



July 8, 2020

Eric S. Dreiband, Esq.
Assistant Attorney General
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Re: Request for CRIPA Investigation into Sexual Misconduct in the Jefferson Davis Parish Jail and Other Misconduct by Jefferson Davis Parish and Jennings City Law Enforcement Agencies

Dear Assistant Attorney General Dreiband:

We write to you on behalf of the people of Jefferson Davis Parish, Louisiana and surrounding communities. The Jefferson Davis Parish law enforcement agencies and leadership have a long tradition of misconduct and corruption that has gone unchecked. This behavior has encouraged criminal activity and violence, especially violence against women, to flourish in the region. The Jefferson Davis Parish Sheriff's Office and Jennings Police Department failed to protect the community from a series of horrific murders of local women, known as the Jeff Davis 8, which go unsolved to this day. Local law enforcement agents have a history of misconduct, including police killing civilians under suspicious circumstances, missing evidence, and police involvement in crime. This level of corruption and incompetence puts the entire region at risk.

This is particularly urgent for the women in the community. Across the nation, communities are taking a hard look at the role of their local law enforcement agencies. There has been widespread attention to the historical and ongoing violence against Black people by police officers. As we recognize the systemic ways in which police officers engage in racialized violence, we must also address the sexual violence that is pervasive throughout modern law enforcement agencies.¹ Police departments and district attorneys' offices have systematically deprioritized and ignored rape cases.² Beyond failing to protect people from sexual assault, officers are often the assailants.³ In a particularly notable recent case, Officer Daniel Holtzclaw was criminally prosecuted and the subject of a civil rights lawsuit for abusing a series of Black

¹ Zoe Carpenter, *The Police Violence We Aren't Talking About*, NATION (Aug. 27, 2014), <https://www.thenation.com/article/archive/police-violence-we-arent-talking-about/>.

² Bernice Yeung et al., *When it Comes to Rape, Just Because a Case Is Cleared Doesn't Mean It's Solved*, PROPUBLICA (Nov. 15, 2018), <https://www.propublica.org/article/when-it-comes-to-rape-just-because-a-case-is-cleared-does-not-mean-solved>.

³ CATO INSTITUTE, NAT'L POLICE MISCONDUCT REPORTING PROJECT (2010); Andrea J. Ritchie, *How Some Cops Use the Badge to Commit Sex Crimes*, WASH. POST (Jan. 12, 2018), https://www.washingtonpost.com/outlook/how-some-cops-use-the-badge-to-commit-sex-crimes/2018/01/11/5606fb26-eff3-11e7-b390-a36dc3fa2842_story.html.

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women in Oklahoma City.⁴ In a national investigation, the AP reported that over 1,000 law enforcement officers lost their badges in a six-year period for sexual assault, sex crimes, and other sexual misconduct.⁵ It is not surprising that this is a problem in Jefferson Davis Parish, but the pervasive level of sexual violence is shocking. Within the parish jail, law enforcement agents have engaged in sex trafficking, prostitution, and rape of detained women. Beyond the jail walls, law enforcement agents have created a culture of sexual misconduct and violence, particularly harmful to female law enforcement agents and local sex workers.⁶

We request that the Civil Rights Division of the Department of Justice open an investigation under the Civil Rights of Institutionalized Persons Act (“CRIPA”), 42 U.S.C. § 1997 *et seq.* into the corruption, incompetence, and criminal activity, especially that related to sexual violence, of the Jefferson Davis Parish Sheriff’s Office and Jennings Police Department.

I. Background on Law Enforcement Practices in Jefferson Davis Parish and Surrounding Area

The Jefferson Davis Parish Sheriff’s Office, the Jennings City Police Department, and other agencies in the region, especially the Calcasieu Parish Sheriff’s Office, have a long and public history of corruption and misconduct.

Regional law enforcement agents participated in and were heavily involved in the illegal drug trade along the I-10 throughout the late 1980s and early 1990s.⁷ Law enforcement was possibly seizing drugs from those traveling on the I-10, and then removing drugs from the evidence room to sell.⁸ This was also a problem in nearby Calcasieu Parish, where a witness to a triple murder identified Calcasieu Parish detective Donald “Lucky” DeLouche as supplying a group of suspects with drugs that had been seized by police.⁹ As recently as 2015, Lake Arthur Police Detective Raymond Mott was ordered to stop making drug busts by then Lake Arthur Detective Terrie Guillory, and Mott experienced retaliation when he refused to stop doing his job.¹⁰

While in office in 1992, Jefferson Davis Parish Sheriff Dallas Cormier was charged in federal court with thirty-six felonies, including improper use of inmate labor and using public money to buy trucks, boots, and guns for personal use.¹¹ The charges were the result of an audit by the

⁴ Complaint, *McIntyre v. Wyandotte County*, No. 2:18-cv-02545 (D. Kan. Oct. 11, 2018); Matt Ford, *A Guilty Verdict for Daniel Holtzclaw*, ATLANTIC (Dec. 11, 2015), <https://www.theatlantic.com/politics/archive/2015/12/daniel-holtzclaw-trial-guilty/420009/>.

⁵ Matt Sedensky, *Hundreds of Officers Lose Licenses Over Sex Misconduct*, AP (Nov. 1, 2015), <https://apnews.com/fd1d4d05e561462a85abe50e7eaed4ec/ap-hundreds-officers-lose-licenses-over-sex-misconduct>.

⁶ A small portion of the relevant facts are provided without citations. This is information provided by anonymous community members that is not in the public record.

⁷ ETHAN BROWN, MURDER IN THE BAYOU 24–25 (2016) (reporting that a former prescription-pill dealer was recruited to sell drugs on behalf of police officers during this period).

⁸ See *Breaux v. Jefferson Davis Sheriff’s Dep’t*, 96-944 (La. App. 3 Cir. 2/5/97); 689 So. 2d 615.

⁹ BROWN, *supra* note 7, at 37; Janelle MacDonald, *KK’s Corner Murders*, KPLC (Jul. 7, 2003), <https://www.kplctv.com/story/1349294/kks-corner-murders/>.

¹⁰ *Murder in the Bayou: God Don’t Sleep* (Showtime 2019).

¹¹ *Jefferson Davis Sheriff, Former Deputy Indicted*, ADVOCATE, July 27, 1990, at 4-B;S.

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legislative auditor's office, which discovered the sheriff's office had misappropriated or was missing a total of \$250,000.¹² As part of a plea deal, Sheriff Cormier pled guilty to one count of felony obstruction of justice and was sentenced to serve three years on probation and pay a fine of \$10,000.¹³ He was only required to serve one year of probation.¹⁴ Sheriff Cormier was also the subject of a Department of Corrections investigation into mistreatment of persons detained in the parish jail.¹⁵

Jefferson Davis Parish Sheriff Ricky Edwards, who took office after Cormier, became embroiled in civil rights litigation soon after taking office.¹⁶ Edwards and his deputies had a practice of stopping cars without probable cause and seizing assets under civil forfeiture laws.¹⁷ They also faced claims that these illegal stops were conducted in a discriminatory manner, targeting Latinx drivers.¹⁸ Their actions were so egregious that they became the subject of a Dateline investigation.¹⁹ The Dateline investigation also identified this practice in neighboring Calcasieu Parish.²⁰

Jennings City Police Chief Johnny Lassiter was also accused of taking public funds. In January 2013, Lassiter was arrested and charged with felonies after a state audit found cash and drugs missing from the Jennings City Police evidence room.²¹

This was not an isolated incident. In fact, evidence problems have plagued both the Jefferson Davis Parish Sheriff's Office and the Jennings Police Department. As mentioned above, drugs would go missing from the evidence room, including nearly 300 pounds of marijuana in one fell swoop.²² In the early 1990s, a witness reported the marijuana was taken by a police officer in coordination with Frankie Richard, a now deceased local man known for dealing drugs, trafficking women, and his role as a prime suspect in the murders of the Jeff Davis 8.²³ In 2007, Warren Gary, Chief Criminal Investigator for the Sheriff's Office, offered to buy a vehicle from a suspect, Connie Siler, during questioning.²⁴ He arranged the sale while she was incarcerated, and then turned around to sell it for a profit.²⁵ Concerningly, Siler was a potential witness to the murder of Kristen Gary Lopez.²⁶ Witnesses had alleged that her truck was used to transport Lopez's body, but Gary did not collect any evidence from the vehicle before selling it.²⁷ Gary

¹² *Ex-Sheriff Gets 3 Years Probation, \$10,000 Fine*, ADVOCATE, Mar. 30, 1993, at X;2-B.

¹³ *Id.*

¹⁴ *Ex-Sheriff Seeks Pardon to Hunt*, ADVOCATE, Aug. 13, 1994, at B2.

¹⁵ *See Ex-Sheriff Gets 3 Years Probation, \$10,000 Fine*, *supra* note 13.

¹⁶ *Complaint, Bryant v. Edwards*, No. 2:93-cv-01800-JTT-APW (W.D. La. Oct. 19, 1993), ECF No. 1.

¹⁷ *Gonzales v. Pierce*, 175 F.R.D. 57, 58 (S.D.N.Y. 1997).

¹⁸ *Gonzales v. Nat'l Broadcasting Co.*, 194 F.3d 29, 31 (2nd Cir. 1999).

¹⁹ *Dateline: Probable Cause?* (NBC television broadcast Aug. 22, 1997).

²⁰ *Id.*

²¹ *Sentencing for Former Jennings Chief on Hold*, SEATTLE PI (Dec. 31, 2013).

²² *Breaux v. Jefferson Davis Sheriff's Dep't*, 96-944 (La. App. 3 Cir. 2/5/97); 689 So. 2d 615.

²³ BROWN, *supra* note 7, at 24.

²⁴ Louisiana Board of Ethics, *In the Matter of Warren Gary*, No. 2007-489 (Jun. 26, 2008).

²⁵ *Id.*

²⁶ BROWN, *supra* note 7, at 99-102.

²⁷ *Id.*

was investigated and fined by the Louisiana Ethics Board.²⁸ In 2009, a large amount of evidence from a theft ring went missing, including jewelry, drugs, and cash, which led to the collapse of a criminal case against Frankie Richard.²⁹ Ultimately, Deputy Paula Guillory, Warden Terrie Guillory's wife, was fired for her handling and potential theft of the evidence.³⁰

In addition to corruption, the region suffers from a dangerous level of incompetence by law enforcement agencies. Jefferson Davis Parish Sheriff's Office has a terrifyingly low homicide clearance rate for a town of about 10,000 people. Most notoriously, eight women, known as the "Jeff Davis 8," were murdered over a period of five years with no criminal prosecutions brought.³¹ A Taskforce formed in response to the murders and led by local law enforcement agents failed to follow leads, conducted cursory interviews with key witnesses or suspects, and allowed suspect Frankie Richard to have access to the Taskforce office.³² Local residents remain concerned that law enforcement agents directly or indirectly participated in these murders.³³ Besides the Jeff Davis 8, there were at least nine other unsolved murders in Jennings between 2005 and 2014.³⁴ The Jennings homicide clearance rate was less than 7 percent in 2014, compared to a national rate of 64 percent.³⁵ The family and friends of the victims are still in search of justice, but afraid of retaliation by law enforcement and discouraged by the total lack of interest by law enforcement over the past fifteen years. There are no signs that any agencies are currently working to identify suspects in the seventeen unsolved murders, leaving the community vulnerable to violence and murder with no reassurance that law enforcement are committed to protecting them.

II. Factual and Legal Allegations

A. Jefferson Davis Parish Jail Officials Have Not Only Failed to Protect Incarcerated Women From Harm But Have Actively Engaged in Sex Trafficking and Created a Culture of Sexual Abuse

In recent years, there has been national attention to jurisdictions that allow for "pay or stay" models, where persons with the means can buy their way out of jail.³⁶ This is not limited to incarceration, as demonstrated by the nearby Calcasieu Parish practice of exchanging gift cards

²⁸ Louisiana Board of Ethics, *In the Matter of Warren Gary*, No. 2007-489 (Jun. 26, 2008).

²⁹ BROWN, *supra* note 7, at 142–143.

³⁰ *Id.*; *Murder in the Bayou: A Precarious Place* (Showtime 2019).

³¹ BROWN, *supra* note 7; Ethan Brown, *Who Killed the Jeff Davis 8?*, MEDIUM (Jan. 30, 2014), <https://medium.com/matter/who-killed-the-jeff-davis-8-d1b813e13581>.

³² *See generally* BROWN, *supra* note 7; *Murder in the Bayou* (Showtime 2019); JDSO Multi-Agency Investigative Team, Crimes in Jefferson Davis Parish, <https://web.archive.org/web/20131002074136/http://www.jeffdaviscrimes.net/>.

³³ *Murder in the Bayou: God Don't Sleep* (Showtime 2019).

³⁴ Mike Pearstein, *Jennings 8: Unsolved Murders Haunt Town, Police*, WWLTV (Jan. 30, 2014), <https://www.wwltv.com/article/news/jennings-8-unsolved-murders-haunt-town-police/289-412271190>.

³⁵ *Id.*

³⁶ *Profiles of Those Forced to 'Pay or Stay'*, NPR (May 19, 2014), <https://www.npr.org/2014/05/19/310710716/profiles-of-those-forced-to-pay-or-stay>.

for community service hours without the knowledge or sanction of the sentencing judge.³⁷ When the exchange requires more than money, there has been general outrage, like in the case of a judge in Tennessee suggesting people in the courtroom donate blood if they did not have money to pay their fine to escape going to jail.³⁸

The Jefferson Davis Parish Jail has an incredibly horrific practice: Jailers offer detained women freedom in exchange for sex. The sexual abuse in the jail is not limited to this practice. Jailers have trafficked women in and out of the Jefferson Davis Parish Jail for nearly two decades. Explicit accounts are limited, which is understandable given the number of women who are known to have engaged in sex with law enforcement and then died under suspicious circumstances in the parish. But the accounts we do have, which include witness accounts and statements taken by various law enforcement agencies, indicate widespread sexual abuse and trafficking. This behavior not only amounts to a Fourteenth Amendment violation for failure to protect the detained women, but implicates federal and state criminal laws against sex trafficking, including 18 U.S.C. § 1590 and La. Rev. Stat. § 14:46.2, and sex with incarcerated persons, including La. Rev. Stat. § 14:134.1. Additionally, in cases where law enforcement agents received compensation for sex acts performed by pre-trial detained women, they likely violated the women's right to be free from involuntary servitude under the Thirteenth Amendment.

Between 2003 and 2004, five women initiated a civil action against parish officials because of the abuse they experienced in the jail, which included jailers openly running an illegal contraband business. Jailers arranged sex between detainees for a fee and rewarded trusty detainees who facilitated sales with coerced sex with detained women. Jailers coerced detained women into sexual relationships and used openings in the cells to view women's private time without their knowledge or consent. When the detained women refused to participate, they were threatened with fraudulent criminal charges and denied basic hygiene products.³⁹

The plaintiffs more specifically alleged that between 2001 and 2002:⁴⁰

- Deputy Eric Phillips removed M.B. from her cell and raped her in a closet;
- Deputy Jacquelyn Varner arranged for a male trusty to rape T.G.;
- Deputy Phillips attempted to coerce D.H. into engaging in a sexual relationship through sexual harassment, sexual advances, sexual battery, written requests for sexual favors, and threats to make her life hard if she declined, including through false criminal charges;
- Deputy Ralph Broussard entered M.T.'s cell without warning while M.T. was in bed and simulated sex on top of M.T. as a female deputy watched and laughed;

³⁷ Jim Hummel, *Calcasieu Parish D.A. Allows Some Defendants to Pay Their Way Out of Community Service*, KATC (Oct. 9, 2019), <https://www.katc.com/news/katc-investigates/calcasieu-parish-d-a-allows-some-defendants-to-pay-their-way-out-of-community-service>.

³⁸ Campbell Robinson, *For Offenders Who Can't Pay, it's a Pint of Blood or Jail Time*, N.Y. TIMES (Oct. 19, 2015), <https://www.nytimes.com/2015/10/20/us/for-offenders-who-cant-pay-its-a-pint-of-blood-or-jail-time.html>.

³⁹ Pretrial Statement of Plaintiffs, No. CV-33-0333 (W.D. La. Oct. 20, 2004).

⁴⁰ *Id.*; Complaint of Intervention, No. 2:03 CV 033 ¶ 9 (W.D. La. Dec. 11, 2003); Complaint, Hubbard v. Edwards, No. CV-33-0333 (W.D. La. Feb. 21, 2003).

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- Deputy Phillips removed M.P. from her cell during the night and raped her; and
- Deputy Varner arranged for a male trusty to rape M.P.

Deputies Phillips, Varner, and Allarate “AJ” Frank were fired and charged with criminal malfeasance in office.⁴¹ In Deputy Phillips’s case, the state was prepared to present at least six formerly detained witnesses who were prepared to testify that Deputy Phillips forced them to have sex with him or other detainees, among other acts of malfeasance.⁴² Then-deputy Terrie Guillory participated in the investigative interviews.⁴³ All three jailers eventually plead guilty to the criminal charges.⁴⁴

In conjunction with these reports and criminal prosecutions, the Jefferson Davis Parish Sheriff’s Office conducted an internal investigation and the Louisiana State Police initiated an external investigation initiated by the Jefferson Davis Parish District Attorney’s office. The investigations involved a series of interviews of detained and formerly detained persons, as well as contemporaneous correspondence among the detainees.

The findings were terrifying and have only recently come to light.⁴⁵ Male trustys roamed the jail without supervision, grabbing women’s body parts and sticking their genitals through a hole in the wall intended to pass trays of food to detainees.⁴⁶ They would use the hole in the wall to have sex with detained women.⁴⁷ They were given video access to watch the women’s showers.⁴⁸ They are alleged to have paid jailers a fee for this level of freedom.⁴⁹ Detained men could pay jailers \$20 to \$100 for sex with a detained woman.⁵⁰ Detained women who agreed to this arrangement were given special privileges.⁵¹ A detained man reported that jailers would borrow money from detained men, and then pay back the debts by arranging sexual encounters with detained women.⁵² A male trusty admitted to giving Deputies Phillips, Varner, and Frank money to arrange sexual encounters with detained women.⁵³ The deputies were able to watch the sexual encounters that took place in a visitation room.⁵⁴ Detained persons could pay jailers

⁴¹ Mem. in Support of Motion to Set Aside Entry of Default, No. CV-33-0333 (W.D. La. Aug. 15, 2003).

⁴² Louisiana Department of Public Safety and Corrections, Malfeasance in Office/Sexual Conduct with Inmates Follow-Up Investigation Requested by District Attorney’s Office, Case No. WDD010102C (Nov. 27, 2002).

⁴³ *Murder in the Bayou: God Don’t Sleep* (Showtime 2019).

⁴⁴ Motion to Withdraw as Counsel of Record, No. CV-33-0333 (W.D. La. Jul. 19, 2004); Motion to Withdraw as Counsel of Record, No. CV-33-0333 (W.D. La. Mar. 5, 2004); Motion to Withdraw as Counsel of Record, No. CV-33-0333 (W.D. La. Dec. 30, 2003).

⁴⁵ Jim Mustian, *Documentary Highlights Rape Allegations at Louisiana Jail*, AP (Oct. 11, 2019), <https://apnews.com/3098d859dc9a4d0a812bed02e0ca30e8>.

⁴⁶ Louisiana Department of Public Safety and Corrections Office of State Police Bureau of Investigations, Case Number WDD010102 (Nov. 26, 2002)

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*

\$20 to arrange a sexual encounter with their non-detained partner in the jailer's bathroom.⁵⁵ Deputy Earnest Robinson reported sexual encounters between detainees to Warden Wallace Simien, and gave him statements from two detained men who had witnessed sexual misconduct in the jail but the warden conducted no follow-up.⁵⁶ A detained man who attempted to report the sexual misconduct was transferred to another facility.⁵⁷

Among other incidents of gross misconduct, the two investigations also uncovered the following incidents:

- In early 2001, T.G. was let out of her cell to assist a male trusty with the laundry. He pulled her into the bathroom and raped her. The next day, Deputy Phillips told T.G. to remember him next time she wanted to "give it away." Deputy Frank made comments about how he thought T.G. would be good in bed.⁵⁸
- In January 2002, Deputy Phillips raped M.B. while taking her to see the nurse.⁵⁹
- In June 2002, an unidentified assailant pulled T.R. from her cell and attempted to remove her clothing. She kicked the assailant, who was unsuccessful in removing her clothes, while Deputy Phillips watched the assault.⁶⁰
- In June 2002, Deputy Phillips brought A.W. out of her cell to have sex with himself and a trusty. Another detained woman reported that, on a separate occasion, a number of officers and trustys took turns having sex with A.W. and watching each other have sex with A.W. on a video monitor.⁶¹
- In July 2002, Necole Guillory, who later became the final victim of the Jeff Davis 8, had sex with Deputy Phillips twice. After one encounter, Deputy Phillips took each of Necole Guillory's roommates to have sex with trustys. Necole Guillory directly reported that she had sex with two detained men.⁶² Necole Guillory reported this to the sheriff's office in interviews and written statements, along with corroborating letters exchanged among detained persons.⁶³
- Between March and July 2002, Deputy Phillips had sex with M.P. over multiple incarcerations and he would give her cigarettes, marijuana, and alcohol as payment. Deputies Phillips and Varner removed M.P. from her cell to have sex with a trusty. One of M.P.'s cellmates reported that the trusty would provide M.P. with cigarettes, marijuana, and alcohol in exchange for sex.⁶⁴

These investigations had little impact on the culture of abuse and sexual misconduct in the parish jail. In 2007, Lisa Allen filed a federal lawsuit, describing a series of sexual harassment and sexual assaults she experienced at the hands of Jailer Mark Ivory while detained in the Jefferson

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.*

Davis Parish Jail.⁶⁵ Allen reported Ivory grabbing her from behind while she completed a task under his direction, exposing himself to her, and luring Allen into a room where he sexually assaulted and attempted to rape her.⁶⁶ The matter was ultimately settled, though Ivory died by suicide soon after the lawsuit was filed.⁶⁷ The only law enforcement employee to experience any consequences for the harassment and assault was Nurse Nina Ravey, who documented Allen's experiences in medical records and reported Ivory's behavior to Warden Terrie Guillory.⁶⁸ Ravey lost her job and was investigated by the Louisiana State Police for obstruction of justice, allegedly for falsifying Allen's medical records, though was never criminally prosecuted.⁶⁹ As a consequence of reporting the assaults and harassment, Ravey lost her house and her livelihood and her marriage fell apart.⁷⁰

While there were officers identified as a result of these investigations and lawsuits, some of whom were prosecuted, others involved in the sex trafficking suffered no consequences. Most outrageously, Warden Terrie Guillory is alleged to have trafficked detained women to members of the community and traded sex for freedom.⁷¹ Terrie Guillory is also known to have engaged in sexual relationships with many, if not all, of the Jeff Davis 8 victims, both in and outside the parish jail. Soon before Loretta Chaisson was murdered, she was seen having sex with then Deputy Terrie Guillory in her jail cell.⁷² Though this was reported to the fourteen agency Taskforce, they did not follow up on it.⁷³ Terrie Guillory released Necole Guillory, his cousin, from jail in exchange for sex.⁷⁴ At another point, he offered to release her boyfriend from jail if she had sex with the warden.⁷⁵ Terrie Guillory and other jailers regularly paid to have women from the community, including some of the Jeff Davis 8 victims, brought to the jail, where they were raped by jailers and detained men. He arranged for detained woman to come to his office on a daily basis and exchange oral sex for cookies and cigarettes. He also brought detained women out of the jail and to his home, where he had sex with them. Terrie Guillory held the position of warden beginning around 2005 or 2006,⁷⁶ and still works in law enforcement today.

B. Jefferson Davis Parish Sheriff's Office and Jennings Police Department Officials Participated in a Pattern of Discrimination and Harassment Against Female Employees

⁶⁵ Complaint, *Allen v. Edwards*, No. 2:07-CV-1675 (W.D. La. Oct. 9, 2007).

⁶⁶ *Id.* ¶¶ 8–16.

⁶⁷ 60-Day Judgment of Dismissal, *Allen v. Edwards*, No. 2:07-CV-1675 (W.D. La. Apr. 27, 2010); BROWN, *supra* note 7, at 97.

⁶⁸ Louisiana State Police, Investigation into Nina B. Ravey, Case No. 08-8 (Feb. 11, 2008).

⁶⁹ *Id.*; Letter from Donald Woods, President, Jefferson Davis Parish Police Jury to Nina Ravey (Jul. 19, 2007).

⁷⁰ BROWN, *supra* note 7, at 96.

⁷¹ *Id.* at 97.

⁷² *Id.* at 6–7; Taskforce Report at 104, Jennings Police Department Case #K-06184-08, Jefferson Davis Parish Sheriff's Office Case #2008110110, Louisiana State Police Case #09-576.

⁷³ *Id.*

⁷⁴ BROWN, *supra* note 7, at 146–47.

⁷⁵ *Id.*

⁷⁶ Guillory Dep. at 31:3–6, *Gunter v. Jefferson Davis Parish*, No. C-488-08 (La. 31st Cir. Feb. 4, 2009).

A series of leaders in the local law enforcement agencies fostered a hostile work environment for women in violation of Title VII of the Civil Rights Act of 1964. Beyond verbal comments and impeding professional development, these leaders terminated women and allowed male officers to assault female officers. There have been no known internal or external interventions into these office cultures, and it is likely that hostility is continuing to thrive today.

Sheriff Ricky Edwards was elected in 1992 and, soon after he took office, he conducted an office reorganization, which led to terminations based on class and gender divisions. Sue Dirks and Ginger Reiley, along with other terminated employees brought a suit alleging gender and age discrimination.⁷⁷ The suit was ultimately dismissed with prejudice, though the claims had been found sufficient to proceed to a jury trial.⁷⁸

This was also a problem in the Jennings Police Department in the early 2000s. Newly vested Police Chief Lucky DeLouche forced a female employee to videotape herself getting her nipples pierced; he then showed the video to office visitors.⁷⁹ One of DeLouche's police captains made explicit comments and gestures towards a female officer.⁸⁰ The same captain drove another female officer to a dead end road and threatened to rape her.⁸¹ A lieutenant threatened to injure a female officer with a knife.⁸² Eight women employed by the Police Department brought a civil rights lawsuit, alleging that it was a hostile work environment that included rape, sexual comments and gestures, unflattering comments, unwelcome touching, and explicit language and jokes.⁸³ Female officers experienced limited opportunities for training and were disproportionately disciplined compared to male officers.⁸⁴

C. Police Shootings in Jennings City and Jefferson Davis Parish Involved Witnesses to Law Enforcement Misconduct

Police Shootings in the City and Parish are concerning not only because of the conflicting accounts of events leading up to the shootings, but also because the shootings involve potential witnesses to police misconduct. These shootings implicate the victims' Fourth Amendment rights to be free from seizure and a host of state criminal laws involving homicide and witness tampering.⁸⁵

⁷⁷ Complaint, *Dirks v. Edwards*, No. 2:93-cv-00810 (W.D. La. May 14, 1993).

⁷⁸ Judgment, *Dirks v. Edwards*, No. 2:93-cv-00810 (W.D. La. May 8, 1995).

⁷⁹ Complaint, *Marie Amie et al. v. City of Jennings, Louisiana*, Docket No. 2:03-cv-2011 (W.D. La. Oct. 29, 2003); BROWN, *supra* note 7, at 43–44.

⁸⁰ *Id.*

⁸¹ *Id.*

⁸² *Id.*

⁸³ Complaint ¶¶ 22–28, *Marie Amie et al. v. City of Jennings, Louisiana*, Docket No. 2:03-cv-2011 (W.D. La. Oct. 29, 2003)

⁸⁴ *Id.* ¶¶ 22–28.

⁸⁵ See, e.g., Obstruction of Justice (LA. REV. STAT. § 14:130.1); Intimidating, Impeding, or Injuring Witnesses; Injuring Officers; Penalties (LA. REV. STAT. § 14:129.1).

On April 20, 2005, Parole Officer John Briggs Becton shot and killed Leonard Crochet while conducting a drug raid based on a tip from a probationer facing robbery charges.⁸⁶ Officers later reported that they were while responding to a reported shooting and narcotics activity.⁸⁷ Though Jefferson Davis Parish Sheriff's Office agents were already on site, it was parole and probation officers who initially entered the house because a probationer lived at the residence, and they were involved in the shooting.⁸⁸ Though Briggs Becton reported that Crochet failed to comply with an order and reached for his belt, no weapons or any items were found near Crochet's location when he was shot.⁸⁹ A witness standing directly behind Crochet said Crochet's hands were in the air when he was shot, disputing Briggs Becton's account.⁹⁰ This homicide becomes more concerning when considering Crochet's relationship with local law enforcement. In the years leading up to his death, Crochet told friends he was being harassed by agents for refusing to sell drugs for them.⁹¹ He had even reported death threats from agents, including Briggs Becton, the month that Briggs Becton killed him.⁹²

In 2007, Steven Gunter was killed by Warden Terrie Guillory. Gunter was a close associate of several of the women of the Jeff Davis 8 and an informant for Terrie Guillory.⁹³ When Lake Arthur Police responded to a reported incident at the house, they called Terrie Guillory for assistance, even though he was the jail warden and administrative officer.⁹⁴ Gunter and his partner both expressed to police that the response was unnecessary.⁹⁵ Terrie Guillory had no relevant training for what was treated as a hostage situation, with officers deploying five canisters of tear gas and storming the house.⁹⁶ After entering the house, Terrie Guillory shot and killed Gunter.⁹⁷ This was allegedly in response to shots fired by Gunter, but the coroner reported to Gunter's family that there was no gunpowder residue on Gunter's hand.⁹⁸

In both Crochet and Gunter's deaths, officers escaped any responsibility for the homicides despite the suspicious circumstances. Each had ties to law enforcement agents, and Crochet had received death threats from the very officer that had killed him. The culture of corruption in Jefferson Davis Parish allows officers to cover their own tracks at any cost, even if it means committing murder.

III. Law Enforcement Agents Have Enabled a Culture of Sexual Violence That Permeates the Parish and Surrounding Region

⁸⁶ BROWN, *supra* note 7, at 52.

⁸⁷ Louisiana State Police Bureau of Investigation, Police Officer Involved Shooting, Case Report #WDD004505.

⁸⁸ *Id.*

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ BROWN, *supra* note 7, at 56.

⁹² *Id.*

⁹³ Guillory Dep. at 35:10–13, *Gunter v. Jefferson Davis Parish*, No. C-488-08 (La. 31st Cir. Feb. 4, 2009).

⁹⁴ Guillory Dep., *Gunter v. Jefferson Davis Parish*, No. C-488-08 (La. 31st Cir. Feb. 4, 2009).

⁹⁵ *Murder in the Bayou: A Precarious Place* (Showtime 2019).

⁹⁶ Guillory Dep., *Gunter v. Jefferson Davis Parish*, No. C-488-08 (La. 31st Cir. Feb. 4, 2009).

⁹⁷ Louisiana State Police Bureau of Investigation, Attempted Murder of a Police Officer, Case Report #WDD005507-1.

⁹⁸ *Murder in the Bayou: A Precarious Place* (Showtime 2019).

A. The Sex Trafficking and Culture of Sexual Abuse Extend Beyond the Jail Walls

Sex work and trafficking were rampant throughout the early 2000s in the Jefferson Davis Parish. Frankie Richard, who had ties to law enforcement agents, was involved in much of the work, with connections to sex workers and trafficked women, especially the women of the Jeff Davis 8.⁹⁹ This was particularly true at the Boudreaux Inn, where anyone could walk in and buy drugs or pay for sex until the Inn closed in 2008.¹⁰⁰ The Boudreaux Inn was run by Martin P. Guillory, or “Big G,” who was a longtime field representative for former U.S. Representative Charles Boustany.¹⁰¹ Martin P. Guillory was fired by the Boustany office in late 2016 when his involvement in the Inn became public.¹⁰² In the late 1990s and early 2000s, there were hundreds of calls to the Jefferson Davis Parish Sheriff’s Office about drug sales and violence at the Boudreaux Inn, including at least one call for service about a dead body on the property.¹⁰³ Warden Terrie Guillory was known to frequent the Inn, and offer to trade free rides for sex.¹⁰⁴ Many of the women engaged in sex work or being trafficked were struggling with substance use disorder, and would exchange sex for any amount of drugs.¹⁰⁵ A number of the women of the Jeff Davis 8 were engaged in sex work and suffered from substance use disorder.¹⁰⁶

In at least one incidence of trafficking, the survivor chose not to pursue criminal charges out of concern for her own safety. On November 28, 2005, Muggy Brown delivered Rosalyn Faith Breaux to Jarriel “Mooney” Palfrey, who raped Breaux, in exchange for crack cocaine.¹⁰⁷ A few months later, Breaux dropped all the charges.¹⁰⁸ Brittney Gary, a minor and later homicide victim, was also trafficked. Teresa Gary, Brittney’s mother, admitted to investigators that she and Frankie Richard trafficked Brittney Gary.¹⁰⁹ Local investigator Kirk Menard describes “luring [] girls to certain guys” as a common practice in the area.¹¹⁰

The men engaged in the sex work business also committed violence against sex workers. On May 14, 2007, Frankie Richard and Eugene Ivory raped Elizabeth Dawn Clemens.¹¹¹ Afterwards, they threatened she would end up like the Jeff Davis 8 victims.¹¹² Though Clemens

⁹⁹ BROWN, *supra* note 7; *Murder in the Bayou: God Don’t Sleep* (Showtime 2019).

¹⁰⁰ *Id.*

¹⁰¹ BROWN, *supra* note 7, at 188.

¹⁰² Mark Ballard, *Fired Boustany Staffer Linked in Book’s Prostitution Claims Latches on with New Campaign*, *ADVOCATE* (Oct. 28, 2016), https://www.theadvocate.com/acadiana/news/politics/elections/article_e1d640ee-9d79-11e6-b0e7-17b3bb86a54f.html.

¹⁰³ BROWN, *supra* note 7, at 13, 193–195.

¹⁰⁴ *Id.* at 206.

¹⁰⁵ *Id.*

¹⁰⁶ *Id.*

¹⁰⁷ *Id.* at 64.

¹⁰⁸ *Id.*

¹⁰⁹ *Id.* at 130; *see also* Taskforce Report at 46, Jennings Police Department Case #K-06184-08, Jefferson Davis Parish Sheriff’s Office Case #2008110110, Louisiana State Police Case #09-576.

¹¹⁰ BROWN, *supra* note 7, at 69.

¹¹¹ *Id.* at 83–84.

¹¹² *Id.*

reported the rape to police, she chose to drop the charges a few months later.¹¹³ During that period, Richard became the suspect in the Jeff Davis 8 murders, but was never prosecuted.¹¹⁴ Evidence continues to emerge tying him to the murders. Many other men who solicited sex workers in the area are known to have been violent towards them, sometimes forcing the encounters into rapes.¹¹⁵

In addition to regularly responding to incidents at the Boudreaux Inn, police officers often paid for sex and engaged in relationships with sex workers. Now deceased Jefferson Davis Parish Sheriff's Deputy Danny Barry and his wife regularly patronized sex workers, especially women of the Jeff Davis 8.¹¹⁶ Barry is known to have been violent in many of these sexual encounters.¹¹⁷ He was later a suspect in the Taskforce investigation into the murders of the Jeff Davis 8 women.¹¹⁸

Warden Terrie Guillory had a sexual relationship with Jeff Davis 8 victim Crystal Benoit Zeno,¹¹⁹ and likely with the other seven as well. His sexual relationship with Loretta Chaisson, the first victim of the Jeff Davis 8, began when she was only thirteen or fourteen years old.¹²⁰ Terrie Guillory was not only engaging in relationships with women, but was regularly seen picking up sex workers, including members of the Jeff Davis 8.¹²¹ He allegedly exchanged sex for narcotics with at least one woman.¹²² There are also reports that Terrie Guillory has engaged in drug trafficking and suffers from substance use disorder.

The complicity and responsibility of law enforcement agencies in the local culture of sexual violence against women, including sex workers, is alarming. Rather than protecting and serving, officers are actively hurting women and allowing civilians to hurt women without consequences. This dereliction of duty requires federal intervention.

B. Officers Who Have Engaged in These and Other Illegal Practices Go Between Regional Law Enforcement Agencies and Criminal Activity With Impunity

Local law enforcement agents regularly move between agencies even after engaging in misconduct or criminal acts. They evade responsibility for their actions, and are rewarded with promotions and continued careers in law enforcement, despite their past disregard for public safety or involvement in crime. A few of the most egregious examples in the region are:

¹¹³ *Id.* at 87.

¹¹⁴ *Id.*; Jennings Police Department Case #K-06184-08.

¹¹⁵ See generally Taskforce Report, Jennings Police Department Case #K-06184-08, Jefferson Davis Parish Sheriff's Office Case #2008110110, Louisiana State Police Case #09-576.

¹¹⁶ BROWN, *supra* note 7, at 72.

¹¹⁷ *Id.* at 131.

¹¹⁸ *Id.*

¹¹⁹ BROWN, *supra* note 7, at 123–24; *Murder in the Bayou: An Unholy Union* (Showtime 2019).

¹²⁰ *Murder in the Bayou: An Unholy Union* (Showtime 2019).

¹²¹ BROWN, *supra* note 7, at 97.

¹²² *Id.*

- Lucky DeLouche was Calcasieu Parish detective and then director of Calcasieu's Violent Crimes Task Force at a time when there was a series of violent murders, including at least two where Calcasieu Parish Sheriff McElveen's son was implicated. In 1997, DeLouche was accused of sexually molesting his daughter, along with his then girlfriend. He was charged with aggravated rape and aggravated oral sexual battery but not prosecuted. In 2000, he was recruited to the Jennings Police Department where he would help foster a work environment hostile to female employees.¹²³ Though DeLouche resigned from his position in Jennings in 2003 because of the sexual misconduct in his department, he later found a leadership position in the Welsh Police Department.¹²⁴
- Todd D'Albor, a former Jennings Police Chief accused of using racial slurs, discouraging officers from investigating certain drug crimes, and using public property for personal use while in office, briefly served as the St. Martinville Police Chief and is now the New Iberia Police Chief.¹²⁵
- Johnny Lassiter was seen in an unmarked police car receiving paper bags from an unidentified man immediately after the murder at KK's Corner in 1997 in Calcasieu Parish. At the time, Lassiter was a detective in the Jennings Police Department and he later became the police chief.¹²⁶ In November 2013, Lassiter pled guilty to malfeasance in office for taking cash and drugs from the Jennings Police Department evidence room.¹²⁷
- Before working at the Jefferson Davis Parish Jail, Mark Ivory, who assaulted Lisa Allen, was a corrections officer at the South Louisiana Correctional Center and worked for the Allen Parish Sheriff's Office.¹²⁸
- Allarate Frank, one of the jailers convicted of criminal malfeasance for trafficking women in the Jefferson Davis Parish Jail, has continued to work in a number of local law enforcement agencies and ran for Chief of Police in Eunice.¹²⁹

¹²³ Sulphur Police Department Offense Report, Complaint No. 97-17369 (Oct. 22, 1997); BROWN, *supra* note 7, at 37-42.

¹²⁴ Graham Winch, *Jennings Police Chief Resigns*, KPLC (Aug. 19, 2003), <https://www.kplctv.com/story/1407941/jennings-police-chief-resigns/#:~:text=Affective%204%20p.m.%20Monday%2C%20Donald,sexual%20misconduct%20within%20the%20department;Jamal%20Petroleum%20v.%20Chassion,2:2015-cv-02040> (W.D. La. July 7, 2015) (naming DeLouche as a Welsh City defendant).

¹²⁵ Wallace Dep. at 26-33, *Lehman v. D'Albor*, No. 2:16-00783 (W.D. La. Oct. 29, 2018); Dwayne Fatherree, *D'Albor Disputes Locations in Blog About Lawsuit*, DAILY IBERIAN (Feb. 3, 2019), https://www.iberianet.com/news/d-albor-disputes-accusations-in-blog-about-lawsuit/article_b63163cc-2776-11e9-95de-af75c9d3a623.html; Doris Maricle, *Possible Misuse of City Assets*, AM. PRESS (Feb. 6, 2018), https://www.americanpress.com/news/local/possible-misuse-of-city-assets/article_5833a238-0b63-11e8-afa3-9f1faad534e8.html; Ben Myers, *Todd D'Albor Selected to Helm New Police Department in New Iberia*, ADVOCATE (Nov. 21, 2017), https://www.theadvocate.com/acadiana/news/crime_police/article_b0977e20-cef2-11e7-bbcf-c3fa0bae0e2b.html

¹²⁶ BROWN, *supra* note 7, at 39.

¹²⁷ *Sentencing for Former Jennings Chief on Hold*, SEATTLE PI (Dec. 31, 2013).

¹²⁸ Mark Ivory's Application for Employment (Jul. 11, 2005).

¹²⁹ ABOUT A.J. FRANK, ALLARATE A. J. FRANK, <https://www.allarateajfrank.com/>.

- Terrie Guillory, former Jefferson Davis Parish Sheriff's Deputy and Warden who trafficked detained women and is a potential suspect in the murders of the Jeff Davis 8, became a detective in nearby Welsh.¹³⁰
- Ricky Edwards, former Jefferson Davis Parish Sheriff who was the subject of civil rights litigation because of his civil asset forfeiture practices and held office during murders of the Jeff Davis 8, accepted a position with the Louisiana Sheriff's Association after leaving the sheriff's office.¹³¹

Most of these towns are within a few minutes of each other, allowing law enforcement agents who transfer agencies to continue to use government resources to terrorize the same communities. This is a dangerous and irresponsible but not uncommon practice.¹³² This is also why there are national calls for a database to track police officers fired for misconduct.¹³³ Yet even recent steps toward this would do little to impact the practice in this region because these officers engaged in crimes and gross misconduct, but mostly left their jobs voluntarily and often without a disciplinary record. At this point, a federal investigation into the practice in the region is the only pathway to justice.

IV. Conclusion

Despite various investigations by the Jefferson Davis Parish Sheriff's Office, the Louisiana State Police, and even the Federal Bureau of Investigations, the corrupt and criminal practices of local law enforcement agents have gone unchecked. So long as the officers involved in these practices continue to not only escape consequences but also find employment and promotions in nearby agencies, the residents of Jefferson Davis Parish and the surrounding communities are in danger.

A CRIPA investigation by the Department of Justice is particularly urgent for the safety and welfare of women in these communities. They have been continuously murdered, trafficked, raped, and harassed by local law enforcement agents and their requests for help have been met with indifference by local agencies. There has been total disregard for their constitutional rights under the Thirteenth and Fourteenth Amendments, as well as their safety. We strongly urge the Department of Justice to immediately initiate a CRIPA investigation into the Jefferson Davis

¹³⁰ Doris Maricle, *Turner Chosen as Interim Police Chief*, AM. PRESS (Feb. 8, 2018), https://www.americanpress.com/news/local/turner-chosen-as-interim-police-chief/article_6c43a67a-0cf7-11e8-b00d-179262f2e783.html.

¹³¹ *Jefferson Davis Sheriff Won't Set 6th Term*, AP (May 30, 2011), https://www.wvgazettemail.com/jefferson-davis-sheriff-won-t-set-th-term/article_f6541cc7-1fcc-51dd-b7b0-adbe009471ac.html; see also RICKY EDWARDS, LINKEDIN, available at <https://www.linkedin.com/in/ricky-edwards-8318ba15> (listing his current employer as the Louisiana Sheriff's Association).

¹³² Nikita Lalwani & Mitchell Johnson, *What Happens When a Police Officer Gets Fired? Very Often Another Police Agency Hires Them.*, WASH. POST (Jun. 16, 2020), <https://www.washingtonpost.com/politics/2020/06/16/what-happens-when-police-officer-gets-fired-very-often-another-police-agency-hires-them/>; Shaila Dewan & Serge F. Kovaleski, *Thousands of Complaints Do Little to Change Police Ways*, N.Y. TIMES (May 30, 2020), <https://www.nytimes.com/2020/05/30/us/derek-chauvin-george-floyd.html>.

¹³³ Ben Grunwald & John Rappaport, *A Wandering Officer*, 129 YALE L.J. 1676 (2020); Amita Kelly & Brian Naylor, *Trump, Hailing Law Enforcement, Signs Executive Order Calling for Police Reform*, NPR (Jun. 16, 2020), <https://www.npr.org/2020/06/16/877601170/watch-live-trump-to-sign-executive-order-on-police-reform>.

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Parish Sheriff's Office, the Jennings Police Department, the Calcasieu Parish Sheriff's Office, and any other local agencies where individuals involved in these crimes are currently employed. After decades of violence, this step is necessary to begin to ensure the safety of communities in the region.

Sincerely,



Mercedes Montagnes
Executive Director
Promise of Justice Initiative
1024 Elysian Fields
New Orleans, LA 70116

cc: David C. Joseph
United States Attorney, Western District of Louisiana
U.S. Attorney's Office
300 Fannin Street, Suite 3201
Shreveport, LA 71101

Paul Killebrew
Trial Attorney, Special Litigation Division
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

David Howard Sinkman
Assistant United States Attorney
Civil Rights Division, Eastern District of Louisiana
U.S. Attorney's Office
650 Poydras Street, Suite 1600
New Orleans, LA 70130