



PROFESSIONAL ASSOCIATION OF LAW ENFORCEMENT OFFICERS

P.O. BOX 1041 | YOUNGSVILLE, LA 70592

December 29, 2023

Youngsville Municipal Police Civil Service Board
C/O Laurie Segura, Board Secretary
P.O. Box 310
Youngsville, LA 70592

RE: Petition for Investigation

Dear Ms. Segura:

Enclosed for filing, please find a *Petition for Investigation*. Please present it the Chairman for placement on the agenda for consideration at the next scheduled meeting of the Youngsville Municipal Police Civil Service Board.

The mission of our organization is to primarily support the lawful activities of peace officers. Unlike others we don't blindly support every action of certain persons simply because they belong to a specific profession, political class or party or have some other label attached to them. It is necessary that bad actors be called out if we are going to maintain integrity in the profession and public trust in our peace officers. As such, we have chosen to step forward where so many others have turned a blind eye or in the words of one Councilman 'sat on their hands.'

Sincerely,


Matthew Thomassee
Executive Director

CC: Allyson C. Melancon, Sallinger Lawfirm
Michael Lunsford, Citizens for a New Louisiana
Cody Louviere, Chief of Police

YOUNGSVILLE MUNICIPAL POLICE CIVIL SERVICE BOARD

CITY OF YOUNGSVILLE

PARISH OF LAFAYETTE

STATE OF LOUISIANA

PETITION FOR INVESTIGATION

NO.: _____

FILED: December 29, 2023

BEFORE THE BOARD, comes Matthew Thomassee, a qualified elector domiciled in Youngsville, Louisiana, in his capacity as Executive Director for the Professional Association of Law Enforcement Officers, a non-profit corporation¹ and juridical entity² registered and operating in the Parish of Lafayette, Louisiana, who respectfully submit the following to the Youngsville Municipal Civil Service Board (the Board):

1.

Pursuant to LSA-R.S. 33:2477, the Board is vested with broad duties and powers, including without limitation:

- Taking **any action which, it determines to be desirable or necessary in the public interest**, or to carry out effectively the provisions and purposes of this Part;
- **Representing the public interest in matters of personnel administration** for the City of Youngsville;

¹ The United States Supreme Court has long held that a corporation is considered a citizen of its State of incorporation and the State where it has its principal place of business. *Americold Realty Tr. V. Conagra Foods, Inc.*, 577 U.S. 378, 381, 136 S. Ct. 1012, 1015, 194 L. Ed. 2d 71 (2016).

² There are two kinds of persons: natural persons and juridical persons. A natural person is a human being. A juridical person is an entity to which the law attributes personality, such as a corporation or a partnership. The personality of a juridical person is distinct from that of its members. LSA-C.C. 24. Furthermore, LAS-C.C.P. art 5251(12), defines "person" as a corporation.

- **Advising and assisting the City Council, Mayor and Chief of Police** for the City of Youngsville, with reference **to the maintenance and improvement of personnel standards and administration in police services, and the classified system;**
- **Making reports to the governing body**, either upon its own motion or upon the official request of the governing body, **regarding general or special matters of personnel administration** in and for the Youngsville Police Department (YPD); and
- **Upon the written petition of any citizen for just cause**, or upon its own motion, **making an investigation concerning the administration of personnel or the compliance with the provisions of this Part in the said municipal police services.**

2.

LSA-R.S. 33:2500(C) provides: “Although it is incumbent upon the appointing authority to initiate corrective or disciplinary action, the board may, and shall upon the written request of any qualified elector of the state which sets out the reasons thereof, make an investigation of the conduct and performance of any employee in the classified service and, thereupon may render such judgment and order action to be taken by the appointing authority. Such action shall be forthwith taken by the appointing authority.”

3.

Based upon information and belief the following events occurred.

4.

On August 16, 2022 YPD Sergeant Eric Segura was involved in a police encounter with a civilian Samuel Leon.

5.

During that encounter Segura used force upon Mr. Leon striking him between fourteen and seventeen times in the head and neck region.

6.

Due to the force Segura used upon Mr. Leon he suffered a detached retina, a ruptured ear drum and permanent vision lose.

7.

Police body camera footage captures Segura uttering something to the effect of ‘we’re about to whip his ass’ just moments before Lafayette Parish Sheriff’s Deputy Brennan Miller pushes Mr. Leon to ground.

8.

On or about September 1, 2022 an internal affairs investigation was launched into the conduct of Segura.

9.

Additionally, sometime in September of 2022 the Lafayette Parish Sheriff launched a criminal investigation into the conduct of Segura.

10.

Segura told both the Youngsville Police Department internal affairs investigator and the Lafayette Parish Sheriff’s Office criminal investigator and that he struck Leon in the brachial plexus, a network of nerves originating from the spinal cord near the neck and extending into the armpit.

11.

Body camera footage recorded on August 16, 2022 captures Segura that same evening bragging about striking Sam in the “head”, not the brachial plexus.

12.

Segura disobeyed departmental policy by failing to submit a use of force report disclosing the fact that he had in fact used force upon a subject and failed to take photographs of Mr. Leon.

13.

Segura also did not complete any written report of the incident for a period of almost three weeks and only after being ordered to do so by his immediate supervisor.

14.

The internal investigation into the conduct of Segura during the August 16, 2022 encounter with Mr. Leon was completed on January 10, 2023.

15.

The investigation concluded that Segura had violated the departments use of force and reporting policy.

16.

Chief Rickey Boudreaux instituted discipline against Segura in the form of a verbal reprimand.

17.

The discipline meted out by Boudreaux was not in compliance with the disciplinary matrix of the Youngsville Police Department.

18.

Further, the discipline was not reasonable and proportionate or consistent with that exacted upon other officers who have been disciplined for the same level of infraction.

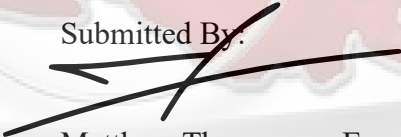
19.

Lastly, no investigation was ever conducted, or discipline taken with regards to the apparent dishonesty of Segura during the internal investigation.

20.

WHEREFORE, premises considered, Petitioners, Matthew Thomassee, in his capacity as Executive Director for the Professional Association of Law Enforcement Officers pray that this Board receive this Petition, grant the request for an investigation, conduct said investigation, make a report to the governing body and appointing authority, render a judgment and order action to be taken by the appointing authority and/or take any other action which it determines to be desirable or necessary in the public interest or to carry out effectively the provisions and purposes of LSA-R.S. 33:2477 and LSA-R.S. 33:2500.

Submitted By:


Matthew Thomassee, Executive Director

Professional Association of Law Enforcement
Officers