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22
23 ALSO PRESENT: Mr. & Mrs. Lehman
24
25

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1 STIPULATIONS
2 IT IS HEREBY STIPULATED BY AND BETWEEN COUNSEL FOR
3 THE PARTIES THAT THE ORAL DEPOSITION OF CHRIS WALLACE
4 WAS TAKEN BEFORE SARAH B. TOWNSLEY, CCR, RPR, CERTIFIED
5 COURT REPORTER IN AND FOR THE STATES OF TEXAS AND
6 LOUISIANA, PURSUANT TO NOTICE AND IN ACCORDANCE WITH THE
7 FEDERAL RULES OF CIVIL PROCEDURE AS PROVIDED BY LAW, AT
8 THE OFFICES OF THE JENNINGS POLICE DEPARTMENT, 110 NORTH
9 BROADWAY, JENNINGS, LOUISIANA, ON OCTOBER 29, 2018;
10 THE PARTIES HEREBY WAIVE ALL FORMALITIES IN
11 CONNECTION WITH THE TAKING OF THE DEPOSITION, WITH THE
12 EXCEPTION OF THE SWEARING OF THE WITNESS AND THE
13 REDUCTION OF THE QUESTIONS AND ANSWERS TO TYPEWRITING;
14 THE RIGHT OF THE WITNESS TO READ AND SIGN A COMPLETED
15 TRANSCRIPT OF TESTIMONY IS SPECIFICALLY WAIVED;
16 COUNSEL FOR ALL PARTIES RESERVE ALL OBJECTIONS EXCEPT
17 AS TO THE FORM OF THE QUESTION AND RESPONSIVENESS OF THE
18 ANSWER AT THE TIME OF TAKING OF SAID DEPOSITION, AND
19 THEY ALSO RESERVE THE RIGHT TO MAKE OBJECTIONS AT THE
20 TIME THAT TAKING OF SAID DEPOSITION OR ANY PART THEREOF
21 MAY BE OFFERED INTO EVIDENCE, WITH THE SAME RIGHTS AS IF
22 THE TESTIMONY HAD BEEN GIVEN IN OPEN COURT;
23 SARAH B. TOWNSLEY, CCR, RPR, OFFICIATED IN
24 ADMINISTERING THE OATH TO THE WITNESS.
25

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1 PROCEEDINGS:
2 CHRIS WALLACE,
3 having been first duly sworn, testified on oath as
4 follows:
5 EXAMINATION MR. MORRIS:
6 Q. Give us your full name, please, sir.
7 A. Christopher William Wallace.
8 Q. You go by "Chris"?
9 A. Yes, sir.
10 Q. Do you mind if I call you "Chris"?
11 A. Yes, sir.
12 Q. My name is Jim Morris. I represent the
13 Lehmans here in their suit against the City of
14 Jennings. Here today to take your deposition. Have
15 you ever given one before?
16 A. No, sir.
17 Q. Let me kind of tell you what it's about, some
18 of the ground rules, to make her job a lot easier.
19 We're here today to find out what you know to a fact,
20 okay, so if I ask you a question, and you don't know
21 the answer, tell me you don't know.
22 A. Alright.
23 Q. If I ask you to estimate, guess, or
24 conjecture, by agreement, you can go ahead and do
25 that, but not unless we specifically tell you to do

<p style="text-align: right;">Page 6</p> <p>1 so. If you don't understand one of my questions, just 2 let me know. I'll rephrase it so that you do 3 understand. I've already said if you don't know the 4 answer. She's taking it down stenographically and 5 with a tape recorder. It won't pick up you shaking or 6 nodding your head, so you have to say "yes" or "no", 7 instead of "uh-huh" or "uh-uh". Answer everything out 8 loud. Probably the most important thing is that we not 9 talk at the same time, so, if you would, wait till I 10 finish my question. We're very easygoing here, so it 11 won't be a problem, but wait till I finish my question 12 before you start your answer. 13 A. Yes, sir. 14 Q. Any other questions? 15 A. (Witness shakes head.) 16 Q. I'm going to go into your background a little 17 bit, and then start asking you specific questions 18 about the police department. You live here in 19 Jennings? 20 A. I just recently moved outside of the city of 21 Jennings. 22 Q. Okay, so where do you live now? 23 A. Guidry Road, between Jennings and Lake 24 Arthur. 25 Q. Do you have any intent, as we sit here today,</p>	<p style="text-align: right;">Page 8</p> <p>1 A. Yeah, they're a little south than us. 2 Q. Okay, so you graduated from high school, and 3 then you went to the fireman academy? 4 A. Yes, sir. 5 Q. Where was that? 6 A. Kilgore, Texas. 7 Q. Kilgore, okay. And did you actually obtain a 8 job as a fireman? 9 A. I did, part-time with the Hugh Springs Fire 10 Department. 11 Q. Hugh Springs, H-U-G-H? 12 A. Yes, sir. 13 Q. And how long did you do that? 14 A. I did that about a year. 15 Q. And then your next move was to? 16 A. I went to TDCJ, Texas Department of Criminal 17 Justice maximum state penitentiary in New Boston, 18 Texas, and I did that for eight months before I 19 enlisted in the military. 20 Q. Did that require any schooling, or you just 21 got the job? 22 A. You had to do the academy, correctional 23 academy. 24 Q. But you were actually employed as a 25 corrections officer for eight months?</p>
<p style="text-align: right;">Page 7</p> <p>1 of moving anywhere else, going somewhere other than 2 the Jennings Police Department -- 3 A. Yes. 4 Q. -- so that we can, rather than get your 5 personal address -- 6 A. Yes, eventually. 7 Q. They'll know where to find you, in case we 8 have to go to trial and we need you. Tell me a little 9 bit about your education. How far did you get in 10 school? 11 A. Graduated. 12 Q. From? 13 A. High school, and then went through the fire 14 academy in 2011, went through correctional academy, 15 and then enlisted in the military, and then, in 2016, 16 I went through the law enforcement academy. 17 Q. Okay, so let's go back a little bit more in 18 detail and get some dates. When did you graduate from 19 high school? 20 A. May of 2011. 21 Q. Did you grow up in Jennings? 22 A. No, sir. I'm straight out of Texas. 23 Q. What part? 24 A. Northeast, south of Texarkana. 25 Q. Okay. All my roots are in Nacogdoches.</p>	<p style="text-align: right;">Page 9</p> <p>1 A. Yes, sir. 2 Q. Okay. And you enlisted? 3 A. Yes, sir. 4 Q. Thanks for your service? 5 A. Thank you, sir. 6 Q. And how long were you in? 7 A. 2-1/2 years before I was medically 8 discharged. 9 Q. Honorable -- so medical discharge? 10 A. Yes, sir. 11 Q. Do you mind if I ask you what -- 12 A. My left foot, I lost my arch. It's giving me 13 a lot of problems. I have no feeling in my left foot, 14 and there was nothing else they could do. It's better 15 to pay you to get out, and they don't have to invest 16 the money. 17 Q. Okay, so you got out in what year? 18 A. 2016? Yeah, '16. 19 Q. And that's when you went straight to the 20 officer academy? 21 A. Yes, sir. 22 Q. When did you end up here? 23 A. 2016. February of 2016. 24 Q. Alright, so you were discharged from the Army, 25 and when you got out, you lived where?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Here in Jennings. 2 Q. What was your connection with Jennings? 3 A. My sister married a guy from here in 4 Jennings, and my father passed away, so there was 5 nobody else back home, so I kind of followed my 6 sister. 7 Q. And so that was in 2016? 8 A. Yes, sir. 9 Q. And which academy did you go to? 10 A. Calcasieu Regional Academy. 11 Q. And you officially started with JPD when? 12 A. May 2016. 13 Q. And when you started, what was your rank? 14 A. Patrolman. 15 Q. And you're still a patrolman, right? 16 A. Yes, sir. 17 Q. And you're the canine officer? 18 A. Yes, sir. 19 Q. When did they allow you to begin working as 20 the canine officer, and actually going with your dog -- 21 A. My adventure started in -- I guess it was 22 2017. I brought the idea up to them because of my GI 23 Bill. I had found a program where I could use my GI 24 Bill to get a dog, so it wouldn't cost the City 25 anything. It was all approved, so I went to San</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. So Chief D'Albor, all of a sudden, says, "Wait 2 a minute. You can't use that dog." 3 A. Yep. 4 Q. So who's -- Richard Abshire? 5 A. Roger. 6 Q. Roger Abshire. Is he a dog guru or something 7 like that around here? 8 A. He's one of the vendors. It's a vendor Todd 9 had used multiple times before. So, from there, I went 10 and talked to Todd -- not Todd, Roger, and Roger was 11 like, "Look, I'll be able to help you out." So from 12 there is where I got my second dog. 13 Q. So Todd had used this guy before with a 14 different agency? 15 A. Yes. 16 Q. Because, from what I understand, Jennings did 17 not have a canine until you started it. 18 A. They had two other dogs. Well, two other 19 handlers before me. They had a dog, a single-purpose 20 female Mal that they retired, and then they -- Max, 21 they had got when I was going through school. 22 Q. Alright, so Mr. Abshire agrees to help you, 23 and he does so how? 24 A. I went through his single-purpose, 25 dual-purpose, and trainer's course, and at that point</p>
<p style="text-align: right;">Page 11</p> <p>1 Antonio for two weeks to do this program on my GI Bill. 2 Got back, everything was going great, and then I was 3 getting on the interstate and starting to stop some 4 people -- 5 [Off the record.] 6 BY MR. MORRIS: 7 Q. This is my co-counsel. So you had gone to 8 the training school in San Antonio for a couple weeks, 9 got back, and you're starting to stop some vehicles on 10 the interstate -- 11 A. Then one day it was brought to my attention -- 12 and it was on a dog from Roger Abshire, from Todd 13 D'Albor. He stated it was not a dog from Roger 14 Abshire. I needed to go through Roger Abshire, so at 15 which point -- 16 Q. So -- okay, so you went to San Antonio with 17 your dog, obviously? 18 A. To get the dog. 19 Q. To get the dog. 20 A. Yes, sir. 21 Q. And did you train there with the dog? 22 A. Yes, sir. 23 Q. And which one is that? You've given us two 24 different breeds. 25 A. It was my Dutch Shepherd.</p>	<p style="text-align: right;">Page 13</p> <p>1 time, I had purchased my new bog. 2 Q. And it's a -- 3 A. A dual-purpose Belgian Malinois. 4 Q. Belgian Malinois. 5 A. Yes, sir. 6 Q. Do you know how to spell "Malinois"? 7 A. M-A-L-I-N-O-S. 8 Q. Alright, so by the time all of that's done 9 with, you start blowing and going in Jennings when? 10 A. So this was all taking place in 2017. I 11 finished my trainer's/single-purpose/dual-purpose 12 certification the first of 2018, so my second dog hits 13 the road in the first part of 2018. 14 Q. Was D'Albor still here at that time? 15 A. Negative. No, sir. 16 Q. No, sir, I understand that. 17 A. A little Texas coming out. 18 Q. So it was January 2018, is when you were 19 ready to go with dog number 2? 20 A. Yes, sir. 21 Q. And, by that time, D'Albor's not here? 22 A. Yes, sir. 23 Q. Who gave you the go-ahead to go ahead and 24 proceed? 25 A. Chief Semmes.</p>

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1 Q. Had Danny already been named chief, or was he
2 acting chief?
3 A. He was acting chief.
4 Q. Okay, very good. Now, before we go any
5 farther, it's always difficult for people to give
6 depositions in cases where their employer's been sued.
7 People obviously don't want to lose their job.
8 Louisiana -- and almost, really, every jurisdiction
9 has what's called a whistleblower statute, to where an
10 employer cannot take adverse action against an
11 employee because the employee has to come in and give
12 a deposition, alright, so you have to understand that,
13 so there's no reason, really, for you to not tell
14 everything you know, and, of course, you're under oath
15 just like you were in a courtroom, so we trust that
16 you'll tell us everything you know without fear of
17 repercussion.
18 A. Yes, sir.
19 Q. Alright, so that was in January of this year,
20 and acting Chief Semmes has given you the go-ahead to
21 start patrolling on the interstate?
22 A. Yes, sir.
23 Q. Is that what you do, mainly, is on the --
24 A. Interstate.
25 Q. -- you're answering a little bit quickly.

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1 Make sure you let me finish talking. Alright, so
2 interstate. Go ahead.
3 A. Yes, sir, interstate and within the city
4 limits is what the canine is used for.
5 Q. Do you ever set up on the interstate, or do
6 you wait for an officer to call for assistance?
7 A. No, sir. I actually sit on the interstate
8 looking -- it's interdiction, looking for smugglers.
9 Q. And when you we are doing that, are you also
10 doing speeding detail?
11 A. I run some LACE. A lot of the interdiction I
12 do is volunteer time, is learning. I sit out there
13 and watch the interstate, and that's -- I don't have
14 near the training that I want in interdiction, and the
15 best way to do it is to sit out there and learn.
16 Q. That's an excellent place to ask some of my,
17 actually, more crucial questions. Tell us what you
18 look for when you're sitting on the interstate. What
19 are you looking for? What types of vehicles, what
20 behavior, what speed, what -- everything that you take
21 into consideration when you're saying, "I've got
22 probable cause to stop that guy."
23 A. I'm looking for driving behavior. I mean,
24 you watch a thousand vehicles. A thousand vehicles
25 does everything normal, then you have one car that

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1 does something just totally sporadic. The biggest
2 thing is, you know, you see a whole bunch of cars
3 going in the left-hand lane, the fast lane, and you're
4 sitting there wide open, and a car's in the left-hand
5 lane, but before it gets to you, it wants to get to
6 the far right, try to get away from you as much as
7 possible.
8 Q. So are you rolling or stopping?
9 A. Sitting still.
10 Q. Alright, so describe that again for me.
11 A. So you're --
12 Q. Sitting on the side of the road --
13 A. Sitting in the median.
14 Q. Oh, in the median. Okay, now I understand
15 better.
16 A. And then -- where you're visible to all
17 vehicles, and then before the vehicle approaches you,
18 they decide to get in the slow lane, pass you, and
19 then get back into the fast lane, so, from there, it
20 sparks interest, so then you just have to build your
21 investigation from there.
22 Q. So they twitch?
23 A. Yeah.
24 Q. That's your first twitch?
25 A. Yeah. The driving behavior, it's something

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1 that not everybody does. I mean, you watch a thousand
2 vehicles, everybody's in the fast lane. I mean, if
3 you're not doing nothing wrong, you don't mind the
4 police.
5 Q. So, at that point, you see this vehicle
6 acting erratically, and you pull out and start
7 following him?
8 A. Yes, sir. You get your probable cause.
9 Q. How do you get your probable cause?
10 A. Well, sometimes you get it, sometimes you
11 don't, whether it be license plate light, turn
12 signals, speeding, going past the fog line. I mean,
13 whatever they're doing.
14 Q. Whatever their infraction is?
15 A. Yeah.
16 Q. In other words -- so you've answered my
17 question. You're not necessarily looking for anything
18 that's indicative of drug-running? You're looking for
19 any reason, legitimate reason to stop them and let your
20 dog do his deal?
21 A. Right. And that's the thing is, a lot of
22 times, the nerves starts getting to people. So if
23 they're doing something, you know, obviously, they're
24 not supposed to be doing, they're going to have a
25 strong concentration on the police. At that point,

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1 involuntary motions, whether they swerve, or don't use
2 a blinker, whatever the case may be.
3 Q. Alright, now, let's switch focus, here.
4 Let's start -- tell me what you do in town.
5 A. In town, basically the same thing. You start
6 watching a lot of the movement, a lot of the heavy
7 traffic areas, the strange traffic.
8 Q. By "the heavy traffic areas", are you
9 referring to automobile traffic or drug traffic?
10 A. Automobile, foot traffic, bicycle traffic. I
11 mean --
12 Q. Just where you're going to see a lot of
13 people?
14 A. Yeah, lot of people, in and out.
15 Q. And strange behaviors?
16 A. Yeah, strange behaviors. Like I say, you
17 might have people come visit you, but you're not going
18 to have a hundred people come visit you in a day's
19 time.
20 Q. Well, there you go. That's actually what
21 we're talking about. So we know -- I live in Lake
22 Charles, but it's pretty well known that Jennings has a
23 drug problem.
24 A. It has a very bad drug problem.
25 Q. Especially on the south end of town.

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1 A. I'm not going to say strictly the south end of
2 the town.
3 Q. No, no, especially.
4 A. The City is bad with a drug problem. I've
5 been after the school for the past year -- almost year
6 -- to let me come to that school, because I have
7 nieces and nephews that are in the school, and they've
8 told me about the drug problem. The school refuses to
9 let me in the school to run my dogs, and that's just --
10 I've come to realize --
11 Q. Legal liability?
12 A. Either that or they like to supply the drugs;
13 and that's basically what I feel like it boils down
14 to, is you don't want the police in there because it's
15 going to be a bad look whenever I start busting kids
16 up.
17 Q. Okay, so you're basically listening for areas
18 that might be hot spots, that type thing?
19 A. Listening, looking. That's a lot of it, is I
20 want to do my own investigation and look. I take
21 stuff, look into it, and then start working from
22 there. It's always better if you get it from your
23 eyes.
24 Q. You mentioned it's not unusual to have a lot
25 of visitors, but -- rephrase that, or repeat that, if

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1 you would, what you just said.
2 A. Yeah, it's very unusual for somebody to have,
3 like, a hundred people at their house in a day's time,
4 or multiple vehicles, I mean, different vehicles.
5 That's a lot of what I'm looking for. Vehicles from
6 out of town.
7 Q. How about vehicles that stop at a particular
8 place for only a few minutes?
9 A. Yeah. I mean, that's a sign of a
10 hand-to-hand.
11 Q. How about isolated places?
12 A. What do you mean by that?
13 Q. I mean, like dead end --
14 A. Yeah, where it's a one way in, one way out.
15 That's going to be your prime area, because they get
16 to watch what comes in, what comes out, and that seems
17 to be the problem I've had in a lot of places, is it's
18 a one way in and one way out, and they know when the
19 police are there.
20 Q. And do they put out watches at the mouth --
21 I'm going to call it "mouth" -- at the beginning of the
22 street, so to speak?
23 A. Yeah. I mean, I can tell you this, because,
24 recently, I got a nice bust out of there, Acadian
25 Apartments off of Florence.

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1 Q. Corner of Florence and Isabelle --
2 A. They know when I come in, they know when I go
3 out, and it's one of the things that's -- I've looked
4 for other avenues on how to get back there, and there
5 is none, unless I walk around.
6 Q. Have you met the Lehmans before today?
7 A. No, sir.
8 Q. Chris Lehman?
9 A. I mean, passing, if that's what you're asking.
10 Like passing, outside talking. I think I've responded
11 to one call over there.
12 Q. Have you been to his house?
13 A. Yes, for a call.
14 Q. And has he shown you the equipment that he
15 has?
16 A. The cameras that's visible from the --
17 Q. Cameras, etcetera, etcetera?
18 A. Yes, sir.
19 Q. And has she shared with you --
20 A. Pictures?
21 Q. Pictures of --
22 A. Yes, sir, from cases.
23 Q. Let me finish my question.
24 A. Yes, sir.
25 Q. People get anxious. It happens all the time.

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1 No big deal. Has he shared with you lists of license
2 plate numbers?
3 A. Yes, sir.
4 Q. Based upon that, does it appear to you as
5 though there's a substantial drug problem on Isabelle
6 Street?
7 A. Yes, sir.
8 Q. All the way down to the end?
9 A. Yes, sir.
10 Q. Okay. I mentioned -- or asked you about an
11 isolated place. That's really what makes it so
12 difficult to do that, right?
13 A. Yes, sir.
14 Q. I've always wondered -- I've done a lot of
15 insurance defense work -- especially workers comp
16 defense, and I have hired investigators that get to a
17 spot to where we know they're going to be like at 4:00
18 in the morning with camera on and all that stuff, just
19 to be able to watch and have gotten incredible
20 footage. Has that ever been considered by the police
21 department, do you know? Because there are woods
22 around there, aren't there?
23 A. Yeah, there's a lot of woods. It's something
24 I have considered. I can't speak for them, but yes,
25 that should be something that should have done been

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1 done, is to get in a Ghillie suit and sit out there and
2 watch.
3 Q. Thank you. That's what I meant.
4 A. I mean, that's part of it.
5 Q. And, as far as you know, that's not been
6 done?
7 A. No.
8 Q. Alright. So what you're telling me is it's
9 perfectly obvious to you that there's a drug problem
10 emanating from Isabelle Street --
11 A. Yes.
12 Q. -- Acadian Apartments, etcetera, etcetera?
13 A. Yes.
14 Q. Is it a likelihood that the people at the end
15 of the street have somebody doing their lookout for
16 them at the apartments?
17 A. Somebody's looking out. Who has set them up
18 to it, I couldn't tell you.
19 Q. Is a sign of that when an officer like you
20 turns on to that street and, all of a sudden, all of
21 those vehicles that have been there all of a sudden
22 aren't there?
23 A. Yeah. I mean, it's obvious that they have
24 alerted everybody the police are on the street, stay
25 away.

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1 Q. And have you -- obviously, that's kind of a
2 burr under your saddle, that area. Have you tried to
3 take any steps to confront that issue?
4 A. Yes. I mean, that's like right now, I'm
5 working on a possible case. One of the biggest
6 narcotic dealers in Jeff-Davis Parish that is probably
7 -- well, that is less than five hundred yards from
8 Isabelle Street.
9 Q. That lives on Isabelle Street?
10 A. Does not live on Isabelle Street but within
11 five hundred yards of Isabelle Street.
12 Q. I would assume if I asked you about names,
13 you're going to say that you can't disclose because of
14 an ongoing investigation?
15 A. Yeah.
16 Q. I understand. What steps have you taken to
17 try to get back there? You mentioned that it already
18 should have been done, something getting back there
19 with a Ghillie suit.
20 A. I've looked at taking the back way in, On
21 Hickory Lane, but that's under lock and key. I've sat
22 at the church on Florence, and it's like they -- they
23 have a tight watch over there. They have a very tight
24 watch. I've tried going down and parking up and
25 sitting a long time and, hopefully, they forget, but

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1 they don't forget.
2 Q. What steps have you taken with your local
3 command in order to try to do that?
4 A. Like asking them to do things or --
5 Q. I'm talking about your -- well, who do you
6 report to directly?
7 A. My lieutenant, and my lieutenant reports to
8 higher up.
9 Q. Your lieutenant is who?
10 A. Michael Janise.
11 Q. And Janise reports to Chief Semmes?
12 A. Yes, sir.
13 Q. Okay. First thing, you've been talking about
14 the -- "they know who's coming", is the term that
15 you've used before. Who are you referring to as
16 "they"?
17 A. The drug dealers. It's all tied in. I mean,
18 on --
19 Q. That's what I was getting -- I was going to
20 try to ask you names, but can you disclose who you are
21 really suspecting --
22 A. I would rather not, I mean, say all their
23 names.
24 Q. Then I'll just ask you this. Do you know
25 Randall Miller and his wife?

<p style="text-align: right;">Page 26</p> <p>1 A. Yes, sir. He works at Walmart. 2 Q. I think he used to. I think he was 3 discharged. We have suspected that they and some -- 4 another -- one of the people that live on that street 5 are involved in drug activity. Does that -- can you 6 confirm your belief in that? 7 A. Yes, sir. The Kelly residence. 8 Q. The Kelly residence? Driving the Mustang? 9 A. Yes, sir. I actually stopped a vehicle from 10 there, like, four months ago, and upon getting 11 permission to search the vehicle and everything, I 12 located paraphernalia in the car. The passenger had 13 jetted before I ever got all the way up to them to stop 14 them. 15 Q. Actually, the question that I was asking you 16 about whether or not you have the support from the -- 17 from the rest of the police department, have you ever 18 had the feeling that you've been discouraged in any 19 way from trying to apprehend the people that are 20 selling drugs - allegedly selling drugs on Isabelle 21 Street? 22 A. Yeah. I mean, like I say, everybody knows 23 Isabelle Street; and -- it's kind of like no-man's 24 land. 25 Q. Explain.</p>	<p style="text-align: right;">Page 28</p> <p>1 Where you are, how long you're sitting there, if you're 2 watching. 3 Q. And how about -- are the chief and assistant 4 chief able to look on their personal computers and 5 access that board? 6 A. They're able to look on a computer. Don't 7 know if it's personal, or cellphone, or what it is. 8 Q. From their office, are they able to look at a 9 computer to be able to tell where Chris Wallace is set 10 up at any given time? 11 A. Yes, sir. 12 Q. And you said that a while back, you heard -- 13 or what was the term that you used? That you were told 14 not to be there? 15 A. We were told to not -- that we were spending 16 too much time at the shelter, not to be at the shelter. 17 We need to be patrolling. 18 Q. Who told you that? 19 A. It was told to us by -- I believe it was Todd. 20 It was when Todd was still here. 21 Q. D'Albor, the police chief? 22 A. Yes, sir. That was back in late 2016, early 23 2017. 24 Q. Told you and who else? 25 A. Sergeant Clement.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Nobody goes down there, that street. 2 Q. Are you talking about law enforcement? 3 A. Yes. 4 Q. And on whose instance do they not go down 5 Isabelle Street? 6 A. Just here recently is when it's really picked 7 up and, "Make sure you're hitting Isabelle Street. 8 Make sure you're hitting Isabelle Street." Before 9 then, it was never heard of. 10 Q. Well, I'll go beyond "nobody says to go to 11 Isabelle." The word that I used was "discouraged." 12 Have you ever felt that you've been discouraged from 13 going down there? 14 A. Yes, because -- make sure I'm wording -- I 15 don't want to say "because". It was told to us about a 16 year ago for us to stay away from the shelter. We 17 were at the shelter too much, me and Sergeant Clement, 18 which is down Isabelle Street. 19 Q. Where is that? 20 A. The animal shelter. 21 Q. Oh, the animal shelter. Okay. I know. 22 A. The GPSes are watched. 23 Q. I noticed the big board at dispatch. Is that 24 where your units are marked? 25 A. It's all on computer, and all reported.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Okay. And why did they tell you to stay away 2 from the shelter? 3 A. "You're spending too much time there. Need to 4 be patrolling." 5 Q. They didn't give you a reason why you're 6 spending too much time? 7 A. (Witness shakes head.) 8 Q. They told you they wanted you to be 9 patrolling, instead of sitting still? 10 A. Yes, sir. Everything's been patrolling. 11 Q. At that time, was it well-known that Isabelle 12 Street was a hotbed for drug sales? 13 A. At that point in time, I was really starting 14 to learn into it. I didn't have near the knowledge I 15 have now of it, but, I mean, it was still pretty 16 obvious that something's going on. 17 Q. Even back then? 18 A. Just to put your finger on it, I mean, it's 19 -- you know, over time is really whenever you could 20 see. 21 Q. And did Chief D'Albor tell you that more than 22 once? 23 A. No. Just once. 24 Q. But it was pretty clear? 25 A. Pretty clear. It's about as clear as I --</p>

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1 every traffic stop that I make is, I mean, it's -- I'm
2 by the book, and I'm fair to everybody. That's what I
3 live by, is fairness, honesty, and everything else,
4 and I made a traffic stop on a subject, and prior
5 knowledge to the passenger, it was January -- I'm not
6 sure of the year, but it was January time, because it
7 was cold. The subjects were blocking. I stopped
8 them -- that's a behavior for narcotics -- at which
9 point in time, I made contact with the driver. AC's
10 blowing --
11 Q. So where is this happening?
12 A. This is actually on Schriever Street on the
13 west side of town. I made contact with the driver,
14 got him out, I said, "Why do y'all have it so cold in
15 here? It's cold outside." He gave me some excuse. I
16 went back up, talked to the passenger, noticed the
17 passenger was dripping the sweat. I said, "What's
18 wrong with your partner?" He said, "He nervous
19 because of the police." There's no reason to be
20 nervous, so I ended up getting the gentleman out,
21 recognized him from getting marijuana off him before,
22 at which point in time, I had got him out and got
23 permission to search the vehicle. The mother showed
24 up. The mother parked right up on our scene, and
25 starts walking up. Me and Officer Guillory tell her

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1 to leave. She refuses to leave. She ends up coming
2 in and filing a complaint on us, at which point in
3 time, it was told to me that if I did not have a body
4 cam, then I would have been gone, because they were
5 going to take her word over anything else. After the
6 video revealed -- later, the video revealed, I mean,
7 we were actually super-polite to the lady, and we had
8 permission to search from her son and everything else,
9 but that kind of -- right there kind of really made me
10 start thinking, you know, you're sitting here telling
11 me right off the bat that if I didn't have this body
12 cam, I would have been done.
13 Q. Who made that comment to you?
14 A. Chief D'Albor.
15 Q. Do you have -- you don't have your body cam on
16 now?
17 A. No, sir. We don't have any body cameras at
18 this moment.
19 Q. Alright, so specifically with regard to
20 Isabelle, what we're basically needing to know is: Did
21 Chief D'Albor discourage you and the other Jennings
22 police officers from trying to interdict drugs from
23 Isabelle Street?
24 A. I can speak from my personal perspective.
25 Yes, because of the simple fact, I mean, GPSes are

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1 watched, and that is -- if you're sitting up, that's
2 going to be something that's going to be brought up,
3 probably be wrote up.
4 Q. What other officers do you believe would say
5 the same thing you're saying right now?
6 A. They're all probably going to say the same
7 thing; all the proactive ones. We've had a lot come
8 and go.
9 Q. We're supposed to have Josh Clement at 5:00.
10 Do you think he would --
11 A. Yeah, I'm sure he's going to bring up about
12 the GPSes. I mean, that's no secret here.
13 Q. Janise, as well?
14 A. Oh, yeah, Janise will tell you the GPSes are
15 watched. That's the number-one thing. They watch the
16 GPSes. That's the best way to keep a thumb on where
17 you are and what you're doing.
18 Q. You made the comment a little while ago -- I
19 really appreciate your honesty -- that with regard to
20 the school, that you think the schools are refusing to
21 let you in because of the money, which implies to me
22 that the people that are in the schools are the ones
23 making the money --
24 A. Well, they're allowing the narcotics. Not
25 necessarily the money; they're allowing the narcotics.

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1 Q. Well, why would they allow the narcotics?
2 A. Your guess is as good as mine.
3 Q. Do you have any idea why Chief D'Albor would
4 have discouraged you from doing your job on Isabelle
5 Street?
6 A. I mean, unless he has some ties, that's the
7 only thing that somebody, I would think, would not
8 want to have your back, if there's ties. Political
9 stuff gets in the way, you know. You don't want to
10 make the citizens, you know, upset because you're
11 busting them with their drugs and their Fentanyl
12 that's killing everybody right now. You would rather
13 keep the positive political role and watch people
14 suffer.
15 Q. I asked you if you knew the Millers --
16 A. Yes, sir.
17 Q. -- and you made the comment that he's working
18 at Walmart. Do you know whether or not either of the
19 Millers knew Chief D'Albor?
20 A. I mean, I'm not sure. Him being the chief, I
21 don't know, I mean, if they were BFFs and drink a beer
22 together, but it seemed like Todd had a pretty well
23 knowledge of the city.
24 Q. Let me ask you if this fits in. Were you
25 aware of the fact that Mr. Lehman was employed by the

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1 police department --
2 A. No, sir.
3 Q. -- at one point in time? That was before your
4 time --
5 A. That was before my time, yes, sir.
6 Q. You're aware of the surveillance cameras that
7 he has on the street?
8 A. Yes, sir.
9 Q. Are you aware of the fact that he would
10 actually go out on the street and take pictures of
11 these cars coming and going?
12 A. I know he has pictures of cars, yes, sir.
13 Q. I'm going to ask you to assume that Mr.
14 Lehman was in the habit of taking all these pictures,
15 gathering the information, that Mrs. Miller came in
16 and complained to Chief D'Albor, and that immediately
17 thereafter, Chief D'Albor suggested to Chris that he
18 stand down.
19 A. That sounds about -- something right.
20 Q. That sounds about what you were experiencing
21 from Chief D'Albor at the time --
22 A. That sounds like a normal political-type
23 deal, you know. You want to keep everybody happy,
24 even if it's the biggest drug dealers in town.
25 Q. Unless you're involved in the drug trafficking

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1 yourself?
2 A. If you have a hand in it, whether it be with
3 the substances or the money.
4 Q. Something like that is not something an honest
5 police chief would do?
6 A. An honest man wouldn't do that.
7 Q. Thank you.
8 A. And that's one thing, being FTO, I tell
9 everybody. All I ask for is honesty and fairness to
10 the people.
11 Q. You said "FTO"?
12 A. Yes, sir. Field training officer.
13 Q. She doesn't know all those acronyms. Has
14 this improved, to your observation, upon Chief
15 D'Albor's departure?
16 A. No, because we haven't got no busts off of it,
17 and it seems like the traffic's picking up more and
18 more, so, you know...
19 Q. Does it appear to you as though Chief Semmes
20 is continuing on with Chief D'Albor's standard
21 operating procedure?
22 A. He's saying patrol more, but what does that
23 mean? I mean, patrol more to suit Mr. Lehman, or
24 patrol more to catch the drugs, or patrol more just to
25 make everybody else think you're doing something, or

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1 is it to cover up more trails? I don't know.
2 Q. If you were to go this afternoon and set up
3 at the pound again, the facility, do you think you
4 would be called down and instructed to do more
5 patrolling?
6 A. No, not at this time, and the reason being is,
7 is I have a brand-new unit, so there's no GPS on it
8 right now, and that's only been for a couple months.
9 Q. And you think that's the only reason?
10 A. I mean, unless they called, yeah. I mean,
11 soon as they can't watch me to see where I am.
12 Q. Well, what I'm saying, what you're painting
13 for me is a picture where Chief D'Albor was taking
14 positive steps to prevent his police department from
15 apprehending drugs on Isabelle Street.
16 A. Right.
17 Q. Okay, my question to you is -- and we know
18 D'Albor's left.
19 A. Maybe so, but he's still in the city limits of
20 Jennings.
21 Q. Who is?
22 A. D'Albor.
23 Q. Oh, he lives in Jennings?
24 A. He still lives in Jennings, travels back and
25 forth on the weekends, makes frequent travels.

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1 Whenever he left --
2 Q. Does he have a house here?
3 A. Yes. He lives, actually, right off of
4 Nezpique.
5 Q. Well, we know that now-Chief Semmes was Chief
6 D'Albor's first assistant.
7 A. Yep.
8 Q. And they work closely together?
9 A. Yep.
10 Q. What I'm asking is: Does it appear to you as
11 an officer that Chief Semmes is perpetuating Chief
12 D'Albor's --
13 A. The same steps?
14 Q. -- operating procedure to keep you away from
15 Isabelle Street?
16 A. Yeah. I mean, it's still the same thing,
17 no-man's land, because if we really want to do
18 something about the narcotics, we'd have done busted
19 it up. Like I say, if it's something you really set
20 your mind to, you're going to get in there with
21 Ghillie suits, you're going to set up, you're going to
22 get what you need, and then you're going to get the
23 house, at which point in time, frequent fliers are
24 going to start being stopped coming out of there.
25 You're going to start doing more of an investigation.

<p style="text-align: right;">Page 38</p> <p>1 There's no investigation over there, that I know of, 2 and that's where the problem lies. Me and another one 3 of my partners, we've actually been trying to set up a 4 way to bust them up, but if you have one proactive cop 5 over here on this shift, and you have another one over 6 here, but on this one over here, you only have this 7 one proactive one, and over here, you only have this 8 one, and you don't want them two together, because, 9 you get them two together, what's going to happen in 10 the city? The parish jail's going to be full. And 11 that's what it all boils down to, is, if we can keep 12 proactive cops not on the same shift, we can keep it to 13 a minimum. 14 Q. Do you have any question that if, given the 15 reins without any restriction, that you'd be able to 16 bust a bunch of drug trafficking on Isabelle Street? 17 A. I think if we had the resources needed, I 18 think we could do some damage on Isabelle. 19 Q. If you had the permission to do it. 20 A. Yeah, if we had the permission and the stuff 21 we needed, the go-ahead, I think we could do, between 22 narcotics and prostitution -- prostitution is another 23 thing -- not being from Jennings, but hearing about 24 the eight women, that's one of my biggest things. 25 Prostitution has everything to do with narcotics.</p>	<p style="text-align: right;">Page 40</p> <p>1 house, so if we could get out there and start buying 2 out of this house, from there, we're going to build up 3 our case to where we can do a search warrant. They're 4 only moving small stuff in vehicles. They're moving 5 the big stuff in shipping containers. That's been 6 another thing I've hit with the post office, but the 7 post office falls under more guidelines, I guess. 8 Nobody wants dogs. Everything I have mentioned with 9 the post office, the schools -- I'll volunteer my time. 10 It's good training for the dogs. I'll start come 11 running packages, but I never hear anything. 12 Q. Are you aware of the fact that -- when was it, 13 Chris with the box? 14 MR. LEHMAN: 2017. 15 A. The three pounds of high-grade marijuana? 16 Yeah, I'm very -- 17 BY MR. MORRIS: 18 Q. You were employed with the department? 19 A. Yes. 20 Q. Okay. And Mr. Lehman reported that, or did 21 you investigate with your dog? 22 A. No. I actually didn't have my dogs on the 23 road at that time. 24 Q. Okay. Is that what you're talking about with 25 the packaging?</p>
<p style="text-align: right;">Page 39</p> <p>1 It's not like a normal, you know, sex-for-money type 2 deal. This is all a drug-affiliated deal. The 3 females that have come out of there, I have stopped two 4 of them with narcotics on them. 5 Q. That have come out of where? 6 A. Isabelle Street, Tizeno Alley. So, I mean, 7 yes, I do think if we were given, "Look, y'all take 8 these couple weeks, go take care of Isabelle Street", I 9 think we'd have a positive outlook. 10 Q. This just occurred to me. The equipment that 11 Mr. Lehman has is pretty sophisticated, isn't it? 12 A. Them cameras, yes, sir. It helps a lot, yes. 13 Q. Could you not simply sit in his garage and 14 watch his camera feed, and not be able to use that for 15 PC to stop and search somebody coming out of there? 16 A. I mean, this is the thing: I would want in 17 the house. That's the first thing we need to do. We 18 need to get in the house -- 19 Q. In whose house? Oh, get them in the house? 20 A. We need to get somebody, an officer, and quit 21 using the CIs that are doing the drugs in the houses. 22 We need an officer to go undercover, go in the house, 23 do a buyout of the house, because that's where we want 24 to get. They're not keeping the drugs outside 25 underneath the oak tree. They're keeping it in the</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Yep. That's exactly what I'm talking about, 2 and it happens to this day. 3 Q. That's how the bulk is being distributed now, 4 isn't it? 5 A. That's how -- you might have your small stuff 6 come in on vehicles, but your biggest of your biggest 7 is going to come in package. That's the easiest way 8 where it can't be processed, because you can't get that 9 coming out of Houston. They have to hit through 10 Beaumont, through Lake Charles, through here, and 11 everywhere else to not get hit. That's too much of a 12 liability. If I send it through a package, that's 13 only one time, and the liability's not really going to 14 fall back on you. 15 Q. Do you think that either the Millers -- or 16 what was the other family? 17 A. The Kellys? 18 Q. The Kellys. Do you think that they're getting 19 their large shipments through packages? 20 A. I think that's how it's all being moved. I 21 mean, the big stuff. 22 Q. If I were to tell you that Mr. Lehman is 23 repeatedly seeing shipping companies stop at the -- I 24 can't remember their names -- at the Kellys' place, 25 does that fit in?</p>

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1 A. Yeah, sounds perfectly just like the normal
2 drug trafficking.
3 Q. I told you a little bit about Mr. Lehman, and
4 that was before you'd left. The Millers -- Mrs.
5 Miller went into the police department, into here, and
6 complained to Chief D'Albor. Chief D'Albor
7 immediately sends an e-mail to Mr. Lehman right here
8 asking him to stand down. Well, Mr. Lehman doesn't do
9 it, and shortly thereafter, he was fired.
10 A. Uh-huh.
11 Q. Does that sound suspicious to you?
12 A. Yeah. Sounds very suspicious.
13 Q. Does it not sound to you like he was fired
14 because of the fact that --
15 A. How far was he --
16 Q. -- he was -- he was threatening --
17 A. How far was he, you know, going to push the
18 issue, you know? I mean, when you have somebody
19 that's determined and willing to deter the crime, if
20 you want to allow the crime, the best way to fix it is
21 to get rid of them.
22 Q. Your honesty is admirable. You mentioned
23 confidential informants. Are you aware, since you've
24 been an officer here, of the use of confidential
25 informants?

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1 A. What do you mean by that? Like do we use
2 them?
3 Q. Yes.
4 A. Oh, yeah. I've told several of them, and I've
5 arrested several of them because they're all dirty. I
6 tell them straight-up that these CIs that they have
7 been using in the past are dirty, and every time they
8 want to say, "Can I call Danny?" "Can I call Frank?"
9 "Can I call such-and-such", I say, "You can call them
10 from the jail cell." I don't do a catch-and-release
11 program here.
12 Q. After you bust them?
13 A. If I bust you, it's fair game. Either I got
14 you or I don't. If I don't have you, hey, fair walk,
15 but if I got you, it's over.
16 Q. Have you ever heard the name Jamie Trahan?
17 A. Yes, sir, because she was actually locked up
18 the other day for narcotics.
19 Q. Is that a he or she?
20 A. She, the one I'm thinking of.
21 Q. How about this one (indicating)?
22 A. James Carl Trahan? The name sounds awful
23 familiar.
24 MR. MORRIS: For the record, I'm
25 showing him a picture of a mugshot for a James Carl

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1 Trahan.
2 A. That's 917, 918 on the right-hand side of
3 first street, brick house, somewhere in there.
4 Supposedly, they're doing heroin right now.
5 Q. These CIs that want to call Danny or whoever,
6 do they say, "If you'll let me call Danny, I'm going to
7 do blah", or "he's going to say blah"?
8 A. No, I just don't entertain them. I just tell
9 them they can call him from the jail cell. I mean, my
10 thing is I have a job to do, and my job is to get the
11 drugs off the road, and I had that one scenario happen
12 when I first started here. I stopped a gentleman on
13 Woods Street, and while I had him stopped for a minor
14 traffic violation, he proceeded to call Chief D'Albor
15 at 2 o'clock in the morning, at which point in time,
16 it was told to me not write him a ticket, from my FTO
17 that spoke to Chief D'Albor on the phone, so after
18 that, it just kind of, I do what I got to do, and I'll
19 take the repercussions of it if I have to, and so I
20 arrest them, and take their drugs for evidence, and
21 they can bail them out of jail if they want. I had
22 one, they told me, said, "It's going to cost us, the
23 department, to get their vehicle", because they were
24 allowing him to drive under suspension, but I'm not
25 going to let somebody drive under suspension. If

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1 you're suspended, I tow your car. You don't call
2 nobody. Every car gets towed.
3 Q. I'm going to show you an e-mail exchange
4 between Chris Lehman and Chief D'Albor in -- on
5 Tuesday, June 16, 2015. If you would read it to
6 yourself, beginning with, "Chief", and then the
7 response is up here (indicating).
8 MR. LEDET: I'll just object, to the
9 extent he wasn't there, and he didn't know anything
10 about it.
11 BY MR. MORRIS:
12 Q. Finished?
13 A. Yes, sir.
14 Q. Does that appear to you, or does that fit in
15 with your comments about the type CIs that the City has
16 been using?
17 A. Yeah.
18 Q. Mr. Lehman telling the chief that this Jamie
19 Trahan fellow has been driving down to the end of the
20 street, and the chief replies that Trahan's been
21 living there -- I'm quoting. "The team is trying to
22 get him to turn over, but seems he is staying loyal
23 for now because they are letting him live there",
24 meaning that the Millers are letting the CI live with
25 them so that they --

<p style="text-align: right;">Page 46</p> <p>1 A. So he's not going to give them up. 2 Q. Not going to give them up. Since we've 3 alluded to it, let's make that 2, if you would, 4 Counsel. 5 MR. SUDDUTH: Wallace 2? 6 MR. MORRIS: Yeah, Wallace 2, and the 7 picture of James Trahan, which is a mugshot with 8 information, as Wallace No. 1. 9 BY MR. MORRIS: 10 Q. Here's another e-mail from Chris Lehman to 11 Danny Semmes dated April 14, 2014, if you'll read that, 12 please. 13 MR. LEDET: Same objection, just to 14 the extent that it's all speculation. 15 MR. MORRIS: I understand. 16 BY MR. MORRIS: 17 Q. Finished? 18 A. Yes, sir. 19 Q. That's an e-mail from Mr. Lehman to Danny 20 Semmes, again with reference to this James Trahan 21 fellow. Chief Semmes' response was -- I'm quoting -- 22 "Yeah, Jamie Trahan, he's a piece of work. I'll have 23 Blake and Heath get on it ASAP. Thanks." Who's -- we 24 know who Blake Bergeaux is. Who's Heath? 25 A. Heath Bertrand.</p>	<p style="text-align: right;">Page 48</p> <p>1 on? 2 A. It sounds exactly like -- I mean, if pressure 3 comes, you see a memo come out, "Make sure you're 4 patrolling Isabelle, make sure you're patrolling 5 Isabelle." But this is the thing: It should be all 6 the time. He should allow it all the time. You might 7 as well just keep that, you know, full-time memo, "Make 8 sure you're patrolling Isabelle." Well, let's take the 9 initiative and go out there and start sitting and 10 watching, you know. 11 Q. That was under Chief D'Albor, but it continues 12 under Chief Semmes, correct? 13 A. Yes, sir. 14 MR. MORRIS: No further questions. 15 Thank you very much. 16 MR. LEDET: I've got just a few 17 follow-up questions. You're not done yet. 18 EXAMINATION BY MR. LEDET: 19 Q. Again, I think you testified that you started 20 in -- 21 A. 2016. 22 Q. In 2016? 23 A. Yes, sir. 24 Q. And when did you start patrolling? 25 A. 2016. I went to the academy in 2016; 2017 is</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Who's he? 2 A. He used to work here. He left around the time 3 I started. 4 Q. How about Blake Bergeaux? What's his 5 position? 6 A. He used to be here. He was in narcotics. He 7 was on patrol for a little while, and then he went to 8 narcotics, left, come back, went to narcotics, but 9 they're all in New Iberia now with Todd D'Albor. 10 Q. So they left -- 11 A. Blake did. Heath is working at the plants. 12 Q. But Blake Bergeaux followed Chief D'Albor to 13 New Iberia? 14 A. Yes, sir. 15 MR. MORRIS: I'll ask that e-mail be 16 marked as Wallace No. 3 for identification. 17 BY MR. MORRIS: 18 Q. Do you know who Debbie Breaux is? 19 A. Yes, sir. 20 Q. She gave her deposition just before you, and 21 she made a comment that the chief is allowing units to 22 drive up and down Isabelle every once in a while just 23 to, as she put it, "placate the Lehmans." 24 A. Yeah, to satisfy them. 25 Q. That does that sound like what's been going</p>	<p style="text-align: right;">Page 49</p> <p>1 when I got my dogs. Well, my first dog. 2 Q. So you were never at Jennings Police 3 Department before Mr. Lehman was employed at Jennings 4 Police Department? 5 A. No, sir. 6 Q. And so you wouldn't have any information 7 about any investigations conducted by the Jennings 8 Police Department prior to 2016? 9 A. No, sir. 10 Q. So you wouldn't have any personal knowledge as 11 to who was involved in the decision to suspend Mr. 12 Lehman? 13 A. What do you mean? Like, to get rid of him? 14 Q. Yeah. Do you know? 15 A. Who was involved in it? 16 Q. No, were you there? 17 A. No. 18 Q. I know you've heard stuff, but were you ever 19 consulted about -- 20 A. No. I come to Jennings, Louisiana, in 2016. 21 Q. So I think you testified that Jennings' drug 22 problem is not isolated to Isabelle Street? 23 A. No, the whole city is. There's a drug problem 24 in the city. 25 Q. Alright. You testified as to -- I want to</p>

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1 get clarification on -- on the instructions not to
2 spend a lot of time at the shelter.
3 A. Yes, sir.
4 Q. That means parked at the shelter?
5 A. Yes. Yes, sitting down at the shelter.
6 Q. Any prohibition for actively patrolling
7 Isabelle Street?
8 A. Like, for us not to patrol? No, but in order
9 to get a good, you know, investigation of what's
10 coming in and out, you got to stay parked. If you
11 keep driving back and forth, they see you, and anytime
12 they see the police, they want to duck you.
13 Q. Any prohibition from parking at the apartments
14 down Isabelle Street?
15 A. I mean, you're not going to park there.
16 That's where the drugs are, so -- I never tried it, so
17 I couldn't --
18 Q. Right. That's my question. Any prohibition
19 from parking at the apartment?
20 A. No. Nothing says you can -- can't, because,
21 like I say, I don't sit there because that's where the
22 drugs are. Usually, whenever you're watching drugs,
23 you don't want to sit right in their hometown.
24 Q. You mentioned Chief D'Albor threatened to fire
25 you for pretty much being rude to a member of the

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1 public.
2 A. Yes, false accusations of being -- whatever
3 the word is -- you want to call it.
4 Q. Did you consider Chief D'Albor a tough
5 disciplinarian?
6 A. Negative. No.
7 Q. No?
8 A. No. I mean, if he wanted to get rid of you,
9 he's going to get rid of you. You have that fear, but
10 at the end of the day, if they want to get rid of me,
11 get rid of me. I look at it this way: I thank Todd
12 D'Albor every single day. If he wouldn't have done
13 what he did for my dogs and making me go through Roger
14 Abshire, I'd probably have a harder time, but now, I
15 own three police-canine-certified, I have a trainer
16 certification. I could leave here at the drop of a
17 hat, and somebody's going to pick that up. I'm
18 sitting on 30 thousand dollars in dogs. Who's not
19 going to take that? That's what I say, my -- you
20 know, I don't want to get fired, because that's not me,
21 and I really don't want to get wrongfully fired, but at
22 the end of the day, if that makes them happy and they
23 get a high off it, that's what they get.
24 Q. So you think you're about to get fired?
25 A. No, no, but whatever happens happens. If

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1 they want the fire me for something, I mean -- it's
2 like when I shot that dog. I knew that I was right.
3 You know, I was justified shooting that dog, but, of
4 course, they put you under IA. You don't know what's
5 going to happen, you know. The things I've seen in
6 this parish is pretty wild. Being from Texas, I could
7 tell you, the law is totally different, totally
8 different, and that's why I have a five-year goal to
9 get out of Louisiana. I'm going to DPS, and then
10 working my way up, but, like I say, if they want to
11 fire me, just let me know. I'll leave.
12 Q. Did Todd D'Albor ever give you any reasons why
13 he suspended Mr. Lehman?
14 A. No. I didn't -- I didn't have a talk with him
15 or anything about it, no.
16 Q. Any reason why he's no longer with -- do you
17 know, personally, why he's not with the department
18 anymore?
19 A. No. You hear things, right?
20 Q. Right, but personal knowledge. You don't
21 know? You weren't consulted, were you?
22 A. No. Just like, they contacted me one time
23 because we had a female recruit, you know, everybody
24 on the street's saying she's leaving. I knew she was
25 leaving. They called me and asked me, you know. My

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1 thing is, if you want to know, you call them. Ask
2 them.
3 Q. That's what I'm asking you. I want to make
4 sure what you know.
5 A. Because this is the thing: If I'm going to
6 leave, call me and ask. I'm going to tell you if I'm
7 going to leave. You might not like everything else
8 that goes with it, but she had her reasons, and it's
9 because of the drama. I mean -- and then, you know,
10 your head might get chopped off this day. The next
11 day, they want to be your friend. Of course, better
12 yourself. I'm a man to better yourself.
13 Q. Now, if somebody testified earlier that they
14 sent additional informants in there besides Jamie
15 Trahan to Isabelle Street, any reason to disagree with
16 that?
17 A. Oh, I can't tell you exactly everybody that's
18 in there, but I guarantee you, they sent a whole
19 bunch.
20 Q. They did? You mean the Jennings Police
21 Department?
22 A. Yeah. I mean, I'm sure. They probably sent
23 all their friends in there, but I couldn't tell you
24 who. The CI program here before, it's not even an
25 informant deal. I mean, what kind of busts have we

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1 got?

2 MR. MORRIS: What kind of what?

3 A. Busts.

4 BY MR. LEDET:

5 Q. But you wouldn't know any of those busts prior

6 to 20 --

7 A. Right, but, I mean, I could speak from now to

8 then.

9 Q. And you haven't made any busts on Isabelle

10 Street?

11 A. Well, the Acadian Apartments, I got a good

12 little lick of synthetic marijuana --

13 Q. Anything else?

14 A. -- just a couple weeks ago.

15 Q. Couple weeks ago from today?

16 A. Probably -- let's say a month ago. I'd have

17 to go back and look at the picture to tell you exactly

18 the exact date, but I've got some other small-account

19 narcotics, but, like I say, everything is inside of a

20 house. You might move small stuff in a vehicle, but

21 how much are you risking to move it in that vehicle?

22 So that's like I say, I've tried pairing up with

23 everybody I could think of. FedEx, UPS, post office,

24 you know. "Let me know. I'll come run my dog around

25 your packages, and then we'll start from there."

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1 Q. Let me ask you this: You talked a lot about

2 Chief D'Albor's decisions to investigate drugs. Did

3 -- did Chief D'Albor ever tell you that he based his

4 decision -- his decisions to police drugs based on

5 politics?

6 A. Did me ever tell me?

7 Q. Did he ever tell you that? Did he ever tell

8 you that he based his law enforcement decisions based

9 on politics?

10 A. I guess I don't understand what you mean. I'm

11 not understanding exactly what you're saying.

12 Q. I'm asking if you ever had a conversation with

13 D'Albor --

14 A. No. No, he's never come out and said, "I'm

15 not going to police drugs today because of politics",

16 but, like I -- like I said before, when I first

17 started, the gentleman had called the chief, and

18 that's always the thing. "Call the chief." Well, the

19 chief shouldn't be taking these complaints over his

20 personal cellphone, and then telling you, you know, to

21 not write them a ticket. At the end of the day, if

22 you messed up, you messed up, you know. If you didn't

23 use your blinker, you didn't use your blinker. You

24 have to go to court, pay your little fine, whatever the

25 case is. If they want to throw it out at that point,

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1 throw it out, but you shouldn't be calling the chief at

2 2 o'clock in the morning and the chief be, "Well, let

3 me" --

4 Q. Are you talking about a confidential informant

5 calling the chief?

6 A. I don't know if he was -- the thing is, a lot

7 of the confidential informants here, I found out from

8 stopping them, pigs squeal, you know. When you start

9 talking to them and everything else, and they start

10 talking, you kind of find out at that point that

11 they're CIs. That's went into as far as they've told

12 me how much they were getting paid, and my thought is,

13 as a CI, you shouldn't get paid, you know. Either you

14 work for us or you don't; and it's really not even

15 working for us. You're going to give some information

16 or you're not.

17 Q. I guess my question is: Do you have any

18 personal knowledge as to what Chief D'Albor thought

19 with respect to his administration of the Jennings

20 Police Department?

21 A. I think, you know, as anybody, they want a

22 good look, right? And I think that the problem we

23 have here today, if he were to have been putting a

24 real hard hitting on the narcotics, you're going to

25 upset a lot of people, probably a lot of big-name

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1 people in the city.

2 Q. And that's my question. That's your thoughts

3 on it?

4 A. Yeah. I mean, it's completely thoughts on it.

5 He never said, "Mr. Wallace, I'm going not to mess

6 with drugs because of the political deal", but you can

7 see from the outside. I mean, you don't start touching

8 these people, but you want to touch these people over

9 here. Well, why are you not touching these people down

10 here that are on the lower end of society? You know,

11 you want -- you want to do everything to the lower,

12 but you don't want to do everything to the

13 higher-society people.

14 Q. That's what I'm asking you. That's your

15 thoughts on it?

16 A. Yeah. I mean, that's completely my thoughts.

17 Q. Chief D'Albor never told you that?

18 A. No. He never said it.

19 Q. Has the mayor ever told you that?

20 A. No, I've never spoke to the mayor.

21 Q. Has Chief Semmes ever told you that?

22 A. No, I never talked to them about who they

23 wanted to arrest and who they didn't.

24 Q. Okay.

25 MR. LEDET: That's all.

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1 FURTHER EXAMINATION BY MR. MORRIS:
2 Q. Counsel just asked you if you would ever sit
3 up at the apartments, and whether or not you were
4 instructed not the sit up at the apartments and you
5 said, "Well, of course I'm not going to sit up there
6 because that's the middle of them."
7 A. Yeah.
8 Q. Did you tell me -- there's a church down the
9 street. Didn't you tell me that you would set up
10 there?
11 A. Yeah, the -- I believe it's -- maybe a Baptist
12 church.
13 Q. And you were instructed not to sit there,
14 weren't you?
15 A. They never did say not to sit there, but they
16 did not want us sitting down Isabelle Street. The
17 thing is, with the church on -- I believe it's on May
18 Street. There's not a very good view there, and
19 that's the thing. You could see the cars coming down,
20 okay, but, for me, for a good, honest person, I want
21 to be able to build everything up into an
22 investigation. I want to know exactly where that car
23 come from, because I have that car either coming from
24 Tizeno Alley, the Millers' residence, which is the
25 trailer, or the Kellys' residence, or it could have

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1 come through Acadian Apartments, so I can't say a
2 hundred percent for sure, yes, that vehicle's coming
3 from this residence; yes, narcotics are coming out of
4 this residence. I can put them in a general area, so
5 the best view, really, is down by the animal shelter.
6 It's a dead end, you back up, you hide out, and you
7 watch. Like I say, you can watch from the church, but
8 then they see you right there. It's like, "Here I am.
9 Come catch me."
10 Q. You could set up at the animal control place
11 with a thermal imaging and see people -- exactly what
12 they're doing inside that place, couldn't you?
13 A. Like, through the house?
14 Q. Uh-huh.
15 A. I don't know. I don't know, like, how,
16 exactly -- it's wood -- or brick, so whatever, or tin,
17 I mean. Maybe, possibly, but you could sit at the
18 animal shelter and you can get out of your unit, park
19 up and watch, or you go back to, you know, the Army
20 days and crawl through the woods and watch. Let's
21 take a nice camera, take some pictures. The mosquitos
22 might bite us, but, hey.
23 Q. So you don't have a lot of experiences as an
24 officer -- peace officer, but just based upon what
25 you've seen on that street, on Isabelle Street -- the

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1 traffic, etcetera, etcetera -- you have no doubt in
2 your mind that there's drug trafficking going on down
3 that street?
4 A. There is no doubt there is drug trafficking.
5 Q. And you don't have any doubt that, through
6 both Chief -- even though you've not asked him --
7 whether it's political, criminal, whatever it is, you
8 don't have any doubt as an officer that the two police
9 chiefs that you've served under have taken affirmative
10 steps to prevent you from doing your job on Isabelle
11 Street, haven't they?
12 A. No.
13 MR. SUDDUTH: No, what? You have no
14 doubts?
15 A. Yeah, I have no doubts, because this is the
16 thing: It's been said over and over, "Why don't we
17 take this opportunity just" -- "if you say there is
18 nothing down this street, let's just prove there's
19 nothing on this street." Say, "Okay, here's a team.
20 Y'all go set up. Here's the cameras or whatever you
21 need. We're going to drop you off and you're going to
22 stay out here and take surveillance. Once you get your
23 surveillance, if everything proves there's nothing
24 there, we'll send in some cops from somewhere else in
25 to buy drugs. If all that comes clean, we're done with

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1 it."
2 BY MR. MORRIS:
3 Q. And who have you told that to?
4 A. Well, I haven't told it to nobody. I mean --
5 Q. In other words --
6 A. I mean, if I got to thinking of it -- they
7 should be thinking of it. They've been doing this a
8 long time. I've been doing this a short time.
9 Q. And speaking of having somebody go undercover
10 to get into that house, you're not talking about
11 having to use a confidential informant. Like you said,
12 you get another volunteer from another PD to go in
13 there --
14 A. I would get a cop. I would get a cop.
15 Q. Get another cop to do it; with even an
16 out-of-state plate?
17 A. Right.
18 Q. Let him grow a beard a few days and --
19 A. Somebody they don't recognize, and you send
20 them in and try. Like I say, if you get in and you
21 buy drugs, then we got something. We're running with
22 it. We're going to do a couple more buys, and we'll
23 go from there. We're going to collect our pictures of
24 everybody that's coming in and out, and then from
25 there, we're going to roll the dice and see what we get

<p style="text-align: right;">Page 62</p> <p>1 out of there. 2 Q. That's it. 3 MR. SUDDUTH: Thank you, sir. 4 Appreciate you. 5 MR. LEDET: I've got just one 6 question. 7 FURTHER EXAMINATION BY MR. LEDET: 8 Q. So the allegation, at least, in the complaint 9 is that Jennings Police Department failed to 10 investigate criminal conduct on Isabelle in 2013 11 through '16. Were you -- you wouldn't have any 12 personal knowledge of that, because you weren't there, 13 right? 14 A. Yeah, so -- no, I mean, I wasn't there from 15 2013 to 20 -- May of 2016 is when I come, but, like I 16 say, since I have been here, there's been no 17 over-the-top performance to find these drug dealers. 18 MR. LEDET: I got you. 19 FURTHER EXAMINATION BY MR. MORRIS: 20 Q. One quick question. You mentioned what you 21 heard. What did you hear, as you put it, about Mr. 22 Lehman's dismissal from the police department? 23 A. Basically, I mean, he was stepping on toes, 24 you know -- 25 Q. Stepping on whose toes?</p>	<p style="text-align: right;">Page 64</p> <p style="text-align: center;">REPORTER CERTIFICATION</p> <p>1 2 This certification valid only for a transcript accompanied 3 by my original signature and original seal on this page. 4 I, SARAH B. TOWNSLEY, Certified Court Reporter for the 5 states of Louisiana & Texas, as the officer before whom this 6 testimony was taken, certify that CHRIS WALLACE, having been 7 duly sworn by me upon authority of R.S. 37:2554, testified as 8 set forth in the previous 63 pages; this testimony was reported 9 by me in the stenotype reporting method, was prepared and 10 transcribed by me, is a true and correct transcript, to the 11 best of my ability and understanding; the transcript has been 12 prepared in compliance with transcript format guidelines 13 required by statute or by rules of the board; I am informed 14 about the complete arrangement, financial or otherwise, with 15 the person or entity making arrangements for deposition 16 services; I have acted in compliance with the prohibition on 17 contractual relationships, as defined by Louisiana CCP Article 18 1434 and in rules and advisory opinions of the board; I have no 19 actual knowledge of any prohibited employment or contractual 20 relationship, direct or indirect, between a reporting firm and 21 any party litigant in this matter, nor is there any such 22 relationship between myself and party litigants in this matter. 23 I have no interest in the outcome of this matter. 24 Witness my hand and seal this 4th day of November, 2018. 25 26 _____ 27 Sarah B. Townsley, CCR, RPR, CSR; LA CCR 92046; TX CSR5748</p>
<p style="text-align: right;">Page 63</p> <p>1 A. -- as is very well knowledgeable. I mean, 2 Mr. Lehman's on a honey spot right there for something, 3 and, you know, for whatever reason, they don't want him 4 any part of it. 5 Q. Meaning a good place for detection of illegal 6 activities; is that right? 7 A. Yep. 8 Q. Is that right? 9 A. Yep. 10 Q. That's what a honey hole is? 11 A. Honey hole, yeah. 12 Q. Okay. That's it. 13 MR. LEDET: We're going to waive reading 14 and signing. 15 [Deposition was concluded 5:10 p.m.] 16 17 18 19 20 21 22 23 24 25</p>	