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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

CHRISTOPHER LEHMAN CIVIL ACTION NO. 2:16-00783

VERSUS

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

ORAL DEPOSITION

OF

DEBBIE BREAUX

Taken at the Offices of
Jennings Police Department
110 N. Broadway
Jennings, Louisiana

October 29, 2018

2:54 p.m.

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1 do understand. You understand you're under oath just
2 like you were in a courtroom, so if you answer one of
3 my questions, we're all going to assume that you've
4 understood it fully and that you're answering it
5 truthfully, just like you were in a courtroom, okay?
6 Something that's very important is that we don't talk
7 at the same time. It'll make her job a whole lot
8 harder, so if you would, wait until I finish talking
9 with my question before you start your answer, and
10 I'll try not to cut you off, either. If you don't
11 know the answer to one of my questions, it's no crime
12 to say that you don't know, okay. We don't want you
13 -- we don't want you guessing or estimating about
14 anything, unless we specifically ask you to guess or
15 estimate. An example is distances. "How far is it
16 from that door?" "Well, I really don't know for
17 sure." "Well, then, would you give us your best
18 estimate?" If we ask you, then you can give it, but
19 we want to know what you know to be facts, okay, so we
20 don't want you guessing or conjecturing, unless you're
21 telling us that, in other words, "I think it was in
22 early 2017", that kind of thing.
23 A. Yes, sir.
24 Q. Any questions about that?
25 A. No, sir.

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1 Q. Okay, let me just ask you a few questions
2 about your background. You're currently employed as
3 the -- the animal control officer in Jennings?
4 A. Yes, sir.
5 Q. You're employed by who?
6 A. The City.
7 Q. So you're not parish-wide?
8 A. No.
9 Q. You operate strictly in the city limits?
10 A. Yes, sir.
11 Q. How long have you been doing that?
12 A. It'll be eight years in April.
13 Q. And are you considered a law enforcement
14 officer?
15 A. Honestly, I don't know what I'm considered.
16 Q. Do you have a commission card?
17 A. Yes.
18 Q. Alright. And does that list you as a
19 officer?
20 A. Honestly, I don't know. I hear one thing
21 from one person and something from another person, and
22 -- if you want to go by my job description, yes. Do
23 they go by my job description? No.
24 Q. Do you carry a firearm?
25 A. No.

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1 Q. Are you allowed to carry a firearm?
2 A. No. They won't send me to the class, even
3 though it's in my job description.
4 Q. But would you like to carry a firearm for your
5 protection?
6 A. Yes.
7 Q. But they have not allowed you to go to POST
8 training?
9 A. No. I've asked. They say no.
10 Q. So you've been here for the last eight years.
11 What did you do before that? Let's talk about your
12 previous employment.
13 A. I worked at The Bank in Jennings, here, and
14 before that, I worked at the sugar cane co-op with the
15 Columbian. Yes, that was an experience.
16 Q. And what did you do before that? That's
17 about it?
18 A. (Witness nods head.)
19 Q. So this job with the JPD is really your first
20 job having anything to do with law enforcement; is that
21 correct?
22 A. Yes, sir.
23 Q. Alright. How far did you get in school?
24 A. I graduated high school. Twelve years.
25 Q. Where is the animal control facility in

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1 Jennings?
2 A. On Isabelle Street.
3 Q. It's at the very, very end of the street?
4 A. Very end, right-hand side.
5 Q. And is there a house nearby, or a residence
6 nearby?
7 A. A trailer. If you want to call it a trailer,
8 but yeah, there's something there.
9 Q. And that's the closest residence to you?
10 A. Actually, if you're going down Isabelle Street
11 there's a house on the left, and then there's a little
12 house here, and then a trailer, and those are the only
13 three that's close to the shelter.
14 Q. Between Mr. Lehman's house and the animal
15 control center?
16 A. That's it.
17 Q. All right. The closest of which is the Miller
18 residence?
19 A. Yes, sir.
20 Q. And that's -- what are their names?
21 A. Loretta and Randall miller.
22 Q. Have you had any communications with the
23 Millers, considering your place of employment is right
24 next door?
25 A. What kind of a communication, exactly?

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1 Q. Any kind. Any conversations. Official,
2 unofficial --
3 A. When he comes down to dig my ditch because he
4 says the water's not draining, or comes down to be
5 nosy to see what I'm doing, or he'll call the cops when
6 I go out there at night to do my job. Stuff like that,
7 yes.
8 Q. So it's not really so much in your official
9 capacity?
10 A. No.
11 Q. It's just that he comes over there to talk to
12 you every once in a while?
13 A. To be a nuisance.
14 Q. Do you have any personal knowledge of either
15 -- of the background of either of the Millers?
16 A. What do you mean "personal"?
17 Q. Do you know whether or not either of them has
18 a criminal background?
19 A. Oh, yes. He was bragging about it.
20 Q. To you?
21 A. To me.
22 Q. And what did he say?
23 A. He was telling me how they was mistreated,
24 wrongly committed -- I forget what state it was in,
25 but, supposedly, they tied a girl to a tree because

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1 she wouldn't take the trash out, and beat her, and
2 they got caught, and they got put in jail for it. He
3 told me that himself.
4 Q. This was in a different state?
5 A. Yes.
6 Q. Describe the building -- or the type structure
7 -- that's what I wanted to say. Describe the structure
8 that the Millers live in.
9 A. To me, it looks like a trailer.
10 Q. Meaning a mobile home?
11 A. Yes.
12 Q. Do you know how the -- that was moved on to
13 the property?
14 A. I have no idea how it was moved on there.
15 It's been there ever since I was here.
16 Q. And, from time to time, have there been
17 campers in the yard?
18 A. Yes.
19 Q. Motor homes or anything like that?
20 A. Yes.
21 Q. Alright, and have you personally viewed people
22 living in those?
23 A. Yes, and then they try to say they don't.
24 They say it's for their animals, but it's not.
25 Q. And have you seen people go in and out of

Page 12

1 those things?
2 A. Yes, sir.
3 Q. Have you seen lights on in those things?
4 A. Yes, sir. I even seen them hooked up,
5 draining to the road when it shouldn't have been. The
6 sewage.
7 Q. So it was a sewage line, direct sewage line?
8 A. Well, I mean, they had a line out there to
9 where it would drain into the ditch, you know.
10 Q. Was it a septic line or was it raw sewage?
11 A. I didn't go on the property to check it out to
12 see exactly what kind of hose it is, but you could see
13 the hose there.
14 Q. Have you had any types of conversations with
15 city inspectors who have gone out to look at the Miller
16 structure?
17 A. To discuss that -- the structure -- or what?
18 Q. Have you had any conversations with any of
19 the city inspectors -- I'll throw out the name "Terry
20 Lavergne". You recognize that name?
21 A. Yes.
22 Q. And have you had any discussions with him
23 concerning his inspection of the Miller property?
24 A. Just that he had went out there to inspect it
25 and reported back, but he did his job, you know, as far

Page 13

1 as he's concerned.
2 Q. Did he make any comments to you as to what he
3 had found?
4 A. That everything was illegal.
5 Q. Give you specifics of things that were not --
6 A. No.
7 Q. -- under --
8 A. No.
9 Q. Let me finish my question.
10 A. Oh, I'm sorry.
11 Q. Did he give you specifics of things that were
12 not to code, as we would put it?
13 A. No. He didn't come out and tell me that. He
14 just said nothing was right.
15 Q. Do you ever contact Mr. Lehman for any type
16 of assistance at the animal control center?
17 A. Now or when he worked with us?
18 Q. When he worked with you.
19 A. Yes.
20 Q. When you say he worked with you, are you
21 referring to him being an officer?
22 A. Yes, sir.
23 Q. Did you understand he was an officer with the
24 Jennings Police Department?
25 A. Yes, sir.

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1 Q. What did you understand was his position?
2 A. Community -- not community service.
3 Communication officer -- no, that's dispatch.
4 Q. Community liaison, so to speak?
5 A. Yeah.
6 Q. So, while he was so employed, did you ever
7 have contact with him concerning the facility where
8 you work?
9 A. Yes. He came there many times and helped me
10 do stuff that needed to be done, like trim the trees,
11 and clean it up and everything, yes.
12 Q. How about cleaning out sewers and things like
13 that, drain lines?
14 A. Mr. Lehman never cleaned drain lines because
15 Mr. Miller made sure that was clean. As far as the --
16 Q. Mr. Miller made sure it was clean?
17 A. Oh, yeah. He was in the ditch all the time.
18 Q. Oh, okay. That's what he was talking about
19 with the drainage issue?
20 A. Yeah.
21 Q. Do you remember when Mr. Lehman was let go by
22 the police department?
23 A. I vaguely remember that. I don't remember
24 the exact date or time, but I do remember, yes.
25 Q. If it happened in December of 2015, were you

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1 questioned or asked to fill out some kind of a report
2 by Lieutenant Hill or Chief D'Albor?
3 A. Against Mr. Lehman?
4 Q. Yes.
5 A. No.
6 Q. That last visit that he made just before he
7 was discharged, had he come to your facility to help
8 you or to spy on the Millers?
9 A. If Mr. Lehman was at my facility, it was to
10 help me, and I called him there, and there was even
11 one other time -- what was it we did? I went and
12 picked him up in the animal control truck, and they
13 knew it, and we went back -- what was I working on? I
14 don't remember exactly what it was I was working on at
15 the time, but he was moving something.
16 Q. Was there a clear view of the Miller property
17 from your facility?
18 A. Oh, yeah. You can see.
19 Q. So, in other words, for Mr. Lehman not to
20 have seen the Miller property when he was on your
21 facility, he would have had to have --
22 A. Been blind.
23 Q. -- taken steps not to look, so to speak?
24 A. Yes, sir.
25 Q. Do you remember the names of any of the

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1 people that have stayed with the Millers over the
2 years?
3 A. Names.
4 Q. Does the name Brian Duhon --
5 A. Oh, yes. Oh, I'm sorry.
6 Q. How about Nicole Duhon?
7 A. Yes, sir.
8 Q. Do you know who they are?
9 A. Yes, sir.
10 Q. Who are they?
11 A. Brian is Randall's son, and Nicole is his
12 wife.
13 Q. Why does Brian have the last name Duhon
14 instead of Miller? Do you know?
15 A. I believe that Randall was not married to his
16 mother, so he went by his mother's name.
17 Q. So his mother was a Duhon?
18 A. From my understanding, yes.
19 Q. Was there any relation there with Mayor Duhon,
20 that you're aware of?
21 A. I can't answer that honestly. Can I say
22 something?
23 Q. I guess you can, if counsel doesn't mind.
24 MR. LEDET: I'd like it to be in
25 response to a question.

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1 THE WITNESS: Oh, okay. Well, it had
2 something to do with a question he'd asked me earlier.
3 BY MR. MORRIS:
4 Q. Yes. In fact, we should have told you that.
5 If, later on in the questioning, you even need to
6 change your answer, just tell us, "Hey, I need to go
7 back to such-and-such. I said this. It should have
8 been that", or, "Can I add to that", that kind of
9 thing, so, yes, if you're going back to something you
10 have already said, then you can add to it or whatever,
11 so go ahead.
12 A. Whenever you asked me about whenever Mr.
13 Lehman left the department or whatever, and if I knew
14 anything about it, the chief at the time, which is
15 Todd, calls me, has me to go to Mr. Lehman's house to
16 pick up his stuff that he had from the office and turn
17 it in to the armory, instead of -- I don't understand
18 why they had me go do it. Why didn't they just go get
19 it their self or send Mr. Bertrand out there, the one
20 that was in charge of all that?
21 Q. So he wanted you to pick up the city property
22 that Chris had?
23 A. Yes, sir.
24 Q. And -- as an officer?
25 A. He just asked me to go by there and pick up

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1 Mr. Lehman's stuff that he had for the City.
2 Q. Did he say what stuff?
3 A. He just said the stuff he has for the City.
4 Q. Based on your observation and your being able
5 to see the Millers' residence and the comings and
6 goings on a daily basis, have you seen any indication
7 that they may be dealing some type of drugs from that
8 house or residence?
9 A. Something's going on, because there's a lot of
10 traffic there.
11 Q. How long do they normally stop? Or stay, I
12 should say.
13 A. Tops, maybe five minutes, in and out.
14 Q. Have you had any conversations with Mayor
15 Guinn, the new mayor concerning the status and
16 classification of the Miller residence?
17 A. Not on the Miller residence, no.
18 Q. Has Mayor Guinn ever voiced his opinion on
19 what kind of structure that is?
20 A. To me?
21 Q. Yes.
22 A. No, sir.
23 Q. Or did you overhear him saying anything?
24 A. No, sir.
25 Q. Have you heard any discussions between any of

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1 the police department personnel, or the fire
2 department personnel, or inspector's office personnel
3 concerning the status and classification of the Miller
4 residence?
5 A. Like what, for instance?
6 Q. Have you ever heard any of the city officials
7 with Jennings make any comments about the Miller
8 residence?
9 A. I mean, just that it's not up to code. They
10 don't feel it's up to code, but --
11 Q. Have you heard City of Jennings personnel say
12 that?
13 A. Not the personnel, no. Not the personnel.
14 Q. Well, then who?
15 A. It's like, you know, the city inspector named
16 Terry, but he's not city inspector no more.
17 Q. Anybody else besides Terry?
18 A. No.
19 Q. How well do you know Danny Semmes?
20 A. I can't honestly say I know him a hundred
21 percent. I know him as working with him.
22 Q. Do you know where the Millers work, or
23 worked?
24 A. Last I heard, they was working at Walmart,
25 but I don't think Randall was working there anymore,

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1 because he got into some kind of message (sic) over
2 there, and they let him go.
3 Q. But you don't have any firsthand knowledge of
4 that?
5 A. I was told by his son that he got fired
6 because he was over there calling these people names
7 and carrying on in the department, and they let him
8 go.
9 Q. Making racial comments?
10 A. Yes, sir.
11 Q. Have you ever heard either Chief D'Albor or
12 Danny Semmes make any racial or derogatory comments,
13 whether in jest, or serious, or not?
14 A. I've heard them say that Mr. Lehman's just
15 lost his rocker -- lost his mind.
16 Q. And that's about it?
17 A. Yeah.
18 Q. And who said that?
19 A. Chief Semmes and Todd, both.
20 Q. Did they say why they thought he had lost his
21 mind?
22 A. For this case.
23 Q. Did they elaborate on why they felt that?
24 A. No. That's all they said.
25 Q. Ricky Benoit was the officer that was shot in

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1 the line of duty several years back?
2 A. Yes, sir.
3 Q. Do you remember there being any charitable
4 fundraisers to raise money for the family?
5 A. Two of them.
6 Q. Alright, and did you -- do you have any
7 knowledge of what happened with the funds?
8 A. The only thing I know is that Mr. Ricky and
9 his wife told me they didn't get a penny. Where the
10 money went, I don't know.
11 Q. You don't know for sure? Do you know who was
12 collecting the money?
13 A. There was like four or five of them, I think.
14 Jackie Heinen -- not Heinen, but -- she used to be the
15 records clerk -- was one. To be honest with you, I
16 don't know exactly who all was collecting the money.
17 Q. That's fine; then don't answer.
18 A. I do know that they would drop money off in
19 dispatch, and they would leave checks in the dispatch
20 area for the fundraiser, and I know that all got turned
21 over to be put into the JP account, which is Jennings
22 Police account, Association. Where it went from there
23 when it left dispatch, I have no clue.
24 Q. Well, the association, the officers
25 association, or the police department itself?

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1 A. From what I was told, it was the police
2 association.
3 Q. During the time that Todd D'Albor was chief,
4 did he ever call upon you to perform any personal
5 favors for him or do activities that were for his
6 personal benefit or his family?
7 A. Yes, sir.
8 Q. Can you tell us about that?
9 A. I used to pick his son up from school every
10 day, take him home, pick up lunch, take it to his son,
11 helped him move his stuff out of his house, to the
12 armory, with the city vehicle, load up the city
13 lawnmower, take it to his house for him to cut his
14 yard. Yeah, I knew it was all wrong, and I shouldn't
15 have been doing it, but what was I supposed to do? He
16 was the chief, he told me to do it. I have no
17 protection. I'm not civil service. He could have
18 fired me on the spot.
19 Q. How long a period of time were you taking the
20 son to and from school?
21 A. The whole school year.
22 Q. Was that just one year or was it more than one
23 year?
24 A. It was about a year and a half.
25 Q. And you would take the son his lunch?

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1 A. Yes.
2 Q. While he was at school?
3 A. Yes.
4 Q. And what kind of lunch would you pick up?
5 A. Whatever his son wanted.
6 Q. I mean, McDonald's --
7 A. McDonald's, Popeyes, whatever.
8 Q. How was that communicated to you? In other
9 words, what the son wanted for lunch?
10 A. Because either Todd's wife would call me and
11 tell me, or either Todd would tell me, and then they'd
12 give me the money, and I'd go get it, and I'd take it
13 to the school.
14 Q. Would you have to leave the -- your work
15 facility to go by and pick up the money, and then go to
16 school?
17 A. Yes.
18 Q. So was that time away from your actual
19 duties?
20 A. Yes.
21 MR. MORRIS: Let's take a break real
22 quick.
23 [Short recess was taken.]
24 BY MR. MORRIS:
25 Q. Ms. Breaux, the activity that you'd seen

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1 around the Miller residence at the end of Isabelle
2 Street, you indicated that the cars kind of come and
3 go?
4 A. Yes, sir.
5 Q. I mean, as a member of the Jennings Police
6 Department, do you find that suspicious?
7 A. Very suspicious.
8 Q. Of what?
9 A. If I was an officer, a police officer, in my
10 mind, there's some drugs going down there somewhere
11 between their house and the Simiens' house, the house
12 right before those.
13 Q. That's one of the other houses that's on
14 Isabelle Street?
15 A. Yes, sir.
16 Q. These cars that come in -- do you see many
17 out-of-state license plates?
18 A. A lot of Texas. There was one I seen the
19 other day, because it comes to the shelter -- they try
20 to use the shelter as their scapegoat. They come down
21 there acting like they're going to the shelter to the
22 road, you know, and they'll pull in -- because I have
23 cameras, and I'll watch them pull in, and all they do
24 in is pull in, pull out, and go right back up to the
25 Millers' house or the Simiens' house.

Page 25

1 Q. Do they always get out of their car? Their
2 cars, I should say.
3 A. I can't say a hundred percent, but I know
4 sometimes they do get out, they'll go in the house and
5 do whatever, but they're not very long.
6 Q. Have you seen any packages go back and forth,
7 money or items exchanged between these people?
8 A. I haven't seen it.
9 Q. Have you seen any indication or evidence that
10 the Jennings Police Department has done at least some
11 investigation of the -- of Isabelle Street?
12 A. Very, very little, until Officer Wallace
13 started doing it, because, since he started doing it,
14 he investigates, he checks it, but all the rest of
15 them didn't want to do nothing.
16 Q. Was there an instance where there was an
17 informant that might have been trying to make a buy at
18 the Miller residence? You remember anything about
19 that?
20 A. I can remember one at my shelter, because I
21 know, one time, I was at my shelter, it was probably
22 2016, maybe, Alex West and Officer Ryan Courville was
23 at my shelter. They were parked in there. It was
24 gray car, and I didn't recognize the car, so I go out
25 there to see who it is, and it's them, and they told

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1 me to go back inside because they was trying to make a
2 buy, and then the next thing I know, here comes this
3 other guy, gets in the car, and they leave. That was
4 the end of it. Never heard no more about it.
5 Q. Were those two officers dressed in plain
6 clothes or uniform?
7 A. Plain clothes.
8 Q. It was not a marked vehicle?
9 A. It was -- it wasn't a rental vehicle.
10 Q. It was an unmarked vehicle? Bad question on
11 my part, I'm sorry.
12 A. Yes, sir. If it would have been a police
13 vehicle, I'd have known who it was.
14 Q. Have you told anybody with the police
15 department about all of these cars coming and going?
16 A. You mean as far as officers --
17 Q. The chief or -- Semmes or D'Albor, anybody
18 else like that? Have you reported the --
19 A. Have I reported it to them?
20 Q. Yes.
21 A. No.
22 Q. Why not?
23 A. Because the officers have, and they didn't
24 seem to care, and if they're not going to listen to the
25 officers, they're not going to listen to me.

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1 Q. Well, going along with what you just said,
2 does it appear as though the Jennings Police
3 Department, from your personal observations, has done
4 enough to try to stop the flow of those people coming
5 to and from the Miller residence or the other
6 residence?
7 A. No, sir. Two officers, maybe, three at the
8 top, but then their hands are tied because they go to
9 try to do their job. They got to follow with what the
10 chief or the ex-chief says, you know, and they're
11 like, "Okay, just go, do a signal 2", which is right
12 down the street, right back up the street, see if
13 anything's going on, to satisfy Mr. Lehman. That's
14 what they say.
15 Q. That's what the officers have told you?
16 A. Yes, and I've heard -- they'd come across the
17 radio with it. Like I said, you have -- Officer
18 Wallace and Officer Conner, if they would let them do
19 their job the way they want to do their job, yes.
20 Q. What's Officer Wallace's first name?
21 A. Chris.
22 Q. Chris Wallace. And how about -- Carpenter,
23 you said?
24 A. Conner.
25 Q. Conner. What's his first name?

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1 A. Donald.
2 Q. You've had conversations with those guys?
3 A. Yes, sir.
4 Q. To that effect?
5 A. Yes, sir.
6 Q. Well, what do they tell you that's stopping
7 them from doing their job, as you put it?
8 A. They can only do so much, you know, and it's
9 like -- I mean, I don't know -- to me, it seems to me
10 like whenever something's going on or it's really busy
11 on Isabelle Street, and the minute the cops come, man,
12 them cars are out of there just like that (snapping
13 fingers). Like they've been tipped. That's the way I
14 look at it. Somebody's tipping them. Don't know who,
15 don't know where. You got the Acadian Apartments.
16 It's like they always have a guy standing out there
17 doing lookout.
18 Q. Acadian Apartments is the structure at the
19 very beginning of the street --
20 A. Oh, yes, sir.
21 Q. -- at the other end from Miller?
22 A. Yes, sir. Drug city.
23 Q. You mean the apartments themselves?
24 A. Yes, sir.
25 Q. Do you -- do you know who's restraining these

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1 officers from, as you say, doing their job?
2 A. No, I don't know for a fact. I have no clue,
3 but it just seems to me like somebody is.
4 Q. Do you think it's somebody higher up with the
5 police department that's restraining these guys?
6 A. I hate to say that because I don't know, you
7 know. I can't say for sure.
8 Q. All right.
9 MR. MORRIS: That's all I have.
10 EXAMINATION BY MR. LEDET:
11 Q. Were you involved in the decision to hire Mr.
12 Lehman with the Jennings Police Department?
13 A. Was I in the decision for that?
14 Q. Yes.
15 A. No.
16 Q. Were you involved in the decision to suspend
17 Mr. Lehman's employment at the Jennings Police
18 Department?
19 A. No.
20 Q. Were you consulted in any way regarding Mr.
21 Lehman's suspension?
22 A. No.
23 Q. Did you ever, as a City employee, manage or
24 supervise Mr. Lehman?
25 A. No.

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1 Q. The -- so, as animal control, as an animal --
2 what was your position again? I'm sorry.
3 A. Animal control officer.
4 Q. Officer. You testified that you're not
5 POST-certified?
6 A. Right.
7 Q. You talked about the structures at the Miller
8 residence, and you said that they were there since --
9 since -- the whole time you've been employed with the
10 City of Jennings?
11 A. Yes, sir.
12 Q. And you've been employed since 2010?
13 A. '11.
14 Q. Okay.
15 A. Yes.
16 Q. You indicated that Mr. Lehman might have come
17 to the -- your facility. You remember the date of
18 that?
19 A. He was working with the police department at
20 that time, and whenever I would need help with stuff,
21 you know -- he helped everybody. That was part of his
22 job, and he was like neighborhood watch, you know, to
23 kind of keep eyes on things and what was going on, and
24 then he would come to the facility, yes, and help me
25 with certain stuff that needed help.

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1 Q. Were you informed as to what Mr. Lehman's
2 specific duties were when he was employed at the
3 Jennings Police Department?
4 A. It was like neighborhood watch, community --
5 you know, the community watch. I think that's the name
6 of it.
7 Q. You mentioned being non-civil service, and you
8 could be fired on the spot?
9 A. Yes, sir.
10 Q. Why do you say that?
11 A. Because they have this no-fault law in
12 Louisiana, and if the chief didn't like something I
13 did, or if I refused to do something that he wanted me
14 to do, he could look at me and say, "I don't like the
15 way you're dressed. I no longer need your service."
16 Q. As far as you know, is that for any
17 non-civil-service employees who worked at the police
18 department?
19 A. Yes, but the only thing, with that, in order
20 for him to do it, he would have had to get permission
21 from the mayor, because the mayor is actually my direct
22 boss, which, at the time, was Terry Duhon, did what
23 Todd wanted.
24 Q. So you're not under the -- you're employed by
25 the City of Jennings?

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1 A. My direct boss, my real boss, is the mayor,
2 but I work through the police department.
3 Q. You mentioned suspicious activity at the
4 Millers' residence. Is that still going on today?
5 A. Yes.
6 Q. And you mentioned some police investigations.
7 As animal control officer, was it ever your duty to
8 investigate criminal activity?
9 A. No.
10 Q. Were you involved in any of the decisions to
11 or to not investigate Isabelle Street?
12 A. No.
13 Q. Were you consulted before any law enforcement
14 officers with the Jennings Police Department --
15 A. Oh, they would ask me if I see what's going
16 on, to kind of let them know, you know, what's going on
17 and stuff.
18 Q. Who would ask you?
19 A. Officer Conner, Officer Wallace, Officer
20 Janise, just to kind of get an idea of what I was
21 seeing going on down there.
22 Q. So I take it from your testimony that law
23 enforcement officers with the police department
24 investigated activity on Isabelle Street?
25 A. They go down there pretty regular, you know.

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1 I don't know if they're investigating, or what they're
2 doing. I know they do check out what's going on down
3 there, what vehicles are down there.
4 Q. Okay. Does the -- in 2013 through 2015, did
5 the Jennings Police Department make you aware of any
6 narcotics investigations that they may have performed
7 over there on Isabelle Street?
8 A. Made me aware of it?
9 Q. Yes.
10 A. No, other than that one with -- you know,
11 when he was sitting in the shelter.
12 Q. The one that you saw?
13 A. Yeah, the one that I saw.
14 MR. LEDET: That's all I have.
15 FURTHER EXAMINATION BY MR. MORRIS:
16 Q. Just a couple of quick follow-ups. I think
17 you said -- I think you said that the -- that the
18 police department appears to be making some appearance
19 of investigation in order to placate Mr. Lehman, to
20 satisfy him?
21 A. Yes, sir.
22 Q. Is that what it looks like to you?
23 A. Yes, sir.
24 Q. But from your standpoint and your
25 observation, do you think that much more could be done

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1 to actually investigate it and stop that traffic?
2 A. Yes, sir.
3 Q. And, from what I understand, you think that
4 there are officers that would like to do that?
5 A. Oh, yes, sir.
6 Q. But are being held back by the bosses?
7 A. They would like to do it. I don't know who's
8 holding them back. I can't say who's holding them
9 back. I don't know for a fact.
10 Q. You haven't heard the words, in other words?
11 A. Pardon?
12 Q. You haven't heard the words come out of
13 anybody's mouth?
14 A. Exactly right.
15 Q. That's it. That's enough. Read and sign?
16 MR. LEDET: You have the right to
17 read and sign. This is a pretty short one, and, you
18 know, you can't change your testimony or anything.
19 It'd be like change the names of people that you
20 identify, streets, stuff. You have the option to read
21 and sign or waive. We're going to recommend waiving it
22 in this instance, because it's a pretty short
23 deposition. But you have that right.
24 THE WITNESS: To waive what?
25 MR. LEDET: To read through it and

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1 check and see if anything's misspelled or anything like
2 that. You can't change the testimony.
3 THE WITNESS: Oh, so, otherwise,
4 double-check to make sure what I said's on there,
5 right?
6 MR. MORRIS: Well, you can't change
7 your testimony. Just, if there's a misspelled word or
8 --
9 MR. SUDDUTH: Yeah, there's a section
10 where you can do corrections. It's not going to change
11 what's in there, but you can write an addendum saying,
12 "Oops, I didn't mean for it to come out that way", or
13 whatever. It's a way to double-check that everything
14 you said today is, indeed, in there.
15 MR. MORRIS: Most people waive it.
16 THE WITNESS: Now, let me ask you
17 something.
18 MR. LEDET: Oh, I don't know. Does it
19 have to do with this, or does it have to do with our
20 lawsuit? Because I don't want to waive any kind of
21 privilege.
22 THE WITNESS: No, it has to do with my
23 protection, because I don't want the City or the chief
24 coming after me because I did a deposition.
25 MR. MORRIS: And I should have

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1 mentioned that before you started. There's a specific
2 whistleblower statute that prevents them from doing
3 that. If you are called to be a witness in a case like
4 this, and you're put under oath, you have to tell the
5 truth, and they can't take any adverse action against
6 you because you did so.
7 THE WITNESS: Okay.
8 MR. LEDET: And I can tell her we're
9 going to waive reading and signing?
10 THE WITNESS: Yeah.
11 MR. LEDET: Alright, we're going to
12 waive.
13 [Deposition was concluded 2:36 p.m.]
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REPORTER CERTIFICATION

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 DEBBIE BREAU, having been
7 duly sworn by me upon authority of R.S. 37:2554, testified as
8 set forth in the previous 36 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 3rd day of November, 2018.
25
Sarah B. Townsley, CCR, RPR, CSR; LA CCR 92046; TX CSR5748