q He has his own office?  
 22 A Yes.  
 23 Q And how many conversations did you and Rodney  
 24 Johnson have about Ms. Rachal's suicide?  
 25 A Actually about the facts, probably one.

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1 occurred since then? Has it occurred -- do you  
 2 know if it occurred before?" And no. The  
 3 answer was no to my knowledge -- my  
 4 recollection.  
 5 Q Page two of Exhibit #20, it says, "To somewhat  
 6 confirm someone is watching my/our every move  
 7 has caused great concern for my safety and the  
 8 safety of my family." Did you ask him what he  
 9 meant by that?  
 10 A We discussed that whole -- the circumstances  
 11 surrounding that, and he explained that one  
 12 particular incident.  
 13 Q What one particular incident, where allegedly  
 14 Erin Friedman, the wife of the lawyer --  
 15 A Yes.  
 16 Q -- daughter of the lawyer --  
 17 A His daughter.  
 18 Q -- turned into the neighborhood?  
 19 A Yes.  
 20 Q Isn't it a public street?  
 21 A I think what was relayed to me by Colonel  
 22 Oliphant, they were watching his house, not  
 23 just driving by his house.  
 24 Q Well, where is that in here, that Erin Friedman  
 25 was watching his house, not just driving by?

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1 Q So you had this threat assessment conference  
 2 call on April 20, 2018. Tell me how many times  
 3 you have participated in a conference call just  
 4 like this.  
 5 A Prior to that?  
 6 Q Yeah.  
 7 A Two or three times on cases.  
 8 Q And how about since then?  
 9 A But I -- at that time, I was not on the plan  
 10 staff, so typically nobody below the rank of  
 11 captain is on those conference calls.  
 12 Q How about since then?  
 13 A A lot.  
 14 Q So when you say threat assessment conference  
 15 call, who was the threat?  
 16 A It was Colonel Oliphant's concerns about his  
 17 and his family's personal safety.  
 18 Q From whom?  
 19 A Whoever could have been that person. You know,  
 20 it could have been persons known or unknown,  
 21 and, I mean, he specifically mentioned the  
 22 Friedmans. He believed that they had been  
 23 watching him at least one time and --  
 24 Q So how did you investigate them?  
 25 A I did not. I asked him, I said, "Has that

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1 Where is that?  
 2 A I notice a small, silver Ford hatchback  
 3 wagon --  
 4 Q Where are you reading from so I can follow  
 5 along?  
 6 A It's about the one, two, three, four, five,  
 7 six, seventh line down on the March 2, 2018  
 8 incident report.  
 9 Q Where it says, "Parked on Jamar," J-a-m-a-r  
 10 "Drive which is located 250 to 300 yards east  
 11 of my residence," three football fields, "and  
 12 is the main entrance to the subdivision in  
 13 which my home is located."  
 14 A Now, how many questions are you going to ask  
 15 me, one or three?  
 16 Q Well, is that what you're referring to?  
 17 A You asked me where it said that she wasn't just  
 18 driving by, and I was trying to read that to  
 19 you.  
 20 Q Well, in --  
 21 A "I noticed a small, silver Ford hatchback wagon  
 22 vehicle parked on Jamar Drive."  
 23 Q Keep reading.  
 24 A It wasn't driving by. It was parked.  
 25 Q Keep reading.

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1 A And I drove by there, and it's not a place to  
 2 park.  
 3 **Q So you did go there?**  
 4 A I drove by as part of the threat assessment and  
 5 looked at the area.  
 6 **Q So there was something else that you did**  
 7 **besides what you've already told us exhaustibly**  
 8 **under oath? You actually drove by there. What**  
 9 **else did you do, sir --**  
 10 A I drove by --  
 11 **Q -- as part of the threat assessment?**  
 12 A I don't recall anything else.  
 13 **Q So you were reading from this part that there**  
 14 **was a silver Ford hatchback parked on Jamar**  
 15 **Drive. It says 250 to 300 yards. I am right,**  
 16 **am I not, that's like three football fields?**  
 17 A It's an open, straight-line site. And if I was  
 18 conducting surveillance, that's typically a  
 19 distance I would park away. You don't park --  
 20 if you're trying to do covert surveillance, you  
 21 don't park right next to a house. You got to  
 22 park away and watch from a distance.  
 23 **Q Did you go there with Mr. Oliphant and he**  
 24 **showed you where he saw this Ford parked?**  
 25 A No.

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1 A I did not.  
 2 **Q Then he writes, "The name Friedman is well**  
 3 **known in Natchitoches, Louisiana and is alleged**  
 4 **to have business connections with Mr. Braxton,**  
 5 **specifically Samuel James Friedman, aka Sam**  
 6 **James, who is the father of Gregory Friedman."**  
 7 **Did you try to figure out if any of that was**  
 8 **true?**  
 9 A No, it wasn't relevant, so I did not.  
 10 **Q Is it that it wasn't relevant because it's kind**  
 11 **of nuts to try to make that connection that**  
 12 **Erin Friedman's car or the lawyer's car happens**  
 13 **to be somewhere three football fields from that**  
 14 **man's house, and his connection in his mind is**  
 15 **that that lawyer guy is related to some guy who**  
 16 **might have been in business with Mr. Braxton**  
 17 **years ago? Really?**  
 18 MR. FALCON:  
 19 Object to the form.  
 20 MS. CRAFT:  
 21 **Q Did you find that odd as an investigator?**  
 22 A And what's your question?  
 23 **Q That this was some sort of -- that's his tie to**  
 24 **Mr. Braxton?**  
 25 A No, I don't think it's odd at all.

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1 **Q So you don't even know where it was parked,**  
 2 **right?**  
 3 A He specifically described it in his report and  
 4 to me, and I drove by and found that specific  
 5 spot. And it was obvious what it was to me. I  
 6 didn't have any questions about it.  
 7 **Q Isn't this an open area, sir, where you can see**  
 8 **all the cars coming in and out? It's one way**  
 9 **in and one say out, right?**  
 10 A Of the -- yeah, there's a neighborhood next to  
 11 it, and it's one way in and one way out. And  
 12 there's no houses at that point, so a car being  
 13 parked there would raise my suspicions also.  
 14 **Q So did he tell you whether or not there was**  
 15 **somebody sitting in this Ford hatchback?**  
 16 A Yeah, I mean, it's in his report that they --  
 17 when they noticed him, they drove away and he  
 18 followed them.  
 19 **Q And he ran the license plate; is that right?**  
 20 A Correct.  
 21 **Q And it came back to Erin Friedman and Gregory**  
 22 **Friedman, the lawyer.**  
 23 A Correct.  
 24 **Q Plantation Point, Natchitoches, Louisiana. Did**  
 25 **you go to that neighborhood, too?**

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1 **Q But you never did anything to ferret out**  
 2 **whether it was true, did you?**  
 3 A No, because it wasn't a criminal violation.  
 4 Whoever they are can legally park there and  
 5 watch his house. That's not a crime,  
 6 especially just one time.  
 7 **Q And that's what Mr. Oliphant told you. "I only**  
 8 **saw somebody parked there one time," right?**  
 9 A That's my understanding, correct.  
 10 **Q And you never --**  
 11 A And I specifically asked him, "Hey, if this  
 12 continues to happen, let me know."  
 13 **Q But you never bothered to call any of the**  
 14 **Friedmans and say, hey, what were you doing on**  
 15 **Jamar Drive, assuming he's being truthful to**  
 16 **you?**  
 17 A I believe he was being 100 percent truthful.  
 18 That was my opinion. And, no, I didn't call  
 19 them because it was not a crime. And what am I  
 20 going to -- I wouldn't have a question to ask  
 21 them. Were you parked there? And, you know,  
 22 it's lawful activity. I didn't see a reason to  
 23 call them.  
 24 **Q But with all due respect, you essentially**  
 25 **looked over the shoulder of the Shreveport**

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**1 Police Department from a 25 year old suicide**  
**2 with nothing else. With that activity on your**  
**3 part plus talking to people, you didn't think**  
**4 enough to call the Friedmans and say, were one**  
**5 of y'all on Jamar Drive?**  
6 A I think there's a big difference of somebody  
7 sitting one time and watching a house of a  
8 police officer and a potential homicide.  
9 That's a big difference, and even the potential  
10 homicide, which I believe was a suicide, you  
11 know, they weren't involved in it. I spent  
12 very little time on it. I read the report. I  
13 asked for a second opinion. I talked to an  
14 officer who was on scene, and everything  
15 checked out in our opinion, and that was the  
16 end of it.  
**17 Q You drove from your office in Bossier to here**  
**18 in Natchitoches. That's an hour, right, one**  
**19 way? That's two hours of state time, not to**  
**20 mention getting Mr. Johnson to get the police**  
**21 report, not to mention the phone calls, not to**  
**22 mention the driving to Alexandria to talk to**  
**23 Mr. Oliphant. That doesn't sound like a little**  
**24 bit of time to me, sir.**  
25 A That's a typical day for us. We drive like

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**1 him --**  
2 A No, that was never told to me.  
**3 Q So what was the part about there's nothing to**  
**4 it, but if there is something, reopen it. What**  
**5 is that about?**  
6 A Mr. Rachal conveyed to Colonel Oliphant that if  
7 y'all have got information that there's  
8 basically credible information that she was  
9 murdered, then, yes, he wants the case  
10 reopened. But if there's no credible  
11 information, he doesn't want that pain -- or  
12 that's the way I took it, the pain brought back  
13 up.  
**14 Q So Mr. Oliphant told you that he had spoken to**  
**15 Mr. Rachal?**  
16 A Yes.  
**17 Q And did Mr. Oliphant tell you that he's the one**  
**18 that approached Mr. Rachal?**  
19 A I don't know if he specifically did, but I  
20 assumed he was.  
**21 Q What else did he tell you about he and Mr.**  
**22 Oliphant -- his communications with Lydia**  
**23 Rachal's ex-husband or dead husband or whatever**  
**24 you want to call him?**  
25 A I don't recall. I mean, I recall that. Off

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1 that all the time. That is not unusual.  
2 That's a typical day's work for us.  
**3 Q Did Mr. Oliphant ever tell you whether or not**  
**4 he had an familial relationship to Lydia**  
**5 Rachal's husband?**  
6 A No.  
**7 Q Wouldn't that have been important to you?**  
8 A Yes.  
**9 Q Did he ever tell you whether or not he had had**  
**10 any communication with Lydia Rachal's husband?**  
11 A Yes.  
**12 Q Why?**  
13 A He described -- I don't remember his name, but  
14 he's a police officer, and maybe a recently  
15 retired police officer here in Natchitoches,  
16 and I think it was described that he doesn't --  
17 if there's something to it, he wants the case  
18 reopened. But if there's nothing to it, you  
19 know, he doesn't want that pain basically to  
20 build back up.  
**21 Q Mr. Oliphant told you that Mr. Rachal told him**  
**22 that there wasn't anything to it. It was a**  
**23 suicide, correct?**  
24 A Ask that again.  
**25 Q Mr. Oliphant told you that Mr. Rachal had told**

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1 the top of my head, that's all I recall.  
**2 Q Did you call Mr. Rachal?**  
3 A No.  
**4 Q Did you ever talk to him?**  
5 A No.  
**6 Q And Mr. Oliphant never told you that he is a**  
**7 family member of Mr. Rachal's did he?**  
8 MR. OXENHANDLER:  
9 Object to form.  
10 MS. CRAFT:  
**11 Q You can answer it.**  
12 A No.  
**13 Q Did Mr. Oliphant ever tell you whether or not**  
**14 he and Mr. Rachal are friends in addition to**  
**15 being family members?**  
16 MR. OXENHANDLER:  
17 Object to form.  
18 A I don't know about friends, but I would assume.  
19 It's a small police community in this area that  
20 they knew each other. Yeah, I would not be  
21 surprised if they are friends.  
22 MS. CRAFT:  
**23 Q That wasn't my question. Did he ever tell you**  
**24 whether or not they were friends?**  
25 A No.

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1 **Q** Now, in the paragraph we were reading, we  
 2 started with the sentence, "To somewhat confirm  
 3 someone is watching." And then the next  
 4 sentence is, "I have no idea what Calvin  
 5 Braxton's intentions are, and I'm not sure what  
 6 he is capable of specific to harming me or my  
 7 family. What's even more concerning to me is  
 8 the mysterious and untimely death of a woman  
 9 named Lydia Rachal whom Calvin Braxton was  
 10 allegedly dating at the time of her death  
 11 several years ago." Did you ever try to  
 12 confirm whether or not Mr. Braxton had been  
 13 dating Ms. Rachal?  
 14 **A** No, I wouldn't know who to talk to other than  
 15 her husband.  
 16 -- INTERRUPTION --  
 17 **MS. CRAFT:**  
 18 Oh, he's here. Thank you.  
 19 **MS. CRAFT:**  
 20 **Q** I'm sorry, what?  
 21 **A** I wouldn't know who to talk to other than her  
 22 husband, and at that point, it wasn't relevant  
 23 to me.  
 24 **Q** And then it says, "Rachal's death, ultimately  
 25 ruled a suicide, occurred in a hotel located in

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1 that was investigated.  
 2 **Q** The only source of, quote, "questions in the  
 3 community" was Mr. Oliphant. That's what he  
 4 was feeding you, correct?  
 5 **A** Correct.  
 6 **Q** And this business about the only source of it  
 7 being a, quote, "mysterious death" was Mr.  
 8 Oliphant. That's what he was feeding you,  
 9 right?  
 10 **A** That's the only source I got that information  
 11 from.  
 12 **Q** Exactly. When you went around to try to figure  
 13 out if, A, the death was mysterious, you  
 14 determined no, there wasn't. It was a suicide,  
 15 straight up, right?  
 16 **A** Yes.  
 17 **Q** Did Mr. Oliphant ever tell you why he thought  
 18 he personally thought it was a mysterious  
 19 death?  
 20 **A** No.  
 21 **Q** And this business, reasonable suspicion, that's  
 22 a term of art in law enforcement, isn't it?  
 23 **A** I don't know -- I wouldn't describe it a term  
 24 of art. No, I think it's in the statute as  
 25 criminal procedure.

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1 the Shreveport/Bossier City area. The fact  
 2 that Calvin Braxton's name was closely  
 3 connected to this woman at the time of her  
 4 death is," quote, "enough reasonable suspicion  
 5 for me to be concerned for my safety and the  
 6 safety of my family." Do you agree with that  
 7 statement?  
 8 **A** I would agree that if somebody has a reputation  
 9 for being involved in a homicide and that you  
 10 suspected them or maybe their close friends are  
 11 watching you, I would be concerned, yes.  
 12 **Q** But you knew, sir, that my client -- first of  
 13 all, it wasn't a homicide, right? You knew  
 14 that.  
 15 **A** I can tell you at that point I didn't, and I  
 16 know Colonel Oliphant didn't know that.  
 17 **Q** Well, yes, he did, sir, because he wrote, "It  
 18 was ultimately ruled a suicide," right? That's  
 19 what he wrote in his report. He certainly knew  
 20 it was a suicide.  
 21 **A** He may have, yes. He may have, but I think a  
 22 mysterious death, he had questions. I don't  
 23 want to put words in his mouth, but he  
 24 obviously had questions and they were, I would  
 25 say, questions in the community of how well

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1 **Q** Right. That in order for you to investigate  
 2 anything, you got to have a reasonable  
 3 suspicion, right?  
 4 **A** Correct.  
 5 **Q** You think somebody of Mr. Oliphant's rank and  
 6 experience knows when he uses the term  
 7 "reasonable suspicion" what it means in the  
 8 "Code of Criminal Procedure?"  
 9 **A** I think he definitely knows the difference  
 10 between reasonable suspicion, probable cause,  
 11 and proof beyond a reasonable doubt.  
 12 **Q** Then it said, "It would be my suggestion that  
 13 Louisiana State Police review the case file  
 14 regarding the death of Lydia Rachal to  
 15 determine the actual manner of death and/or  
 16 determine if there's any possibility of foul  
 17 play." That suggestion by Mr. Oliphant was  
 18 followed through; isn't that correct?  
 19 **A** Correct.  
 20 **Q** You never, independent of anything that Mr.  
 21 Oliphant wrote, you never had any reasonable  
 22 suspicion that Calvin Braxton was in any way  
 23 involved in the death of Ms. Rachal, did you?  
 24 **A** Correct.  
 25 **Q** Then he writes, "Additionally, I'm requesting

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1 the Louisiana State Police conduct a personal  
 2 threat assessment regarding the capabilities of  
 3 Calvin Braxton, Gregory Friedman, and Erin  
 4 Friedman to potentially harm me or my family."  
 5 That occurred, didn't it?  
 6 A Threat assessment, yes, of his family's safety,  
 7 correct.  
 8 Q And this threat assessment phone call on April  
 9 20th, what did you brief the command staff on?  
 10 A I briefed them on Lydia Rachal, that we  
 11 reviewed it, and we believed it was an actual  
 12 suicide and that Mr. Braxton was not involved  
 13 whatsoever and that I had discussed with  
 14 Colonel Oliphant some personal safety measures  
 15 for him and his family. And one of those  
 16 things is report, you know, any other such  
 17 sightings as the one that's in that report.  
 18 Q So are you denying that you performed a threat  
 19 assessment as it relates to Calvin Braxton  
 20 specifically?  
 21 A Correct.  
 22 Q And you never told Mr. Oliphant that you  
 23 performed a threat assessment on Mr. Braxton?  
 24 A A threat assessment on Mr. Braxton would  
 25 include running his criminal history, checking

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1 Q In your conference call with the command staff,  
 2 did you also talk about Gregory Friedman and  
 3 Erin Friedman?  
 4 A I don't recall talking about them. I have no  
 5 idea who they are other than them being in that  
 6 report.  
 7 Q What else did you tell them during the  
 8 conference call?  
 9 A To my recollection, just the Lydia Rachal  
 10 suicide and the threat assessment concerning  
 11 the situation.  
 12 Q You need to tell me other than in generalities.  
 13 What do you specifically remember --  
 14 -- INTERRUPTION --  
 15 -- OFF THE RECORD --  
 16 MS. CRAFT:  
 17 Q Go ahead. What else did you tell them?  
 18 A About the threat assessment that --  
 19 Q No, the conference call.  
 20 A I just explained it to you. The Lydia Rachal  
 21 suicide and the measures that I suggested to  
 22 Colonel Oliphant to increase his family's  
 23 awareness.  
 24 Q That's it?  
 25 A To the best of my recollection, correct.

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1 those type of sources, maybe interviewing  
 2 people that he knows and that stuff, and I  
 3 never did specifically do those on him because  
 4 I didn't see a reason to.  
 5 Q So you never told Mr. Oliphant that you  
 6 performed a threat assessment on Mr. Braxton?  
 7 A I performed a threat assessment related to this  
 8 whole incident, not specifically on Mr.  
 9 Braxton.  
 10 Q So you never told Mr. Oliphant you performed a  
 11 threat assessment on Mr. Braxton? I'm asking  
 12 the third time. That's a "yes" or "no," and  
 13 then you can explain until the cows come home.  
 14 A I'm not changing my answer. That's my answer.  
 15 Q You never told Mr. Oliphant you performed a  
 16 threat assessment on Mr. Braxton?  
 17 A I told him I performed a threat assessment. If  
 18 he took that to be specifically on Mr. Braxton,  
 19 I do not know. I told him I performed a threat  
 20 assessment and told him my findings.  
 21 Q Which were?  
 22 A I didn't see specifically any particular person  
 23 that was potentially going to harm him or his  
 24 family, that he could take certain measures to  
 25 raise his and his family's awareness.

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1 Q Do you know if anybody made any notes of this  
 2 conference call on April 20, 2018?  
 3 A I have no idea. I did not.  
 4 Q And then he writes, "I was so concerned that I  
 5 contacted Louisiana State Police Troop E and  
 6 requested that they make frequent security  
 7 checks around my residence." Did you verify  
 8 whether that was true?  
 9 A No, I took Colonel -- based on his reputation,  
 10 I took him at his word.  
 11 Q And he said, "I also advised LSPE to contact  
 12 the Natchitoches Parish Sheriff's Office to  
 13 conduct a security check as well." Did you  
 14 verify whether that was true?  
 15 A Based on Colonel Oliphant's reputation, I took  
 16 him at his word.  
 17 Q Do you know if one of the people he asked to  
 18 perform a security check on his residence was  
 19 actually Mr. Rachal?  
 20 A I had no idea.  
 21 Q Wouldn't you have wanted to know that?  
 22 A Yeah, I would like to know that.  
 23 Q Then he writes, "For months I have noticed  
 24 several suspicious-looking vehicles as I travel  
 25 the highways of the State of Louisiana, and

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1 I've even conducted counter-surveillance  
 2 missions to see if someone is following me.  
 3 I'll occasionally travel to open parking lots,  
 4 department stores, malls, business districts  
 5 and just park to observe the movements of other  
 6 vehicles. I have even exited my vehicle and  
 7 walked in certain areas to see if I can  
 8 identify suspicious vehicles. As a Louisiana  
 9 state trooper, I will remain vigilant and do my  
 10 best to ensure that I provide a safe  
 11 environment for me and my family." Did you  
 12 have any discussion with Mr. Oliphant about  
 13 that?  
 14 A No, that's not unusual behavior.  
 15 Q Did you have any discussion with him about  
 16 that, sir?  
 17 A No, I read the report and I took him at his  
 18 word.  
 19 Q Here's what I'm asking. If I'm a person, not  
 20 even a trained state police officer who  
 21 commands hundreds of people, I'm just a regular  
 22 gal, and I see a suspicious vehicle, I'm going  
 23 to write down the license plate number. Can  
 24 you tell me why Mr. Oliphant never did the same  
 25 thing in all this several months suspicious-

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1 Q You can answer it.  
 2 A I think everything he did was totally rational  
 3 and appropriate, and that's not unusual to make  
 4 u-turns. Bad guys do occasionally follow us  
 5 for ill intent. Like I mentioned to you  
 6 earlier, we constantly get warnings about it.  
 7 So that's -- I do it. I've never put it in a  
 8 report because it's never risen to that level,  
 9 but that's common and I encourage my personnel  
 10 to be aware of your surroundings. If you think  
 11 somebody is following you, then take counter-  
 12 measures. And obviously Colonel Oliphant did  
 13 that and --  
 14 Q The counter -- go ahead.  
 15 A And if it's just a singular vehicle going by or  
 16 -- you know, no, I would not write those down.  
 17 And sometimes you're just not in a position to  
 18 get a license plate. I say sometimes, most of  
 19 the time you're not in a position to get a  
 20 license plate.  
 21 Q Let me ask you this. In this training about  
 22 the surveillance and making sure you're not  
 23 being followed, I am correct, am I not, that  
 24 one of the parameters that are trained to the  
 25 officers is if you believe a vehicle is

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1 looking vehicles? How come?  
 2 A I think if -- I would not unless I noticed a  
 3 vehicle repeatedly. If there's a pattern by a  
 4 particular person or a vehicle and if you -- if  
 5 it's just a singular event unless something  
 6 particularly stands out, like obviously this  
 7 car that was parked near his house, stood out,  
 8 then I would not write down random car license  
 9 plate numbers.  
 10 Q Well, what he meant -- what do you know about  
 11 him conducting counter-surveillance missions?  
 12 Are you seriously telling me that he's going to  
 13 use this phrase, "I've conducted counter-  
 14 surveillance missions to see if someone is  
 15 following me," and that you didn't expect him  
 16 to write down the license plate number of a  
 17 single vehicle that he claims is suspicious in  
 18 all those months? He's trooper, right?  
 19 A Yes.  
 20 Q Wouldn't you expect him to act like one?  
 21 MR. FALCON:  
 22 Object to the form.  
 23 MR. OXENHANDLER:  
 24 Object to the form.  
 25 MS. CRAFT:

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1 suspicious or following you, you're supposed to  
 2 write down the license number? That's one of  
 3 the parameters in your training; isn't that  
 4 right?  
 5 A No. No, I wouldn't -- I don't agree with that.  
 6 You're not supposed to. If you can, yeah,  
 7 certainly write it down. But like I just  
 8 explained to you, many times you can't. And if  
 9 there's -- if it's trained personnel, it's  
 10 going to be multiple vehicles like we do.  
 11 Q You never garnered any information whatsoever  
 12 that anything about this last paragraph that  
 13 Mr. Oliphant wrote in this document was in any  
 14 way true, right? You asked him, "Do you have  
 15 the license plate numbers of people? Can you  
 16 describe the circumstances?" I would guess you  
 17 did as a trained investigator. Maybe you  
 18 didn't.  
 19 A I took -- based on his reputation, I took him  
 20 at his word.  
 21 Q So you never even asked him a single question  
 22 about this, hey, dude, did you write down the  
 23 plates? Where were you? Tell me what was  
 24 going on. What's the circumstances?  
 25 A Well, he did provide me with one plate and --

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**1 Q One plate.**  
 2 A Yeah.  
**3 Q For Ms. Friedman.**  
 4 A Uh-huh.  
**5 Q And are you the one that ran her plate?**  
 6 A I did not.  
**7 Q Who did?**  
 8 A He did as he stated in his report.  
**9 Q And so did you ask him about this last**  
**10 paragraph? You, as the investigator, you're**  
**11 supposed to be investigating his concerns.**  
**12 This sounds like a big part of his concerns has**  
**13 been going on for months.**  
 14 A Well, that's the reason that we talked about  
 15 the threat assessment and being aware, and he  
 16 obviously was already aware. But he also needs  
 17 to be aware around his house, which I think he  
 18 is.  
**19 Q Sir, my question was specific to this**  
**20 paragraph.**  
 21 A Did we discuss that paragraph specifically?  
 22 No.  
**23 Q Is there anything else in your conversations**  
**24 with Mr. Oliphant that you have not told me**  
**25 about? And I'm talking about every**

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1 one of the first steps I'm going to take.  
**2 Q I appreciate that. But my question was did you**  
**3 ever get any facts from him supporting his**  
**4 assertion that Mr. Braxton was in any way**  
**5 involved in Ms. Rachal's death?**  
 6 MR. FALCON:  
 7 Asked and answered.  
 8 MS. CRAFT:  
 9 He hasn't answered it.  
 10 MS. CRAFT:  
**11 Q Did you?**  
 12 A He mentioned the -- potentially the deputy,  
 13 Natchitoches deputy, maybe had some facts.  
**14 Q But did he tell you what they were? No, right?**  
 15 A No. When I talked to him, the deputy did not  
 16 have any facts. But I would assume Colonel  
 17 Oliphant believed he had some credible facts.  
**18 Q Well, did you ask Mr. Oliphant what he was**  
**19 supposed to know? You told us earlier no, you**  
**20 didn't even ask him that.**  
 21 A Yeah, I think he just said, "Look, supposedly  
 22 the deputy who was involved in the  
 23 investigation has concerns about it." And when  
 24 I talked to the deputy, he didn't have anything  
 25 to add.

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**1 conversation you had with him with respect to**  
**2 Mr. Braxton or this alleged threat assessment.**  
 3 A To the best of my recollection, I've told you.  
 4 I've answered honestly every question you've  
 5 asked, and I told you about every conversation  
 6 that I can recall concerning this incident.  
**7 Q Did you ever get any details from Mr. Oliphant**  
**8 whatsoever, as for his factual basis that Mr.**  
**9 Braxton was in any way involved in Ms. Rachal's**  
**10 suicide?**  
 11 A Details other than what's in his report? No, I  
 12 did not.  
**13 Q Well, there's no details in the report, sir.**  
**14 It just says a mysterious death. Other than**  
**15 his opinion or whatever you want to call it,**  
**16 did he ever provide you any factual basis for**  
**17 an assertion that Mr. Braxton was in any way**  
**18 involved in Ms. Rachal's death?**  
 19 A Based on his reputation, I took him at his  
 20 word.  
**21 Q I'm sorry.**  
 22 A And it's very easy to pull the Shreveport  
 23 report and actually to look at the facts. And  
 24 that's -- in my opinion, if I'm going to  
 25 conduct an investigation, that's the first --

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**1 Q So when you had this threat assessment**  
**2 conference call with the command staff, you**  
**3 told us who you do remember being there and who**  
**4 potentially was there. Can you tell me anyone**  
**5 you talked with about the threat assessment**  
**6 other than the conference call with Mr. McNeal,**  
**7 Mr. Johnson, Mr. Oliphant, the deputy here in**  
**8 Natchitoches Parish?**  
 9 MR. FALCON:  
 10 Object to the form.  
 11 MS. CRAFT:  
**12 Q Can you tell me?**  
 13 A I don't remember talking to anybody else. This  
 14 is -- it was a very -- like I described  
 15 earlier, a very much a nothing burger, and I  
 16 put very little time into it. I certainly  
 17 didn't talk about it around the office or  
 18 really anywhere else. I mean, there wasn't  
 19 really much to it. So there was -- you know,  
 20 other than those people that I've described, I  
 21 don't recall telling anybody else about it.  
**22 Q If you had to guesstimate, how much time did you**  
**23 spend?**  
 24 A Well, I mean, if you strike the travel time, a  
 25 few hours.

<p style="text-align: right;">122</p> <p><b>1 Q At least whole day if I do my math right. Hour</b>  <b>2 to and from, 20 minutes in the parking lot.</b>  3 A I said if you don't count the travel time.  <b>4 Q Oh, well, let's count the travel time.</b>  5 A Probably a full day, which is that's my job.  6 That's what I do, and I move onto the next  7 thing.  <b>8 Q Have you -- did you talk to Mr. Oliphant after</b>  <b>9 April 20, 2018 about Mr. Braxton?</b>  10 A I don't know that we've had a discussion -- I  11 don't recall having a discussion about this  12 since then.  <b>13 Q I'm not talking about this. I asked about Mr.</b>  <b>14 Braxton.</b>  15 A About Mr. Braxton. I don't know -- I don't  16 know Mr. Braxton, and I don't ever talk about  17 him. And this is the first time I've ever seen  18 him in my life.  19 MS. CRAFT:  20 Take a short break.  21 -- OFF THE RECORD --  22 MS. CRAFT:  23 That's all the questions I have, sir.  24 I'm sure one of these gentlemen will have  25 questions for you. Maybe not, but we'll</p>	<p style="text-align: right;">123</p> <p>1 see.  2 MR. OXENHANDLER:  3 Can I go first?  4 MR. FALCON:  5 Sure.  6 -- OFF THE RECORD --  7 EXAMINATION BY MR. OXENHANDLER:  <b>8 Q Captain Turner, right?</b>  9 A Yes, sir.  <b>10 Q Captain Turner, my name is Steve Oxenhandler.</b>  <b>11 I'm a lawyer, and I represent Colonel Oliphant</b>  <b>12 in this case. I just have a few questions.</b>  <b>13 One of the things that Ms. Craft asked you was</b>  <b>14 would it have been important for you to know</b>  <b>15 whether a lawsuit was filed before the report</b>  <b>16 was written, Colonel Oliphant's report, on</b>  <b>17 March 2nd or during your review of the case</b>  <b>18 file. And you said that would have been</b>  <b>19 important to you, right?</b>  20 A Yes, I'd like to know that.  <b>21 Q I'm going to show you what's Exhibit #1, which</b>  <b>22 is the lawsuit filed by Mr. Braxton. Do you</b>  <b>23 see this document, sir?</b>  24 A Yes.  <b>25 Q Can you tell me the date of this fax filing</b></p>
<p style="text-align: right;">124</p> <p><b>1 that's written there?</b>  2 A May 10, 2018.  <b>3 Q And from what I see in your notes that you had</b>  <b>4 here that your entire review of the contents of</b>  <b>5 Colonel Oliphant's March 2, 2018 incident</b>  <b>6 report were completed no later than April 20,</b>  <b>7 2018; is that correct?</b>  8 A Correct. That's correct.  <b>9 Q April 20th is before a lawsuit was filed</b>  <b>10 against Mr. Oliphant, right?</b>  11 A Yes.  12 MS. CRAFT:  13 I'm sorry, April 20th of 2018? Yeah?  14 MR. OXENHANDLER:  15 Yes.  16 MS. CRAFT:  17 Okay, great. Got you.  18 MR. OXENHANDLER:  <b>19 Q And this is May 10th, correct?</b>  20 A Yes, May 10th.  <b>21 Q So the lawsuit was filed after your</b>  <b>22 investigation was already complete?</b>  23 A Yes, so he couldn't have told me.  <b>24 Q If you look at Exhibit #20, please -- look at</b>  <b>25 Exhibit #20. Is that something -- sorry, 24 is</b></p>	<p style="text-align: right;">125</p> <p><b>1 the -- which exhibit is the --</b>  2 MR. FALCON:  3 You want the 2018 report?  4 MR. OXENHANDLER:  5 Yes, the 2018 --  6 MS. CRAFT:  7 That's 20.  8 MR. FALCON:  9 That's 20.  10 MR. OXENHANDLER:  11 Twenty (20).  12 MR. OXENHANDLER:  <b>13 Q I think on the second page of the report where</b>  <b>14 Colonel Oliphant writes, "It would be my</b>  <b>15 suggestion," you see where I'm talking about,</b>  <b>16 "-- That the Louisiana State Police," you're</b>  <b>17 following along with me?</b>  18 A Yes, sir.  <b>19 Q "It would be my suggestion that the Louisiana</b>  <b>20 State Police review the case file regarding the</b>  <b>21 death of Lydia Rachal to determine the actual</b>  <b>22 manner of death and/or determine if there was</b>  <b>23 any possibility of foul play." Did I read that</b>  <b>24 correctly?</b>  25 A Correct.</p>



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**1 Q Colonel Oliphant's suggestion that Lydia Rachal's case file be reviewed was not a request to reopen the case, was it?**  
**2**  
**3**  
 4 A Correct.  
**5 Q And what's the difference between reviewing a report and reopening a case?**  
**6**  
 7 A Reviewing a report is just like it sounds.  
 8 We're just reading the report to educate  
 9 ourselves on the facts of the case. And to  
 10 reopen a case, especially one that old, you  
 11 would have to have some very credible  
 12 information to actually open a -- reopen the  
 13 case.  
**14 Q That's not what you did in this case, is it?**  
 15 A No, not even close.  
**16 Q Were you ever asked or directed to conduct a murder investigation into the death of Lydia Rachal?**  
**17**  
**18**  
 19 A No.  
**20 Q Were you ever told that Colonel Oliphant had accused Calvin Braxton of murdering Lydia Rachal?**  
**21**  
**22**  
 23 A No.  
**24 Q Were you ever told that anyone had accused Calvin Braxton of murdering Lydia Rachal?**  
**25**

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1 A No.  
**2 Q Did you ever consider Calvin Braxton to be an accused murder of Lydia Rachal?**  
**3**  
 4 A No.  
**5 Q Did you ever investigate Calvin Braxton as a murder suspect related to the death of Lydia Rachal?**  
**6**  
**7**  
 8 A No.  
**9 Q Were you ever asked to review the Lydia Rachal case file to determine if Calvin Braxton murdered Lydia Rachal?**  
**10**  
**11**  
 12 A I was asked to review the file, which I did,  
 13 and I know in his report he said something  
 14 about potential involvement in her suspicious  
 15 death. I'm sorry, mysterious and untimely  
 16 death. I have no idea --  
 17 MS. CRAFT:  
 18 I'm sorry, sir, you can't read unless  
 19 you're going to read where she can pick it  
 20 up.  
 21 A I'm sorry. I'll read to myself.  
 22 MR. FALCON:  
 23 What's the pending question?  
 24 MR. OXENHANDLER:  
**25 Q The question is were you ever asked -- did**

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**1 anybody ever ask you to review the Lydia Rachal case file to determine if Calvin Braxton murdered Lydia Rachal?**  
**2**  
**3**  
 4 MS. CRAFT:  
 5 No, that wasn't the question,  
 6 whether --  
 7 MR. OXENHANDLER:  
 8 That was my question.  
 9 MR. OXENHANDLER:  
**10 Q Were you ever asked to review the Lydia Rachal case file to determine if Calvin Braxton murdered Lydia Rachal?**  
**11**  
**12**  
 13 A Upon close reading of his report, he said -- he  
 14 just says Calvin Braxton's name was closely  
 15 connected to this woman at the time of her  
 16 untimely death. So the answer would be no.  
**17 Q Based on your experience today subsequent -- but I know right now -- I think under your -- you testified that you supervised a number of serious criminal investigations including murder investigations. And isn't it true that a review of a case file could also show that a death ruled as a suicide could also be undetermined?**  
**18**  
**19**  
**20**  
**21**  
**22**  
**23**  
**24**  
 25 A Correct.

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**1 Q I'd like to ask you some questions about the threat assessment. It seems like Ms. Craft was -- asked you a lot of questions about the time you spent traveling from place to place, and correct me if I'm wrong, but you testified that you expended about a day's worth of effort looking at this entire incident including the threat assessment and the Lydia Rachal case file.**  
**2**  
**3**  
**4**  
**5**  
**6**  
**7**  
**8**  
**9**  
 10 A I think that's a good rough guess.  
**11 Q Is one -- is investing one day of time worth the effort to prevent harm to a police officer?**  
**12**  
**13**  
 14 MS. CRAFT:  
 15 Object to the form.  
 15 A Absolutely. And I would say that's to anybody,  
 16 not just a police officer.  
 17 MR. OXENHANDLER:  
**18 Q Did you know that I'm a former police officer?**  
 19 A I did not know that.  
**20 Q Would you agree with me that incident reports are very versatile reports?**  
**21**  
 22 A Yes.  
**23 Q And isn't it true that sometimes when you document a series of events or an event that may occur over a long period of time that when**  
**24**  
**25**

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1 you finish what you're documenting that you can  
 2 write an incident report at that time?  
 3 MS. CRAFT:  
 4 Objection. Hypothetical, 701.  
 5 MR. OXENHANDLER:  
 6 Q You can answer.  
 7 A Yes, I think that would be reasonable.  
 8 Q If you go to the first page of Exhibit #20, the  
 9 first -- before it gets to the part about Lydia  
 10 Rachal, and you see where Colonel Oliphant --  
 11 and we read it over a number of times and you  
 12 probably remember it by heart by now, in that  
 13 first paragraph, isn't it true that Colonel  
 14 Oliphant saw a vehicle out of place near his  
 15 home?  
 16 MS. CRAFT:  
 17 Object.  
 18 MR. OXENHANDLER:  
 19 Q Isn't that what Colonel Oliphant wrote in his  
 20 statement?  
 21 MS. CRAFT:  
 22 Same objection.  
 23 A Yes.  
 24 MR. OXENHANDLER:  
 25 Q And did Colonel Oliphant also note that the

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1 Those are all the questions I have.  
 2 EXAMINATION BY MR. FALCON:  
 3 Q Captain Turner, would I understand your  
 4 testimony, sir, to be that some time in March  
 5 of 2018 you got an assignment from your  
 6 immediate commander, Captain McNeal, to look  
 7 into some concerns that had been expressed by  
 8 Oliphant in an incident report; is that  
 9 correct?  
 10 A That's correct.  
 11 Q And you read the incident report to familiarize  
 12 yourself?  
 13 A Correct.  
 14 Q And you did a preliminary investigation or a  
 15 preliminary evaluation to determine if there  
 16 was any crime involved?  
 17 A Correct.  
 18 Q And did you determine whether or not there was  
 19 a crime involved?  
 20 A In my opinion, there was no crime involved.  
 21 Q If there would have been a crime involved,  
 22 would you have used -- would you have written  
 23 an incident report, another incident report, or  
 24 would you have written some type of criminal  
 25 report?

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1 vehicle looked very suspicious?  
 2 A Yes.  
 3 Q Did Colonel Oliphant state that he had  
 4 information that he believed was credible that  
 5 someone was -- that Calvin Braxton had hired a  
 6 private investigator or somebody to watch and  
 7 follow him?  
 8 A Yes.  
 9 Q Is it written by Colonel Oliphant in his  
 10 statement that the suspicious vehicle  
 11 accelerated and fled as Colonel Oliphant's car  
 12 approached it?  
 13 A Yes.  
 14 Q Considering that statement and all the other  
 15 statements in that paragraph in the incident  
 16 report and Colonel Oliphant's expressed  
 17 concerns, was it proper for a personal threat  
 18 assessment to have been requested by Colonel  
 19 Oliphant?  
 20 MS. CRAFT:  
 21 I'm going to object to the form.  
 22 MR. OXENHANDLER:  
 23 Q You can answer.  
 24 A Yes.  
 25 MR. OXENHANDLER:

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1 A I would have written a case report.  
 2 Q And that's the distinction, a case report and  
 3 an incident report.  
 4 A Correct.  
 5 Q A case report -- there were some questions by  
 6 Ms. Craft about the DA down the line might want  
 7 some information and so forth. That would be  
 8 if it was a criminal investigation and you  
 9 thought a crime was -- occurred and that a  
 10 follow-up needed to be done and you would do a  
 11 case report?  
 12 A Yes.  
 13 Q That's your practice?  
 14 A Yes.  
 15 Q And in this case or in regard to the assignment  
 16 given to you in March of 2018 by Captain  
 17 McNeal, you did not prepare a case report.  
 18 A Correct.  
 19 Q And that was because there was no criminal  
 20 action.  
 21 A Correct.  
 22 MR. FALCON:  
 23 Thank you, sir.  
 24 MS. CRAFT:  
 25 You have any questions?

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1 MR. MAYEAUX:  
 2 I do.  
 3 EXAMINATION BY MR. MAYEAUX:  
 4 **Q Captain, you know we've met. I'm Ben Mayeaux.**  
 5 **I represent the Louisiana State Police. I've**  
 6 **got a few questions for you. We were**  
 7 **discussing looking for records, some notes that**  
 8 **you had prepared in connection with this**  
 9 **incident report, true?**  
 10 A Correct.  
 11 **Q How were you contacted to produce your records?**  
 12 A State police legal, Ms. Fay Morrison, emailed  
 13 me, and I think it was a document from Ms.  
 14 Craft that requested those records, among other  
 15 things.  
 16 **Q And what did you do in response to that**  
 17 **inquiry?**  
 18 A I began looking for those, anything I had  
 19 related to the incident. And that's how I  
 20 found these. And I've torn my office apart,  
 21 and I've been -- we were able to find what  
 22 little notes that I had.  
 23 **Q And by these, you're referring to what we've**  
 24 **marked as "Exhibit 25," your calendar excerpts?**  
 25 A Correct.

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1 **request?**  
 2 A I found these calendar entries, which is --  
 3 MS. CRAFT:  
 4 "Exhibit 25."  
 5 MR. OXENHANDLER:  
 6 **Q "Exhibit 25."**  
 7 A -- "Exhibit 25."  
 8 **Q But did you find those notes?**  
 9 A I found "Exhibit 25." I did not find the other  
 10 notes.  
 11 **Q But you looked?**  
 12 A Oh, yeah, several times.  
 13 **Q Pages 2 and 3 of Exhibit 20 of Colonel**  
 14 **Oliphant's report, did you show that report to**  
 15 **the Natchitoches Parish sheriff's deputy that**  
 16 **you met in connection with your investigation?**  
 17 A No.  
 18 **Q Did you show that report to the Shreveport**  
 19 **Police Department detective whose name is**  
 20 **Rodney --**  
 21 A Horton.  
 22 **Q -- Horton? Did you show that report to**  
 23 **Detective Horton in connection with your**  
 24 **investigation?**  
 25 A No.

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1 **Q Now, you recall taking some notes in response**  
 2 **to your investigation of this -- Colonel**  
 3 **Oliphant's February 2018 report, right?**  
 4 A Correct.  
 5 **Q Did you defer those notes --**  
 6 MS. CRAFT:  
 7 I'm sorry, March 18 report?  
 8 MR. MAYEAUX:  
 9 I thought I said February 21, 2018.  
 10 MS. CRAFT:  
 11 But I see the date is March of 2018.  
 12 MR. MAYEAUX:  
 13 Exhibit 20, the report attached as  
 14 pages 2 and 3 of Exhibit 20, how about  
 15 that?  
 16 MS. CRAFT:  
 17 Right.  
 18 MR. MAYEAUX:  
 19 **Q Did you take some notes in connection with**  
 20 **investigating the statements in that report?**  
 21 A Some brief notes, yes.  
 22 **Q Did you destroy those notes?**  
 23 A I did not.  
 24 **Q Did you find those notes when you were looking**  
 25 **for documents responsive to Ms. Craft's records**

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1 **Q Have you shown that report to anybody that was**  
 2 **not an employee of the Louisiana State Police?**  
 3 A No, I don't think I showed it to anybody.  
 4 MR. MAYEAUX:  
 5 That's all I have. Thank you.  
 6 RE-EXAMINATION BY MS. CRAFT:  
 7 **Q You have Exhibit #1 in front of you again, sir?**  
 8 **That's the lawsuit that was filed. There are**  
 9 **several attachments to it. I would like for**  
 10 **you to look at the last three pages of Exhibit**  
 11 **#1. There's a letter from me. Is that the**  
 12 **records request you said that you were**  
 13 **responding to that you got from Ms. Morrison?**  
 14 A Give me just a minute to read it.  
 15 **Q Sure.**  
 16 A I'm 90 percent sure. I know it was -- I don't  
 17 know if you issued more than one of these to  
 18 us, but it looked like this.  
 19 **Q And, in fact, it was the certified copies of --**  
 20 **complete certified copy of any and all**  
 21 **investigations, investigative material of any**  
 22 **kind, recordings of any kind relating or**  
 23 **pertaining in any manner to Mr. Calvin Braxton;**  
 24 **is that right?**  
 25 A Yes.

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**1 Q Sir, the date on this letter is February 2,**  
**2 2018. Do you mind explaining to me how it is**  
**3 in response to this document you pulled**  
**4 calendar entries from two months later?**  
**5 Explain that to me, please, sir.**  
**6 A** I can tell you I wrote in my calendar when I  
**7** was assigned to investigate it. I don't know  
**8** when our -- when the state police received  
**9** this. I have no idea. All I can tell you is  
**10** what I know, and that's my calendar and that's  
**11** what I wrote and that's factual.  
**12 Q Here's another thing. You were asked about the**  
**13 date of the lawsuit that was filed, and you**  
**14 identified correctly that it was filed on May**  
**15 14, 2018. That's Exhibit #1, right?**  
**16 A** Yes.  
**17 Q And you were asked by Mr. Oliphant's attorney**  
**18 would it have been important to you to know**  
**19 whether or not Mr. Oliphant knew anything about**  
**20 any claims or lawsuit that was either filed or**  
**21 coming from Mr. Braxton. You remember those**  
**22 questions? In fact, I asked you some of those.**  
**23 A** Yeah.  
**24 Q Well, if you wouldn't mind in the lawsuit, sir,**  
**25 can you turn to paragraph 23 of the lawsuit?**

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**1 month later, he's writing a report where he**  
**2 accuses my client of being involved in the**  
**3 death of Ms. Rachal.**  
**4 MR. FALCON:**  
**5** Object to the form.  
**6 MS. CRAFT:**  
**7 Q As an investigator, sir, doesn't that cause you**  
**8 a tad bit of concern?**  
**9 A** I would like to know that. I don't know that  
**10** it would change anything, but I would like to  
**11** know it.  
**12 Q You'd like to know it because it gives you the**  
**13 motive as to why this man is accusing my client**  
**14 of being involved in a murder, right?**  
**15 MR. FALCON:**  
**16** Object to the form.  
**17 MS. CRAFT:**  
**18 Q All of a sudden there's ghosts out there.**  
**19 People are following him around.**  
**20 A** I don't think he -- my understanding, he didn't  
**21** accuse Mr. Braxton of being involved in the  
**22** murder.  
**23 Q Right. You said that when you were asked**  
**24 questions about it, and so I'm going to ask the**  
**25 correct questions. One of the things you were**

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**1 A** Exhibit 1?  
**2 Q Yes, sir. Paragraph 23. Would you mind**  
**3 reading that paragraph for the record out loud?**  
**4 A** "On February 2, 2018, petitioner calls to be  
**5** sent the attached public records request to  
**6** defendant Oliphant and the Louisiana State  
**7** Police. Petitioner contends that a copy of his  
**8** February 2, 2018 public records request was  
**9** also provided to defendant, LSTA."  
**10 Q Here's the reason I'm asking. When you talked**  
**11 to Mr. Oliphant about his March 2018 report,**  
**12 did he tell you that he had, in fact, received**  
**13 the public records request that I sent in**  
**14 February 2018 asking for all of this stuff,**  
**15 investigative files, all these things? Did he**  
**16 tell you that?**  
**17 A** No.  
**18 Q And, sir, would you have expected him to tell**  
**19 you that, that, hey, I just got a public**  
**20 records request from an attorney for Calvin**  
**21 Braxton in February of 2018 looking for**  
**22 investigative materials, asking what I, Captain**  
**23 Oliphant, have?**  
**24 A** Yeah, I --  
**25 Q And then all of a sudden, voila, less than one**

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**1 asked to determine is whether or not my client**  
**2 was involved in the death of Lydia Rachal;**  
**3 isn't that right? That's what he asked you to**  
**4 do.**  
**5 A** I think he was associated. My close reading of  
**6** the report is he was allegedly associated with  
**7** Ms. Rachal at the time of her death.  
**8 Q You were asked to determine if Calvin Braxton**  
**9 was in any way involved in the death of Ms.**  
**10 Rachal, yes?**  
**11 A** Mr. Braxton or anybody.  
**12 Q Got it. Now you were asked a question about**  
**13 suicide. Sometimes they are deemed**  
**14 undetermined. I get that. But the death of**  
**15 Ms. Rachal was in no way undetermined. It was,**  
**16 in fact, conclusively a suicide, right?**  
**17 A** It's my understanding, correct, from reading  
**18** this Shreveport Police Department report.  
**19 Q And you have zero evidence that in any way**  
**20 means Ms. Rachal's death was anything other**  
**21 than a suicide, correct?**  
**22 A** And that's what I've repeatedly stated.  
**23 Q And everybody you talked to, including the**  
**24 folks Mr. Oliphant asked you to talk to all**  
**25 said the same thing. She killed herself,**

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1 **tragic as it is.**  
 2 A And that's what I've told -- that's what I've  
 3 briefed everybody from Colonel Oliphant to the  
 4 command staff.  
 5 **Q In your training, sir, when you write an**  
 6 **incident report, I don't care what kind of**  
 7 **report you call it, but you are trained, are**  
 8 **you not, that when you write a report, you are**  
 9 **supposed to include facts, not opinions, facts,**  
 10 **right?**  
 11 A Yeah, absolutely.  
 12 **Q This report you have said by my mouth and my**  
 13 **head seven times something about it being Mr.**  
 14 **Oliphant's opinion. Is there anything factual**  
 15 **in that other than the first part about I think**  
 16 **I saw there was a car, ran the plate, and it**  
 17 **came back to this. Is there anything factual**  
 18 **in that report about my client having any**  
 19 **involvement in poor Ms. Rachal's death?**  
 20 **Anything factual?**  
 21 MR. FALCON:  
 22 Asked and answered. Objection.  
 23 MS. CRAFT:  
 24 **Q In the report as opposed to an opinion.**  
 25 A His name is in the report.

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1 the concerns I believe he had, yes.  
 2 **Q How much do you make an hour? Let me rephrase**  
 3 **that. How much did you make an hour in April**  
 4 **-- March and April of 2018?**  
 5 A I would guess Forty Dollars (\$40.00) an hour.  
 6 **Q When you reopen a death investigation, I am**  
 7 **correct that the first step in that process is**  
 8 **to review the existing reports; isn't that**  
 9 **right?**  
 10 A I don't think that's correct. It's hard to say  
 11 what the first step would be. It may be  
 12 talking to witnesses, but yes, reviewing a  
 13 report would be near the front of the -- of the  
 14 line.  
 15 MS. CRAFT:  
 16 That's all I have, sir. Thank you very  
 17 much.  
 18 MR. OXENHANDLER:  
 19 I do have a question.  
 20 MS. CRAFT:  
 21 Well, I'm going to object because you  
 22 don't get recross.  
 23 MR. OXENHANDLER:  
 24 You can object all you want.  
 25 MS. CRAFT:

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1 **Q His name is in the report because he owned the**  
 2 **car?**  
 3 A Yes.  
 4 **Q In Mr. Oliphant's report, is there anything**  
 5 **factual written by Mr. Oliphant other than his**  
 6 **suspicious or his opinions that Mr. Braxton was**  
 7 **in any way involved in Ms. Rachal's death?**  
 8 A I think based on Colonel Oliphant's reputation  
 9 and my working with him that everything in the  
 10 report is factual to my knowledge, and nobody  
 11 has told or shown me evidence to prove  
 12 otherwise.  
 13 **Q What, that you still think Mr. Braxton was**  
 14 **somehow involved in the mysterious death of**  
 15 **Lydia Rachal?**  
 16 MR. FALCON:  
 17 Object to the form.  
 18 MS. CRAFT:  
 19 **Q Yes or no, sir?**  
 20 A He never said that he was involved. He said he  
 21 was associated during her untimely and  
 22 mysterious death.  
 23 **Q But he said that was the basis for his fear,**  
 24 **didn't he? That's what he wrote.**  
 25 A I think that's one of the concerns -- was in

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1 I am because that's the rule in the  
 2 code of evidence, but go ahead, Counselor,  
 3 over my objection.  
 4 RE-EXAMINATION BY MR. OXENHANDLER:  
 5 **Q Do you know when Colonel Oliphant and his wife**  
 6 **were married?**  
 7 A No, sir.  
 8 **Q Do you know whether Donald Rachal is actually**  
 9 **related to Colonel Oliphant directly?**  
 10 A No, I didn't.  
 11 MR. OXENHANDLER:  
 12 Thank you.  
 13 MS. CRAFT:  
 14 I'm assuming you want to read and sign,  
 15 but I don't know. You need to let our  
 16 court reporter know.  
 17 MR. MAYEAUX:  
 18 I thought I told you, but yeah, we want  
 19 to read and sign.  
 20  
 21  
 22 THE WITNESS WAS EXCUSED.  
 23 DEPOSITION CONCLUDED AT: 11:41 A.M.  
 24  
 25

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CERTIFICATE

1  
2  
3 This certification is valid only for a  
4 transcript accompanied by my original signature and  
5 original required seal on this certificate.  
6 I, Kim Taylor, Certified Court Reporter in and  
7 for the State of Louisiana, as the officer before  
8 whom this testimony was taken, do hereby certify  
9 that JASON TURNER, after having been duly sworn by  
10 me upon authority of R.S. 37:2554, did testify on  
11 the 2nd day of October 2020, at Natchitoches,  
12 Louisiana, as hereinbefore set forth in the  
13 foregoing 145 pages; that this testimony was  
14 reported by me in the Stenographic reporting method,  
15 was prepared and transcribed by me or under my  
16 personal direction and supervision, and is true and  
17 correct to the best of my ability and understanding;  
18 that the transcript has been prepared in compliance  
19 with the transcript format guidelines required by  
20 statute and rules of the board; that I am informed  
21 about the complete arrangement, financial or  
22 otherwise, with the person or entity making  
23 arrangements for deposition services; that I have  
24 acted in compliance with the prohibition on  
25 contractual relationships, as defined by Louisiana

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1 Code of Civil Procedure Article 1434 and rules of  
2 the board; that I have no actual knowledge of any  
3 prohibited employment or contractual relationship,  
4 direct or indirect, between a court reporting firm  
5 and any party litigant in this matter, nor is there  
6 any such relationship between myself and a party  
7 litigant in this matter; that I am not related to  
8 counsel or to any of the parties hereto, I am in no  
9 manner associated with counsel for any of the  
10 interested parties to this litigation, and I am in  
11 no way concerned with the outcome thereof.  
12 This 14th day of November 2020, Lafayette,  
13 Louisiana.  
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Kim Taylor, CCR #91244

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1 Errata Sheet  
2  
3 NAME OF CASE: CALVIN W. BRAXTON, SR. VERSUS LOUISIANA STATE TROOPERS ASSOCIATION, ET AL  
4 DATE OF DEPOSITION: 10/02/2020  
5 NAME OF WITNESS: Jason Turner  
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 \_\_\_\_  
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<p><b>Exhibits</b></p> <hr/> <p><b>J TURNER 10 KT E</b> <b>X 25</b> 67:1,2 91:24 134:24 136:4,6,7,9</p> <hr/> <p><b>#</b></p> <hr/> <p><b>#1</b> 123:21 137:7,11 138:15 <b>#20</b> 96:5 124:24,25 130:8 <b>#25</b> 67:2</p> <hr/> <p><b>\$</b></p> <hr/> <p><b>\$40.00</b> 144:5</p> <hr/> <p><b>(</b></p> <hr/> <p><b>(20)</b> 125:11 <b>(25)</b> 66:9,11</p> <hr/> <p><b>1</b></p> <hr/> <p><b>1</b> 56:19 139:1 <b>10</b> 124:2 <b>100</b> 83:14 92:12,21 101:17 <b>103</b> 70:1 <b>10:00</b> 68:13,14 <b>10:30</b> 91:24 <b>10th</b> 124:19,20 <b>11:41</b> 145:23 <b>13</b> 69:9 71:6 <b>13th</b> 70:2 71:7,18 89:8, 11 <b>14</b> 138:15 <b>15</b> 9:8 14:6 <b>16:10</b> 37:21 <b>16:30</b> 70:6 <b>18</b> 55:5 135:7 <b>19</b> 55:5 <b>1988</b> 6:9,12 7:15 <b>1990</b> 56:20 <b>1997</b> 6:25 19:11</p> <hr/> <p><b>2</b></p> <hr/> <p><b>2</b> 28:22 29:5 39:8 40:2 45:25 97:7 124:5 135:14 136:13 138:1 139:4,8</p>	<p><b>20</b> 11:15 28:17,20 46:16,19 55:6 91:23 95:2 113:2 122:2,9 124:6 125:7,9 135:13, 14 136:13 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