



JOHN BEL EDWARDS
GOVERNOR

KEVIN W. REEVES, COLONEL
DEPUTY SECRETARY

State of Louisiana
Department of Public Safety and Corrections
Public Safety Services

OCTOBER 23, 2018
4750/0501/MMG/18-21723
HQ-01-207-18

TROOPER DARYL THOMAS, JR.
TROOP B

VIA PERSONAL DELIVERY

RE: TERMINATION

Dear Trooper Thomas:

On Monday, October 22, 2018, you received via hand delivery, a letter advising you that you were being terminated from your position with State Police effective at 4:30 pm on Sunday, October 21, 2018. That letter and action is hereby rescinded, is of no effect, and is replaced by this letter.

I am in receipt of two responses to the intended termination letter delivered to you. On Monday, October 15, 2018, your response emailed to IA was received and forwarded to me. On Wednesday, October 17, 2018, a response from your attorney, Floyd Falcon, was received via mail and forwarded to me. I have thoroughly reviewed and considered both responses. In your response, you stated in part, "As far as the ticket times on my citations go. Some of those times were intentionally incorrect." I find that intentionally falsifying times on traffic citations that you issued and subsequently filed with the troop for submission to the court for prosecution, is alone sufficient grounds to terminate you from the state police service.

In accordance with State Police Commission Rules 12.1 and 12.2, you are hereby notified that effective at 4:30 p.m. on Friday, October 26, 2018, you are terminated from the state police service for the following reasons:

LACE, Local Agency Compensated Enforcement, is a program through which troopers work traffic enforcement details in parishes in designated areas. The troopers are paid at their time and one half overtime rate. The monies expended by Louisiana State Police (LSP) for salary as well as the mileage accrued on the state's vehicles for these details, are reimbursed by the District Attorney's Office of the parish where the traffic enforcement detail occurs.

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In November 2017, New Orleans news channel WVUE Fox 8 aired a five part series of news reports titled "State of Unrest" which included assertions, in part, that you were claiming time not worked during regularly assigned work hours and LACE overtime hours, as well as altering times on citations you issued. In response to these reports, a criminal investigation was conducted by Louisiana State Police (LSP) Investigator Mark Fournet, with the assistance of analyst Lyn Lesage. The investigation resulted in you being arrested on April 30, 2018, pursuant to a warrant signed by Beau Higginbotham, Judge, 19th Judicial District, Parish of East Baton Rouge, and you were booked on two counts of filing false public records in violation of R.S. 14:133, and one count of Theft, a violation of R.S. 14:67, all felony offenses. An administrative investigation was then conducted to determine if any Louisiana State Police Policies and Procedures were violated. IA investigators reviewed, in part, information compiled during the criminal investigation, and conducted interviews. The findings are as follows:

Troopers who want to work LACE overtime for Troop B are required to sign up at Troop B prior to working the detail. In addition to general policy requirements for making traffic stops, which includes but is not limited to calling in the stop on the radio, the LSP LACE policy requires troopers working LACE overtime upon beginning a LACE detail, to notify the radio operator of their on-duty status, the area of assignments and beginning and ending mileage, and at the conclusion of the detail, to notify the radio operator of their ending mileage and off-duty status. The Troop B radio logs and your MDT records were reviewed to determine if you complied with these policies.

On January 8, 2016, you claimed to have worked regular shift from 0700 to 1500 hours, and a LACE overtime detail in St. Charles Parish from 1500 to 2100 hours, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit A and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Your Mobile Data Terminal (MDT) records for citations you claimed were written during this LACE detail show queries from 1457 to 1626 hours, and a query unrelated to a citation at 1659 hours. Your Mobile Video Recorder (MVR) recorded you in a carwash line from 1630 to 1650 hours. The three citations as described below contain false information:

Citation #2427493, designated as a LACE citation¹, was issued to Sherman Wilder and the time you entered on the citation you submitted to Troop B appears to be 1830 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1622 hours, a difference of approximately 2 hours and 8 minutes. Your MDT records show that at 1626 you queried the Louisiana license plate of the vehicle Mr. Wilder was driving which was registered to Tamika Green, but you did not query Mr. Wilder's Louisiana driver's license.

¹ LACE citations are designated by "B" in the block for duty status.

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Citation #2427494, designated as a LACE citation, was issued to Cole Marshall and the time you entered on the citation you submitted to Troop B appears to be 1949 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1517 hours, a difference of approximately 4 hours and 32 minutes. The vehicle Mr. Marshall was driving at the time of the stop had a Mississippi license plate and you did not query the plate number or Mr. Marshall's driver's license.

Citation #2427495, designated as a LACE citation, was issued to James Flick and the time you entered on the citation you submitted to Troop B appears to be 2008 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1459 hours, a difference of approximately 5 hours and 9 minutes. The vehicle Mr. Flick was driving at the time of the stop had a Texas license plate and you did not query the plate number or Mr. Flick's driver's license. On January 30, 2018, Mr. Flick advised Investigator Mark Fournet in a recorded telephone call that he recalled being stopped for speeding on January 8, 2016. Mr. Flick recalled he was leaving work in Paradis, LA around 2:30 p.m., so the stop had to be around 3:00 or 3:15 p.m., and was definitely not at night. Mr. Flick stated he was driving a white Ford truck and he was stopped by a black male state trooper, which is consistent with the recording of the stop from your MVR. Mr. Flick emailed Inv. Fournet a copy of the citation you issued to him, which had a time of 2008 hours entered on the citation.

On July 5, 2016, you claimed to have worked regular shift from 0700 to 1500 hours, and a LACE overtime detail from 1500 to 2300 hours in St. Charles Parish, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit B and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. The 18 recordings from your MVR for that day had a blank screen with only the date and time stamp, but most had audio associated with the recording. The first recording began at 0851 hours and the last began at 1553 hours. Your MDT records for citations you claimed were written during this LACE detail show queries from 1454 to 1641 hours. The citation as described below contains false information:

Citation #3166257, designated as a LACE citation, was issued to Charles F. Uren and the time you entered on the citation you submitted to Troop B appears to be 2100 hours. The vehicle Mr. Uren was driving at the time of the stop had a Mississippi license plate. Your MDT records show that you did not query the vehicle plate or Mr. Uren's driver's license. On January 23, 2018, Mr. Uren

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advised Inv. Fournet in a recorded telephone call that he remembered the traffic stop in Louisiana. While Mr. Uren could not remember the exact time of the stop, he stated it was definitely in the morning and not at night, which means you actually wrote the citation while you were on regular duty.

On November 24, 2016, you claimed to have worked regular shift from 1000 to 1800 hours, and a LACE overtime detail from 1800 to 2300 hours in St. Charles Parish, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit C and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records for citations you claimed were written during this LACE detail show queries from 2006 to 2207 hours. The four citations as described below contain false information:

Citation #3236762, designated as a LACE citation, was issued to Justin Hillman and the time you entered on the citation you submitted to Troop B appears to be 1807 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 2012 hours, a difference of approximately 2 hours and 5 minutes. The vehicle Mr. Hillman was driving at the time had an Arkansas license plate and your MDT records show you did not query the license plate or Mr. Hillman's driver's license. On January 24, 2018, Mr. Hillman advised Inv. Fournet in a recorded telephone call that he recalled the traffic stop on Thanksgiving, when he, his wife, and his mother, were driving back from New Orleans to Baton Rouge. Mr. Hillman recalled the stop was definitely at night time, between 2000 and 2100 hours because they got home around 2200 hours. He recalled the citation being scratched through as though you had already written it out.

Citation #3236776, designated as a LACE citation, was issued to Moustapha Diakite and the time you entered on the citation you submitted to Troop B appears to be 1847 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 2018 hours, a difference of approximately 1 hour and 31 minutes. Your MDT records show that at 2016 hours you queried the Louisiana license plate of the vehicle Mr. Diakite was driving. On January 23, 2018, Mr. Diakite advised Inv. Fournet in a recorded telephone call that he remembered being stopped by you for speeding and recalled the time as being late at night, possibly around 2100 hours. Mr. Diakite sent Inv. Fournet a picture of the citation you issued to him, on which you entered the time as 817 hours.

Citation #3236784, designated as a LACE citation, was issued to Johnny Maloid. The citation indicated the driver was cited for speeding and no driver's license. Your MDT records show that at 2109 hours you queried the license plate of the

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vehicle Mr. Maloid was driving, which was registered to Teesha Williams, but did not query Mr. Maloid's Louisiana driver's license. The video and audio recording of the stop show that you allowed Mr. Maloid, an unlicensed driver and the only occupant of the vehicle, to drive the vehicle from the stop, contrary to what you wrote on the citation – "released c/o owner."

Citation #3237100, designated as a regular duty citation², was issued to Rafael Abreu and the time you entered on the citation you submitted to Troop B appears to be 1600 hours. The recording of the stop from your MVR shows that the actual stop occurred at or around 2156 hours, a difference of approximately 5 hours and 56 minutes. Your MDT records show that you queried the Louisiana license plate of the vehicle Mr. Abreu was driving at 2153 hours. This citation was written while you were claiming LACE overtime on your time sheet, but you designated it as a citation written during regular duty. This citation was issued out of sequential order.

On November 25, 2016, you claimed to have worked regular shift from 0700 to 1500 hours, and worked a LACE overtime detail from 1500 to 2300 hours in St. Charles Parish, as indicated on your official State Police timesheet, as evidenced by Exhibit C. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records for citations you claimed were written during this LACE detail show queries from 1501 to 1841 hours. The five citations as described below contain false information:

Citation #3236789, designated as a LACE citation, was issued to Jamario Dillon and the time you entered on the citation you submitted to Troop B appears to be 1350 hours, at which time you would have been on regular duty. The recording of the stop from your MVR shows the actual stop occurred at or around 1548 hours, a difference of approximately 1 hour and 58 minutes. Your MDT records show that you queried the license plate of the vehicle Mr. Dillon was driving at 1547 hours. This citation was not issued in sequential order.

Citation #3236797, designated as a LACE citation, was issued to Tiara Jones and the time you entered on the citation you submitted to Troop B appears to be 2040 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1636 hours, a difference of approximately 4 hours and 4 minutes. The vehicle Ms. Jones was driving at the time had a Texas license plate and your MDT records show that you did not query the license plate or Ms. Jones' driver's license.

² Citations issued on regular duty are designated by an "A" in the duty status block.

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Citation #3236798, designated as a LACE citation, was issued to Larry Alexie and the time you entered on the citation you submitted to Troop B appears to be 2225 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1534 hours, a difference of approximately 6 hours and 51 minutes. The vehicle Mr. Alexie was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Mr. Alexie's driver's license. On January 23, 2018, Mr. Alexie advised Inv. Fournet in a recorded telephone call that he recalled the time when he was stopped as being in the afternoon sometime, and not at night. You made a note on the bottom of the copy of the citation you turned in to Troop B which appears to read "going to hospital," and Mr. Alexie confirmed to Inv. Fournet he told you he was going to the hospital.

Citation #3236799, designated as a LACE citation, was issued to Edward Green, IV, and the time you entered on the citation you submitted to Troop B appears to be 2030 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1530 hours, a difference of approximately 5 hours. The vehicle Mr. Green was driving at the time had a Georgia license plate and your MDT records show you did not query the license plate or Mr. Green's driver's license.

Citation #3237105, designated as a LACE citation, was issued to Kevin Parikh and the time of the stop you entered on the citation you submitted to Troop B appears to be 2240 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1739 hours, a difference of approximately 5 hours and 1 minute. The vehicle Mr. Parikh was driving at the time had a Missouri license plate and your MDT records show that you did not query the license plate or Mr. Parikh's driver's license.

On January 7, 2017, you had a Regular Day Off (RDO), and claimed to have worked a LACE overtime detail from 0600 to 1800 hours in St. Charles Parish, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit D and is attached hereto and made a part hereof. Troop B radio logs show you went 10-8³ at 0652 hours with no mileage given; at 0946 hours you called in a traffic stop on I-10 at MP 220; at 0949 hours you called in a traffic stop on I-10 at MP 220; at 0949 hours you went 10-8; and at 1027 hours you called in a traffic stop on I-10W at MP 219. Your MDT records show queries from 0926 to 1249 hours, and one query with no citation issued at 1755 hours. Cell phone data retrieved shows your cell phone, and by extension your person, was likely in the area of your residence in Jefferson Parish at 0841 and 0912

³ 10-8 means in service.

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hours, elsewhere in Jefferson Parish at 1257, 1304, and 1314 hours, near your residence at 1346 and 1352 hours, and in Orleans Parish at 1504 and 1506 hours. The six citations as described below contain false information.

Citation #32433503, designated as a LACE citation, was issued to Carol Ridgeway and the time you entered on the citation you submitted to Troop B appears to be 1447 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1149 hours, a difference of approximately 2 hours and 58 minutes. The vehicle Ms. Ridgeway was driving at the time had a Florida license plate and your MDT record shows that you did not query the license plate or Ms. Ridgeway's driver's license. On January 23, 2018, Ms. Ridgeway advised Inv. Fournet in a recorded telephone call that she recalled getting this citation while driving a rental vehicle and believed the trooper had the citation written up before he pulled her over. Ms. Ridgeway did not remember the exact time of the stop, but remembered her rental vehicle had a Florida license plate. Ms. Ridgeway e-mailed Inv. Fournet a photo she took upon arriving at her destination the day she was issued the citation, which photo was taken at the Jackson, MS airport and was time stamped 2:52 p.m. (1452 hours). Ms. Ridgeway also e-mailed Inv. Fournet a copy of the citation she was issued by you which shows the time you entered as 1147 hours.

Citation #3243504, designated as a LACE citation, was issued to Deni Coffman and the time you entered on the citation you submitted to Troop B appears to be 1458 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1113 hours, a difference of approximately 3 hours and 45 minutes. The vehicle Ms. Coffman was driving at the time had a Missouri license plate and your MDT records show that you did not query the license plate or Ms. Coffman's driver's license. On January 23, 2018, Ms. Coffman advised Inv. Fournet in a recorded telephone call that she remembered getting the citation and said the stop was in the morning, not in the afternoon. Ms. Coffman recalled that she was headed to Bass Pro and remembered you being short with her as she believed another vehicle was speeding and not her. She described the vehicle she was driving at the time of the stop, which matched the vehicle depicted in the recording of the stop from your MVR.

Citation #3243505, designated as a LACE citation, was issued to Diana Vlasova and the time you entered on the citation you submitted to Troop B appears to be 1508 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1108 hours, a difference of approximately 4 hours. The vehicle Ms. Vlasova was driving at the time had a California license plate and your MDT records show that you did not query the license plate or Ms. Vlasova's

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driver's license. On January 23, 2018, Ms. Vlasova advised Inv. Fournet in a recorded telephone call that she remembered the traffic stop and citation, however she could not recall the time of the stop. She described the vehicle she was driving at the time of the stop, which matched the vehicle depicted in the recording of the stop from your MVR.

Citation #3243506, designated as a LACE citation, was issued to Michal Matthews and the time you entered on the citation you submitted to Troop B appears to be 1540 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1035 hours, a difference of approximately 5 hours and 5 minutes. The vehicle Ms. Matthews was driving had an Alabama license plate and your MDT records show you did not query the license plate or Ms. Matthews' driver's license. On January 23, 2018, Ms. Matthews advised Inv. Fournet in a recorded telephone call that she remembered the traffic stop and citation. Ms. Matthews recalled that the time of the stop was definitely in the morning around eleven, and not in the afternoon.

Citation #3243507, designated as a LACE citation, was issued to Charles Herrington and the time you entered on the citation you submitted to Troop B appears to be 1630 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1030 hours, a difference of approximately 6 hours. The vehicle Mr. Herrington was driving at the time had a Mississippi license plate and your MDT records show that you did not query the license plate or Mr. Herrington's driver's license. On January 23, 2018, Mr. Herrington advised Inv. Fournet in a recorded telephone call that he remembered the stop and thought the time was sometime around 1200 hours as he was going to Baton Rouge to a basketball game at LSU. Mr. Herrington advised he was at LSU at 1500 hours. He described the vehicle he was driving, which is depicted in the recording of the stop from your MVR.

Citation #3243509, designated as a LACE citation, was issued to Landon Merriweather and the time you entered on the citation you submitted to Troop B appears to be 1709 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1002 hours, a difference of approximately 7 hours and 7 minutes. The vehicle Mr. Merriweather was driving at the time had an Arkansas license plate and your MDT records show you did not query the license plate or Mr. Merriweather's driver's license. On January 23, 2018, Mr. Merriweather advised Inv. Fournet in a recorded telephone call that he remembered the stop as being before noon as he was headed home from a cruise. He recalled the vehicle he was driving that day was a grey 4 Runner. The audio recording of the stop from you MVR captured a person stating his name as Landon.

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On January 16, 2017, you claimed to have worked regular shift from 0700 to 1500 hours, and a LACE overtime detail in St. Charles Parish from 1500 to 2300 hours, as indicated on your official State Police time sheet, a copy of which is labeled as Exhibit E and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records show license plate queries from 1530 to 1650 hours. Cell phone data retrieved indicates your cell phone, and by extension your person, was in St. Charles Parish at 1720 hours, Ascension Parish west of Prairieville, LA at 1912 hours, East Baton Rouge Parish near Siegen Lane at 2204 hours, Bluebonnet Blvd. at 2256 hours, and near the LSU campus at 2302 hours. You were not even in the assigned area for the LACE detail – St. Charles Parish - for at least four hours you claimed to have worked LACE overtime. Your timesheet, and the four citations described below, contain false information.

Citation #3243481, designated as a LACE citation, was issued to Raymond Williams and the time you entered on the citation you submitted to Troop B appears to be 2040 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1713 hours, a difference of approximately 3 hours and 27 minutes. Your MDT records show you did not query the Louisiana license plate of the vehicle Mr. Williams was driving or his driver's license. Cell tower data shows that your cell phone, and by extension your person, were not even in St. Charles Parish at the time you entered on the citation you submitted to Troop B.

Citation #3243482, designated as a LACE citation, was issued to Danny Callahan and the time you entered on the citation you submitted to Troop B appears to be 2100 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1702 hours, a difference of approximately 3 hours and 58 minutes. The vehicle Mr. Callahan was driving at the time had an Arkansas license plate and your MDT records show you did not query the license plate or Mr. Callahan's driver's license. On April 2, 2018, Mr. Callahan advised Inv. Fournet in a recorded telephone call that he remembered the stop and was driving a 2016 white Dodge truck when he was stopped between 5:00 and 6:00 p.m., which is what is depicted on the recording of the stop from your MVR. Cell tower data shows that your cell phone, and by extension your person, were not even in St. Charles Parish at the time you entered on the citation you submitted to Troop B.

Citation #3243483, designated as a LACE citation, was issued to Ulissa White and the time you entered on the citation you submitted to Troop B appears to be 2130 hours. The recording of the stop from your MVR recorded the actual stop occurred at or around 1529 hours, a difference of 6 hours and 1 minute. The

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vehicle Ms. White was driving had a Florida license plate and your MDT records show you did not query the license plate or Ms. White's driver's license. On April 2, 2018, Ms. White advised Inv. Fournet in a recorded telephone call that the stop would have been in the afternoon, and it was definitely not at night. Ms. White recalled that she was driving a rental vehicle at the time. Cell tower data shows that your cell phone, and by extension your person, were not even in St. Charles Parish at the time you entered on the citation you submitted to Troop B.

Citation #3243484, designated as a LACE citation, was issued to David Cortines and the time you entered on the citation you submitted to Troop B appears to be 2225 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1525 hours, a difference of approximately 7 hours. The vehicle Mr. Cortines was driving had a Texas license plate and your MDT records show you did not query the license plate or Mr. Cortines driver's license. On April 3, 2018, Mr. Cortines advised Inv. Fournet in a recorded telephone call that he remembered he was stopped for speeding on the interstate between 2:00 and 4:00 p.m. when he was headed to a meeting, and was sure the stop was not at night. Mr. Cortines advised he was driving a 2015 Toyota Tundra truck which conforms to what appears on the recording of the stop from your MVR. Cell tower data shows that your cell phone, and by extension your person, were not even in St. Charles Parish at the time you entered on the citation you submitted to Troop B.

On February 11, 2017, you had a RDO, and claimed to have worked a DWI detail from 1400 hours to 0600 hours on February 12, 2017, as indicated by your official State Police timesheet you submitted, a copy of which is labeled as Exhibit F, and is attached hereto and made a part hereof. Although there are no specifics relative to the location of the detail noted on your timesheet, your routine patrol area is Jefferson Parish, and is certainly not out of the Troop B area. Cell phone data recovered indicates your cell phone, and by extension your person, was in the area of I-20 around Meridian, MS⁴ at 1414, 1535, and 1607 hours; I-59 south of Enterprise, MS at 1648 hours; I-59 at Heidelberg, MS at 1713 hours; I-59 south of Sandersville, MS at 1716 hours; I-59 south of Laurel, MS at 1725 hours; I-59 at Ellisville, MS at 1731 hours; I-59 north of Moselle, MS at 1736 hours; I-59 north of Poplarville, MS at 1817 hours; and I-59 at Picayune, MS at 1841 hours; on I-10 near Read Blvd. in Orleans Parish, LA at 1915 hours; I-10 near Morrison Rd. at 1918 hours; I-610 at Gentilly Blvd. at 2002 hours; I-610 at St. Bernard Ave. at 2005 hours; Esplanade Ave. at Wisner Blvd. near the Fairgrounds at 2009 hours; I-610 at St. Bernard Ave. at 2119 and 2120 hours; I-610 at Gentilly Blvd. at 2121 hours; US 90 at Loyola at 2131 hours; and Magazine St. at Erato St. at 2132 hours. Your first

⁴ According to Bing maps, Meridian, MS is approximately 169 miles from Slidell, LA and it is estimated to take 2 hours and 29 minutes to travel without traffic.

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MVR recording during that detail shows that you conducted a traffic stop on a truck on US 90 E/B in Jefferson Parish, LA at Exit 9 at 2228 hours. The next traffic stop recorded on your MVR was at 0120 hours on US 90, W/B at Exit 6. You continued to make traffic stops until a traffic stop on US 90 W/B at MP 7.5 at approximately 0257 hours resulted in an arrest for DWI. There were no radio communications for you recorded on the Troop B radio log for this DWI detail until 0307 hours. Your MDT records show the first query during this detail was at 0119 hours. You were not even in Louisiana from 1400 hours until approximately 1900 hours – 5 hours-during the time which you claimed to have been working a DWI overtime detail in the Troop B area. IA investigators reviewed the recording of a phone call you made from your cell phone to a recorded phone line at Troop B (504-471-2775) at 2002 hours. You requested the trooper working the Troop B desk to have the desk log show that you were working a DWI grant until 6:00 (a.m.). The trooper then asked you “Six to six?” Using audio clarification software, LSP Technical Support Officer Greg Ducharme was able to determine that your response was “Yes.” Although you indicated in the phone call that you were working from “Six (p.m.) to six (a.m.),” which is 12 hours, you claimed and were paid overtime from 1400 (2:00 p.m.) to 0600 (6:00 a.m.), 16 hours.

On February 14, 2017, you claimed to have worked a regular shift from 0700 to 1500 hours, and a LACE overtime detail in St. Charles Parish from 1500 to 2300 hours, as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit G and is attached hereto and made a part hereof. The last traffic stop recorded on your MVR that date was at 1619 hours. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records show queries from 1421 to 1615 hours. Cell phone data recovered indicates your cell phone, and by extension your person, was in East Baton Rouge Parish near Bluebonnet Blvd. at 1937 hours, near the I-10/I-12 split at 1941 hours, and on the LSU campus at 2028 hours, during which time you claimed to have written citations in St. Charles Parish. You were not even in the assigned area of the LACE detail – St. Charles Parish – for at least 2 hours and 30 minutes (1900 to 2130 hours) of the overtime detail you claimed to have worked. Your timesheet and the eight citations as described below, contain false information:

Citation # 3244764, designated as a LACE citation, was issued to Lisa Cabrera and the time you entered on the citation you submitted to Troop B appears to be 1420 hours which is supported by the recording of the stop from your MVR. Your MDT records show that at 1421 hours you queried the Louisiana license plate of the vehicle Ms. Cabrera was driving. The evidence shows that you made this traffic stop and issued the citation during your regular duty hours and claimed to have written it while you were on LACE overtime.

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Citation #3238352, designated as a LACE citation, was issued to Nathan Lamas and the time you entered on the citation you submitted to Troop B appears to be 2024 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1428 hours, a difference of approximately 5 hours and 56 minutes. The vehicle Mr. Lamas was driving had a Texas license plate and your MDT records show you did not query the license plate or Mr. Lamas' driver's license. You made this traffic stop and issued the citation during your regular duty hours and claimed to have written it while you were on LACE overtime. This citation was not issued in sequential order.

Citation #3244765, designated as a LACE citation, was issued to Carlton Galmon and the time you entered on the citation you submitted to Troop B appears to be 1435 hours, which is supported by the recording of the stop from your MVR. Your MDT records show you queried the Louisiana license plate of the vehicle Mr. Galmon was driving at 1432 hours. You made this traffic stop and issued the citation during your regular duty hours and claimed to have written it while you were on LACE overtime.

Citation # 3244766, designated as a LACE citation, was issued to Gina Collins and the time you entered on the citation you submitted to Troop B appears to be 1440 hours, which is supported by the recording of the stop from your MVR. Your MDT records show that at 1436 hours you queried the Louisiana license plate of the vehicle Ms. Collins was driving. You made this traffic stop and issued the citation during your regular duty hours and claimed to have written it while you were on LACE overtime.

Citation # 3244767, designated as a LACE citation, was issued to Darius Lee and the time you entered on the citation you submitted to Troop B appears to be 1445 hours, which is supported by the recording of the stop from your MVR. Your MDT records show that at 1440 hours you queried the Louisiana license plate of the vehicle Mr. Lee was driving. You made this traffic stop and issued the citation during your regular duty hours and claimed to have written it while you were on LACE overtime.

Citation #3238353, designated as a LACE citation, was issued to Clinton Robison and the time you entered on the citation you submitted to Troop B appears to be 2200 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1455 hours, a difference of approximately 7 hours and 5 minutes, and before your LACE detail began. The vehicle Mr. Robison was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Mr. Robison's driver's license. On April 2,

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2018, Mr. Robison advised Inv. Fournet in a recorded telephone call that he remembered the traffic stop on I-310 stating he was driving a white Dodge truck, which was confirmed by the recording of the stop from your MVR. Mr. Robison remembered the time of the stop was about 1500 hours and the trooper was a black male. This ticket was not issued in sequential order.

Citation #3244773, designated as a LACE citation, was issued to Amy Ott and the time you entered on the citation you submitted to Troop B appears to be 1800 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1559 hours, a difference of approximately 2 hours and 1 minute. The vehicle Ms. Ott was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Ms. Ott's driver's license. On April 2, 2018, Ms. Ott advised Inv. Fournet in a recorded telephone call that she remembered being stopped by a black male trooper around 3:00 or 4:00 p.m. on I-310. Ms. Ott advised that she was driving a grey Nissan, which was confirmed by the video recording of the stop from your MVR.

Citation #3244774, designated as a LACE citation, was issued to Jill Gonzalez and the time you entered on the citation you submitted to Troop B appears to be 1940 hours. The recording for the stop from your MVR shows the actual stop occurred at or around 1553 hours, a difference of approximately 3 hours and 47 minutes. Your MDT records show that at 1548 hours you queried the Louisiana license plate of the vehicle Ms. Gonzalez was driving at the time. On April 3, 2018, Ms. Gonzalez advised Inv. Fournet in a recorded telephone call that she was on the way home from a doctor's appointment in Metairie with her children on I-310 when she was stopped for speeding. Ms. Gonzalez recalled the trooper was driving in front of her prior to her being stopped at about 3:00 p.m., and definitely not at 1940 hours as is written on the citation you submitted. Ms. Gonzalez advised she was driving a light grey Kia at the time, which is confirmed by the recording of the stop from your MVR.

On February 20, 2017, you had a RDO, and claimed to have worked a LACE overtime detail from 0800 to 2000 hours in St. Charles Parish, as indicated on your official State Police timesheet you submitted, as evidenced by Exhibit G. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records show queries from 1004 hours to 1235 hours. Cell phone data retrieved indicates your cell phone, and by extension your person, was in Jefferson Parish at 1159 and 1200 hours; and Orleans Parish at 1315, 1435, 1648, 1649, 1653, 1752 and 1840 hours, all while you were supposed to be working LACE in St. Charles Parish. The six citations as described below contain false information.

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Citation #3238409, designated as a LACE citation, was issued to Lawanda Dement and the time you entered on the citation you submitted to Troop B appears to be 1445 hours. The recording of the stop from your MVR shows the actual stop at or around 1149 hours, a difference of approximately 2 hours and 56 minutes. The vehicle Ms. Dement was driving had a Mississippi license plate and your MDT records show you did not query the license plate or Ms. Dement's driver's license.

Citation #3238410, designated as a LACE citation, was issued to Juanlisa Monroe and the time you entered on the citation you submitted to Troop B appears to be 1750 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1054 hours, a difference of approximately 6 hours and 56 minutes. The vehicle Ms. Monroe was driving at the time had a Michigan license plate and your MDT records show you did not query the license plate or Ms. Monroe's driver's license. On January 24, 2018, Ms. Monroe advised Inv. Fournet in a recorded telephone call that she remembered the stop and recalled she had been staying at a hotel in Houma and was on the way to New Orleans that morning between 11:00 a.m. and 1:00 p.m. Ms. Monroe provided Inv. Fournet with a copy of the citation you issued to her. It was noted that the first zero in the time entered of 1050 was very faint.

Citation #3238411, designated as a LACE citation, was issued to Ross Williams and the time you entered on the citation you submitted to Troop B appears to be 1644 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1045 hours, a difference of approximately 5 hours and 59 minutes. The vehicle Mr. Ross was driving at the time had a California license plate and your MDT records show you did not query the license plate or Mr. Ross' driver's license.

Citation #3238412, designated as a LACE citation, was issued to William Goodwin and the time you entered on the citation you submitted to Troop B appears to be 1830 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1032 hours, a difference of approximately 7 hours and 58 minutes. The vehicle Mr. Goodwin was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Mr. Goodwin's driver's license.

Citation #3238413, designated as a LACE citation, was issued to John Davidson and the time you entered on the citation you submitted to Troop B appears to be 1925 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1020 hours, a difference of approximately 9 hours and 5

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minutes. The vehicle Mr. Davidson was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Mr. Davidson's driver's license. On February 6, 2018, Mr. Davidson advised Inv. Fournet in a recorded telephone call that he is an attorney and former prosecutor. He remembered the stop and described his vehicle which matched the vehicle captured on the recording of the stop from your MVR. Mr. Davidson advised he was returning to Mississippi from his camp in Cocodrie and did not recall the time of the stop, but the time was definitely not 1925 hours as the stop was during the day and not at night. The first two digits for the time entered on Mr. Davidson's copy of the citation he provided to Inv. Fournet were very faint and the third digit is a 1.

Citation #3238414, designated as a LACE citation, was issued to James Richardson and the time you entered on the citation you submitted to Troop B appears to be 1940 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1014 hours, a difference of approximately 9 hours 26 minutes. The vehicle Mr. Richardson was driving at the time had a Texas license plate and your MDT records show you did not query the license plate or Mr. Richardson's driver's license. On January 23, 2018, Mr. Richardson advised Inv. Fournet in a recorded telephone call that he remembered the stop and it was mid-morning, definitely not evening or night. He recalled the trooper, location and what he was driving at the time of the stop, which is supported by what is depicted in the video recording of the stop from your MVR.

On March 16, 2017, you claimed to have worked regular shift from 0700 to 1500 hours, and worked a LACE overtime detail in St. Charles Parish from 1500 to 2300 hours as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit J and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records show queries from 1449 to 1721 hours. Cell phone data recovered indicates your cell phone, and by extension your person, was in Laplace in St. John the Baptist Parish at 1729 and 1733 hours; East Baton Rouge Parish east of Pecue Ln, at 1814 and 1815 hours; LSU at 1857 and 1901 hours; and Ascension Parish near Sorrento at 2206 hours. You were not even in the assigned area of the LACE overtime detail – St. Charles Parish – for at least five hours of the overtime detail you claimed to have worked. Your timesheet and the four citations described below contain false information.

Citation #3239567, designated as a LACE citation, was issued to Christian Ardon and the time you entered on the citation you submitted to Troop B appears to be 1643 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0849 hours, a difference of approximately 7 hours and 54

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minutes, and during your regular duty hours. Your MDT records show that at 0839 hours you queried the license plate of the vehicle Mr. Ardon was driving. On April 3, 2018, Mr. Ardon advised Inv. Fournet in a recorded telephone call that he remembered the stop and identified the vehicle he was driving as a 2015 while Chevrolet Silverado. Mr. Ardon said he was stopped around 9:00 a.m. on I-10 for weaving and he must have been distracted while on the phone. Mr. Ardon advised that the trooper told him it was a warning ticket, but he later got a letter in the mail telling him there was an attachment for his arrest, and now he is under suspension. The copy of the citation Mr. Ardon sent to Inv. Fournet has a time of 1643 hours on it.

Citation #3239614, designated as a LACE citation, was issued to Anthony Crubaugh and the time you entered on the citation you submitted to Troop B appears to be 2301 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1506 hours, a difference of approximately 7 hours and 55 minutes. The vehicle Mr. Crubaugh was driving at the time had an Illinois license plate and your MDT records show you did not query the license plate or Mr. Crubaugh's driver's license. On April 4, 2018, Mr. Crubaugh advised Inv. Fournet in a recorded telephone call that he was stopped by you either late morning or mid-afternoon when driving eastbound on I-10. Mr. Crubaugh recalled he had taken over driving from his wife after exiting I-55, a few minutes before he was stopped and given the citation. Mr. Crubaugh was adamant the time of the stop was not 2301 hours as written on the copy of the citation you submitted to Troop B. Mr. Crubaugh sent Inv. Fournet a copy of the citation he received, which indicates the time as 301 hours. You did not enter the time on this citation in military time.

Citation #3239612, designated as a LACE citation, was issued to Rosemond Vanhuss and the time you entered on the citation you submitted to Troop B appears to be 1941 hours. There was no MVR recording of this stop. The vehicle Ms. Vanhuss was driving at the time had a Texas license plate and your MDT records show you did not query the license plate or Ms. Vanhuss' driver's license. On April 3, 2018, Ms. Vanhuss advised Inv. Fournet in a recorded telephone call that she works in Kenner, LA on Loyola and got off work at 4:00 p.m. She recalled receiving the citation around 4:15 p.m. on I-310 as she was headed to Norco when she received the citation. She advised she was driving a white 2013 Toyota and the stop was definitely before 7:00 p.m. Ms. Vanhuss sent Inv. Fournet a copy of the citation she received which shows the time recorded on it as 41 hours.

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Citation #3239613, designated as a LACE citation, was issued to Hugo Mendonca and the time you entered on the citation you submitted to Troop B appears to be 2011 hours. There was no MVR recording of this stop. The vehicle Mr. Mendonca was driving at the time had a Florida license plate and your MDT records show that you did not query the license plate or Mr. Mendonca's driver's license. On April 5, 2018, Mr. Mendonca advised Inv. Fournet in a recorded telephone call that he recalled receiving the citation at about 10:00 a.m. on the interstate as he was bringing his father to the airport, and the stop was definitely not at night. Mr. Mendonca could not remember what the trooper looked like, but recalled he was driving his wife's vehicle - a white Dodge pickup truck – which is what was written on the citation you submitted to Troop B.

On March 22, 2017, you claimed to have worked a LACE overtime detail in St. Charles Parish from 0700 hours to 1500 hours, and then your regular shift from 1500 hours to 2300 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit H copy of which is labeled as Exhibit K and is attached hereto and made a part hereof. There were no radio communication for you recorded on the Troop B radio log for this LACE detail; however, you went 10-8 for your regular shift on the radio at 1453 hours. Cell phone data retrieved indicates that your cell phone, and by extension your person, was in Jefferson Parish at 0913, 0932, 1231, 1232, 1305, 1315, 1328, 1339, and 1455 hours. Your MDT records show three queries between 0958 and 1139 hours. The three citations as described below contain false information.

Citation #3239629, designated as a LACE citation, was issued to Abraham Pacana and the time you entered on the citation you submitted to Troop B appears to be 1234 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1139 hours, a difference of approximately 55 minutes. The vehicle Mr. Pacana was driving at the time had a New York license plate and your MDT records show you did not query the license plate or Mr. Pacana's driver's license.

Citation #3239630, designated as a LACE citation, was issued to Victor Carlstrom and the time you entered on the citation you submitted to Troop B appears to be 1310 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1112 hours, a difference of approximately 1 hour and 58 minutes. The vehicle Mr. Carlstrom was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license plate or Mr. Calstrom's driver's license.

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Citation #3239631, designated as a LACE citation, was issued to Jorge Acosta and the time you entered on the citation you submitted to Troop B appears to be 1400 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1104 hours, a difference of approximately 2 hours and 56 minutes. The vehicle Mr. Acosta was driving at the time had a Mississippi vehicle license plate and your MDT records show you did not query the license plate or Mr. Acosta's driver's license.

On April 14, 2017, you had a RDO, and claimed to have worked a LACE overtime detail from 0600 hours to 1800 hours in St. Charles Parish, as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit I and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Cell phone data retrieved indicates that your cell phone, and by extension your person, was in Jefferson Parish at 1120, 1124, 1125, 1204, 1208, 1231, 1239, 1241, 1353, 1441, 1500, and 1515 hours. Your MDT records show queries between 0830 and 1108 hours. The eight citations as described below contain false information:

Citation #3300802, designated as a LACE citation, was issued to Tomy Derouen and the time of the stop stated on the citation you submitted to Troop B appears to be 2038 hours, however, your LACE detail ended at 1800 hours. There was no MVR recording of the stop. Your MDT records show that at 0837 hours, you queried the Louisiana license plate of the vehicle Mr. Derouen was driving. On January 26, 2018, Mr. Derouen advised Inv. Fournet in a recorded telephone call that he remembered the stop when he and his wife were leaving New Orleans headed back home to New Iberia. He advised that the stop occurred between 0800 and 1000 hours by a state trooper.

Citation #3300818, designated as a LACE citation, was issued to Elizabeth LeBlanc and the time you entered on the citation you submitted to Troop B appears to be 1235 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1036 hours, a difference of approximately 1 hour and 59 minutes. The vehicle Ms. LeBlanc was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license plate or Ms. LeBlanc's driver's license.

Citation #3300819, designated as a LACE citation, was issued to Joshua Jones and the time you entered on the citation that you submitted to Troop B appears to be 1340 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1010 hours, a difference of approximately 3 hours and 30

minutes. The vehicle Mr. Jones was driving at the time had a Kentucky license plate and your MDT records show you did not query the license plate or Mr. Jones' driver's license.

Citation #3300820, designated as a LACE citation, was issued to Jose Lizama-Motica and the time you entered on the citation you submitted to Troop B appears to be 1350 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0951 hours, a difference of approximately 3 hours and 59 minutes. The vehicle Mr. Lizama-Motica was driving at the time had a Tennessee license plate and your MDT records show you did not query the license plate or Mr. Lizama-Motica's driver's license.

Citation #3300821, designated as a LACE citation, was issued to Brad Snodgrass and the time you entered on the citation you submitted to Troop B appears to be 1433 hours. The recording of the stop from you MVR shows the actual stop occurred at or around 0938 hours, a difference of approximately 4 hours and 55 minutes. The vehicle Mr. Snodgrass was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license plate or Mr. Snodgrass' driver's license. On January 24, 2018, Mr. Snodgrass advised Inv. Fournet in a recorded telephone call that he remembered receiving the citation and said he received it somewhere in the middle of the morning. Mr. Snodgrass advised that he was in a rental car and left the hotel to go look at plantation homes.

Citation #3300822, designated as a LACE citation, was issued to Brett Orgeron and the time you entered on the citation you submitted to Troop B appears to be 1440 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0914 hours, a difference of approximately 5 hours and 26 minutes. The vehicle Mr. Orgeron was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Mr. Orgeron's driver's license.

Citation #3300823, designated as a LACE citation, was issued to Mathilde Morzaniga and the time you entered on the citation you submitted to Troop B appears to be 1500 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0909 hours, a difference of approximately 5 hours and 51 minutes. The vehicle Ms. Morzaniga was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Ms. Morzaniga's driver's license. On January 24, 2018, Ms. Morzaniga advised Inv. Fournet in a recorded telephone call that she remembered the stop and receiving the citation. Ms. Morzaniga recalled that she was traveling to St.

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Rose to feed her horse when she was stopped. She advised that she would have been in class at 1100 and 1500 hours, so the time had to be early. Ms. Morzaniga advised that you were standing in the middle of the highway when you pulled her over.

Citation #3300824, designated as a LACE citation, was issued to Natasha Sumerlin and the time you entered on the citation you submitted to Troop B appears to be 1625 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0828 hours, a difference of approximately 7 hours and 57 minutes. The vehicle Ms. Summerlin was driving at the time had an Alabama license plate and your MDT records show you did not query the license plate or Ms. Summerlin's driver's license. On April 5, 2018, Ms. Sumerlin advised Inv. Fournet in a recorded telephone call that she recalled the citation. She was traveling from Alabama en-route to Lafayette, LA when she was stopped at about 9:00 or 10:00 a.m. for speeding. She advised that she was definitely stopped in the morning and not the afternoon. Ms. Sumerlin advised that she was driving her mother's vehicle, a light colored Toyota Highlander, which is confirmed by the recording of the stop from your MVR.

On May 17, 2017, you had a RDO and you claimed to have worked a LACE overtime detail in St. Charles Parish from 1400 to 0000 hours (midnight), as indicated by your official State Police timesheet, a copy of which is labeled as Exhibit J and is attached hereto and made a part hereof. The only radio communication recorded for you in the Troop B radio log entry for this detail was you going 10-8 at 1348 hours. Cell phone data recovered indicates your cell phone, and by extension your person, was in St. Charles Parish at 1430, 1432, and 1503 hours; Orleans Parish at 1700 and 1754 hours; crossing Lake Pontchartrain at 1830 hours as your phone pinged off the tower in the middle of the lake and in New Orleans East near the I-10/I-510 interchange facing the lake; and St. Tammany Parish in Mandeville, LA at 1909, 1912, 1938, and 1948 hours. Video footage from your MVR shows you on I-610 in Orleans Parish at approximately 1650 and 1652 hours. You were not even in the assigned LACE detail area – St. Charles Parish - for approximately seven hours of the overtime detail you claimed to have worked. Your timesheet, and the two citations as described below, contain false information:

Citation #3302398, designated as a LACE citation, was issued to Jason Arieux and the time you entered on the citation you submitted to Troop B appears to be 2155 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1611 hours, a difference of approximately 5 hours and 44 minutes. The vehicle Mr. Arieux was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license

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plate or Mr. Arieux's Louisiana driver's license. On April 4, 2018, Mr. Arieux advised Inv. Fournet in a recorded telephone call that he recalled the stop, and although he could not recall exactly what time the stop occurred, he was adamant it was not at night. Mr. Arieux recalled the location of the stop and the vehicle he was driving as noted on the citation.

Citation #3302399, designated as a LACE citation, was issued to Jamie LeCompte and the time you entered on the citation you submitted to Troop B appears to be 2302 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1508 hours, a difference of approximately 7 hours and 54 minutes. The vehicle Ms. LeCompte was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license plate or Ms. LeCompte's Louisiana driver's license.

On May 28, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 1400 to 0200 hours as indicated on your official State Police timesheet you submitted labeled as Exhibit K attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Cell phone data recovered indicates your cell phone, and by extension your person, was in Orleans Parish in the Gentilly area at 1857 hours; near I-10 east of Biloxi, MS at 2127 hours; and near I-10 east of Mobile, AL and west of Pensacola, FL at 0015 hours on May 29, 2017. You were not even in the assigned LACE detail area – St. Charles Parish – for at least 5 hours you claimed to have worked the overtime LACE detail. Your timesheet, and the 4 citations as described below, contain false information.

Citation #3302499, designated as a LACE citation, was issued to Floyd Bradford and the time you entered on the citation you submitted to Troop B appears to be 2342 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1545 hours, a difference of approximately 7 hours and 57 minutes. On April 4, 2018, Mr. Bradford advised Inv. Fournet in a recorded telephone call that he remembered the traffic stop and recalled the time of the stop as about 4:00 p.m. Mr. Bradford was headed to work in Laplace and had to be there for 5:00 p.m. and he worked until 5:00 a.m. the next day. Mr. Bradford gave Inv. Fournet the location of the stop and the description of the vehicle he was driving, which was consistent with the recording of the stop from your MVR.

Citation #3302498, designated as a LACE citation, was issued to Vincent Briggs and the time you entered on the citation you submitted to Troop B appears to be 2317 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1623 hours, a difference of approximately 6 hours and 54 minutes. The vehicle Mr. Briggs was driving at the time had a Mississippi license

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plate. On April 3, 2018, Mr. Briggs advised Inv. Fournet in a recorded telephone call that he was leaving New Orleans when he was stopped on the interstate while driving a white Mustang. Mr. Briggs advised that a black male trooper gave him the citation in the early afternoon as it was still daylight, and it was definitely not 11:00 p.m.

Citation #3302497, designated as a LACE citation, was issued to Rebecca Eremia and the time you entered on the citation you submitted to Troop B appears to be 2110 hours. The recording of the stop from your MVR shows that the actual stop occurred at or around 1715 hours, a difference of approximately 3 hours and 55 minutes. The vehicle Ms. Eremia was driving at the time had a Texas license plate. On April 5, 2018, Ms. Eremia advised Inv. Fournet in a recorded telephone call that she was driving to Berwick to her father's house in a rental vehicle between 3:00 and 6:00 p.m. when she was stopped and issued the citation by a black male trooper. Ms. Eremia was adamant she was not stopped at night. The copy of the citation Ms. Eremia sent to Inv. Fournet had three faint numbers written in the space for the time - 110 hours.

Citation #3302496, designated as a LACE citation, was issued to Jleion Chauvin and the time entered on the citation you submitted to Troop B appears to be 1430 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1740 hours, a difference of approximately 3 hours and 10 minutes.

On May 31, 2017, you claimed to have worked a LACE overtime detail in St. Charles Parish from 0700 to 1500 hours, and your regular shift from 1500 to 2300 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit K. There were no radio communication for you for this detail noted on the Troop B radio log. Cell phone data retrieved indicates your cell phone, and by extension you person, was in Orleans Parish at 0743 and 0746 hours; Jefferson Parish at 0801, 0802, and 0807 hours; St. Charles Parish at 0942, 0947, 0951, 0953, and 0957 hours; Jefferson Parish at 1130 hours; and Orleans Parish at 1135, 1222, 1334, and 1501 hours. Your MDT records show queries from 0722 to 1259 hours. The three citations as described below, contain false information.

Citation # 3403315, designated as a LACE citation, was issued to Katie Baudoin for Speeding (75/60) and a Suspended Driver's License. You wrote on the citation "Released to Owner." However, a review of the video of this stop from your MVR shows that, although Ms. Baudoin's driver's license was suspended, you let her drive the vehicle from the stop. Furthermore, Ms. Baudoin was not the registered owner of the vehicle and the vehicle was not released to the owner as you indicated on the citation.

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Citation #3403327, designated as a LACE citation, was issued to James Bender King and the time entered on the citation you submitted to Troop B appears to be 1455 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0905 hours, a difference of approximately 5 hours and 50 minutes. The vehicle Mr. Bender was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Mr. Bender's driver's license. In the video recording of the stop, the driver can be heard stating he had "to be in New Orleans by 10:00."

Citation #3403328, designated as a LACE citation, was issued to Shawnnessy Lidgard and the time you entered on the citation you submitted to Troop B appears to be 1500 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0900 hours, a difference of approximately 6 hours. The vehicle Ms. Lidgard was driving at the time had an Alabama license plate and your MDT records show you did not query the license plate or Ms. Lidgard's driver's license.

On June 10, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 0700 to 1900 hours, as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit L and is attached hereto and made a part hereof. The only radio communication for you entered in the Troop B radio log for this detail was you going 10-8 at 0656 hours and your mileage given as "63381-77⁵." Your MVR and MDT records show you made traffic stops in Orleans Parish after 0700 hours when you were supposed to be in St. Charles Parish. Cell phone data retrieved indicates your cell phone, and by extension your person, was in Jefferson Parish at 0909 hours; Orleans Parish at 1035 and 1139 hours; and Jefferson Parish at 1151 and 1539 hours. Your MDT records show queries during your LACE detail from 0702 hours to 1143 hours. The four citations as detailed below, contain false information:

Citation #3403410, designated as a LACE citation, was issued to Amy (Morvant) Chaisson and the time you entered on the citation you submitted to Troop B appears to be 1405 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0911 hours, a difference of approximately 4 hours and 54 minutes. Your MDT records show that at 0903 hours, you queried the Louisiana license plate of the vehicle Ms. Chaisson was driving. The driver can be heard in the video stating she went to a Journey concert the night before. On January 24, 2018, Ms. Chaisson advised Inv. Fournet in a recorded telephone call that she recalled receiving the citation and confirmed that she went to a concert the night before and had just checked out of her hotel prior to being stopped. Ms. Chaisson advised that the stop was definitely in the morning.

⁵ 63381 represents your beginning mileage and 77 represents your unit number.

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Citation #3403411, designated as a LACE citation, was issued to Sean Young and the time you entered on the citation you submitted to Troop B appears to be 1625 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0841 hours, a difference of approximately 7 hours and 44 minutes. The vehicle Mr. Young was driving at the time had an Ohio license plate and your MDT records show you did not query the license plate or Mr. Young's driver's license.

Citation #3403412, designated as a LACE citation, was issued to Tyrone Gibson and the time you entered on the citation you submitted to Troop B appears to be 1630 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0835 hours, a difference of 7 hours and 55 minutes. The vehicle Mr. Gibson was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Mr. Gibson's driver's license. On January 24, 2018, Mr. Gibson advised Inv. Fournet in a recorded telephone call that he remembered the traffic stop and citation. He advised that at the time he was stopped, he was on his way to Baton Rouge to visit his brother in jail and always goes in the morning on a Saturday or a Sunday.

Citation #3403413, designated as a LACE citation, was issued to Rachel Shepard and the time you entered on the citation you submitted to Troop B appears to be 1726 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0733 hours, a difference of approximately 7 hours and 55 minutes. Your MDT records show that you did not query the Mississippi license plate of the vehicle Ms. Shepard was driving, but you did query her Alabama driver's license. On January 31, 2018, Ms. Shepard advised Inv. Fournet in a recorded telephone call that on the day in question she was en-route to Destrehan, LA from Mobile, AL and had to be at her destination for about 0800 hours. She advised she was stopped and received the citation prior to that time. Ms. Shepard recalled that she was driving a Kia and a black male trooper stopped her.

On June 11, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 0700 to 1500 hours, as indicated on your official State Police timesheet you submitted, as evidenced by Exhibit L. There were no radio communications for you for this detail noted on the Troop B radio log. Your MVR shows you assisted stranded motorists at 0811 and 0827 hours. Cell phone data recovered indicates your cell phone, and by extension your person, was in Jefferson Parish at 0912 hours; and north of Pensacola, FL at 1409, 1410, 1411, and 1455 hours. You were not even in the assigned LACE detail area – St. Charles Parish – for approximately six hours of the overtime detail you claimed to have worked. Your timesheet, and the four citations described below, contain false information:

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Citation #3403429, designated as a LACE citation, was issued to Gary Perkins, Jr. and the time entered on the citation you submitted to Troop B appears to be 1440 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0648 hours, a difference of approximately 7 hours and 52 minutes. On April 16, 2018, Mr. Perkins advised Inv. Fournet in a recorded telephone call that he recalled this particular traffic stop and stated the time he was stopped was about 6:30 a.m. Mr. Perkins' description of the vehicle he was driving matches what is depicted in the recording of the stop from your MVR. Cell phone data recovered indicates your cell phone, and by extension you person, was in Pensacola, FL at the time you entered on the citation you submitted to Troop B. This citation was issued out of sequential order.

Citation #3403428, designated as a LACE citation, was issued to Kara Parikh and the time you entered on the citation you submitted to Troop B appears to be 1350 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0656 hours, a difference of approximately 6 hours and 54 minutes. The vehicle Ms. Parikh was driving at the time had a Florida license plate. On April 5, 2018, Ms. Parikh advised Inv. Fournet in a recorded telephone call that she recalled the traffic stop and citation and that on the day in question, she left New Orleans about 6:00 a.m. She was en-route to Baton Rouge when she was stopped and received the citation. Ms. Parikh advised that she had to be in Baton Rouge for 1:00 p.m. so the stop was not at 1350 hours as was written on the citation you submitted to Troop B. Ms. Parikh advised that a time of 6:56 a.m. would be more accurate. Ms. Parikh's description of the vehicle she was driving at the time of the stop coincides with what is depicted on the recording of the stop from your MVR. Cell phone data recovered indicates your cell phone, and by extension you person, was in Pensacola, FL at the time you entered on the citation you submitted to Troop B. This citation was issued out of sequential order.

Citation #3403426, designated as a LACE citation, was issued to Donovan Alexander and the time you entered on the citation you submitted to Troop B appears to be 1050 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0751 hours, a difference of approximately 2 hours and 59 minutes. The vehicle Mr. Alexander was driving at the time had a Florida license plate. This citation was issued out of sequential order.

On July 8, 2017, you had a RDO, and claimed to have worked a LACE overtime detail from 0600 hours to 1800 hours in St. John the Baptist Parish, as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit M and is attached hereto and made a part hereof. Several citations written by you on this date were issued to motorists for speeding violations in St. John the Baptist Parish when a sign

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designating the St. John Parish Line could be seen on the MVR videos of the stops in front (west) of your unit. The motorists being stopped were approaching the rear of your vehicle from the east headed west, which proves you were clocking vehicles via radar in St. Charles Parish, stopping the vehicles in St. John the Baptist Parish and issuing the driver a citation for speeding in St. John Parish. There were no radio communications for you for this detail noted on the Troop B radio log. Cell phone data recovered indicates your cell phone, and by extension your person, was in Jefferson Parish near your residence at 0856, 0918, 0948, and 0955 hours; Orleans Parish at 1040 hours; just west of Meridian, MS at 1301 hours; and just south of Gadsden, AL at 1538 and 1541 hours. You were not even in the assigned area of the LACE detail – St. John the Baptist Parish – for approximately nine hours of the overtime detail that you claimed to have worked. Your timesheet, and the three citations as described below, contain false information:

Citation #3091790, designated as a LACE citation, was issued to Chinh Tran and the time you entered on the citation you submitted to Troop B appears to be 1120 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0628 hours, a difference of approximately 4 hours and 52 minutes. The vehicle Mr. Tran was driving at the time had a Florida license plate. The video recording of the stop from your MVR indicates the vehicle appears to be in St. Charles Parish when you clocked its speed. Cell phone data indicates you and your cell phone were past Orleans Parish headed toward Mississippi, not in St. John the Baptist Parish at the time you entered on the citation you submitted to Troop B.

Citation #3091791, designated as a LACE citation, was issued to Deborah Kirkland and the time you entered on the citation you submitted to Troop B appears to be 1150 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0657 hours, a difference of approximately 4 hours and 53 minutes. The vehicle Ms. Kirkland was driving at the time had an Alabama license plate. The video recording of the stop from your MVR indicates the vehicle appears to be in St. Charles Parish when you clocked its speed. Cell phone data indicates you and your cell phone were not even in the State of Louisiana, much less St. John the Baptist Parish, at the time you indicated on the citation you submitted to Troop B.

Citation #3091794, designated as a LACE citation, was issued to Shawn Flanigan and the time you entered on the citation you submitted to Troop B appears to be 1608 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0817 hours, a difference of approximately 7 hours and 51 minutes. The vehicle Mr. Flanigan was driving at the time had an Iowa license plate. On April 5, 2018, Mr. Flanigan advised Inv. Fournet in a recorded

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telephone call that he recalled the traffic stop and said he was westbound on I-10 en-route to the golf course in Laplace when he was stopped and issued a citation. Mr. Flanigan advised that the stop was in the morning, probably between 8:00 and 9:00 a.m., and definitely not in the afternoon. His descriptions of the vehicle he was driving, the location of the stop, and the trooper who stopped him are all corroborated by the video recording of the stop from your MVR. Cell phone data indicates you and your cell phone were not even in the State of Louisiana, much less St. John the Baptist Parish, at the time you indicated on the citation you submitted to Troop B.

On July 22, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. John Parish from 0600 to 1800 hours, as indicated on your official State Police timesheet you submitted, a copy of which is labeled as Exhibit N and is attached hereto and made a part hereof. There was one radio communication logged for you in the Troop B radio log for this LACE detail which was you going "10-8" with the mileage of "66770" given at 0551 hours. Your MDT records show queries from 0630 to 1120 hours. Cell phone data recovered shows your cell phone, and by extension your person, were in St. Charles Parish at 1056 and 1059 hours; and in Jefferson Parish at 1242, 1501, 1542, 1622, 1653, 1710, and 1753 hours. The seven citations as described below, contain false information.

Citation #3446183, designated as a LACE citation, was issued to Robert McGraw and the time you entered on the citation you submitted to Troop B appears to be 1410 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0918 hours, a difference of approximately 4 hours and 52 minutes. The vehicle Mr. McGraw was driving at the time had a Florida license plate and your MDT records show you did not query the license plate or Mr. McGraw's driver's license. On January 26, 2018, Mr. McGraw advised Inv. Fournet in a recorded telephone call that he was traveling North on I-55 en-route to see his sister in Denham Springs to talk about his mother who had just passed away when he was stopped. Mr. McGraw advised that the stop occurred in the morning and the trooper was standing in the road and flagged him over.

Citation #3446184, designated as a LACE citation, was issued to Silas Miles and the time you entered on the citation you submitted to Troop B appears to be 1440 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0904 hours, a difference of approximately 5 hours and 36 minutes. The vehicle Mr. Miles was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Mr. Miles' Mississippi driver's license.

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Citation #3446185, designated as a LACE citation, was issued to Gergana Hoon and the time you entered on the citation you submitted to Troop B appears to be 1450 hours. The recording of the stop from your MVR shows the actual stop occurred at 0858 hours, a difference of approximately 5 hours and 52 minutes. The vehicle Ms. Hoon was driving at the time had a Kansas license plate and your MDT records show you did not query the license plate or Ms. Hoon's driver's license. On January 26, 2018, Ms. Hoon advised Inv. Fournet in a recorded telephone call that she recalled the traffic stop was in the morning and not the afternoon. Her description of the vehicle she was driving matched that depicted on the video recording of the stop from your MVR.

Citation #3446186, designated as a LACE citation, was issued to Greg Steffens and the time you entered on the citation you submitted to Troop B appears to be 1530 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0840 hours, a difference of approximately 6 hours and 50 minutes. The vehicle Mr. Steffens was driving at the time had a Missouri license plate and your MDT records show you did not query the license plate or Mr. Steffens' driver's license.

Citation #3446187, designated as a LACE citation, was issued to Joey Roach and the time you entered on the citation you submitted to Troop B appears to be 1540 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0828 hours, a difference of approximately 7 hours and 12 minutes. The vehicle Mr. Roach was driving at the time had an Arkansas license plate and your MDT records show you did not query the license plate or Mr. Roach's driver's license.

Citation #3446188, designated as a LACE citation, was issued to Dr. Kyle Bateman. The time you entered on the citation you submitted to Troop B, although faint, begins with 1, the second number is illegible, and the last two numbers appear to be zeros (1?00). The recording of the stop from your MVR shows the actual stop occurred at or around 0811 hours. The vehicle Dr. Bateman was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Dr. Bateman's driver's license. On January 26, 2018, Dr. Bateman advised Inv. Fournet that he was traveling northbound on I-55 early Saturday morning en-route to Jackson, MS when he was stopped.

Citation #3446189, designated as a LACE citation, was issued to Scott Vogt and the time you entered on the citation you submitted to Troop B appears to be 1750 hours. The recording of the stop from your MVR shows the actual stop occurred

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at 0800 hours, a difference of approximately 9 hours and 50 minutes. The vehicle Mr. Vogt was driving at the time had a Missouri license plate and your MDT records show you did not query the license plate or Mr. Vogt's driver's license. On January 26, 2018, Mr. Vogt advised Inv. Fournet in a recorded telephone call that he recalled receiving the citation and said he was traveling from Gulfport, MS and was northbound on I-55 when he was stopped. Mr. Vogt advised that he was stopped probably sometime around 10:00, 10:30 or 11:00 a.m., but it was definitely in the morning, and it was raining that day. Mr. Vogt recalled the trooper came to the passenger side of the vehicle and Mr. Vogt's wife handed the trooper his license. Mr. Vogt's description of his vehicle as a white Ford Explorer corroborates what is depicted in the video recording of the stop from your MVR. The video recording also shows the sky to be cloudy and overcast as well. The copy of the citation Mr. Vogt sent to Inv. Fournet shows the time you entered on it as 750 hours.

On August 17, 2017, you claimed to have worked regular shift from 0700 to 1500 hours and a LACE overtime detail from 1500 to 2300 hours in St. Charles Parish, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit O and is attached hereto and made a part hereof. There were no radio communications for you for this detail noted on the Troop B radio log. Your MDT records during this detail show you ran queries from 1717 to 1924 hours. Cell phone data recovered shows your cell phone, and by extension your person, was in Orleans Parish at 1504, 1505, and 1507 hours; and Jefferson Parish at 1812 hours, St. Charles Parish at 1814 hours, and Jefferson Parish at 1918, 1929, 1939, and 1954 hours. The two citations as described below, contain false information:

Citation #3487226, designated as a LACE citation, was issued to Jessica Bagert and the time you entered on the citation you submitted to Troop B appears to be 2008 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1854 hours, a difference of approximately 1 hour and 14 minutes. Your MDT records show you did not query the Louisiana license plate of the vehicle Ms. Bagert was driving or her driver's license.

Citation #3487228, designated as a LACE citation, was issued to Joshua Perrault and the time you entered on the citation you submitted to Troop B appears to be 2130 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1836 hours, a difference of approximately 2 hours and 54 minutes. The vehicle Mr. Perrault was driving at the time had a California license plate and your MDT records show you did not query the license plate or Mr. Perrault's New York driver's license. On January 26, 2018, Mr. Perrault advised Inv. Fournet in a recorded telephone call that the actual time he was stopped by

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you was about 1700 hours and it was still daylight, definitely not at night. Mr. Perrault's descriptions of the vehicle he was driving and the location of the stop were corroborated by the video recording of the stop from your MVR.

On August 18, 2017, you claimed to have worked regular shift from 0700 to 1500 hours and a LACE overtime detail from 1500 to 2300 hours in St. Charles Parish, as indicated on your official State Police timesheet, as evidenced by Exhibit O. The only radio communication recorded for you in the Troop B radio log for this LACE detail was at 1732 hours when you assisted a motorist with a flat tire, and at 1743 hours when you cleared from that assist. Your MDT records show queries from 1623 to 2227 hours. Cell phone data retrieved shows your cell phone, and by extension your person, was in Orleans Parish at 1507 and 1522 hours; Jefferson Parish at 1620 hours; St. Charles Parish at 1702 hours; Jefferson Parish at 1855 and 1856 hours; Orleans Parish at 1859 and 1901 hours; Jefferson Parish at 2012, 2014, 2023, and 2033 hours; Orleans Parish at 2038 hours; Jefferson Parish at 2046, and 2047 hours; and St. Charles Parish at 2056 and 2207 hours. You MVR captured you in Jefferson Parish on I-10 eastbound at milepost 220 at 2219 hours assisting with a vehicle out of gas. The three citations as described below, contain false information:

Citation #3487255, designated as a LACE citation, was issued to Jeremie Ryan and the time you entered on the citation you submitted to Troop B appears to be 2135 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1635 hours, a difference of approximately 5 hours. Your MDT records show that at 1623 hours you ran the license plate of the vehicle Mr. Ryan was driving. On January 26, 2018, Mr. Ryan advised Inv. Fournet in a recorded telephone call that at the time of the stop, he was traveling home to Many, LA from New Orleans with his wife and son during the afternoon, he believed between noon and 1400 hours. Mr. Ryan was adamant the stop was definitely during the day time hours. Mr. Ryan recalled you had someone pulled over on the side of the road and after he passed you, you pulled out and pulled him over. Mr. Ryan recalled there were cars passing him when you pulled him over.

Citation #3487256, designated as a LACE citation, was issued to Melissa Medina and the time you entered on the citation you submitted to Troop B appears to be 2220 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1630 hours, a difference of approximately 5 hours and 50 minutes. The vehicle Ms. Medina was driving at the time had a Texas license plate and your MDT records show you did not query the license plate or Ms. Medina's Texas driver's license. On January 26, 2018, Ms. Medina advised Inv.

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Fournet in a recorded telephone call that she was stopped by you during the afternoon as she was on the interstate going home and headed towards Texas, and the stop was definitely not at night.

Citation #3487253, designated as a LACE citation, was issued to Courtney Gordon and the time you entered on the citation you submitted to Troop B appears to be 1900 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 2105 hours, a difference of approximately 2 hours and 5 minutes. Your MDT records show that at 2050 you queried the license plate of the vehicle Ms. Gordon was driving. On March 26, 2018, Ms. Gordon advised Inv. Fournet in a recorded telephone call that she remembered the traffic stop and described her vehicle and the trooper who stopped her, which descriptions matched the video recording of the stop from your MVR. Ms. Gordon recalled she was headed home from work on the Bonne Carre Spillway around 2100 hours when she was stopped. She recalled she was in the left lane when the trooper was flashing his lights behind her to get over, and as she sped up to get around the car in the right lane, the trooper got behind her and pulled her over for speeding. Ms. Gordon advised that she left work about 2000 hours so the stop could not have been at 1900 hours. Ms. Gordon forwarded a copy of the citation she received from you to Inv. Fournet. Ms. Gordon's citation has a time of 900 hours on it. This citation was issued out of sequential order.

On August 23, 2017, you claimed to have worked a LACE overtime detail from 0700 to 1100 hours in St. Charles Parish, and regular shift from 1500 to 2300 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit O. There were no radio communications for you for this detail noted on the Troop B radio log, and no MVR recordings until 1044 when you stopped a dump truck on a 4 lane highway with a 45 MPH speed limit, which is not believed to be on the assigned LACE route for St. Charles Parish. There were no MDT queries until 1048 hours. WVUE surveillance⁶ captured your LSP unit leaving your residence at 0600 hours and cell phone data retrieved indicates your cell phone, and by extension your person, were in the area of I-610 and Elysian Fields at 0642 hours. WVUE surveillance captured your unit returning to your residence at 0825 hours and leaving again at 1014 hours. It is believed you were not even in St. Charles Parish from 0700 to approximately 1044 hours (3 hours and 44 minutes), but certainly not from 0825 hours to 1014 hours (1 hour and 49 minutes) during your LACE detail. Your timesheet and the citation as described below, contain false information:

⁶ All recordings of you by WVUE were made by Mr. Jon Turnipseed.

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Citation #3487262, designated as a LACE citation, was issued to Roy Painter and the time entered on the citation you submitted to Troop B appears to be 1158 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 1111 hours, a difference of approximately 47 minutes. Your MDT records show that at 1101 hours you queried the license plate of the vehicle Mr. Painter was driving.

On September 4, 2017, you claimed to have worked a LACE overtime detail from 0600 to 1200 hours in St. Charles Parish, and regular shift from 1200 to 2200 hours, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit P and is attached hereto and made a part hereof. Your MDT showed 8 queries between 0853 hours and 1057 hours. Recorded surveillance conducted by WVUE News shows your State Police vehicle at your residence at 1110 hours and remaining there until 1700 hours. There were no radio communications for you recorded in the Troop B radio log for this LACE detail; however, the radio log shows that at 1147 hours when you went 10-8 for your regular duty shift. You were not even in St. Charles Parish for approximately 50 minutes of the LACE overtime detail you claimed to have worked. Your timesheet contains false information.

On September 6, 2017, you claimed to have worked a LACE overtime detail from 0600 to 1200 hours in St. Charles Parish, and regular shift from 1200 to 2200 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit P. The only radio traffic during this LACE detail noted for you was at 0606 hours when you gave your mileage as "77-71625 LACE." Cell phone data retrieved indicates your cell phone, and by extension your person, was in St. Charles Parish at 0900 hours. WVUE recorded surveillance shows your State Police vehicle returning to your residence at 0926 hours, still there at 1228 hours, and leaving at 1243 hours. You were not even in St. Charles Parish for approximately two hours and 30 minutes of the LACE overtime detail you claimed to have worked. Your timesheet and the two citations as described below, contain false information.

Citation #3488051, designated as a LACE citation, was issued to Kenneth Wasik and the time you entered on the citation you submitted to Troop B appears to be 1045 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0747 hours, a difference of approximately 2 hours and 58 minutes. The vehicle Mr. Wasik was driving at the time had a Louisiana rental vehicle license plate and your MDT records show you did not query the license plate or Mr. Wasik's driver's license. According to WVUE surveillance, you were at your home in Jefferson Parish at the time you entered on the citation you submitted to Troop B.

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Citation #3488052, designated as a LACE citation, was issued to Kristina Knipe and the time you entered on the citation you submitted to Troop B appears to be 1100 hours. The recording of the stop from your MVR shows the actual stop occurred at or around 0708 hours, a difference of approximately 3 hours and 52 minutes. The vehicle Ms. Knipe was driving at the time had a Pennsylvania vehicle license plate and your MDT records show you did not query the license plate or Ms. Knipe's driver's license. On January 30, 2018, Ms. Knipe advised Inv. Fournet in a recorded telephone call that she remembered the time of the stop as being about 0700 hours because she was en-route to Hammond, LA and had to be there by 0800 hours. According to WVUE surveillance, you were at your home in Jefferson Parish at the time you entered on the citation you submitted to Troop B.

On September 7, 2017, you had a RDO, and claimed to have worked a LACE overtime detail in St. Charles Parish from 0600 to 1400 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit P. The only radio communication for you recorded in the Troop B radio log for this LACE detail was you going "10-8" "71959-77 LACE" at 0558 hours. Your MDT records show 17 queries between 0805 and 1028 hours. WVUE recorded surveillance shows you leaving your home in your Louisiana State Police vehicle at 0555 hours and returning home at 1038 hours and you were still there at 1201 hours. Cell phone data retrieved shows that your cell phone, and by extension your person, were in Jefferson Parish at 0601 hours; the westbank of Orleans Parish at 0610; the eastbank of Orleans Parish at 0620 hours; and in Jefferson Parish at 1052, 1118, 1143, 1203 and 1246 hours. The evidence shows you were not even in the assigned area of the LACE detail - St. Charles Parish - for approximately three hours of overtime LACE detail you claimed to have worked. Your timesheet, and the two citations as described below, contain false information.

Citation #3448064, designated as a LACE citation, was issued to Brandi Holstead and the time of the stop stated on the citation appears to be 1110 hours. Your MVR recorded the actual time of the stop as 0920 hours, a difference of 1 hour and 50 minutes. The vehicle Ms. Holstead was driving at the time had a Texas license plate and your MDT records show you did not query the license plate or Ms. Holstead's Mississippi driver's license. On January 30, 2018, Ms. Holstead advised Inv. Fournet in a recorded telephone call that she remembered getting a citation on this day, and another on the next day, from two different troopers. She did not remember exactly what time she got this citation or what the trooper looked like. WVUE recorded surveillance captured your Louisiana State Police vehicle at your residence at the time you wrote on the citation you submitted to Troop B and around the time your cell phone pinged on a tower in Jefferson Parish.

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Citation #3448065, which was designated as a LACE citation, was issued to Daniel Gannon, and the time of the stop stated on the citation you submitted to Troop B appears to be 1145 hours. Your MVR recorded the actual time of the stop as 0948 hours, a difference of 1 hour and 57 minutes. Your MDT records show that at 0937 hours, you queried the Louisiana license plate of the vehicle Mr. Gannon was driving, which was registered to Karen Berrigan, but you did not query Mr. Gannon's driver's license. WVUE recorded surveillance captured your Louisiana State Police vehicle at your residence at the time you wrote on the citation you submitted to Troop B and around the time your cell phone pinged in Jefferson Parish.

On October 12, 2017, you had an RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 0600 to 1800 hours, as evidenced by your office State Police timesheet, a copy of which is labeled as Exhibit Q and is attached hereto and made a part hereof. All of your citations for this detail were written on I-10 between 0635 and 1608 hours. Cell phone data retrieved shows that your cell phone, and by extension your person, was in East Baton Rouge Parish on LSU's campus at 1723 hours. Thus, you would have to have left your LACE Detail in St. Charles Parish no later than 1630 hours, and would not have been in St. Charles Parish for approximately one hour and 30 minutes of the LACE overtime detail you claimed to have worked.

On October 13, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 0600 to 1800 hours, as indicated on your official State Police timesheet, as evidenced by Exhibit Q. However, at 1650 hours, your MVR captured you at a crash scene⁷ in New Orleans at the intersection of N. Broad Street and Desoto Street and you were not wearing a state police uniform. On June 11, 2018, IA investigator M/T Kevin Ducote conducted a recorded telephone interview with Ms. Latoya Luckett, the driver of vehicle 1 involved in that crash. Ms. Luckett confirmed that trooper arrived at the scene of the crash and he was not wearing a state trooper uniform at the time.

On October 28, 2017, you had a RDO and claimed to have worked a LACE overtime detail in St. Charles Parish from 0700 to 1900 hours, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit R and is attached hereto and made a part hereof. The Troop B radio logs indicate you communicated "10-8, 77180-77" at 0653 hours, and had additional radio communications at 0916, 0925, 0930, 0935, 1003, 1026, 1650 and 1654 hours. Your MDT records show queries from 0910 to 1124 hours, and at 1649, 1726, 1732, 1739, 1757, 1802, 1900 hours. Cell phone data recovered indicates your cell phone and, by extension your person, was in St.

⁷ The NOPD crash report no. relating to this crash is 171013182224974. A copy is maintained by Internal Affairs and is available for your review upon your request.

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Charles Parish at 0925, 0936, 1028, 1038, and 1114 hours; St. John the Baptist Parish near Laplace at 1139 hours; Ascension Parish near Sorrento at 1210 hours, and in Gonzales near Cabela's at the LA 30 interchange at 1305, 1330, 1400, 1419, 1420, and 1440 hours. At or around 0925 hours, you can be heard having a conversation on your cell phone about "winter clothes" "for the boy" and tell the other person to "call when you leave." During a traffic stop captured on your MVR at approximately 1128 hours, you can be heard having a cell phone conversation with someone wherein you stated, "After you cross the 12 mile bridge you will see me with my lights on." As the call continues, you are heard stating, "I'm on the 12 mile bridge – when you see me pull up behind me or in front of me." At approximately 1142 your MVR recorded you stating to a vehicle behind you, "follow me off this bridge." Around that time your MVR, radio and MDT activity stopped until approximately 1649 hours, and your cell phone records show you traveled to Ascension Parish in the area of Cabela's. The evidence shows you were not even in the assigned area of the LACE detail – St. Charles Parish – for at least four hours of the overtime detail you claimed to have worked. Your timesheet, and the two citations as described below, contain false information.

Citation #3569817, designated as a LACE citation, was issued to Dominic Pittman and the time of the stop stated on the citation you submitted to Troop B appears to be 1450 hours. Your MVR recorded the actual time of the stop as 1719 hours, a difference of 2 hours and 29 minutes. The vehicle Mr. Pittman was driving at the time had a Mississippi license plate and your MDT records show you did not query the license plate or Mr. Pittman's driver's license. Furthermore, the video shows that the stop occurred on I-10 eastbound at or near milepost 217, but you wrote on the citation that the location was I-10 westbound at milepost 220.

Citation #3569818, designated as a LACE citation, was issued to Gene Hunter and the time of the stop as stated on the citation you submitted to Troop B appears to be 1519 hours. Your MVR recorded the actual time of the stop as 1734 hours, a difference of 2 hours and 15 minutes. The vehicle Mr. Hunter was driving at the time had a Missouri license plate and your MDT records show you did not query the license plate or Mr. Hunter's driver's license.

On November 3, 2017, you claimed to have worked a DWI Grant from 2200 hours to 0400 hours on November 4, 2017, as evidenced by Exhibit R. At approximately 2338 hours, you stopped Occy Rocheney for a running a red light. You issued Ms. Rocheney Citation No. 3488924 for a violation of R.S. 32:232 – Traffic Control Signals, and 32:415 – Suspended Driver's License, and let her continue to operate the vehicle after the traffic stop.

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On November 6, 2017, you claimed to have worked your regular shift from 0700 to 1700 hours, and a LACE overtime detail in St. Charles Parish from 1700 to 2300 hours, as indicated on your official State Police timesheet, a copy of which is labeled as Exhibit S and is attached hereto and made a part hereof. LSP investigators conducted surveillance on you this day⁸. The Troop B radio logs show that you went "10-8 LACE 77-78296" at 1658 hours, and utilized your radio and MDT throughout the time you were issuing citations. Cell phone data retrieved shows that your cell phone, and by extension your person, was in Jefferson Parish at 1702 hours; St. Charles Parish at 1915 hours; and Jefferson Parish at 2139 and 2141 hours. Your LACE citations for that detail were all written between 1844 and 2100 hours. Around 2110 hours, the LSP surveillance team no longer saw you on the interstate or heard you on the radio so they proceeded to your residence. Although your St. Charles Parish LACE detail did not end until 2300 hours, LSP surveillance team members observed you arrive at your residence in Harvey at approximately 2218 hours and park your State Police unit in your driveway. None of the citations you issued during this detail are believed to have altered or false times, however, your timesheet claiming you worked St. Charles LACE until 2300 hours is false.

On November 7, 2017, you claimed to have worked regular shift from 0700 to 1700 hours, and a LACE overtime detail in St. Charles Parish from 1700 to 2300 hours, as evidenced by Exhibit S. LSP investigators conducted surveillance on you this day. Troop B radio logs show that you went "10-8 LACE, 77-78518" at 1657 hours, and utilized your radio throughout the time you were issuing most of your citations. Cell phone data retrieved shows that your cell phone, and by extension your person, was in Jefferson Parish at 1706 and 1711 hours; St. Charles Parish at 1855, 1901, 1912, 1924, and 1939 hours; and Jefferson Parish at 2113, 2116, and 2214 hours. Your LACE citations for that detail were all written between 1727 and 1950 hours. LSP surveillance team members observed your State Police unit arrive at your residence in Harvey at 2130 hours, then drive your LSP motorcycle from around the south side of your residence and back it up in your driveway. No times on citations you issued during that LACE detail appear to have been falsified. However, at approximately 1000 hours, you stopped Quinton Willis for speeding and issued him Citation No. 3569865 for a violation of R.S. 32:63 – Speeding, R.S. 32:415 - Suspended D/L, and allow him to continue to operate the vehicle after the traffic stop.

Following your placement on administrative leave pending investigation on November 8, 2017, your state police equipment was collected, including your assigned unit. While cleaning out your unit, Lt. John Stelly recovered numerous loose citations and ticket books in your unit. Some of the citations were partially filled out as follows:

⁸ The members of the LSP surveillance team were Sgt. Mark Fontenot, Trooper William Bosworth, Trooper Steve Linn, Trooper Rohn Bordelon, and Trooper Brandon Beaudoin.

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Citation# 2649986, dated Feb, 2016, for Jefferson Parish, First Parish Court, signed by you with court date, time and location information completed.

Citation# 3448008, dated Sept, 2017, for St. John Parish, 40th JDC, with court date, time and location information completed.

Citation# 3448009, dated Sept, 2017, for St. John Parish, 40th JDC, with court date, time and location information completed.

Citation# 3488810, dated Oct, 2017, for Jefferson Parish, 2nd Parish Court, signed by you, with court date, time and location information completed.

Citation# 3569870, dated Nov, 2017, for Jefferson Parish, 2nd Parish Court, signed by you, with court date, time and location information completed.

Citation# 3569989, dated Nov, 2017, for St. Charles Parish, 29th JDC, with court date, time and location information completed.

Citation# 3300912, dated April 25, 2017, written to Princess Steib for speeding 89/60 mph in St. Charles Parish at 1000 hours, signed by you.

Citation# 3302443, dated June 5, 2017, written to Kim Pourciau, for a violation of R.S. 32:58 – COMV, in Jefferson Parish.

Citation# 3446285, dated July 29, 2017, written to Alan James at 130 hours in Jefferson Parish, for a violation of R.S. 32:295.11, no seatbelt, with “VOID” written across the citation.

Citation # 3446159, dated July 23, 2017, written to Michael Duncan in St. John Parish at 0805 hours for Speeding 77/60, signed by you, with VOID written across the citation.

Citation# 3239551, dated March 14, 2017, for St. Charles Parish at 2118 hours, with vehicle and violation information scratched through and rewritten, signed by you, but the driver's personal information was not completed.

Citation# 3487237, dated August 18, 2017, for St. Charles Parish, with an illegible time, vehicle information scratched through and rewritten, a violation of speeding, signed by you, but the driver information was not completed.

Citation# 3404729, dated June 27, 2017, written to Deltanya Dunlap, for a violation of R.S. 32:295.1 – No Seatbelt, in Orleans Parish, and signed by you.

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Citation# 3239800, dated March 29, 2017, written to Chrishaad George, for a violation of R.S. 32:124 – Failure to Yield from a Private Drive, in Jefferson Parish, and signed by you.

Citation# 3488922, dated November 3, 2017, written to Kelly Varnado, for a violation of R.S. 32:58 – COMV, in Jefferson Parish, and signed by you.

The following partially completed ticket books were recovered from your unit:

2650924 – beginning March 9, 2016
3243425 – beginning December 27, 2016
3244650 – beginning January 30, 2017
3234350 – beginning February 15, 2017
3238375 – beginning February 15, 2017
3239150 – beginning March 22, 2017
3485615 – beginning July 27, 2017
3446265 – beginning September 14, 2017
3488915 – beginning October 30, 2017
3569965 – beginning November 6, 2017
3569865 – beginning November 7, 2017

On June 9, 2018, after being placed under oath, you participated in an interview with IA investigators⁹. Investigators advised you that for the 24 LACE details they reviewed from late 2016 through 2017, they reviewed 87 citations with times on them that appeared to be false. You were asked to explain the discrepancies in times on the citations you issued compared to the times of the stops on your MVR recordings. You offered that sometimes you were careless and failed to write the times on the citations and had to go back and guess at the times of the violations. You offered that the discrepancies were errors. You denied that there was any “incentive” for you to falsify the times. IA investigators advised you that there was a pattern of you falsifying the times on citations issued to drivers of vehicles with out of state license plates. They also suggested that you were issuing all of the citations during a short period of time during the detail and falsified the times on the citations to make it look like you were conducting enforcement throughout the detail when you were not actually working, so as to not raise any suspicions. You denied that you intentionally falsified times on LACE citations and stated, “I didn’t have to do that.” IA investigators specifically reviewed with you citation numbers 2427495, 3236776, 3236798, and 3243482. They explained the times on the citations were significantly different from the times of the stops as shown on your MVR. You had no explanation except that the time must be in error. IA investigators suggested that a polygraph examination would be administered to you regarding this issue. It was decided that the interview would be suspended to afford you a lunch break.

⁹ You were interviewed on June 19, 2018 by Master Trooper Kevin Ducote and Sgt. James Jefferson.

Upon returning from your lunch break, your attorney, Ms. Jennifer Theriot, advised IA investigators that you would like to clarify some things from the interview that morning. You stated, "Based on what we talked about, I have no monetary incentive to do any of those things that y'all are saying. They didn't give me any more money. I've been doing this 23 years. I'm embarrassed I'm in this situation. I'm embarrassed to say this, but a lot of those tickets that you showed me were exactly what you say they were. Meaning those times were not accurate. I did some stupid stuff." When asked again if you had intentionally falsified times on citations to cover your entire LACE detail, you responded, "Right." You were asked if you knowingly falsified the times on your citations to cover your entire LACE shifts, and whether you knew what you did was against policy and the law, and you responded, "Correct."

IA investigators then advised you that they had cell phone evidence showing you left your assigned LACE area during time you claimed to have been working LACE overtime. You were advised that on January 16, 2017, while working a LACE detail in St. Charles Parish, your cell phone pinged in Ascension Parish at 1912 hours, and in East Baton Rouge Parish at 2204, 2256, and 2302 hours. You could not explain why your phone pinged in these parishes, but offered that you sometimes left the detail area to assist motorists.

IA Investigators specifically asked you about September 3, 2017, when your phone records showed you were in Baton Rouge near LSU during your detail. IA investigators advised you that the LSU soccer team, of which your daughter was a member, played a game at LSU that night which began at approximately 1800 hours (6:00 p.m.) and ended at 1953 hours (7:53 p.m.). You admitted to investigators that you left your LACE detail that evening to go watch your daughter play soccer. You denied that you drove your unit to LSU and explained that you drove to and parked your unit at a friend's house in Laplace and rode to LSU with your ex-wife.

IA investigators asked you about October 12, 2017, when your phone records showed you were at LSU in Baton Rouge at 1723 hours (5:23 p.m.) during your LACE detail. IA investigators advised you that the LSU soccer team played a game at LSU that night which began at approximately 1805 hours (6:05 p.m.) and ended at approximately 1954 hours (7:54 p.m.) You admitted that you left your LACE detail that evening to go watch your daughter play soccer. You denied that you drove your unit to LSU and explained that you drove to and parked your unit at a friend's house in LaPlace and rode to the game with your ex-wife.

IA investigators advised you that on June 11, 2017, your cell phone pinged in Pensacola, FL during your LACE detail. You admitted that you left your LACE detail to go watch your daughter play soccer out of state, but denied that you drove your unit out of state.

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IA investigators asked you about the DWI grant you worked on February 11, 2017, when your cell phone records showed you were in Mississippi. You admitted that you were probably on your way home from watching your daughter play soccer or softball.

IA investigators advised you that your cell phone pinged out of the Troop B area numerous times while you were working LACE (see above for details). You were specifically asked about May 28 and July 8, 2017. You related that although you could not specifically remember these dates, there were several occasions you left your LACE detail to watch your daughters play competitive sports. You admitted that you have driven your unit out of the Troop B area to watch them play, but denied driving your unit out of state. You offered that on some occasions when they played out of state, you let your daughter use your cell phone, which may explain some of the out of state pings.

IA investigators asked you about being in plain clothes on October 13, 2017, when you stopped for a crash in Orleans Parish when you claimed to be working LACE in St. Charles Parish. You offered that you may have just come from the gym and were probably on the way to your ex-wife's house.

IA investigators questioned you about being at your residence during your LACE detail on August 23, 2017. You offered that you probably left at 0600 hours, traffic was bad, so you returned home and went back out later. You probably worked on paperwork such as crash reports, DWI reports, Daily/Monthly LACE forms, or you may have been having trouble with your MDT.

IA investigators questioned you about being at your residence during your LACE and regular duty shift on September 6, 2017. You offered that if you were at home, you were working on paperwork, monitoring the radio, or doing something work related.

IA investigators questioned you about leaving your residence after the time your regular shift or LACE shift began. You related if you left home after your scheduled time, you were usually getting paperwork together before your shift, such as pre-writing¹⁰ citations. You also offered that you sometimes have trouble with your MVR and/or your MDT. You advised that you cannot write citations during peak traffic hours due to heavy traffic, so you were not in a rush to get out there. Additionally, there may be several troopers working LACE in the same area, which made it difficult to catch violators, so you may wait to go work. Although you alleged being visible was considered as enforcement, you claimed that sometimes being visible led to slow-downs and crashes, making traffic worse when you tried to work I-10 during rush hours. When investigators

¹⁰ Pre-writing a citation means filling out information such as the parish, your name, and court information that would not change for the detail.

asked you about working LACE in areas other than I-10, you explained there are not enough median cross-overs on U.S. 61 to turn around in and it was too dangerous to work LACE there. You would not work LACE on 3127 because it was too far away and there weren't enough violators until the plants let out. At times, you worked US 90, but in the early morning or late evening hours the mosquitos were too bad.

IA investigators questioned you about returning home prior to the end of your regular or LACE shifts. You admitted that you sometimes went home one to two hours prior to the end of your shift and finished paperwork and monitored your radio. You advised you did not feel comfortable sitting in your unit to complete paperwork because people are ambushing police these days and your gun belt is uncomfortable. You also feel vulnerable in places like a restaurant.

Your actions in claiming overtime for hours that you did not actually work during LACE details, and receiving pay for those hours as detailed hereinabove above, were in the nature of, if they do not constitute, violations of the following:

R.S. 14:67 – Theft (felony), which states in pertinent part:

- A. Theft is the misappropriation or taking of anything of value which belongs to another, either without the consent of the other to the misappropriation or taking, or by means of fraudulent conduct, practices, or representations. An intent to deprive the other permanently of whatever may be the subject of the misappropriation or taking is essential.

R.S. 14:138 – Public Payroll Fraud, which states in pertinent part:

- A. Public payroll fraud is committed when:
- (1) Any person shall knowingly receive any payment or compensation, or knowingly permit his name to be carried on any employment list or payroll for any payment or compensation from the state, for services not actually rendered by himself, or for services grossly inadequate for the payment or compensation received or to be received according to such employment list or payroll.

By submitting the 87 above described citations to Troop B and ultimately the courts, with times and other detailed information that you intentionally falsified, and submitting 16 timesheets claiming hours that you did not actually work, as detailed hereinabove, you violated the following:

R.S. 14:133 – Filing or Maintaining False Public Records, which states in pertinent part:

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A. Filing false public records is the filing or depositing for record in any public office or with any public official, or the maintaining as required by law, regulation, or rule, with knowledge of its falsity, of any of the following:

...

(3) Any document containing a false statement or false representation of a material fact.

Your actions in intentionally falsifying times on the 87 citations detailed above, which you submitted to Troop B and were ultimately filed with the court, as well as submitting 16 timesheets in which you claimed and were paid for overtime hours which you knew you did not actually work, all as detailed hereinabove, were in violation of R.S. 14:134 – Malfeasance in Office, which states in pertinent part:

A. Malfeasance in office is committed when any public officer or public employee shall:

...

(2) Intentionally perform any such duty in an unlawful manner.

You submitted 16 timesheets that you knew contained false information wherein you claimed to have worked LACE overtime hours and regular duty hours that you did not actually work, as detailed hereinabove. You intentionally wrote false times on 87 citations you issued as detailed hereinabove, and submitted those citations to Troop B, and ultimately to the court for prosecution. Your actions violated Louisiana State Police Policy and Procedure Order No. 901 – Code of Conduct and Ethics, Section 19 – Department Records, which states in pertinent part:

i) A commissioned officer shall submit reports on time and in accordance with existing regulations.

ii) Reports submitted by commissioned officers shall be truthful. No officer shall knowingly enter or cause to be entered, any false, inaccurate or improper information of the facts on any Department records or reports.

...

By violating state laws in the performance of your duties as detailed hereinabove, you violated Louisiana State Police Policy and Procedure Order No. 901 – Code of Conduct and Ethics, Section 3 - Conformance to Laws, which states in pertinent part:

i) A commissioned officer shall conform to, and abide by, the laws of the United States, the State of Louisiana, all other states of the United States, and subdivisions thereof.

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By failing to go "10-8" and "10-7"¹¹ for your LACE details and regular duty shifts as detailed above, you violated Louisiana State Police Policy and Procedure Order No. 402 – Communications, Section 2 – Trooper Assigned Officer Responsibilities, which states in pertinent part:

- i) All Troop assigned officers shall inform their headquarters by radio or other means of communication upon beginning and ending their tour of duty.

...

By failing to remain in the parish in which you were assigned to work LACE overtime for the length of the entire details, and on some occasions even the state, and conduct enforcement action in the assigned parish throughout the LACE details, as described hereinabove, you violated Louisiana State Police Policy and Procedure Order No. 19 – Code of Conduct and Ethics, Section 11 – Neglect of Duty, which states in pertinent part:

- i) A commissioned officer shall not, without proper authorization, absent himself from his assigned duty station or otherwise fail to perform his duty during his tour of duty.

...

Your failure to go "10-8" and "10-7" for each LACE detail, report your beginning and ending mileage, conduct enforcement action throughout the entire detail in the assigned parish, and remain in your Class "A" uniform, all as detailed hereinabove, you violated Louisiana State Police Policy and Procedure Order No. 1108 – LACE, Section 2 - LACE Operations, which states in pertinent part:

...

- ii) Participant's Responsibilities

...

- c) Officers shall ensure that enforcement occurs throughout the LACE detail hours. Officers who compress activities into a short period of time will be suspended from participation.

- d) Officers shall wear the Class "A" uniform in accordance with P.O. 237, Uniform and Ballistic Vest, while working a LACE detail.

- f) Upon beginning a LACE detail, officers shall notify the radio operator of their on-duty status, the area of assignments and beginning and ending mileage either by radio or MDT. At the conclusion of the detail, officers shall notify the radio operator of their ending mileage and off-duty status either by radio or MDT.

¹¹ 10-7 means out of service or off duty.

By failing to call out your traffic stops while working LACE details, as outlined hereinabove, you violated Louisiana State Police Policy and Procedure Order No. 1106 – Enforcement, Section 5 - Stopping Violators, which states in pertinent part:

- i) When conducting a traffic stop, it is imperative that precautions be taken to ensure the safety of the officer and the public.
...
iii) Marked Units
 - a) When an officer has determined that enforcement action is warranted, he shall activate the unit's emergency lights and/or audible warning devices notifying the violator of the patrol officer's presence. He shall notify the appropriate Troop, sheriff's office, or police department and should give the:
 - 1) Vehicle's registration number.
 - 2) Vehicle's description.
 - 3) Location of the stop.
 - 4) Direction of travel.

You actions in failing to issue citations in sequential order, failure to properly void traffic citations, and failure to complete and submit ticket book covers, as detailed above, were in violation of Louisiana State Police Policy and Procedure Order No. 1106 – Enforcement, Section 4 – Uniform Traffic Summons/Complaint Affidavit, which states in pertinent part:

- ...
v) Officer's Responsibilities
 - a) Officers shall:
 - 1) Issue affidavits in sequential order.
 - 2) Log the numbers of all issued and voided affidavits in the space provided on the manila, outside cover of the Uniform Traffic Summons/Complaint Affidavit booklet. The log shall be submitted with other paperwork when the book is empty. ...
...
 - 4) Denote the time of the offense in military time.
 - 5) Be responsible for books of Uniform Traffic Summons/Complaint Affidavits issued to them.
 - 6) Submit all citations to the appropriate Troop for processing. An officer shall not void a citation after it has been issued to the violator. LRS 32:392.2 restricts citation disposal to actions of district attorneys or courts.

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By allowing Ms. Baudois to operate a vehicle on May 31, 2017, Ms. Rocheney on November 3, 2017, and Mr. Willis on November 7, 2017, after you determined that their driver's licenses were suspended, you violated Louisiana State Police Policy and Procedure Order No. 1106 – Enforcement, Section 6 – Citing Violators, which states in pertinent part:

- ...
ii) Driver's License Law, LRS 32:401-32:429
...
g) Persons driving during a period of suspension, revocation, or cancellation of their driver's license, shall be issued a citation for a violation of LRS 32:415, and shall not be allowed to drive away from the scene. The officer shall afford the violator the opportunity to sign the promise to appear section of the traffic citation. If the violator refuses to sign, the officer may physically arrest the violator. When a physical arrest is made, the provisions of this order shall be adhered to.

By failing to perform your duties as a state trooper in accordance with laws and policy and procedure, as documented and aired in part by WVUE Fox 8, and all as determined by investigators and detailed hereinabove, you violated the following:

Louisiana State Police Policy and Procedure Order No. 901 – Code of Conduct and Ethics, Section 8 – Performance of Duty, which states in pertinent part:

- i) A commissioned officer shall conscientiously strive to enforce the laws of the state of Louisiana, render service to all citizens within the state, be responsible for the proper performance of all assigned duties, and strictly adhere to the rules, regulations, orders, manuals, and directives promulgated by the Department.
- ii) Ignorance of the rules, regulations, and directives shall not be considered an excuse or justification for any violation of such an officer.
- iii) Officers shall be responsible for their own acts and shall not attempt to shift the burden or responsibility for executing or failing to execute a lawful order/duty.

Louisiana State Police Policy and Procedure Order No. 901 – Code of Conduct and Ethics, Section 4 – Conduct Unbecoming an Officer, which states in pertinent part:

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- i) A commissioned officer shall conduct himself at all times, both on and off-duty, in such a manner as to reflect most favorably on himself and the Department.
- ii) Unbecoming conduct is defined as conduct which:
 - a) Brings the Department or any of its subdivisions into disrepute.
 - b) Reflects discredit upon the officer as a member of the Department.
 - c) Impairs the operations or efficiency of the Department, the officer, or state service.
 - d) Detrimentally affects the morale of the Department's personnel.
 - e) May reasonably be expected to destroy public respect for State Police Officers and/or confidence in the Office of State Police.

Although the above cited violations warrant your termination, this is not the first time that you have been disciplined for violating Louisiana State Police Policies and Procedures. By letter dated September 19, 1995, you were reprimanded for failing to honor a subpoena to appear at an administrative hearing. By letter dated June 19, 1996, you were counseled for failing to honor a subpoena to appear at an administrative hearing. By letter dated June 6, 1997, you were suspended for three days for neglecting your duties by leaving your assigned work area without permission. By letter dated June 6, 1997, you were suspended for two days without pay and allowances for unjustified speeding in excess of 100 miles per hour in your unit. By letter dated March 9, 1998, you were suspended for 48 hours without pay for a violation of policy relating to department records by claiming 13 hours of overtime for a 12 hour LACE detail, with no justification for the extra hour. By letter dated February 8, 2002, you were suspended for 40 hours without pay for violating policies relating to code of conduct for your actions off duty regarding a parking situation at your home. By letter dated May 2, 2006, your pay was temporarily reduced by 20% for 20 pay periods for violations of policy related to driving your unit to Texas to pick up your child. By letter dated September 9, 2013, you were reprimanded for being out of uniform by failing to wear your gun belt while on duty conducting a traffic stop. By letter dated October 31, 2013, you were counseled for unsatisfactory performance by failing to confirm blood was being drawn from the correct person and failing to provide all rights relating to chemical testing as well as appeals.¹²

¹² Copies of these letters are maintained by Internal Affairs and are available for your review upon your request.

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You have the right to appeal this action to the Louisiana State Police Commission. The time limits and procedure for appealing are contained in Chapter 13 of the State Police Commission Rules. A copy of Chapter 13 can be obtained from the State Police Commission. Their current mailing address is P.O. Box 66555, Baton Rouge, LA 70896-6555. Their current telephone number is (225) 925-7057 and their fax number is (225) 925-7058.

Sincerely,


Colonel Kevin Reeves
Superintendent, Louisiana State Police

c: Lt. Col. Mike Noel
Lt. Col. Jay D. Oliphant
Major James McGuane
Captain Donovan Archote
Internal Affairs
Office of Legal Affairs
Human Resources Management