

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION**

**CHRISTOPHER LEHMAN**

*Plaintiff*

**TODD A. D'ALBOR** in his official  
capacity as Chief of Police for the  
Jennings Police Department, and  
individually and the **CITY OF  
JENNINGS**

*Defendants*

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**CIVIL ACTION**

**NUMBER: 2:16-CV-00783-PM-KK**

**UNASSIGNED DISTRICT JUDGE**

**MAGISTRATE JUDGE:  
KATHLEEN KAY**

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**AFFIDAVIT**

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**STATE OF LOUISIANA**

**PARISH OF** Jefferson Davis

**BEFORE ME**, undersigned authority, personally came and appeared:

**CLAUDE WINSTON GUILLORY**

*Resident of Jefferson Davis Parish, Louisiana*

Who, being first duly sworn, did depose and state:

1. I have personal knowledge of all of the facts stated herein.
2. From 1988 through June 2015, I served as an officer for the Jennings City Police Department. I also served on the Civil Service Board during my employment as an officer.
3. I was serving in my capacity as an officer when Todd D'Albor became the Chief of Police for the Jennings City Police Department.

4. The Chief placed a sign on his desk that stated, "I am the alpha male – I am the Lion."  
The Chief also purchased two concrete lion statues, which he placed at his parking space. The Chief told me that he did this to let everyone know that he was the "top dog."
5. In September 2013, the Chief hired Christopher Lehman as the Department's Community Services Coordinator, to act as a liaison with the black community, to revive the neighborhood watch program, and to report suspected drug activity.
6. At the time Mr. Lehman was hired, he held the rank of Captain, and he acted in second-in-command behind the Chief. The Chief made it clear to all employees, including myself, that Mr. Lehman was a fully authorized and sworn officer, and that he (Lehman) was to report to the Chief and would be allowed to work his own hours.
7. The Chief and myself interviewed Mr. Lehman for the Community Services Coordinator position. Once Mr. Lehman left the interview room, I commented that Mr. Lehman was "squared away" because he was a former sailor. Immediately thereafter, the Chief turned to me and said, "We have been needing a token nigger."
8. Over the course of Mr. Lehman's employment with the Police Department, I personally witnessed and overheard the Chief refer to Mr. Lehman as a nigger on at least six (6) separate occasions.
9. Despite the Chief's constant derogatory references to Mr. Lehman, the Chief always complimented Lehman's work in public.
10. In May 2015, the Chief's attitude toward Mr. Lehman suddenly changed. Loretta Miller, a resident who lived at the end of Mr. Lehman's street, contacted the Police Department to complain that Mr. Lehman was standing in his own driveway to take pictures and record license plate numbers of passing vehicles. In response to the complaint, which

occurred approximately one (1) month before I retired, the Chief stated to me, "I'm getting rid of our token nigger."


11. Officer Michael Hill was another African American officer on the force. On one occasion, after the Chief demoted officer Hill, the Chief stated, "That nigger gives me more headaches than I need." It became abundantly clear to me that the Chief referred to his African American officers in an overtly discriminatory and derogatory manner.
12. I was not involved in any decision to terminate Mr. Lehman, nor did the Chief ever explain to me the grounds upon which he based Mr. Lehman's termination. I did not observe Mr. Lehman violate any policy, procedure, or law. When Mr. Lehman was terminated, his personnel file was clean.
13. A Caucasian officer and long-time friend of the Chief, Bryan Foti, was allowed to remain on the force in spite of the fact that he had discharged a firearm at moving vehicles and assaulted hand-cuffed alleged perpetrators. It was not until Bryan Foti tased and pinned to the ground on I-10 an elderly driver that the Mayor decided to terminate Foti. In fact, the only reason Foti was terminated was because the event had been recorded on several body cameras and other responding officers complained to supervision.
14. During my tenure with the Police Department, I participated in at least one hundred (100) officer terminations. For each termination, the individual officer was instructed on why he was being terminated, was given an opportunity to respond to said allegations, and thereafter was provided a termination document.
15. Despite the well-established officer termination procedure, Mr. Lehman was terminated without any process typically afforded to fellow officers. He was not informed as to the

reason for his termination, he was not given any opportunity to respond, and he was not provided with any termination paperwork.

16. For several years, including those in which Mr. Lehman and myself worked as officers, it was common knowledge that Randall and Loretta Miller and the Kelley family were suspected of dealing drugs from their residences located at the end of Isabelle Street. Mr. Lehman collected video and documentary evidence to substantiate these claims of illegal activity. To my knowledge, nothing of substance was done by the Jennings Police Department to either investigate or otherwise stop the illegal activity.

  
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CLAUDE WINSTON GUILLORY

**THUS DONE AND SIGNED**, before me, Notary Public, on this 12<sup>th</sup> day of November, 2018 in Jennings, Louisiana.

  
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NOTARY PUBLIC

**JAMES R. MORRIS**  
**NOTARY PUBLIC**  
**STATE OF LOUISIANA**  
**Duly Commissioned For Life**  
**State I.D. Number 30106**