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January 12, 2026

Ms. Laurie Segura
Board Secretary
Youngsville Municipal Police
Civil Service Board
Post Office Box 310
Youngsville, LA 70592

RE: YPD Captain John Davison
IA Case No. 2025-02

Dear Ms. Segura:

Please find enclosed an original submission filed on behalf of Capt. Davison along with three copies for the respective members of the Youngsville Municipal Police Civil Service Board. I will also email a digital copy to all Board members, the Board's counsel, and counsel for the appointing authority.

Thank you in advance and with kindest regards, I am,

Very truly yours,

ALLYSON C. MELANCON

ACM/rmc

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YOUNGSVILLE POLICE DEPARTMENT : YOUNGSVILLE MUNICIPAL
CAPTAIN JOHN DAVISON POLICE CIVIL SERVICE BOARD

VERSUS : IA 2025-02

CITY OF YOUNGSVILLE AND THE : APPEAL OF DISCIPLINE
YOUNGSVILLE POLICE DEPARTMENT

HEARING DATE: JANUARY 27, 2026

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COUNSEL FOR CAPT. JOHN DAVISON

PRE-HEARING MEMORANDUM

COMES NOW, through undersigned counsel, YOUNGSVILLE POLICE DEPARTMENT (YPD) CAPTAIN JOHN DAVISON (Davison), who submits this *Pre-hearing Memorandum* to the YOUNGSVILLE MUNICIPAL POLICE CIVIL SERVICE BOARD (the Board) in connection with his Appeal of Discipline hearing set for January 27, 2026.

The evidence will show that the discipline at issue is a calculated act of retaliation by YPD Chief J.P. Broussard (Broussard), imposed not to enforce policy, but to insulate himself from exposure stemming from his own potentially illegal misconduct. Particularly, and as will be explained more fully *infra*, Broussard attempted to obstruct the execution of a lawfully issued arrest warrant for former YPD and, at the time of the underlying event, active Carencro Police Department (CPD) Officer Eric Segura.¹ Broussard has provided at least six (6) inconsistent versions of the June 18, 2025 telephone call that gives rise to this matter, including contradictory claims as to whether Davison used profanity at all as well as whether the conversation took place in his [Broussard's] office or on the telephone, inconsistencies that undermine his credibility. The evidence will further demonstrate that Broussard flagrantly abandoned established YPD investigative protocols and weaponized the disciplinary process, culminating in an unprecedented seizure of Davison's badge and commission card. This action was arbitrary, pretextual, retaliatory, and, made in bad faith without cause.

¹ During Eric's tenure with YPD, he was named a defendant in an excessive force lawsuit which the City of Youngsville resolved with a monetary resolution. The event occurred while he was on duty with YPD. See Exhibit A, *in globo*. In connection with that event, the Lafayette Parish District Attorney has filed a Bill of Information alleging that Eric committed second degree battery and malfeasance. The matter is set for pre-trial on January 22, 2026. See Exhibit B.

FACTS:

The following will be proven at the hearing of this matter:

Davison has been continuously employed with YPD and holds permanent status in the classified service. During his nearly 15 year tenure at YPD, he has received no discipline whatsoever. On September 4, 2025, Broussard demoted Davison in rank and pay grade to that of Police Officer and suspended him without pay for ninety (90) days on sustained complaints of insubordination and unprofessional conduct. This disciplinary action was imposed only days after Davison filed an ethics complaint with the Louisiana Ethics Administration and a criminal complaint with the Louisiana Attorney General's Office, both concerning Broussard's attempts to interfere with and improperly influence the investigation of a shooting involving a former YPD officer, then serving with CPD, and his son, also then serving with CPD officer.

Interestingly, Broussard was the complainant, only alleged witness, and final arbiter in this matter.

• Friday, June 13, 2025

Davison received a phone call from YPD Sgt. Louvenia Landry, the on-shift supervisor, advising that her shift was investigating a shooting complaint involving off-duty (then) CPD Officer Zachary Segura. The incident happened near the intersection of Lafayette Street and Copper Meadows Boulevard in Youngsville. Officers were called to that intersection around 11:00 p.m. and found a woman in a vehicle suffering from a single gunshot wound. She was taken to a local hospital and was listed in stable condition. (Hereinafter referred to as the Segura shooting).

Sgt. Landry further advised that Zachary is the son of former YPD and then current CPD Officer Eric Segura. She stated that Eric was on scene but had not been involved in the original incident. Because of Eric's history with YPD, Davison advised Landry that he would dispatch a YPD detective and respond personally. He also notified YPD Deputy Chief Gabe Thompson, who confirmed he would respond to the scene as well.

Broussard was not present at the scene of the Segura shooting at any time described *supra*. He did not participate in the on-scene command or investigation.

Upon arrival, Davison observed a marked CPD unit with emergency lights activated. Eric was standing near a YPD unit. He [Davison] made contact with Sgt. Landry who briefed him on the initial incident. Thompson arrived during this time, followed shortly thereafter by CPD Assistant Chief Trent Walker, who met with Eric. After that meeting, Eric departed the scene.

Assistant Chief Walker was briefed and permitted to photograph the scene. He asked Thompson and Davison whether Eric conducted himself professionally, to which they responded affirmatively based on their observations. After Assistant Chief Walker departed, YPD Officer Victor Guidry informed Thompson and Davison that Eric had acted unprofessionally and cursed at him during the encounter. Given Guidry's limited experience, six (6) months to one (1) year at that time, Thompson and Davison agreed that the body-worn camera (BWC) footage should be reviewed.

- **Monday, June 16, 2025**

Davison received a phone call from Broussard requesting that he download the BWC footage related to Eric. He advised the footage would be forwarded to CPD Chief

David Anderson. At approximately 1630 hours, Davison began reviewing and downloading video footage. The footage showed Eric arriving in a marked CPD unit with lights and sirens activated, wearing a CPD polo shirt, and openly carrying a firearm. He crossed the crime scene barrier and was verbally stopped by Guidry, who stated, "Sir, Sir." Eric responded, "I don't give a fuck about what you said." When Guidry asked him to calm down and exit the scene, Eric replied, "If you fucking touch me, I will fuck you up." A short time later, Eric again said, "I told you, if you fucking touch me, I'll fuck you up."

Based on the conduct observed from the BWC footage, along with his training, experience, and knowledge of relevant Louisiana criminal law, Davison determined that there existed probable cause that Eric committed violations of LSA-R.S. 14:329 (misdemeanor)², LSA-R.S. 14:108 (misdemeanor)³, and LSA-R.S. 14:37.2 (felony)⁴.

² **Interfering with a Law Enforcement Investigation** is the intentional interference or obstruction of a law enforcement officer conducting investigative work at the scene of a crime by refusing to move or leave the immediate scene of the crime when ordered to do so by the law enforcement officer when the offender has reasonable grounds to believe the officer is acting in the performance of his official duties. "Law enforcement officer" means any commissioned police officer.

³ **Resisting an Officer** is the intentional interference with, opposition or resistance to, or obstruction of an individual acting in his official capacity and authorized by law to make a lawful arrest, lawful detention, or seizure of property or to serve any lawful process or court order when the offender knows or has reason to know that the person arresting, detaining, seizing property, or serving process is acting in his official capacity. The phrase "obstruction of" in addition to its common meaning, signification, and connotation, knowing interference with a police cordon resulting from the intentional crossing or traversing of a police cordon by an unauthorized person. "Police cordon" means any impediment or structure erected or established by an officer for crowd or traffic control, or to prevent or obstruct the passage of a person at the scene of a crime or investigation. "Impediment or structure" includes but is not limited to crime scene tape, rope, cable, wire or metal barricades, or the posting of uniformed officers or other personnel otherwise identifiable as law enforcement officers. The word "officer" includes municipal police officers.

⁴ **Aggravated assault upon a peace officer** is an assault committed upon a peace officer who is acting in the course and scope of his duties. Assault is an attempt to commit a battery, or the intentional placing of another in reasonable apprehension of receiving a battery. [LSA-R.S. 14:36]

Given the felony nature of at least one of the offenses by a law enforcement officer subsequent to a shooting, allegedly by another law enforcement officer, in this incident, said officer's son, both currently employed by an out of jurisdiction agency, as well as Eric's history of force issues, and LSA-C.Cr.P. art. 211⁵, Davison determined that Guidry should seek an arrest warrant for Eric.

Davison contacted Cotone, as Guidry's immediate supervisor, Sgt. Landry, was out of town, and requested that he assist Guidry with the arrest affidavit as he [Guidry] was a rookie officer. Cotone agreed to help. Davison called Guidry and instructed him to apply for the warrant. He advised that Cotone would assist him with the affidavit.

- **Tuesday, June 17, 2025 | 0800 hours**

When Davison arrived at YPD, he observed Officers Cotone and Guidry preparing the arrest affidavit. Later that morning, Broussard entered Davison's office and was informed that the affidavit was being drafted. He acknowledged having already spoken with both Guidry and Cotone. Later that morning, Cotone called Davison to advise the arrest warrant had been approved and signed by 15th Judicial District Court Commissioner Andre Doguet. See Exhibit C.

⁵ Louisiana Code of Criminal Procedure Article 211 allows officers to issue summons instead of making arrests only for misdemeanors or two specific felony charges: theft (LSA-R.S. 14:67) or illegal possession of stolen things (LSA-R.S. 14:69(B)(4)). Aggravated assault upon a peace officer is not included in these limited exceptions.

- **Wednesday, June 18, 2025**

The very next day, Broussard issued a Department-wide email as follows:

Subject: Mandatory Review of High-Profile Cases Prior to Warrant Submission

Dear Team,

Effective immediately, any case involving high-profile individuals – including law enforcement officers, political figures, or dignitaries – must be submitted to the Chief for review prior to presenting the warrant to a judge.

This directive is issued to ensure that all such matters are handled with the highest level of oversight and sensitivity, given their potential implications. Please route all relevant materials to the Chief's office as early as possible in the process to avoid delays.

Should you have any questions regarding what constitutes a high-profile case or require clarification on this procedure do not hesitate to reach out.

See Exhibit D.

Approximately 1600 hours

Thompson presented to Captain Davison's office and reported that he had observed Guidry come upstairs after being summoned to Chief Broussard's office.

Thompson further advised that he believed Chief Broussard intended to pressure Guidry to recall the warrant. Thompson stated that he expressly informed Guidry that he was not required to comply with an unlawful order.

Approximately 1730 hours

Davison met with Guidry to advise him not to comply with illegal directives. He [Guidry] advised that he had already submitted the recall, citing "request by Chief

Broussard" in CloudGavel.⁶ Davison advised him to document the encounter with Broussard in a supplemental report. During that conversation, Broussard called Guidry on his phone instructing him to resubmit the recall due to the warrant still showing as "active." Guidry stated to Davison, "that was him." Guidry further stated that Broussard wanted him to resubmit the recall. Guidry stated he was not going to do so.

Approximately 1801 hours

Broussard returned a call to Davison who asked if he [Broussard] was aware that he had just attempted to pressure Guidry into committing a felony and by doing so had potentially committed a felony himself.⁷ Davison advised Broussard that he could go to jail for his actions, at which time he stated "ok" and the call was ended. Davison will testify that he may have stated something to the effect of "you do know that you told that boy to commit a fucking felony." Profanity describing conduct is not the same as profanity directed toward a person. He did not state that Broussard was stupid, nor did he make any other derogatory comments directed at Broussard. He made no threatening comments.

⁶ CloudGavel is a US based Information Technology business that seeks to provide warrant processing, document processing, data analytics, and custom developed solutions to the Law Enforcement and Judicial Communities. <https://cloudgavel.com/>

⁷ A police chief who instructs a subordinate to recall an arrest warrant executed by a judge and based on probable cause faces potential criminal liability under LSA-R.S. 14:130.1, obstruction of justice, and LSA-R.S. 14:134, malfeasance. The Louisiana Supreme Court's recent decision in *In re Fiffie* established important precedent regarding improper warrant practices, specifically finding that recalling fellow judges' warrants without consultation constitutes willful misconduct *In re Fiffie*, 395 So.3d 738 (2024). *A fortiori*, this decision strengthens the foundation for prosecuting police chiefs who usurp judicial warrant authority, as it demonstrates that even judges face discipline for improper warrant interference.

Approximately 2023 hours

Guidry notified Davison that he completed a supplemental report (CR# 25-168813(3) detailing that on June 18, 2025, at approximately 1559 hours, he was summoned to Broussard's office wherein he [Broussard] stated that he had spoken to 15th JDC DA Don Landry who advised that there was not enough evidence to support the charges against Eric. Guidry stated that he attempted to recall the arrest warrant on Eric due to the request coming from his chief and that he felt that he was under pressure to recall the warrant and was unsure how not complying would affect his career at YPD.

- On or about June 19, 2025**

Zachary was arrested and booked with negligent injury. Eric was also arrested and booked with resisting an officer, interfering with a law enforcement investigation, and aggravated assault. See Exhibit E. Both matters are pending review with the Lafayette Parish District Attorney's Office, felony Track 4.

- Friday, June 20, 2025 | approximately 1347 hours**

Davison sent Youngsville Mayor Ken Ritter a text message stating, "Hey man, give me a call when you can," in order to comply with YPD General Order 77, Employee Grievance Procedure, relative to Broussard's handling of the Segura shooting and subsequent attempts to force the recall of a felony arrest warrant. Mayor Ritter did not respond. See Exhibit F.

- **Monday, June 23, 2025**

Carencro Police Department Chief David Anderson issued the following statement:

Both Eric and Zachary Segura were involved in an incident on June 14th, 2025 within Youngsville Police Departments jurisdiction. The actions of the officers did not align with the Policy and Procedures of the Carencro Police Department and are no longer employed.⁸

- **Thursday, June 26, 2025 | approximately 1000 hours**

Broussard and Thompson entered Davison's office. Broussard served Davison with an "Immediate Suspension Notice" citing "Insubordination and Conduct Unbecoming an Officer" based on their June 18, 2025 phone call. He demanded Davison's badge, commission card, and iPad, actions wholly inconsistent with the treatment of others placed on administrative leave. Thompson transported Davison to his home. See Exhibit G.

AFTER he was placed on leave, several YPD employees contacted Davison and advised that Broussard was claiming that Davison "cursed him out" during the June 18, 2025 phone call.

To date, there are at least six (6) versions of the subject phone call relayed to others by Broussard:

1. During an encounter between Mayor Ritter, Davison, and Thompson at City Hall regarding the shooting event, Mayor Ritter advised that Broussard had called him to tell him that Davison cursed him out on a phone call. The Mayor

⁸<https://www.katc.com/lafayette-parish/update-father-and-son-dismissed-from-cpd-over-youngsville-incident> [Visited on 01/12/2026]

further relayed that Broussard admitted that there were no witnesses to the alleged conversation. The Mayor provided that he would "tread lightly" as the conversation was unwitnessed.

2. In a conversation between Thompson and Cotone regarding the ongoing IA investigation at issue herein, Thompson will testify that Cotone mentioned Broussard had stated he "thought" Davison cursed him out.

3. As he will testify, for reasons unknown, Broussard called Vermilion Parish Sheriff's Deputy Tim Picard and advised that Davison had "burst" into his office and cursed him out. He had previously contacted Deputy Picard inquiring if he [Broussard] was under investigation by any other law enforcement agency in connection with his handling of the Segura shooting.

4. At Davison's Pre-Disciplinary Hearing, Broussard stated that Davison had "cursed toward him."

5. In Broussard's undated written complaint, he claimed the following:

It is fucked up that you ask [sic] the officer to recall a warrant for further investigation. You're a fucking idiot, bro. You are going to go to jail for malfeasance in office, and you are trying to get this officer to commit malfeasance. You're fucked up, bro.

He claimed Davison then terminated the call. Among other things, he found Davison's language to be "threatening." See Exhibit H.

6. Finally, in his IA interview, he claimed Davison stated:

You're fucking stupid, bro. You're gonna go to jail for malfeasance and [sic] office. You can have this officer go to jail for malfeasance and [sic] office also.

This time he left out threatened. See Exhibit I.

Approximately 1829 hours

YPD Lt. Jason Brown will testify that he called Davison to check on him and informed him that he had been advised by Sgt. Reginald Mosely that after Broussard seized his [Davison's] commission card, he [Broussard] entered Mosely's office and began brandishing it seemingly in an attempt to have Mosely ask why he had it in his possession.

• Tuesday, July 16, 2025 | 2150 hours

Davison attempted to enter YPD to complete required POST training but was denied access. He contacted Thompson and was informed that YPD access had been deactivated.

Notably, YPD Sgt. Pedro Alexander, who had previously been placed on leave for being AWOL, was not stripped of his equipment or access, showing clear disparate and inconsistent treatment, and potential retaliation.

• Wednesday, August 20, 2025

Based on the above information and as is his legal obligation, Davison filed a complaint with the Louisiana Ethics Administration via hand delivery. On information and belief that matter has been assigned No. 2025-519. See Exhibit J.

• Wednesday, August 27, 2025

Based on the above information and as is his legal obligation, Davison filed a criminal complaint with the Louisiana Attorney General's Office via hand delivery. Upon arrival, he met with the supervisor of Criminal Investigations, Agent Jack Lightfoot, to discuss the particulars of the complaint. Agent Lightfoot also requested that Davison

inform him of the outcome of his Pre-disciplinary Hearing, which Davison did, via text, on Thursday, September 4, 2025, at approximately 18:35 hours. See Exhibit K.

- **Thursday, August 28, 2025**

Davison's Pre-disciplinary hearing was had in Broussard's office.

- **September 4, 2025**

By written correspondence, Broussard sustained violations of YPD General Orders 13, 14, and 26, as well as LSA-R.S. 33:2560(A)(4). In connection therewith he administered the following discipline: a. Demotion from Captain to Police Officer, b. Demotion to Pay Grade of Police Officer, and c. 90 Days of Suspension without pay.

See Exhibit L.

- **Thursday, September 11, 2025**

Davison filed the instant appeal.

LAW AND ARGUMENT:

1. The Board's legal duties and obligations

In its most recent pronouncement on the subject, the Louisiana Supreme Court, in *Monroe Mun. Fire & Police Civ. Serv. Bd. v. Brown*, 2024-00543 (La. 9/3/25), 417 So. 3d 547, 554–55, defined the duties and procedures applicable to appeals of discipline as follows [Internal citations omitted]:

The administrative proceeding is initiated when a classified employee demands a hearing to determine the reasonableness of the disciplinary action. LSA-R.S.

33:2501(A).⁹ In relevant part, section A provides:

Any regular employee in the classified service who feels that he has been discharged or subjected to any corrective or disciplinary action without just cause, may, within fifteen days after the action, demand, in writing, a hearing and investigation by the board to determine the reasonableness of the action.

The statutory “reasonableness” standard broadly defines the Board’s role and informs the interpretation of the remaining provisions of the statute. While the statute is captioned “appeals,” proceedings before the Board more closely resemble a trial than conventional appellate review. The Board is the factfinder, performing a role typically reserved to the district court. The parties are allowed to present evidence at a public hearing, to show the action was or was not taken “in good faith for cause.” The appointing authority has the burden of proving its case by a preponderance of the evidence.¹⁰

⁹ Fire and police civil service laws governing municipalities between 13,000 and 250,000 persons are found in LSA-R.S. 33:2471-33:2508. The civil service laws applicable to small municipalities and for parishes and fire protection districts with persons 7,000 or more but less than 13,000 persons are found in LSA-R.S. 33:2531 through 33:2568. In both sets of statutes, the provisions pertaining to the corrective and disciplinary action for maintaining standards of service, the appeal of such actions to the civil service board, and the right of appeal to the appropriate district court, are virtually identical. Therefore, the jurisprudence involving disciplinary actions imposed under LSA-R.S. 33:2560 and reviewed under LSA-R.S. 33:2561 is applicable to cases involving disciplinary actions imposed under La. R.S. 33:2500 and reviewed under LSA-R.S. 33:2501. *In re McDermitt*, 2022-1331, n.8, (La. App. 1 Cir. 6/2/23), 370 So. 3d 79, 86. See also *Hagan v. City of Gonzales*, 2015-0020 (La. App. 1st Cir. 9/18/15), 2015 WL 5515192, n.3 (unpublished); *King v. Tangipahoa Fire Protection Dist. No. 1*, 2012-1130 (La. App. 1st Cir. 7/1/13), 2013 WL 3367569, n.6 (unpublished).

¹⁰ Specifically, the appointing authority must establish two key elements: (1) that the complained-of violation or activity actually occurred, and (2) that the conduct impaired the efficiency of the public service and bears a real and substantial relationship to the efficient operation of the public service. *Burnette v. New Orleans Police Department*, 2023-0684 (La. App. 4 Cir. 3/6/24), 385 So. 3d 314. This burden is codified in Louisiana Constitution Article 10, Section 8(A), which states that “[t]he burden of proof on appeal, as to the facts, shall be on the appointing authority.” The preponderance standard requires the appointing authority to demonstrate that it is more likely than not that both the factual occurrence and the impairment to public service efficiency existed. *Allen v. Department of Police*, 2009-0589 (La. App. 4 Cir. 11/12/09), 25 So. 3d 966, writ denied, 2009-2714 (La. 2/26/10), 28 So. 3d 273.

In this context, “for cause” refers to the statutory grounds for disciplining an employee identified in LSA-R.S. 33:2500A. Prohibited conduct includes, among others, insubordination, failure to perform duties in a satisfactory manner, dishonest or immoral conduct, and deliberate failure to perform an act the employee had a duty to perform. LSA-R.S. 33:2500A. If an employee commits one or more of those acts, the appointing authority has “cause” to discipline him. LSA-R.S. 33:2500A; *Shields*, 579 So. 2d at 964.

Good faith is absent if the appointing authority acted arbitrarily or capriciously, or as the result of prejudice or political expediency. *Moore*, 839 So. 2d at 945; *Shields*, 579 So. 2d at 964. This determination considers the appointing authority's motivation for taking the disciplinary action. The prohibited conduct cited by the appointing authority must be the basis for the discipline. If the cited conduct is used only as a pretext for punishment motivated by impermissible grounds, the discipline was not taken in good faith. LSA-R.S. 33:2501A and C(1).

At the conclusion of the evidence, the Board makes one of three decisions: the Board is authorized to render one of three decisions: affirm the discipline, modify the discipline, or reverse the discipline and reinstate the employee. LSA-R.S. 33:2501C(1). Subsection C(1) contains both mandatory and permissive provisions. If the board finds the appointing authority did not act in good faith for cause, it SHALL reinstate the person to their previous position of employment. LSA-R.S. 33:2501C(1). Conversely, if the Board finds the appointing authority acted in good faith for cause, the board “may” affirm the discipline or modify it. LSA-R.S. 33:2501C(1); *City of Bossier City v. Vernon*, 12-0078 (La. 10/16/12), 100 So. 3d 301, 312.

2. At all times relevant, Davison exercised his lawful command authority.

During the Segura shooting investigation, Davison was a YPD senior supervisory officer exercising lawful command authority over the scene and the resulting criminal investigation. Sgt. Landry, the on-shift supervisor, immediately notified Davison of the officer-involved shooting and deferred to his direction, including his decision to dispatch a YPD detective and respond personally. Thompson also responded to the scene, worked in coordination with Davison, and did not countermand or override any investigative or enforcement decisions made by Davison, including the preparation and submission of the arrest warrant. Davison's instruction to Guidry to apply for a warrant, with assistance from Cotone, was a lawful exercise of supervisory authority in response to observed felony conduct. His actions were not freelance, discretionary, or political; they were compelled by his duty to enforce the law and the facts presented by uncontested BWC footage/evidence.

3. There exists no legal authority for Broussard, Davison, or Guidry to recall a duly executed warrant.

Louisiana's constitutional framework strictly divides governmental power among three separate branches and prohibits any branch from exercising power belonging to the others. The Louisiana Constitution provides that "no one of these branches, nor any person holding office in one of them, shall exercise power belonging to either of the others." LSA-CONST Art. 2, § 2 This separation of powers doctrine establishes the basis for recognizing inherent powers in the judicial branch that the legislative and executive branches cannot abridge. *State v. Umezulike*, 2003-1404 (La. 2/25/04), 866 So. 2d 794.

The Third Circuit's decision in *Domino v. Crowley City Police Dep't*, 2010-1244 (La. App. 3 Cir. 5/25/11), 65 So. 3d 289, writ denied, 2011-1339 (La. 9/30/11), 71 So. 3d, demonstrates that only judicial officers possess authority over warrant recall. In that case, an arrest warrant had been recalled by a district judge (or magistrate) before the petitioner's arrest, but the clerk's office failed to process the recall properly. The court specifically noted that "the police had no responsibility for recalling the warrant," emphasizing that warrant recall authority rests exclusively with the judicial branch. *Id.*

Louisiana law establishes that law enforcement officers have a mandatory duty to execute valid arrest warrants within a reasonable time. Louisiana Code of Criminal Procedure Article 204 provides that arrest warrants "shall be directed to all peace officers in the state" and "shall be executed only by a peace officer." This language creates an affirmative duty rather than discretionary authority. The mandatory nature of warrant execution was further confirmed where the court held that police officers "did not have the discretion to refuse to execute the warrant." *Touchton v. Kroger Co.*, 512 So. 2d 520 (La. App. 3d Cir. 1987). This principle applies regardless of administrative preferences or any other concerns that might motivate a police chief to seek warrant recall.

Moreover, Louisiana law grants district attorneys exclusive authority over criminal prosecutions and related dismissals, but this authority does not extend to police chiefs. Louisiana Code of Criminal Procedure Article 691 provides that "the district attorney has the power, in his discretion, to dismiss an indictment or a count in an indictment, and in order to exercise that power it is not necessary that he obtain consent of the court." This prosecutorial authority operates independently of police administrative

functions. Article 61 further establishes that the district attorney "has entire charge and control of every criminal prosecution instituted or pending in his district, and determines whom, when, and how he shall prosecute." Nowhere in Louisiana law or jurisprudence does this prosecutorial discretion authorize police chiefs to make unilateral decisions about warrant recall or prosecution dismissal.

Police department policies typically require officers to obey lawful orders from superiors, but this duty has important limitations when orders conflict with legal obligations. See *Stelly v. Lafayette City-Par. Consol. Gov't*, 2016-328 (La. App. 3 Cir. 10/12/16), 203 So. 3d 531. The "Stelly" principle creates a clear hierarchy: legal obligations supersede administrative directives. Since warrant execution represents a legal duty imposed by judicial authority, police chiefs cannot lawfully order subordinates to ignore or effectively nullify this obligation through administrative recall directives. Louisiana courts have applied departmental regulations emphasizing the importance of following the chain of command in law enforcement settings. In *Fernandez v. New Orleans Fire Dep't*, 2001-0436 (La. App. 4 Cir. 2/6/02), 809 So. 2d 1163 , the court applied Section 5.2.8 of the New Orleans Fire Department Rules and Regulations, which provides that "conflict of authority must be avoided and the chain of command adhered to at all times except for an emergency," and held that the firefighter failed to follow the chain of command. However, this principle supports rather than undermines the conclusion that judicial warrants take precedence over administrative orders, as judicial authority represents a higher legal authority than police administrative structures.

4. **The entirety of the IA investigation and resulting discipline imposed by Broussard is contrary to well established Louisiana statutory and jurisprudential law, as well as YPD General Orders.**

For context:

Davison contends Broussard returned a call to Davison who asked if he [Broussard] was aware that he had just attempted to pressure Guidry into committing a felony and by doing so he had potentially committed a felony himself.¹¹ Davison advised Broussard that he could go to jail for his actions, at which time he stated "ok" and the call was ended. Davison may have stated something to the effect of "you do know that you told that boy to commit a fucking felony." He did not state that Broussard was stupid, nor did he make any other derogatory comments directed at Broussard. He made no threatening comments.

Broussard contends that one or all of the following:

- Told the Mayor that Davison, in an unwitnessed phone call, "cursed him out."
- Relayed to Cotone that he "thought" Davison cursed him out.
- Advised Deputy Picard that Davison "burst" into his office and cursed him out.
- Stated at Davison's Pre-Disciplinary Hearing, that Davison had cursed "toward" him.
- Wrote in his complaint: "It is fucked up that you ask [sic] the officer to recall a warrant for further investigation. You're a fucking idiot, bro. You are going to go

¹¹ A police chief who instructs a subordinate to recall an arrest warrant executed by a judge and based on probable cause faces potential criminal liability under LSA-R.S. 14:130.1, obstruction of justice, and LSA-R.S. 14:134, malfeasance. The Louisiana Supreme Court's recent decision in *In re Fiffie* established important precedent regarding improper warrant practices, specifically finding that recalling fellow judges' warrants without consultation constitutes willful misconduct *In re Fiffie*, 395 So.3d 738 (2024). *A fortiori*, this decision strengthens the foundation for prosecuting police chiefs who usurp judicial warrant authority, as it demonstrates that even judges face discipline for improper warrant interference.

to jail for malfeasance in office, and you are trying to get this officer to commit malfeasance. You're fucked up, bro." He found Davison's language to be threatening.

- Provided in his IA interview that Davison stated, "You're fucking stupid, bro. You're gonna go to jail for malfeasance and [sic] office. You can have this officer go to jail for malfeasance and [sic] office also." This time he left out feeling threatened.

Broussard alleges the following violations of YPD policy and law relative to the June 18, 2025 telephone (or by one of his accounts - office) conversation between he and Davison:

- **YPD General Order 13**

Employees shall not engage in the following activities while on duty or in uniform:

- Use abusive, obscene, profane, or threatening language or actions toward their immediate supervisor(s), other members of the Department, or the general public.

- **YPD General Order 14:**

Employees shall practice professionalism, loyalty, cooperation, assistance, and courtesy toward other employees and the public.

Employees shall not criticize or ridicule the Department or its policies, City of Youngsville Officials, or other employees by speech, writing, email, MDT transmission, police radio, or other expression. This includes, but is not limited to, expressions which are defamatory, obscene, unlawful, undermines the effectiveness of the Department, interferes with the maintenance of discipline, or is made with reckless disregard for the truth and/or malice.

Employees shall promptly obey all lawful orders issued by supervisors, in addition to promptly follow the directions of radio dispatchers.

Flaunting with the authority of a supervisor by displaying obvious disrespect or by

disputing his/her orders shall likewise be deemed as insubordination and shall be subject to progressive disciplinary action up to and including termination of employment.

Employees shall treat other employees of the Department with respect. They shall be courteous, civil and respectful of their superior officers, other employees, and shall not use threatening, intimidating, or insulting language.

• **YPD General Order 26:**

1:11 Conduct Unbecoming of an Officer

Employees whether on or off duty shall follow the ordinary and reasonable rules of good conduct and behavior. They shall not commit any act in an official or private capacity that would bring reproach, discredit, or embarrassment to their profession, the Department, or which could constitute conduct unbecoming by an employee. Employees shall follow established procedures in carrying out their duties, and shall at all times use sound judgement.

2:3 Command of Temper

All employees shall exercise emotional control while in the performance of their duties. No employee while on duty or while acting in an official police capacity off-duty shall use rude or derogatory language, racist terminology, or attempt to deride, offend, or insult anyone. This applies to any social media comments that would otherwise bring discredit or embarrassment to the department or employee.

3:18 Insubordination

Employees shall promptly obey all lawful orders and directions given by supervisors. The failure or deliberate refusal of employees to obey such orders shall be deemed insubordination and is prohibited. Flaunting with the authority of a superior officer by displaying obvious disrespect or by disputing his orders shall likewise be deemed insubordination.

• **Louisiana Revised Statute 33:2560**

The tenure of persons who have been regularly and permanently inducted into positions of the classified service shall be during good behavior. However, the appointing authority may remove any employee from the service or take such disciplinary action as the circumstances warrant in the manner provided below, for any one of the following reasons:

Insubordination

5. The discipline was retaliatory, and not imposed in good faith.

This determination considers the appointing authority's motivation for taking the disciplinary action. The prohibited conduct cited by the appointing authority must be the basis for the discipline. If the cited conduct is used only as a pretext for punishment motivated by impermissible grounds, the discipline was not taken in good faith. LSA-R.S. 33:2501A and C(1).

Within this legal framework, we turn to Broussard's findings of "insubordination" and "conduct unbecoming" which are wholly unsupported by the evidence which will be presented at the hearing of this matter. Advising a chief, or any other law enforcement employee that his directive is unlawful and refusing to participate in obstruction of justice is not insubordination. To the contrary, it is lawful, required conduct. No rule, statute, or policy prohibited Davison's actions. The appointing authority therefore cannot establish cause.

Good faith is absent where discipline is arbitrary, retaliatory, or politically motivated. *Moore v. Ware*, 839 So. 2d 940 (La. 2003). Here, the evidence will establish that Broussard's imposed discipline was retaliation for refusing to obstruct a criminal investigation; retaliation for reporting misconduct to ethics and law-enforcement authorities; disparate treatment compared to similarly situated officers; and inconsistent and shifting justifications for discipline. The timing alone, discipline imposed immediately after protected reporting, demonstrates bad faith.

It is anticipated that Broussard will argue that discipline is grounded based on the use of profanity even if not directly threatening, or the need for supervisory respect, regardless of context. These assertions fail as the lack of targeting or threatening as

well as protecting the integrity of the Segura shooting criminal process neutralizes their weight.

6. Neither insubordination nor unprofessional conduct occurred.

a. Insubordination

Broussard alleges that Davison committed insubordination during a June 18, 2025 conversation, but admits to at least six inconsistent versions of the event, vacillating on critical details such as whether Captain Davison used profanity, whether threats or disrespect were present, and the very nature of the encounter (phone call vs. office visit). These inconsistencies call into question the factual foundation of any insubordination finding.

The insubordination charge requires proof that Davison failed or refused to follow a lawful order, or displayed obvious disrespect for proper authority. The evidence will unequivocally show he did not. Rather, he questioned and refused to assist with a directive he reasonably believed to be unlawful, an action supported by both policy and legal standards. The evidence will show he advised a subordinate not to comply with what he reasonably perceived as an illegal order, rather than disobeying a legitimate command.

b. Unprofessional Conduct

The charge of “unprofessional conduct” fares no better. The allegation rests entirely on Broussard’s unwitnessed, inconsistently described, and ever-changing account of a single conversation. These inconsistencies are not minor, they go to the heart of credibility and render his account unreliable as a matter of fact.

Davison did not threaten Broussard, did not insult him, and did not engage in conduct unbecoming. At most, and only under Broussard's most charitable version, Davison expressed frustration while confronting what he reasonably believed to be an attempt to interfere with a criminal prosecution and to coerce a subordinate into criminal conduct. Even under Broussard's most expansive version, the alleged language relates to the legality of conduct, not to personal degradation, threats, or intimidation

CONCLUSION:

This case is not about tone, temperament, or professionalism. It is about whether a police chief may weaponize discipline to punish a subordinate for refusing to obstruct justice and for reporting misconduct. The evidence and testimony will establish that Davison did not commit insubordination as defined under YPD policy and LSA-R.S. 33:2560. He did not disobey a lawful order, nor did he display disrespect or use abusive or threatening language toward his supervisor. The shifting, inconsistent accounts from Broussard further negate any credible foundation for the insubordination charge. Because the appointing authority relied on inconsistent, unsupported accounts and cannot show that Davison directed profanity or threats at Broussard or engaged in conduct prohibited by YPD policy, likewise, the "unprofessional conduct" charge cannot be proven. Finally, the context and timing of discipline point to a retaliatory purpose rather than a good faith, for-cause disciplinary action as required by law.

Accordingly, the Board must overturn the discipline imposed by Broussard, order Davison's immediate reinstatement to his rank of Captain, with restoration of pay grade, retroactive, award him reasonable attorney's fees pursuant to LSA-R.S. 33:2501.1; and grant all general and equitable relief as the Board deems just.

WITNESS LIST

CAPTAIN JOHN DAVISON may call the following witnesses at the hearing of this matter:

1. Mayor Ken Ritter
305 Iberia Street
Youngsville, LA 70592
Re: Conversation with YPD DC Gabe Thompson and Capt. John Davison concerning the June 18, 2025 telephone conversation underlying IA 2025-02
2. YPD Deputy Chief Gabe Thompson
Youngsville Police Department Administrative Building
311 Lafayette Street
Youngsville, LA 70592
Re: Conversations with YPD Mayor Ken Ritter Thompson, Officer Timothy Cotone, Chief JP Broussard, and Capt. John Davison concerning the June 18, 2025 telephone conversation underlying IA 2025-02; general IA investigation protocol
3. Laurie Segura
Youngsville Police Department Administrative Building
311 Lafayette Street
Youngsville, LA 70592
Re: Removal of YPD access to Capt. John Davison and Chief JP Broussard's reasons relayed to her for same
4. Officer Victor Guidry
Youngsville Police Department Patrol Center
304 Fourth Street
Youngsville, LA 70592
Re: Segura shooting and obtaining of warrant for Eric Segura
5. Captain Jason Brown
Youngsville Police Department Patrol Center
304 Fourth Street
Youngsville, LA 70592
Re: Pedro Alexander IA investigation protocols; Chief JP Broussard's behavior after having seized Capt. John Davison's commission card

6. Sergeant Reginald Mosely
Youngsville Police Department Administrative Building
311 Lafayette Street
Youngsville, LA 70592
Re: Chief JP Broussard's behavior after having seized Capt. John Davison's commission card
7. YPD Sergeant Louvenia Landry
Youngsville Police Department Patrol Center
304 Fourth Street
Youngsville, LA 70592
Re: Chief JP Broussard's response to her complaint regarding significantly similar behavior he claims occurred herein yet failed to render consistent discipline
8. Detective Timothy Cotone
Youngsville Police Department Administrative Building
311 Lafayette Street
Youngsville, LA 70592
Re: IA 2025-02
9. Deputy Timmy Picard
Vermilion Parish Sheriff's Office
101 State Street
Abbeville, LA 70510
Re: Telephone calls from Broussard regarding the June 18, 2025 event underlying IA 2025-02
10. Chief JP Broussard
311 Lafayette Street
Youngsville, LA 70592
Re: IA 2025-02 and the Segura shooting investigation
11. 15th JDC ADA Lance Beal
800 S. Buchanan Street
Lafayette, Louisiana 70501
Re: Segura shooting pending review
12. Any witness listed by any party.

EXHIBIT LIST

- A. Plaintiff's *Original Complaint* and *Notice of Settlement* in Samuel Leon versus Ricky Boudreaux, City of Youngsville, Eric Segura, and Amguard Insurance Company bearing United States District Court/Western District Docket Number 6:23-cv-01095
- B. Bill of Information in State of Louisiana versus Eric P. Segura bearing 15th JDC/Lafayette Parish Docket Number CR 198620
- C. 15th JDC/Lafayette Parish Arrest Warrant for Eric P. Segura executed by Commissioner Andre Doguet
- D. Department email from Chief JP Broussard
- E. Affidavit of Arrest of Eric Segura
- F. Test message from Capt. John Davison to Mayor Ken Ritter
- G. Immediate Suspension Notice
- H. Chief JP Broussard's Written Complaint
- I. Chief JP Broussard's IA statement
- J. Capt. John Davison's Ethic Complaint
- K. Capt. John Davison's Attorney General Complaint
- L. Letter of Discipline
- M. YPD General Order 13
- N. YPD General Order 14
- O. YPD General Order 26
- P. YPD General Order 77

A



CITIZENS FOR A
NewLouisiana



UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

SAMUEL LEON	§	CIVIL ACTION NO. _____
<i>Petitioner</i>	§	
	§	
VERSUS	§	JUDGE: _____
	§	
RICKY BOUDREAU, CITY OF YOUNGSVILLE, ERIC SEGURA, AND AMGUARD INSURANCE COMPANY	§	MAGISTRATE JUDGE: _____
<i>Defendants</i>	§	
	§	
	§	

PLAINTIFF'S ORIGINAL COMPLAINT

NOW INTO COURT, through undersigned counsel, comes Petitioner, SAMUEL LEON (hereinafter, "Mr. Leon"), a person of the full age of majority and a resident of the County of Henderson, State of Texas, and who respectfully avers as follows:

INTRODUCTION

1. This is an action for money damages brought by complainant, Mr. Leon, pursuant to 42 U.S.C. 1983 and 1988, and the Fourth, Fifth, Sixth, and Fourteenth Amendments of the United States Constitution, and under Louisiana law against Defendants listed hereinafter.

JURISDICTION AND VENUE

2. This is a civil action seeking damages against Defendants, for committing actions, under color of law, which deprived Mr. Leon of rights secured under the United States Constitution, the law of the United States, and the laws of the State of Louisiana.
3. Petitioner brings this action as it appears within 42 U.S.C. § 1983, *et seq.*, and Louisiana Code Article 2315.
4. This Court has jurisdiction pursuant to the following statutes:
 - a. 28 U.S.C. § 1331, which gives District Courts original jurisdiction over civil actions under the Constitution, law, or treaties of the United States;
 - b. 28 U.S.C. § 1343, which gives District Courts jurisdiction over actions to secure civil rights extended by the United States government;
 - c. 28 U.S.C. § 1367, which gives District Courts jurisdiction over Louisiana state law claims that are so related to claims in the action within the District Court's original jurisdiction that they form a party of the same case and controversy under Article III of the United States Constitution.
 - d. Venue is proper in this judicial district under 28 U.S.C. § 1391 (b) because the events that gave rise to this Complaint occurred in the Western District of Louisiana, specifically the Parish of Lafayette, State of Louisiana, making the Lafayette Division the most appropriate Division for this suit.

PARTIES

5. Petitioner, Mr. Leon, is a citizen of the United States and resides in the City of Mabank, County of Henderson, State of Texas.
6. Made Defendants herein are:
 - a. **RICKY BOUDREAUX** (hereinafter, "Chief Boudreax"), the duly elected Chief of Police for the City of Youngsville, acting under Color of Law and under color of the statutes, ordinances, regulations, policies, customs and uses of the Youngsville Police Department, who can be served at his place of employment, the Youngsville Police Department;
 - b. **CITY OF YOUNGSVILLE**, upon information and belief, a municipal entity and political subdivision of the State of Louisiana with the capacity to sue and be sued, which can be served through its duly elected Mayor,
 - c. **ERIC SEGURA** (hereinafter, "Officer Segura"), upon information and belief, a sworn officer of the Youngsville Police Department, acting under the Color of Law and under color of the statutes, ordinances, regulations, policies, customs, and uses of the Youngsville Police Department.
 - d. **AMGUARD INSURANCE COMPANY** (hereinafter, "AMGUARD"), upon information and belief, a foreign insurance company licensed to do and doing business in the State of Louisiana, which provides coverage to the Youngsville defendants herein at all times relevant hereto.

STATEMENT OF FACTS

7. Chief Boudreax, at all pertinent times herein, was acting under the color of state law as the duly elected Chief of Police for the City of Youngsville, the Chief Law Enforcement Officer of the City of Youngsville, and the policy maker for the Youngsville Police Department.
8. Officer Segura, at all pertinent times herein, was a law enforcement officer employed as a Sergeant for the Youngsville Police Department, and/or the City of Youngsville, and he was acting in the course and scope of said employment during the commission of the acts complained of herein.
9. At all times relevant times herein, the individual Defendants were personally acting under the color of state law and/or in compliance with official rules, regulations, laws, statutes, customs, usages, and/or practices of the State of Louisiana and/or the City of Youngsville.
10. Each and all of the acts of the individual Defendants alleged herein were committed by said Defendants while acting within the scope of their employment with the Youngsville Police Department, and were done knowingly, recklessly, intentionally, wantonly, callously, and/or with the deliberate indifference and/or gross negligence.
11. On or about August 16, 2022, Officer Segura was on patrol when, at approximately 11:04 p.m., he approached Mr. Leon for sitting on the ground because his truck wouldn't operate.
12. As Mr. Leon was being questioned, Officer Segura stood and watched Mr. Leon sit on the ground.
13. After several minutes, the present officers displayed aggressive tendencies towards Mr. Leon. Ultimately, Officer Segura and other officers present began to detain Mr. Leon without informing him of why. During the detention process, Mr. Leon was placed on his stomach,

with his hands placed behind his back. At this time, three law enforcement officers, including Officer Segura, were on top of Mr. Leon and had him secured in a position with Mr. Leon's hands behind his back, partially handcuffed.

14. Despite being completely subdued and posing no threat whatsoever to Officer Segura or any of the other personnel, Officer Segura aggressively punched Mr. Leon in the face seventeen (17) times.
15. In addition to striking Mr. Leon aggressively and violently in the face, Officer Segura also began kneeling on Mr. Leon's head.
16. During this entire incident, there were at least six (6) law enforcement and/or emergency medical personnel present in close vicinity to Mr. Leon and Officer Segura.
17. At no point did any law enforcement officer inform Mr. Leon that he was under arrest.
18. Fortunately for Mr. Leon, several body cameras were able to capture video and audio recording of the entire incident.
19. Mr. Leon did nothing to justify Officer Segura's conduct. Mr. Leon did not reasonably pose a threat to Officer Segura or anyone else that would justify the aggressive force used against Mr. Leon. Officer Segura had no cause to believe that Mr. Leon posed a threat of serious physical harm, either to himself or others. Under the circumstances, the conduct of Officer Segura was intentional, excessive, unlawful, malicious, oppressive, and deliberately indifferent to Mr. Leon's rights, and no reasonable law enforcement officer would believe that his conduct did not violate clearly established law to be free from excessive force.
20. On August 30, 2022 at 3:00 p.m., Deputy Gabriel S. Thompson filed a Youngsville Police Department Formal Complaint against Police Personnel Form, stating Officer Segura and Officer Justin Ortis used excessive force, after his review of the body cameras. Deputy Gabriel

S. Thompson provided that he believes Mr. Segura became angered with Mr. Leon, "which in turn caused them to overreact to the situation that was being investigated. It is my opinion that both Sergeant Segura and the Deputy lost control of the situation and by my account used more force than was necessary to take control of the situation to make the arrest of the defendant."

21. Deputy Gabriel S. Thompson, in an effort to solicit further opinions, contacted Captain John Davison and Captain Morgan Green, who both viewed the body camera videos and believed more force than necessary was used during the investigation.
22. Ultimately, Chief Boudreax ordered an Internal Affairs Investigation be conducted.
23. Officer Vincent stated there were other avenues and techniques which Office Segura could have used.
24. Officer Segura, during his interview with Internal Affairs proceeded to fabricate a false account of the punching of Mr. Leon. In his Use of Force Report, Officer Segura made the following false statements in an attempt to justify his beating of Mr. Leon, including stating: (1) Mr. Leon was being very aggressive; (2) he heard Officer Miller state he was placing Mr. Leon under arrest; (3) he struck Mr. Leon around two (2) times; and (4) he didn't know he needed to timely complete a use of force report.
25. In the final conclusion, it was found that Mr. Segura's "behavior causes a major liability to the Youngsville Police Department and could prove financially detrimental to the Department in any future legal litigation. This needs to be relegated to the scenario of further training is needed for this employee as well as the legal ramifications of such actions."
26. By reason of the conduct of Officer Segura, including the assault; battery; unlawful arrest, detention, and/or seizure; and unreasonable and excessive use of force on Mr. Leon, Mr. Leon sustained significant injuries, including, but not limited to continued severe headaches,

concussion, hearing loss, affected vision, and he is entitled to obtain damages including, but not limited to:

- a. Punitive damages;
- b. Medical expenses – past, present, and future;
- c. Lost wages and/or earnings capacity -- past, present, and future;
- d. Physical pain and suffering – past, present, and future;
- e. Loss of enjoyment of life – past, present, and future;
- f. Emotional damages – past, present, and future;
- g. Harassment and/or embarrassment -- past, present, and future; and
- h. All other damages that may be established at the trial in this matter.

27. Upon information and belief, Amguard was the insurer of the City of Youngsville for all of the actions alleged.

FIRST CAUSE OF ACTION

*42 U.S.C. § 1983 Claim for Use of Excessive Force and Unlawful Detention in
Violation of the Fourth Amendment to the United States Constitution*

28. All portions of the Complaint are incorporated herein by reference.

29. The Fourth Amendment to the United States constitution protects an individual's right to be free from unreasonable seizures and excessive force.

30. Officer Segura, under the supervision of Chief Boudreaux, and at his behest, and in accordance with the policies of the City of Youngsville and/or the Youngsville Police Department, punched Mr. Leon several times and arrested and/or detained Mr. Leon without probable cause of any criminal wrongdoing as described in the foregoing paragraphs.

31. Defendant, City of Youngsville, as a local governmental body, is not considered part of the State for Eleventh Amendment purposes and is not barred from liability under 42 U.S.C. § 1983.
32. Defendant, Officer Segura, in his capacity as Deputy at Youngsville Police Department and/or City of Youngsville, a local governmental body, is not considered part of the State for Eleventh Amendment purposes and is not barred from liability under 42 U.S.C. § 1983.
33. Defendant, Chief Boudreaux, in his capacity as Chief at Youngsville Police Department and/or City of Youngsville, a local governmental body, is not considered part of the State for Eleventh Amendment purposes and is not barred from liability under 42 U.S.C. § 1983. As Chief, Chief Boudreaux supervises and directs the deputies and officers at the Youngsville Police Department.
34. The conduct of Officer Segura was a violation of Mr. Leon's right to be free from an unreasonable seizure and excessive force under the Fourth Amendment of the United States Constitution, as secured by 42 U.S.C. § 1983.
35. Acting under color of law, Officer Segura knowingly, recklessly, and with deliberate indifference and callous disregard for Mr. Leon's rights, used excessive force when punching Mr. Leon and causing him severe injury, which thereby deprived Mr. Leon of his rights to be free from an unreasonable seizure, in violation of the Fourth Amendment of the Constitution of the United States and 42 U.S.C. § 1983.
36. Officer Segura's conduct in punching Mr. Leon, as a subdued individual, was objectively and subjectively unreasonable, given the circumstances, because no reasonable officer could have believed that it was lawful to punch a subdued individual when no one, especially Officer Segura, was in danger of harm from Mr. Leon's actions.

Officer Segura's actions, after the fact, demonstrate that he could not have reasonably believed his actions were lawful in light of clearly established law and the information he possessed. Officer Segura failing to complete a use of force report and falsifying his testimony to the investigator of this incident, clearly demonstrates his culpability that he knew it was clearly established that it was unconstitutional to punch a subdued subject, especially when he posed no threat to the safety of the officer or any others. As such, Officer Segura's actions violated clearly established constitutional rights. Plaintiff has suffered harm from these actions.

37. Upon information and belief, Officer Segura has been accused of excessive force through his position in several different law enforcement agencies.

SECOND CAUSE OF ACTION
State law claims

38. All portions of the Complaint are incorporated here in by reference.

A. Fault by Officer Segura and Vicarious Liability of Youngsville Police Department

39. The City of Youngsville, and/or including the Youngsville Police Department, was the employer of Officer Segura, who was acting within the course and scope of his employment during the aforementioned acts and is liable for his state law torts pursuant to the doctrine of *respondeat superior*, which doctrine is specifically pleaded herein.

40. Pursuant to Louisiana Civil Code Art. 2315, Leon asserts state tort actions against Officer Segura.

41. The actions of Officer Segura constitute fault under La. C.C. art. 2315, which entitle Mr. Leon to assert this tort action.

42. As a result of Officer Segura;s fault, Mr. Leon is entitled to recover damages for the losses he sustained, including, but not limited to:

- a. Punitive damages;
- b. Medical expenses – past, present, and future;
- c. Lost wages and/or earnings capacity – past, present, and future;
- d. Physical pain and suffering – past, present, and future;
- e. Loss of enjoyment of life – past, present, and future;
- f. Emotional damages – past, present, and future;
- g. Harassment and/or embarrassment – past, present, and future; and
- h. All other damages that may be established at the trial in this matter.

B. Youngsville Police Department Failure to Supervise and Train

43. The City of Youngsville, and/or the Youngsville Police Department, as the employer of Segura, had the duty to properly train and supervise Segura.

44. Upon information and belief, the City of Youngsville and/or the Youngsville Police Department failed to properly train Segura on, among other things, use of force. In particular, they failed to train officers on the constitutional limitations regarding the use of force on subdued individuals.

45. At all times relevant herein in this complaint, the direct and proximate cause of the damages and injuries complained of herein were caused by the policies, practices, and/or customs developed, implemented, enforced, encouraged, and sanctioned by the Youngsville Police Department, including the failure:

- a. To adequately hire, supervise and train its officers and agents, including the individual Defendants, failing to adequately discourage further constitutional violations on the part of its police officers;
- b. To properly and adequately monitor and discipline its officers, including the individual Defendants; and
- c. To adequately and properly investigate citizen's complaints of police misconduct and instead, acts of misconduct were tolerated by Youngsville Police Department. The Youngsville Police Department has acted with deliberate indifference to the constitutional rights of the Plaintiff. As a direct and proximate result of the acts as stated herein by each of the Defendants, the Plaintiff's was injured as result of the actions of the defendants.

46. The failure to supervise, discipline, or control its officers demonstrate deliberate indifference to the constitutional rights of the plaintiff and is directly responsible for the individual defendants acting the way they did as outlined in this lawsuit.

47. By failing to properly train its officers, the harm suffered by Mr. Leon was predictable.

DAMAGES

48. As a result of the foregoing, Mr. Leon is entitled to an award of compensatory damages, including both special and general damages, with judicial interest from the date of judicial demand, against defendants *in solido*.

49. Because Segura exhibited reckless and callous indifference to the federally protected rights of Mr. Leon, he is entitled to an award of punitive damages against him pursuant to 42 U.S.C. § 1983.

50. In addition to compensatory and punitive damages, Mr. Leon is entitled to, including an award of judicial interest from the date of judicial demand, the following damages:

- a. Medical expenses – past, present, and future;
- b. Lost wages and/or earnings capacity – past, present, and future;
- c. Physical pain and suffering – past, present, and future;
- d. Loss of enjoyment of life – past, present, and future;
- e. Emotional damages -- past, present, and future;
- f. Harassment and/or embarrassment – past, present, and future;
- g. Economic Damages – past, present, and future;
- h. Punitive damages against Rickey Boudreux in his personal capacity;
- i. Punitive damages against Officer Segura in his personal capacity; and
- j. All other damages that may be established at the trial in this matter.

51. Mr. Leon is entitled to an award of reasonable attorney's fees pursuant to 42 U.S.C. § 1983.

REQUEST FOR JURY TRIAL

52. Mr. Leon requests to have this case tried by a jury and shows he is entitled to same.

PRAYER

WHEREFORE, Plaintiff, Samuel Leon, respectfully prays that after due proceedings are had that there be judgment rendered in his favor, holding defendants liable as requested in this complaint and awarding appropriate damages, attorney's fees and costs as requested in this complaint.

Respectfully Submitted:

SUDDUTH AND ASSOCIATES, LLC
1109 Pithon Street
Lake Charles, Louisiana 70601
Telephone: (337) 480 - 0101
Facsimile: (337) 419 - 0507

/s/ John L. Fourcade, III
JAMES E. SUDDUTH, III (#35340)
Email: James@saa.legal
JOHN L. FOURCADE, III (#40364)
Email: John@saa.legal
Counsel for Samuel Leon

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

SAMUEL LEON : CIVIL ACTION NO. 6:23-cv-01095
VERSUS : JUDGE DAVID C. JOSEPH
RICKEY BOUDREAU, CITY OF : MAGISTRATE JUDGE CAROL B.
YOUNGSVILLE, ERIC SEGURA, AND : WHITEHURST
AMGUARD INSURANCE COMPANY : NOTICE OF SETTLEMENT

NOTICE OF SETTLEMENT

NOW INTO COURT, through undersigned counsel comes, the CITY OF YOUNGSVILLE, CHIEF RICKY BOUDREAU AND OFC. ERIC SEGURA (collectively, "Defendants"), who submit that the parties to this matter have reached a settlement agreement. As such, the parties desire that this Honorable Court issue a conditional order of dismissal, dismissing this case in its entirety, allowing for reinstatement of this matter if the settlement is not consummated within sixty (60) days of the date hereof.

Respectfully submitted,
THE DILL FIRM, A.P.L.C.

BY: s/ K. Wade Trahan
K. WADE TRAHAN (#20474)
MICHAEL C. WYNNE (#36096)
825 Lafayette Street
Post Office Box 3324
Lafayette, Louisiana 70502-3324
Telephone: (337) 446-0380
Facsimile: (337) 261-9176
Email: wtrahan@dillfirm.com
Email: mwynne@dillfirm.com

COUNSEL FOR CITY OF YOUNGSVILLE,
RICKY BOUDREAU AND ERIC SEGURA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of December, 2023 a copy of the foregoing pleading was filed electronically with the Clerk of Court using CM/ECF system. Notice of this filing will be sent to counsel for all parties to this proceeding by operation of the court's electronic filing system.

/s/K. Wade Trahan
K. WADE TRAHAN

B



CITIZENS FOR A
NewLouisiana



CLERK OF COURT
LAFAYETTE PARISH, LA

2625 AUG 13 PM 2:27

BILL OF INFORMATION

STATE OF LOUISIANA

VERSUS

NO: CR 198620

ERIC P SEGURA

**IN THE FIFTEENTH JUDICIAL DISTRICT COURT FOR THE
PARISH OF LAFAYETTE
STATE OF LOUISIANA**

DONALD D. LANDRY, District Attorney in and for the Fifteenth Judicial District Court, through the undersigned Assistant District Attorney, and by authority of the Laws of the STATE OF LOUISIANA charges that on or about August 16, 2022, at and in the Parish, District and State aforesaid

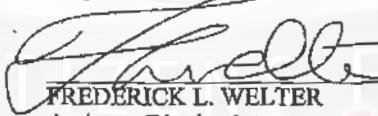
ERIC P SEGURA
107 SYRUP ROW
LAFAYETTE, LA 70508
DOB 10/10/1970 DL# - WHITE/MALE
ARREST DATE:
SSN [REDACTED] 0143
SID 2401003

COUNT 1: in that Eric P Segura, on or about August 16, 2022, did commit battery upon Samuel Jason Leon without his consent with the intention of inflicting serious bodily injury, in violation of R.S. 14:34.1. (Second Degree Battery-Felony)

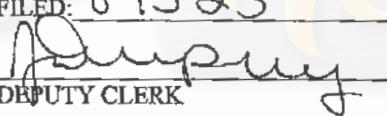
COUNT 2: in that Eric P Segura, on or about August 16, 2022, by willfully and intentionally performing duties in an unlawful manner, in violation of R.S. 14:134. (Malfeasance in Office-Misdemeanor)

**CONTRARY TO THE LAWS OF THE STATE OF LOUISIANA and
against the Peace and Dignity of the same.**

Respectfully Submitted,

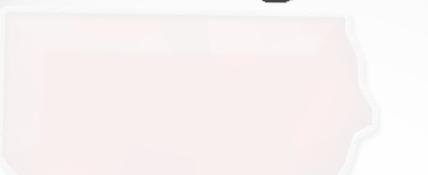

FREDERICK L. WELTER

Assistant District Attorney

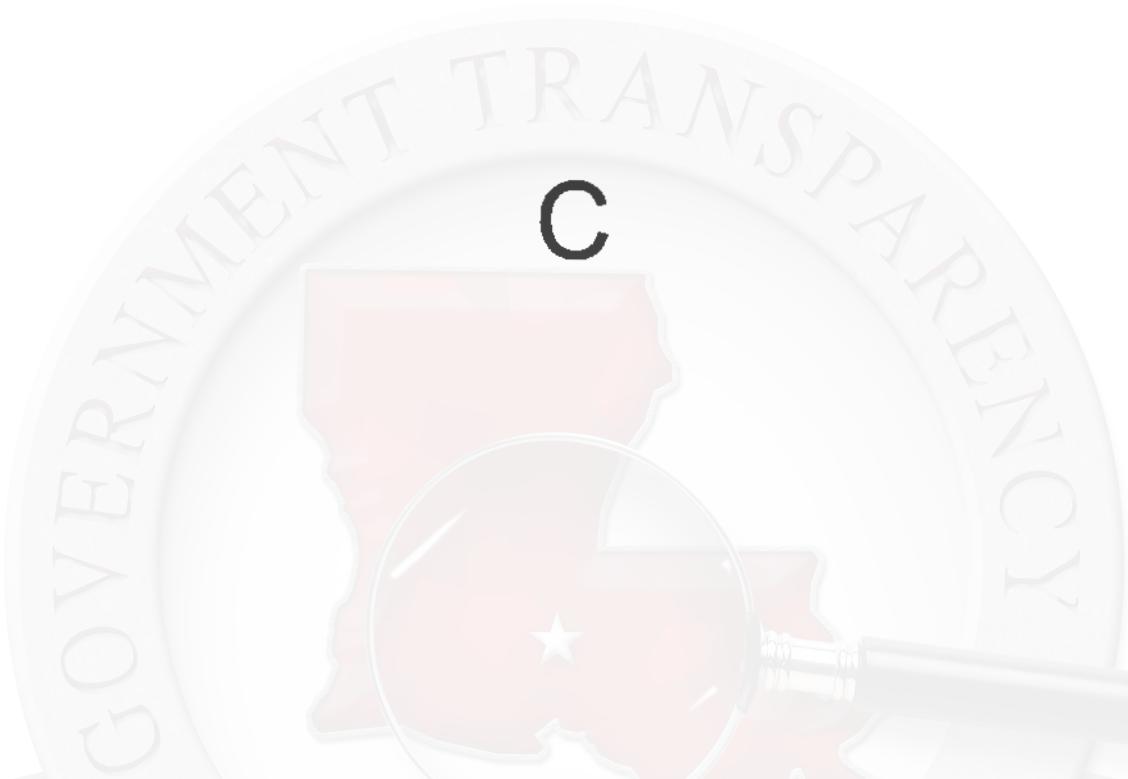
FILED: 8-13-25

Deputy Clerk

NON-CERTIFIED COPY

C



CITIZENS FOR A
New Louisiana



15TH JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE, STATE OF LOUISIANA
ARREST WARRANT

STATE OF LOUISIANA

VERSUS

ERIC P. SEGURA - WHITE/MALE

DOB: 10-10-1970

107 Syrup Row Lafayette Louisiana 70508

DL/ID #: LA 5233735

SSN: 437-27-0143

Height: 503

Weight: 180

Eye Color: Brown

Hair Color: Gray

D/M:



TO ANY COMMISSIONED PEACE OFFICER:

WHEREAS, complaint has been made to me, upon the sworn affidavit of Officer Victor Louis Guidry, with the Youngsville Police Department, charging one Eric P. Segura with:

1 Count(s) of 14:329--Interfering with a Law Enforcement Investigation--(Misdemeanor)

1 Count(s) of 14:108--RESISTING AN OFFICER--(Misdemeanor)

1 Count(s) of 14:37--AGGRAVATED ASSAULT--(Felony)

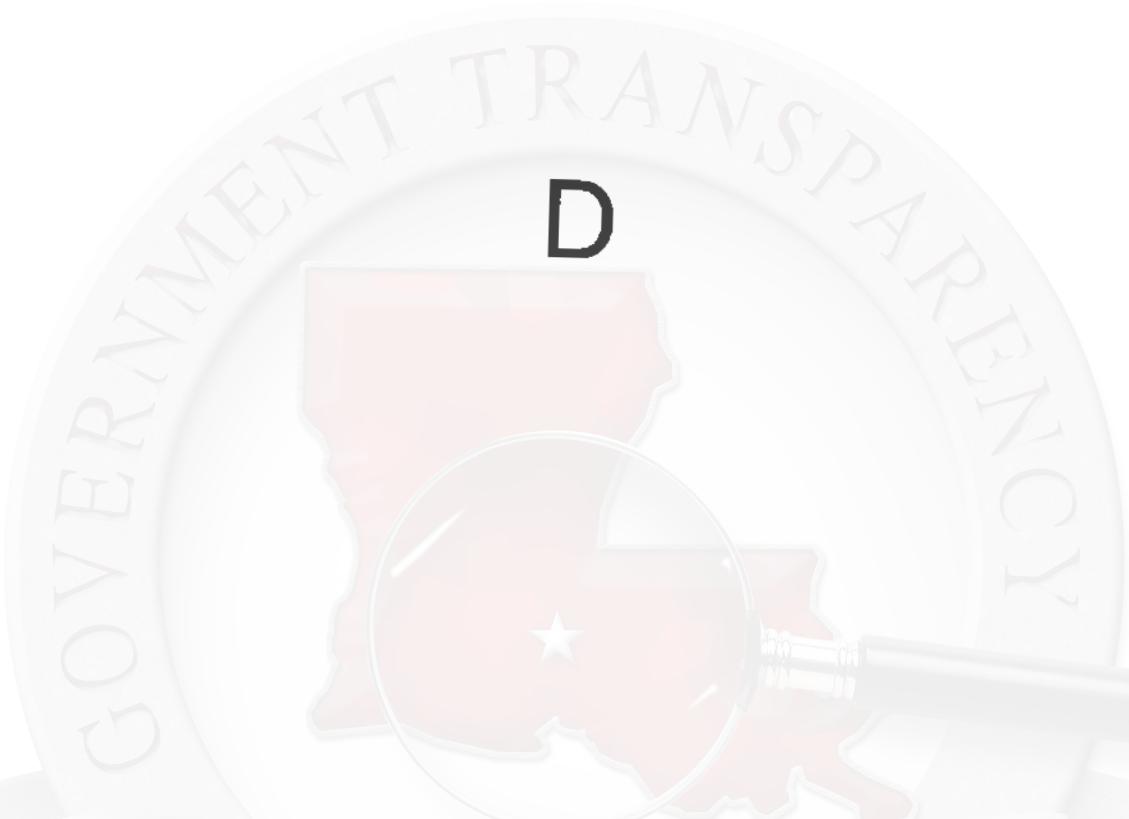
Committed on or about the date(s) of 06-14-2025.

Now, therefore, you are hereby commanded, in the name of the State, to apprehend and arrest and book the said accused to answer the said complaint. You are further commanded to keep the said accused in safe custody until released according to law, and this shall be your warrant.

Given under my official signature, this 17th day of Jun, 2025 at 11:53 AM.

Judge Andre Doguet
15TH JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA

D



CITIZENS FOR A
New Louisiana

JP

Jean Paul Broussard
To briefpasson

Jun 18

...



**Subject: Mandatory Review of High-Profile Cases
Prior to Warrant Submission**

Dear Team,

Effective immediately, any case involving high-profile individuals — including law enforcement officers, political figures, or dignitaries — must be submitted to the Chief for review **prior** to presenting the warrant to a judge.

This directive is issued to ensure that all such matters are handled with the highest level of oversight and sensitivity, given their potential implications. Please route all relevant materials to the Chief's office as early as possible in the process to avoid delays.

Should you have any questions regarding what constitutes a high-profile case or require clarification on this procedure, do not hesitate to reach out.

Thank you for your cooperation and continued professionalism.

E

CITIZENS FOR A
NewLouisiana

FIFTEENTH JUDICIAL DISTRICT COURT

7/17/00

015-468053

PARISH OF LAFAYETTE

STATE OF LOUISIANA

AFFIDAVIT OF ARREST

Arrestee Information

Arrest# 12503089

Case# 25-168813 *400* / Guidry

Last Name SEGURA

First Name ERIC

Middle

Gender MALE

Race WHITE

Age

Arrest Location LPCC

D/O/B 10/10/1970

Statute/Charges

Arrest Date/Time 06/19/2025

OR WARRANT

Transporting Officer L. Lafleur 13034

Arresting Officer L. Lafleur 13034

Arresting Agency LAFAYETTE SO

Did the prisoner cooperate during the arrest process?	YES <input checked="" type="checkbox"/>
Were restraining devices other than handcuffs used?	NO
If yes, list devices:	<i>RESTR CUFFS</i>
Does the arrestee have valid identification?	NO
Did your agency seize or retain any of the arrestee's property?	NO
If yes, list items:	<i>111M 2 1 2014</i>
Continued Detention is required because:	
The arrestee is likely to cause injury to himself, another or property.	NO
The inmate has prior criminal convictions.	NO
The arrestee is unlikely to appear on an issued summons.	YES <input checked="" type="checkbox"/>

The affiant states that the accused committed the above offenses based on the following information:

OR WARRANT# OR-204594 ON THE CHARGE OF INTERFERING WITH LAW ENFORCEMENT INVESTIGATION

OR WARRANT# OR-204594 ON THE CHARGE OF RESISTING AN OFFICER

OR WARRANT# OR-204594 ON THE CHARGE OF AGGRAVATED ASSAULT

*CITIZENS FOR A
New Louisiana*

Sworn to and subscribed before me this _____ day of _____ 20____

Notary

Lana Lafleur 13034

Affiant (Print full Name)

J. Lafleur

Affiant (Signed)

Click here if additional sheets attached



Page _____ of _____

F

CITIZENS FOR A
NewLouisiana



73



Captain >

iMessage

Fri, Jun 20 at 1:47 PM

Hey man, give me a call when you
can.



+ i message



Youngsville Police Department

Jean Paul Broussard
Chief of Police

P.O. Box 310
304 Fourth Street
Youngsville, LA 70592

Office: (337) 856-5931
Fax: (337) 856-4904



IMMEDIATE SUSPENSION NOTICE

TO: Captain John Davison

Date and Time: June 26, 2025 @ 10:00 a.m.

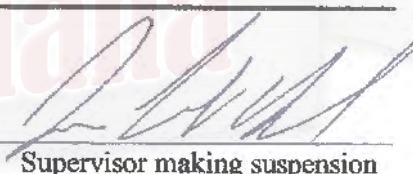
TAKE NOTICE that you are suspended from duty effective immediately for the following reason:

- You are unfit for duty
- You are a hazard to other people if permitted to remain on the job
- An immediate suspension is necessary to maintain safety, health, order or effective direction of public service; or
- You have been formally charged with a Misdemeanor or Felony Crime.
- You have been formally charged with a Misdemeanor or Felony Crime while on duty, or the criminal act is directly related to your employment.

The facts in support of the above reason are:

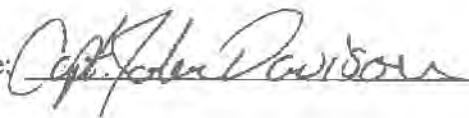
Insubordination and Conduct Unbecoming of An Officer based on telephone conversation
that occurred between Chief Broussard and Captain Davison on Wednesday, June 18, 2025.

Reference Case # IA-2025-02


Supervisor making suspension

I hereby acknowledge receipt of this notice.

Officer Signature:



Date: 6/26/2025



Internal Affairs
Control Number

Date / Time Received

YOUNGSVILLE POLICE DEPARTMENT
FORMAL COMPLAINT AGAINST POLICE PERSONNEL FORM



Complaint received by:

- Phone
- In Person
- E-Mail
- Mail

Complainant's Information

Complainant's Name: Jean Paul Broussard

Street Address: 311 Lafayette St

City: Youngsville

State: LA

Zip: 70592

Contact Number(s): 337-856-5931

Complaint Information

Employee Receiving Complaint: Captain John Davison

Type of Complaint: Insubordination RS 33:2560
Conduct Unbecoming of an Officer

- Unprofessional / Rudeness
- Excessive Force
- Racial Issue or Profiling
- Neglect of Duty
- Other (Please explain below in narrative)

Date and Time of Complaint:

Location of Complaint:

Narrative (Please provide the facts related to the allegation with as much detail as possible)

On June 18, 2025, at approximately 17:59 hours, I received a phone call from Captain John Davison, which I was unable to answer at that moment. I returned his call at approximately 18:01 hours.

Upon answering the call, Captain Davison immediately began to raise his voice and expressed strong objections regarding my prior directive to an officer to consider recalling a warrant for further investigation. Captain Davison stated the following,

"It is fucked up that you ask the officer to recall a warrant for further investigation. You're a fucking idiot, bro. You are going to go to jail for malfeasance in office, and you are trying to get this officer to commit malfeasance. You're fucked up, bro."

Immediately after making these statements, Captain Davison terminated the call.

I found Captain Davison's language and tone to be unprofessional, disrespectful, and threatening. His conduct was not only inappropriate but also contrary to the standards of professionalism expected within this department.

This form will be provided to any citizen upon request and any employee may accept and / or assist any citizen with filing a complaint. The form will be forwarded to the Chief of Police upon receipt.



Transcription of Chief Broussard's Interview

07/18/2025

TC - All right, today is July 18th, 2025. The time is approximately nine 50 hours. Detective Tim Cotone is conducting an IA investigation in reference to case number IA-2025-02. I'm interviewing Chief John Paul Broussard at the Youngsville Police Department administrative building located at 311 Lafayette Street. Youngsville. Uh, like I said, today's date is 07/18/2025, and the time right now is approximately 0951 hours. Uh, the person conducting the interview is myself, Detective Tim Cotone. Again, the person being interviewed is Chief Jean Paul Broussard. Uh, Chief, are you aware that I am recording this interview?

JPB - Yes..

TC - Do you have any objections?

JPB - No.

TC - Reasons for the investigation is in reference to a complaint you made that occurred on June 18, 2025, against Captain John Davison in reference to comments made of under conduct unbecoming of an officer for unprofessionalism and rudeness, uh, in your own words

JPB - And insubordination.

TC - Insubordination. Okay. Chief, in your own words, can you tell me exactly what happened?

JPB - I got a phone call from Captain Davidson, uh, I want to say probably around six o'clock that night. I missed the call, so I called him back a couple minutes later and he was irritated, and he said, that's fucked up. You give an order or a recommendation to an officer to recall a warrant due to further investigation? My plan was I was going to turn the investigation over to the State Police.

TC - Okay, so can you tell me his exact words that was said to you?

JPB - You're fucking stupid, bro. You're gonna go to jail for malfeasance and office. You can have this officer go to jail for malfeasance and office also.

TC -- Okay, how long were you on the phone with him?

JPB - Probably a minute if that, maybe a little longer.

TC - Okay, so he called you, you missed the call, he called you back?

JPB - No, I returned the call.

TC - Yeah, that's what I'm saying. He called you, you missed the call, you called him back.

JPB - Yep.

TC - Um, and that's when he made those statements to you?

JPB - Yes, sir.

TC - Okay. Um, anything else was said besides that between you and him?

JPB - Couple other things. I just can't remember the exact wording of what was said, but it was some derogatory remarks.

TC - And the reason the statements were made was over decision you made, correct?

JPB - Yes.

TC - Okay. Um, did you find Captain Davidson's language to be un uh, unprofessional?

JPB - Absolutely.

TC - Disrespectful?

JPB - Absolutely.

TC - Rude?

JPB - Absolutely.

TC - Okay. Has he ever made comments similar to you in the past?

JPB - He did make one comment in the hallway one day and he said, don't you fucking lie to me and ask me a question. I can't remember what the exact question was.

TC - Okay, so it's not the first time, uh, Captain Davidson spoke to you in this manner?

JPB - no. It's not. No.

TC - Okay. Is there anything else you could think of regarding this investigation during this interview?

JPB - Um, here possibly that they had a, he was making derogatory comments about me to the public in the front lobby of the department.

TC - Okay, anything else just regarding this matter right here?

JPB – Yes, he also, when I asked him for his equipment, he stated, you are a clown. You are a clown, bro.

TC – Okay, did you find that to be unprofessional and rude as well?

JPB – I did, yes.

TC – Okay

JPB - And Deputy Chief Thompson was in there as well.

TC – Okay, alright, anything else you can think of?

JPB - No sir.

TC - Okay. I'm concluding this interview at approximately 0954 hours, going off record.

J



CITIZENS FOR A
New Louisiana

August 18, 2025

HAND DELIVERED:

Louisiana Board of Ethics
617 North Third Street
LaSalle Building, Ste. 10-36
Baton Rouge, LA 70802

RE: Complaint for Violation of Ethics Laws

To Whom It May Concern:

Pursuant to the powers granted to the Louisiana Board of Ethics (hereinafter "Board") as outlined in Louisiana Revised Statute 42:1141, *et seq.* and as otherwise provided by applicable law I hereby submit the following to you for review and request that an investigation be opened into the conduct outlined herein.

On Friday, June 13, 2025, at 2215 hours I, Captain John Davison, an employee of the City of Youngsville Police Department received a phone call from Sergeant Louvenia Landry, the on-shift supervisor, advising that her shift was investigating a shooting complaint involving an off-duty Carencro Police Department (CPD) Officer, Zachary Segura. She further advised that Zachary is the son of former Youngsville Police Department (YPD) Officer and current CPD Officer Eric Segura. She stated that Eric was on scene but had not been involved in the original incident. I advised Sergeant Landry that I would dispatch a YPD detective and respond personally. I also notified Deputy Chief (DC) Gabe Thompson of the incident, who confirmed he would respond to the scene as well.

Upon arrival, I observed a marked CPD unit with emergency lights activated. Eric was standing near a YPD unit. I made contact with Sergeant Landry who briefed me on the initial incident. Deputy Chief Thompson arrived during this time, followed shortly thereafter by CPD Assistant Chief Trent Walker, who met with Eric. After that meeting, Eric departed the scene.

Assistant Chief Walker was briefed and permitted to photograph the scene. He asked Deputy Chief Thompson and me whether Eric conducted himself professionally, to which we responded affirmatively based on our observations. After Assistant Chief Walker departed, YPD Officer Victor Guidry informed Deputy Chief Thompson and me that Eric had acted unprofessionally and had cursed at him during the encounter. Given Officer Guidry's limited experience (6 months to 1 year), Deputy Chief Thompson and I agreed that the body-worn camera (BWC) footage should be reviewed concerning the incident.

On Monday, June 16, 2025, at approximately 1619 hours, I received a phone call from Youngsville Chief of Police J.P. Broussard requesting that I download the BWC footage related to the incident involving Eric and Zachary Segura. He advised that the footage would be forwarded to Carencro Police Chief David Anderson. At approximately 1630 hours, I began reviewing and downloading video footage. The footage showed Eric arrive in a marked CPD unit with lights and

sirens activated, wearing a CPD polo shirt, and openly carrying a firearm. He crossed the crime scene barrier and was verbally stopped by Officer Guidry, who stated, "Sir, Sir". Eric continued walking and responded, "I don't give a fuck about what you said." When Officer Guidry asked him to calm down and exit the scene, Eric replied, "If you fucking touch me, I will fuck you up." A short time later, Eric again stated to Officer Guidry, "I told you, if you fucking touch me, I'll fuck you up."

Based on the conduct observed, I determined that Officer Eric Segura committed violations of:

- LSA-R.S. 14:329 – Interfering with a Law Enforcement Investigation [Misdemeanor]
- LSA-R.S. 14:108 – Resisting an Officer [Misdemeanor]
- LSA-R.S. 14:37.2 – Aggravated Assault on a Peace Officer [Felony]

Given the felony nature of the offense, I determined that Officer Guidry must seek an arrest warrant in accordance with LSA-C.Cr.P. art. 211. I later contacted YPD Detective Tim Cotone and advised him to assist Officer Guidry with the arrest affidavit for Eric. Detective Cotone agreed to help and asked that Officer Guidry reach out to schedule a meeting. I also called Officer Guidry and instructed him to apply for the warrant. I advised him that Detective Cotone would assist him with the affidavit.

On Tuesday, June 17, 2025, at approximately 0800 hours when I arrived at YPD, I observed Detective Cotone and Officer Guidry preparing the arrest affidavit. Later that morning, Chief Broussard entered my office, at which time I informed him that the affidavit was being drafted for the arrest of Eric. He acknowledged having already spoken with both Officer Guidry and Detective Cotone concerning the incident. By mid-day Detective Cotone called to advise the arrest warrant had been approved and signed by Commissioner Douget.

Based on information and belief, on or around Wednesday, June 18, 2025 Chief Broussard and Carencro Chief of Police David Anderson met with and attempted to persuade or influence 15th Judicial District Attorney Don Landry into not pursuing criminal charges against the Segura's.

On Wednesday, June 18, 2025, at approximately 1629 hours, Chief Broussard issued a department-wide email as follows:

Subject: Mandatory Review of High-Profile Cases Prior to Warrant Submission

Dear Team,

Effective immediately, any case involving high-profile individuals – including law enforcement officers, political figures, or dignitaries – must be submitted to the Chief for review prior to presenting the warrant to a judge.

This directive is issued to ensure that all such matters are handled with the highest level of oversight and sensitivity, given their potential implications. Please route all

relevant materials to the Chief's office as early as possible in the process to avoid delays.

Should you have any questions regarding what constitutes a high-profile case or require clarification on this procedure do not hesitate to reach out.

Around the same time, Deputy Chief Thompson entered my office and reported that Chief Broussard had summoned Officer Guidry to his office and was pressuring him to recall the warrant. This constituted violations of:

- LSA-R.S. 14:130.1 – Obstruction of Justice [Felony]
- LSA-R.S. 14:134 – Malfeasance in Office [Felony]

I then made contact with Officer Guidry in the parking lot of 307 Church Street, Youngsville, LA to warn him not to comply with illegal directives. He informed me that he had already submitted the recall, citing "request by Chief Broussard" in CloudGavel. I advised him to document the encounter in a supplemental report. During our conversation, Officer Guidry received another call from Chief Broussard urging him to resubmit the recall due to the warrant still showing as "active." Upon completion of the call, Officer Guidry stated to me that he was not going to resubmit the recall. I immediately called Chief Broussard, (1759 hours), at which time I received no answer.

At approximately 1801 hours Chief Broussard returned my call. I asked him if he was aware that he had just attempted to pressure Officer Guidry into committing a felony and by doing so he had committed a felony himself. I advised Chief Broussard that he could go to jail for his actions, at which time he stated "ok" and the call was ended.

At approximately 2023 hours, Officer Guidry notified me that he completed a supplemental report (CR# 25-168813(3)) detailing that on June 18, 2025, at approximately 1559 hours, he was summoned to Chief Broussard's office wherein he [Chief Broussard] stated that 15th Judicial District Attorney Don Landry had advised that there was not enough evidence to support the charges against Eric. Officer Guidry stated that he attempted to recall the arrest warrant on Eric Segura due to the request coming from his chief and that he felt that he was under pressure to recall the warrant and was unsure how not complying would affect his career at YPD.

On Thursday, June 26, 2025, at 1000 hours Chief Broussard and Deputy Chief Thompson entered my office. Chief Broussard served me with an "Immediate Suspension Notice" under the pre-text of "Insubordination and Conduct Unbecoming an Officer" based on our June 18, 2025, phone call. He demanded my badge, commission card, and iPad, actions wholly inconsistent with the treatment of others placed on administrative leave. Deputy Chief Thompson transported me home.

Since being put on leave, several YPD employees have contacted me and advised that Chief Broussard is claiming I "cursed him out" during the subject conversation. This is false.

On June 26, 2025, at approximately 1829 hours, Lieutenant Jason Brown called to check on me and informed me that shortly after I left the office, Chief Broussard entered Sergeant Reginald Mosely's office, tapped my commission card on his desk, and made mocking remarks.

On Tuesday, July 16, 2025, at approximately 2150 hours, I attempted to enter YPD to complete required POST training but was denied access. I called Deputy Chief Thompson at approximately 2156 hours. He returned my call at 2209 hours and informed me that my access had been deactivated under direct orders from Chief Broussard via his secretary, Laurie Segura. Deputy Chief Thompson stated that Mrs. Segura also informed him that Chief Broussard personally contacted CBM Technologies to disable all my electronic access (email, login credentials, etc.).

Notably, Sergeant Pedro Alexander, who was recently placed on leave for being AWOL, was not stripped of his equipment or access, showing clear disparate and inconsistent treatment, and potential retaliation.

On Tuesday, July 22, 2025, at approximately 1130 hours Deputy Chief Thompson informed me that he reminded Chief Broussard on July 21st, 2025, that I remain an employee on paid leave and should not have been denied access or equipment. Deputy Chief Thompson stated that shortly afterward, Mrs. Segura informed him that Chief Broussard stated that he was "not comfortable" with me retaining access to YPD buildings and email.

Based on the forgoing I believe I am being subjected to reprisals for disclosing improper acts. Louisiana revised statute 33:423 provides that the Chief of Police "...shall have general responsibility for law enforcement in the municipality, and shall be charged with the enforcement of all ordinances within the municipality and all applicable state laws." Our Attorney General has held that a failure of the Chief of Police to perform his duties may constitute malfeasance in office. As indicated above I advised my employer in good faith that his conduct was in violation of state law, order, rules and regulations issued in accordance with law, I objected to and refused to participate in the violation of law, and I have since provided information in the conduct of an investigation. I have since been subjected to reprisal and disciplinary action all in violation of Louisiana revised statute 42:1169. I hereby again request that this agency promptly open an investigation into the conduct I have alleged.

Sincerely,

Captain John Davison

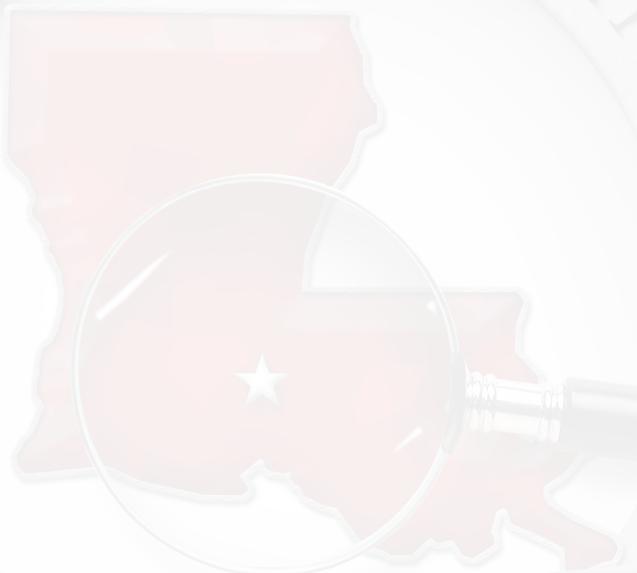
414 Mermentau Road

Youngsville, LA 70592

(337) 303-2606

jddavison716@yahoo.com

K



CITIZENS FOR A
New Louisiana



August 27, 2025

HAND DELIVERED:

Louisiana Office of the Attorney General
Public Corruption Unit
1885 North Third Street
Baton Rouge, LA 70802

RE: Complaint for Potential Violation of State Laws

To Whom It May Concern:

Pursuant to the powers granted to the Louisiana Attorney General's Office as provided in Article IV, Section 8 of the Louisiana Constitution, and applicable law, specifically Louisiana revised statutes 49:251, *et seq.* I hereby submit the following to you for review and request that an investigation be opened into the conduct outlined herein.

On Friday, June 13, 2025, at 2215 hours I, Captain John Davison, an employee of the City of Youngsville Police Department received a phone call from Sergeant Louvenia Landry, the on-shift supervisor, advising that her shift was investigating a shooting complaint involving an off-duty Carencro Police Department (CPD) Officer, Zachary Segura. She further advised that Zachary is the son of former Youngsville Police Department (YPD) Officer and current CPD Officer Eric Segura. She stated that Eric was on scene but had not been involved in the original incident. I advised Sergeant Landry that I would dispatch a YPD detective and respond personally. I also notified Deputy Chief Gabe Thompson, who confirmed he would respond to the scene as well.

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Assistant Chief Walker was briefed and permitted to photograph the scene. He asked Deputy Chief Thompson and me whether Eric conducted himself professionally, to which we responded affirmatively based on our observations. After Assistant Chief Walker departed, YPD Officer Victor Guidry informed Deputy Chief Thompson and me that Eric had acted unprofessionally and had cursed at him during the encounter. Given Officer Guidry's limited experience (6 months to 1 year), Deputy Chief Thompson and I agreed that the body-worn camera (BWC) footage should be reviewed.

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Based on the conduct observed, I determined that Officer Eric Segura committed violations of:

- LSA-R.S. 14:329 – Interfering with a Law Enforcement Investigation [Misdemeanor]
- LSA-R.S. 14:108 – Resisting an Officer [Misdemeanor]
- LSA-R.S. 14:37.2 – Aggravated Assault on a Peace Officer [Felony]

Given the felony nature of the offense, I determined that Officer Guidry must seek an arrest warrant in accordance with LSA-C.Cr.P. art. 211. I later contacted YPD Detective Tim Cotone and advised him to assist Officer Guidry with the arrest affidavit. Detective Cotone agreed to help and asked that Officer Guidry contact him to schedule a meeting. I also called Officer Guidry and instructed him to apply for the warrant. I advised Officer Guidry that Detective Cotone would assist him with the affidavit.

On Tuesday, June 17, 2025, at approximately 0800 hours when I arrived at YPD, I observed Detective Cotone and Officer Guidry preparing the arrest affidavit. Later that morning, Chief Broussard entered my office, at which time I informed him that the affidavit was being drafted. He acknowledged having already spoken with both Officer Guidry and Detective Cotone concerning the matter. By mid-day Detective Cotone called to advise the arrest warrant had been approved and signed by Commissioner Douget.

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- LSA-R.S. 14:134 – Malfeasance in Office [Felony]

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At approximately 1801 hours Chief Broussard returned my call. I asked him if he was aware that he had just attempted to pressure Officer Guidry into committing a felony and by doing so he had committed a felony himself. I advised Chief Broussard that he could go to jail for his actions, at which time he stated "ok" and the call was ended.

At approximately 2023 hours Officer Guidry notified me that he completed a supplemental report (CR# 25-168813(3)) detailing that on June 18, 2025, at approximately 1559 hours, he was summoned to Chief Broussard's office wherein he [Chief Broussard] stated that 15th Judicial District Attorney Don Landry had advised that there was not enough evidence to support the charges against Eric. Officer Guidry stated that he attempted to recall the arrest warrant on Eric due to the request coming from his chief and that he felt that he was under pressure to recall the warrant and was unsure how not complying would affect his career at YPD.

On Thursday, June 26, 2025, at 1000 hours Chief Broussard and Deputy Chief Thompson entered my office. Chief Broussard served me with an "Immediate Suspension Notice" under the pre-text of "Insubordination and Conduct Unbecoming an Officer" based on our June 18, 2025, phone call. He demanded my badge, commission card, and iPad, actions wholly inconsistent with the treatment of others placed on administrative leave. Deputy Chief Thompson transported me home.

Since being put on leave, several YPD employees have contacted me and advised that Chief Broussard is claiming I "cursed him out" during the subject conversation. This is false.

On June 26, 2025, at approximately 1829 hours Lieutenant Jason Brown called to check on me and informed me that shortly after I left the office, Chief Broussard entered Sergeant Reginald Mosely's office, tapped my commission card on his desk, and made mocking remarks.

On Tuesday, July 16, 2025, at approximately 2150 hours I attempted to enter YPD to complete required POST training but was denied access. I called Deputy Chief Thompson at approximately 2156 hours. He returned my call at 2209 hours and informed me that my access had been deactivated under direct orders from Chief Broussard via his secretary, Laurie Segura. Deputy Chief Thompson stated that Mrs. Segura told him that Chief Broussard had also personally contacted CBM Technologies to disable all my electronic access (email, login credentials, etc.).

Notably, Sergeant Pedro Alexander, who was recently placed on leave for being AWOL, was not stripped of his equipment or access, showing clear disparate and inconsistent treatment, and potential retaliation.

On Tuesday, July 22, 2025, at approximately 1130 hours Deputy Chief Thompson informed me that he reminded Chief Broussard on July 21, 2025, that I remain an employee on paid leave and should not have been denied access or equipment. Deputy Chief Thompson stated that shortly, Mrs. Segura informed him that Chief Broussard stated that he was "not comfortable" with me retaining access to YPD buildings and email.

Louisiana revised statute 33:423 provides that the Chief of Police "...shall have general responsibility for law enforcement in the municipality and shall be charged with the enforcement of all ordinances within the municipality and all applicable state laws." Our Attorney General has held that a failure of the Chief of Police to perform his duties may constitute malfeasance in office. The conduct of Broussard constitutes public corruption and violations of various criminal statutes. I hereby request that this agency promptly launch a criminal investigation into the conduct outlined above.

Sincerely,

Captain John Davison

414 Mermenau Road

Youngsville, LA 70592

(337)303-2606

jddavison716@yahoo.com

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CITIZENS FOR A
New Louisiana

Youngsville Police Department

P.O. Box 310

Jean Paul Broussard

Chief of Police

311 Lafayette Street

Youngsville, LA 70592

Office: (337) 856-5931

Fax: (337) 856-4904



September 4, 2025

Captain John Davison
Youngsville Police Department
311 Lafayette St.
Youngsville, LA 70592

Captain Davison:

You were notified on June 26, 2025 that you were the subject of Administrative Investigation 2025-02. That Investigation has been completed. The synopsis and result of this investigation is as follows:

Administrative Investigation 2025-02

Regarding: Conduct Unbecoming of an Officer and Insubordination.

Factual and Procedural Background

On June 23, 2025, the subject IA investigation was opened on the basis of a complaint made in regard to your conduct. That complaint originally concerned events of June 18, 2025, in which your interactions with Chief Jean Paul Broussard were considered insubordinate and unprofessional. You were notified at the onset of this investigation that conduct which is revealed during the investigation, not originally cited in the complaint, may subject you to further discipline. You were advised to refer to Youngsville Police Department General Order 35 for more detailed information of your rights and responsibilities during this investigation. You signed an acknowledgement of this investigation on June 26, 2025.

After gathering relevant facts and interviewing witnesses in connection with this investigation, the same was concluded on August 11, 2025. Following the closure of this investigation, you were notified that a pre-disciplinary hearing would be conducted to assist the Appointing Authority in determining the appropriate level of discipline to administer in response to any sustained complaints. That pre-disciplinary hearing was conducted on August 28, 2025, which you attended along with your legal counsel, Ms. Allyson Melancon.

Administrative Investigation 2025-02 revealed information sufficient to sustain the allegations against you in the original complaint concerning violations of the General Orders. Those findings are as follows:

Findings of Administrative Investigation 2025-02

This investigation concerned a complaint regarding alleged violations of the Youngsville Police Department General Orders, including G.O. 13; G.O. 14; and G.O. 26 as well as La. R.S. 33:2560(A)(4) concerning insubordination and unprofessional conduct. This investigation concluded with a finding that the complaint concerning insubordination is sustained. The complaint concerning unprofessional conduct is sustained.

Specifically, your conduct was found to have violated the following:

General Order 13: GENERAL CONDUCT

PROHIBITED ACTIVITIES

- A. Employees shall not engage in the following activities while on duty or in uniform:
 1. Use abusive, obscene, profane, or threatening language or actions toward their immediate supervisor(s), other members of the Department, or the general public.

General Order 14: PROFESSIONAL CONDUCT AND RESPONSIBILITIES

PROFESSIONAL CONDUCT

- A. Employees shall practice professionalism, loyalty, cooperation, assistance, and courtesy toward other employees and the public.
- ...
- I. Employees shall not criticize or ridicule the Department or its policies, City of Youngsville Officials, or other employees by speech, writing, email, MDT transmission, police radio, or other expression. This includes, but is not limited to, expressions which are defamatory, obscene, unlawful, undermines the effectiveness of the Department, interferes with the maintenance of discipline, or is made with reckless disregard for the truth and/or malice.
- ...

RESPONSIBILITIES

- D. Employees shall promptly obey all lawful orders issued by supervisors, in addition to promptly follow the directions of radio dispatchers.
- ...
2. Flaunting with the authority of a supervisor by displaying obvious disrespect or by disputing his/her orders shall likewise be deemed as insubordination and

shall be subject to progressive disciplinary action up to and including termination of employment.

...

COOPERATION WITH FELLOW EMPLOYEES AND AGENCIES

- A. Employees shall treat other employees of the Department with respect. They shall be courteous, civil and respectful of their superior officer, other employees, and shall not use threatening, intimidating, or insulting language.

General Order 26: DEPARTMENTAL DISCIPLINE

CATEGORY 1 OFFENSES

1:11 Conduct Unbecoming of an Officer

Employees whether on or off duty shall follow the ordinary and reasonable rules of good conduct and behavior. They shall not commit any act in an official or private capacity that would bring reproach, discredit, or embarrassment to their profession, the Department, or which could constitute conduct unbecoming by an employee. Employees shall follow established procedures in carrying out their duties, and shall at all times use sound judgment.

CATEGORY 2 OFFENSES

2:3 Command of Temper

All employees shall exercise emotional control while in the performance of their duties. No employee while on duty or while acting in an official police capacity off-duty shall use rude or derogatory language, racist terminology, or attempt to deride, offend, or insult anyone. This applies to any social media comments that would otherwise bring discredit or embarrassment to the department or employee.

CATEGORY 3 OFFENSES

3:18 Insubordination

Employees shall promptly obey all lawful orders and directions given by supervisors. The failure or deliberate refusal of employees to obey such orders shall be deemed insubordination and is prohibited. Flaunting with the authority of a superior officer by displaying obvious disrespect or by disputing his orders shall likewise be deemed insubordination.

Louisiana Revised Statute 33:2560 CORRECTIVE AND DISCIPLINARY ACTION FOR MAINTAINING STANDARDS OF SERVICE

- A. The tenure of persons who have been regularly and permanently inducted into positions of the classified service shall be during good behavior. However, the appointing authority may remove any employee from the service or take such disciplinary action as the circumstances warrant in the manner provided below, for any one of the following reasons:

4. Insubordination

As a law enforcement officer, your actions should demonstrate sound judgment and portray good decision-making, which reflect positively upon the reputation and integrity of the Youngsville Police Department and our Officers, including respect for the chain of command in place. It is of

great concern that your recent actions reflected negatively upon the Youngsville Police Department and demonstrated a clear disregard for the command structure and effective operation of this Department. This Department is impaired in its effective operation when officers cannot be trusted to respect the authority of their supervisors, hindering the operation of the Department as a whole and negatively impacting the Department's ability to effectively provide the level of public service expected.

I would be remiss in my duties, as the Police Chief, to uphold the accountability and integrity of the Youngsville Police Department and our Officers, if I did not administer disciplinary action. Your actions constitute violations of the policies and General Orders of the department which are classified as a Category 3 Offense. There is no higher classification for seriousness of offense than this.

As a result of these sustained findings, the following disciplinary action is administered:

1. Demotion from Captain to Police Officer
2. Demotion to Pay Grade of Police Officer
3. 90 Days of Suspension without pay

Effective: September 4, 2025

As you are aware, the Youngsville Police Civil Service Rules provide you a right to appeal this action. If you wish to appeal, you must submit a written request to the Youngsville Police Civil Service office within fifteen (15) calendar days.

Jean Paul Broussard

Jean Paul Broussard
Chief of Police
Youngsville Police Department

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Youngsville Police Department

GENERAL ORDERS

DATE ISSUED April 28 th , 2016	EFFECTIVE DATE April 28 th , 2016	REVISION NO. 1	PROCEDURE NO: G.O.# 13	PAGE of PAGES: 1 of 5
ISSUED BY: Cody D. Louviere, CHIEF OF POLICE			REVISION DATE: February 10 th , 2016	
SUBJECT: GENERAL CONDUCT				

PURPOSE

This Order establishes rules and standards to be followed concerning the general conduct required of each employee.

POLICY

It shall be the policy of the Youngsville Police Department to ensure that all employees conduct themselves in a professional manner consistent with generally accepted standards and shall strive to perform their duties with a high level of quality that assures the citizens that they serve the respect and dignity they deserve.

DEPARTMENTAL GENERAL POLICIES

- A. Employees, unless otherwise instructed, shall promptly report for duty at a specified place and time required by assignment, subpoenas, or orders.
 1. Employees shall be properly equipped and ready for roll-call, inspection, or applicable Section/Unit meetings.
 2. Employees shall remain at their post or place of assignment until properly relieved by another employee, or until officially dismissed by a supervisor.
 3. When an officer is representing the Department in their official capacity, whether attending a Department related official meeting, deposition, or associated function, they shall appear in uniform when practical or abide by the Department's dress standards.
- B. Employees shall provide their Division Commander, Office of the Chief of Police, Assistant Chief of Police, Personnel Clerk, and respective supervisors with current up-to-date telephone number(s) and a proper physical home address. In the event of any changes, the information shall be updated within twenty-four (24) hours.

PROHIBITED ACTIVITIES

- A. Employees shall not engage in the following activities while on duty or in uniform:
 1. Use abusive, obscene, profane, or threatening language or actions toward their immediate supervisor(s), other members of the Department, or the general public.
 2. Stealing any item of value, whether property of the Department, The City of Youngsville, an employee, or the public or private businesses.
 3. Willful destruction or damage of Department/City of Youngsville owned equipment, vehicles, police facilities, etc.

4. Deliberate falsification of any police report, form, record, or public document.
5. Physically fighting with other Department employees.
6. Sleeping, loitering, loafing, while on duty.
7. Devoting on-duty time to any activities that are not directly related to the employee's police related duties.
8. Using tobacco products or materials that may be mistaken for tobacco in any form while in contact with the public. All forms of tobacco products and by-products are prohibited in all enclosed public places within the Youngsville Police Department, in addition to departmentally owned/issued vehicles.
9. Engaging in any electronic arcade game, billiards, pool, cards, and dominoes, in addition to betting and gambling.
10. Reading non-law enforcement related literature, except while on break.

B. Intoxicants

1. Employees shall not consume any intoxicant, regardless of its alcoholic content, or be under the influence of an intoxicant, within eight (8) hours before going on duty or operating a Department/City of Youngsville owned vehicle.
2. Reasonable suspicion of an intoxicant does not require absolute proof or certainty and mere speculation or hunches are not sufficient to meet this standard. Therefore, before any testing on the basis of reasonable suspicion is scheduled, such suspicion must be discussed with, and supported by the Appointing Authority and/or designee in coordination with the City of Youngsville Substance Abuse Coordinator and/or his/her supervisor(s).
 - a. Reasonable suspicion may be categorized as the following but not limited to:
 1. A fellow co-worker or immediate supervisor that recognizes unusual behavior in another employee or signs of impairment or inability of the employee to make common or normal judgements with the presence of signs of impairment.
 2. Any employee that is displaying gross insubordination with or without the additional signs of impairment.
 3. An employee that has been involved in an "on-duty" accident that otherwise might have not occurred given that employee's history or abilities with or without additional signs of impairment.
 4. Obvious signs of impairment in conjunction with any other unusual behavior as witnessed by other employees or citizens.
 - b. Police officers shall be in violation of this Order if their BAC is at or above 0.01g% while on duty and/or while operating a Department/City of Youngsville owned vehicle.
 - c. Civilian employees shall be in violation of this Order if their BAC is at or above 0.02g% while on duty and/or operating a Department/ City of Youngsville owned vehicle.

- d. When an employee is requested to submit to the specified testing, he/she shall submit to all testing procedures.
- e. Refusal to, or failure to, submit to the requested testing shall be deemed as gross insubordination and the employee is subject to severe disciplinary actions up to and including termination.
- f. Required testing is considered as compelled by this General Order and may not be used in any criminal investigation or proceedings. Any criminal investigations shall be separate from the required departmental testing.

3. Employees shall not consume alcoholic beverages while in uniform – whether on-duty or off-duty with the noted exception. Consumption of alcoholic beverages by commissioned police officers (not in uniform) is allowed only in the performance of a police duty or training procedure, and at the specific direction of a Department Division Commander or Chief of Police. Commissioned officers who are required to consume alcoholic beverages in the performance of a police duty are exempt from the provisions set forth in the “PROHIBITED ACTIVITIES” section of this General Order, however those employees shall not consume alcoholic beverages to the point of intoxication.
4. Employees shall not appear in public in such a state of intoxication as to reflect discredit upon the Youngsville Police Department.
5. No alcoholic beverages, of any amount, intended for (personal use), will be brought onto any Youngsville Police Department police facility or transported within a Department/City of Youngsville owned vehicle.

C. Prohibited Substances and Items

1. The possession of illegal drugs is prohibited except in the performance of a police function. The use of illegal or non-prescribed controlled drugs is prohibited. Any employee found in violation of this section shall be terminated. Illegal drugs, improper acts, or illegal possession are defined as follows:
 - a. Illegal drugs such as, but not limited to, marijuana, cocaine, phencyclidine (PCP), heroin, opium, MDMA, or any of the controlled dangerous substances as denoted in Schedules I, II, III, IV, or V of the Louisiana Revised Statutes 40:964, as may be amended.
 - b. Prescribed drugs not legally obtained, and prescribed drugs not being used for its intended purposes.
 - c. Consumption of prescription drugs that were not legally prescribed by a physician for the employee.
 - d. Drug-related Paraphernalia – Any unauthorized material, equipment, or item used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling, or otherwise introducing into the human body, a controlled dangerous substance. Commissioned police officers coming in contact with drug paraphernalia during the course of their official police duties (legally seizing or for the purpose of entering into evidence for criminal prosecution) shall be exempt.

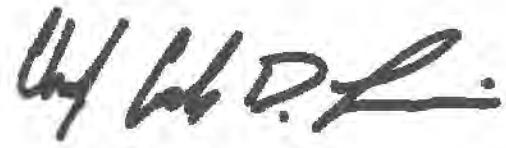
D. Prescribed Drugs

1. Employees must not ingest prescribed drugs or over-the-counter medication more often than as directed by the employee's physician or label instructions and they must not allow any other person to ingest the drug that has been specifically prescribed only to them.

2. Employees shall not ingest or otherwise consume any drug that has not been specifically prescribed to the particular employee. Drugs that have been specifically prescribed to other family members or friends shall not be taken by employees of the Department. (See also Prohibited Substances, Heading "C" 1-c).
3. Employees who have been informed that a medication could cause adverse side effects while working (or where the medication label indicated such a warning), shall inform their supervisor of having been prescribed this medication or that they have taken said medication immediately upon reporting to duty. The supervisor may request that the employee either consult a licensed physician or medical practitioner to ascertain whether that employee may return to full duty while taking such medication, or suggest to the employee that they not report to work until they have taken the medication and have not had any adverse side effects that could limit their abilities.
 - a. A supervisor may require the employee to provide a written authorization from the medical professional, prescribing the specific medication, stating that the employee may return to full duty or limit the employee's ability to perform his/her job assignment while taking such medication(s).
4. In any event where a supervisor has allowed the employee to return to work while taking said medication(s) and the employee discovers that additional or unforeseen side effects have occurred it shall be the responsibility of that employee to report these side effects immediately to their supervisor.

RESTRICTIONS ON BEHAVIOR

- A. Officers shall not interfere with the lawful business of any person, establishment or entity.
- B. Employees shall not use their official positions to intimidate or entice any person, establishment, or entity.
- C. Employees may not portray or represent themselves in or on social media or internet sites in the official Department uniform or make any statements or discuss subject matter that could or would bring discredit to themselves or the Department. This may be subject matter of the following nature but not limited to:
 1. Subject matter that is of a sexual, racist or other biased material or photographs or depictions.
 2. Information pertinent to ongoing criminal or administrative investigations.
 3. Engaging in derogatory remarks or depictions of the Department /City of Youngsville and or its employees.
 4. Posting or uploading pictures or depictions to the internet, including texts which could otherwise interfere with the normal social interaction of the Department with citizens, vendors or other law enforcement/governmental agencies or portray the Department in a negative or harmful fashion.
- D. Employees shall not lend, sell, provide or otherwise post or upload photographs or depictions of themselves for the sole purpose of advertisements or sponsored products either in uniform or with any Department property or vehicles. Employees shall not endorse any products where there is any affiliation to the employee as an Officer of the Department or any relation to the Youngsville Police Department and shall not be compensated for products or endorsements by accepting anything of value for endorsements. This includes any political endorsements while "on-duty"



Cody D. Louviere

CHIEF OF POLICE





Youngsville Police Department

GENERAL ORDERS

DATE ISSUED April 28 th , 2016	EFFECTIVE DATE April 28 th , 2016	REVISION NO. 1	PROCEDURE NO: G.O.# 14	PAGE of PAGES: 1 of 6
ISSUED BY: Cody D. Louviere, CHIEF OF POLICE		REVISION DATE: February 17 th , 2016		
SUBJECT : PROFESSIONAL CONDUCT AND RESPONSIBILITIES				

PURPOSE

This Order establishes standards regarding professional conduct and general responsibilities required of each employee.

POLICY

- A. This Order represents a culmination of past disciplinary discretionary incidents whereby it has contributed to the formation of a set of rules regarding professional conduct. In addition to its implementation, it shall be the responsibility of each employee to maintain a benchmark of integrity and to strive in the attainment of the Department's written professional standards.
- B. Employees of the Youngsville Police Department acknowledge the need for authority and commensurate responsibility. Authority allows for the imposition of sanctions in enforcing rules and procedures imposed upon employees of the Department. It shall be the Command Staff or designee's responsibility to ensure the fair, impartial, and judicious enforcement of all Written Directives.
- C. The first consideration of discipline shall be to correct performance and/or unacceptable behavior. Support of the disciplinary system shall be inherent of every employee, therefore, it shall be the responsibility of all supervisors to motivate and counsel employees toward compliance. When modification, counseling and the imposition of sanctions (disciplinary action) have been administered and personal behavior and/or performance has not been altered, if the act(s) is of a serious transgression, separation from the Department may follow.

PROFESSIONAL CONDUCT

- A. Employees shall practice professionalism, loyalty, cooperation, assistance, and courtesy toward other employees and the public.
- B. Employees shall not, under any circumstances, solicit any gift, gratuity, loan or fee where there is any direct or indirect connection between the solicitation and their Department membership or employment; other exceptions may be authorized only by the Chief of Police. Under no circumstances shall any employee accept anything of value when the offer of said item or service is made in an attempt to influence, directly or indirectly, any departmental decision or official action of the employee.
- C. Employees shall not solicit or accept any gift, gratuity, loan, fee, service, or any other item of value, from lending, borrowing, buying, or selling anything of value and are prohibited from or the issuance to any suspect, prisoner, defendant, persons of ill repute, professional bondsmen, or other persons whose vocations may profit from information obtained from the police.

- D. If an employee receives a bribe offer, he shall immediately complete a written Supplemental Report to his/her respective Division Commander and shall immediately notify his/her supervisor of such bribe.
- E. Employees shall not use their official positions or identification to solicit special privileges for themselves or others. Examples are, but not limited to:
 1. Free admission to places of amusement.
 2. Free or discounted food items at established restaurants, or discounts on retail purchases.
- F. Employees shall not give testimonials or permit their names, photographs, or forms of video media to be utilized for commercial advertising purposes while representing themselves as a member of the Youngsville Police Department. In addition, police personnel are prohibited from utilizing Youngsville Police Department equipment, vehicles, or uniforms for any public or personal purpose without prior approval of the Chief of Police. See also YPD General Order #13 General Conduct.
- G. Employees shall not, while on duty, solicit subscriptions, sell books, papers, tickets, merchandise or other items of value, nor collect or receive compensation for any purpose without the prior expressed permission of the Chief of Police. This includes any non-profit solicitations.
- H. While on or off duty, classified employees are not allowed to actively participate (e.g. make political speeches, pass out campaign or other political literature, actively and openly solicit votes) in political campaigns.
- I. Employees shall not criticize or ridicule the Department or its policies. City of Youngsville Officials, or other employees by speech, writing, email, MDT transmission, police radio, or other expression. This includes, but is not limited to, expressions which are defamatory, obscene, unlawful, undermines the effectiveness of the Department, interferes with the maintenance of discipline, or is made with reckless disregard for the truth and/or malice.
- J. Employees shall not perform any actions which disrupt the performance of official duties or which tend to interfere with reasonable supervision and discipline.
- K. Employees who have become the subject of a civil citation, traffic citation, an arrest action, or who are suspected of having committed an offense in another agencies jurisdiction shall immediately notify, through the chain of command, the Chief of Police.
- L. Orders from supervisory or command officers shall be clear, concise, and understandable. Orders shall be issued in a civil tone, and in the pursuit of departmental business. No supervisor or command officer shall knowingly or willfully issue an order that violates a Federal, State, Local Ordinance, Department Written Directive, or a City of Youngsville policy or procedure.
 1. All employees shall follow the lawful order(s) of a supervisor, even when the lawful order is relayed from a supervisor to another employee through an employee who is of the same or lesser rank. The employee receiving this order from the relaying employee shall follow that order just as if the supervisor had given the order directly to the intended employee.
 2. Upon receipt of a conflicting order, the employee receiving the order shall inform the supervisor issuing the initial order of this fact. If then directed, the employee shall obey the second order.
 3. Upon receipt of a perceived unjust or improper order, the receiving employee shall obey the order to the best of his/her ability within the limits of the law, and then report the incident through the proper chain of command. No employee shall obey an order that is contrary to Federal, State, or Local Ordinance.

4. Employees shall not publicly criticize or ridicule any instruction or order that they receive, nor shall they criticize or ridicule the supervisor issuing the order or instructions.

CLANDESTINE RECORDINGS

Definitions:

1. **Clandestine Recordings** -- "Clandestine Recordings" is defined as the covert use of a device to record voice, video, or voice and video to capture and record to tape, disk, flash, memory stick, SD Card or other similar emerging electronic media **WITHOUT** a Department Member's knowledge.
2. **Department Member** -- "Department Member" is defined as any sworn or civilian employee of the Youngsville Police Department.

A. It shall be the policy of the Youngsville Police Department to prohibit clandestine recordings of members of the Department.

B. In an effort to prevent unauthorized conduct and to ensure the integrity of the Youngsville Police Department, clandestine recordings of members of the Department by another member is strictly prohibited unless specifically authorized by the Chief of Police and in accordance with applicable Federal and State law.

C. **Clandestine Recordings of Department Members – Exceptions:**

1. In conjunction with an official departmental internal administrative investigation.
2. During an authorized criminal investigation involving Department members.

D. **Authorized Recordings:**

1. Members of the Department may utilize electronic devices to record any member of the Department so long as the party wishing to record the conversation notifies (all) parties present that such recording is to take place before initiating such activity -- with their consent. If during a recorded session, a new member of the Department enters the conversation, that employee shall be notified immediately with consent to continue the recording; otherwise, the recording shall be terminated.
 - a. Members of the Department that are under special conditions to record all interactions with the public, where other members of the Department are present, shall adhere to this policy.
 - b. Departmental regulated interview rooms, temporary holding rooms, O.W.I. testing room, overt police building security cameras, and the Internal Affairs Staff offices shall be presumed recorded areas by the Department.
 - c. All 700 and 800Mhz radio/interconnect communications.
 - d. Any Departmental incoming phone lines, such as the main Police Department line.

E. **In-Car camera recordings.** See also YPD General Order #19- Heading, Prohibited Acts.

F. **Applicable to Duty Status:**

1. This policy shall be applicable if any party to the recording is in an on-duty or police related capacity i.e. off-duty police related employment.

G. Violations:

1. Violations of this Written Directive shall be classified as a serious violation of policy which is subject to disciplinary action, leading up to, and inclusive of termination.
2. Violations that are determined to be criminal in nature and violate Federal wiretapping laws and/or State law shall be handled as a criminal matter – in addition to an administrative investigation.

RESPONSIBILITIES

- A. All officers shall, at all times while on duty, take appropriate police action to:
 1. Protect life and property.
 2. Preserve the peace.
 3. Prevent crime.
 4. Detect and arrest law violators.
 5. Enforce all State and Local Ordinances within the extent of their authority and jurisdiction.
- B. Officers assigned to special duties or details shall not be relieved from taking proper police action even if the violation is outside the scope of their specialized assignment.
- C. Employees shall abide by all Federal, State, and Local Ordinances, as well as The City of Youngsville policies, Department Written Directives, General Orders, Standard Operating Procedures, and rules of the Civil Service Board.
- D. Employees shall promptly obey all lawful orders issued by supervisors, in addition to promptly follow the directions of radio dispatchers.
 1. The failure or deliberate refusal of employees to obey such orders shall be deemed as insubordination and is prohibited.
 2. Flaunting with the authority of a supervisor by displaying obvious disrespect or by disputing his/her orders shall likewise be deemed as insubordination and shall be subject to progressive disciplinary action up to and including termination of employment.

ATTENTION TO DUTY

- A. Employees shall be attentive to their duties at all times and shall perform all duties assigned.
- B. All employees, within the scope of their responsibilities, shall abide by The City of Youngsville Policies and Procedures, in addition to all Youngsville Police Department Written Directives. Employees shall report any violation to their immediate supervisors without delay. When possible, they will actively prevent such violation or interrupt/intervene as necessary to ensure professional and proficient operations.
- C. Employees, whether on or off duty, shall follow the ordinary and reasonable rules of good conduct and behavior. They shall not commit any act in an official or private capacity that would bring reproach, discredit, or embarrassment to their profession, the Department, or which could constitute conduct unbecoming by an employee. Employees shall follow established procedures in carrying out their duties and shall at all times use sound judgement.
- D. Employees shall promptly serve the public by providing direction, counsel, and other assistance that does not interfere with the discharge of their police responsibilities. They shall make every attempt to respond to the service request without referring the person to another source.

- E. Employees shall respect the rights of individuals and shall not engage in discrimination, oppression, or favoritism. Employees shall maintain a strict impartial attitude toward complainants and violators. Employees shall at all times be courteous to the general public. Courteous is defined herein as marked with respect for and consideration of others.
- F. Employees shall not knowingly make false or untrue statements – whether written or verbal.
- G. While on duty, employees shall not conceal themselves except in the course of covert or surveillance related operations.
- H. While on duty, officers shall respond without delay to all calls for police service. Non-emergency calls shall be answered in compliance with normal safety precautions and adherence to all traffic laws.
- I. Employees shall promptly report, and shall not distort, falsify, or fail to include, pertinent facts of all crimes, violations, incidents, emergencies, hazardous situations, and police information that has occurred or observed.
- J. Officers shall know the location and boundaries of their assigned zones and the geographical city limits. Officers shall be familiar with the names and general locations of Youngsville streets, highways, hospitals, and major public buildings and schools.
- K. Each day while on duty and immediately upon returning from an absence, employees shall review and become familiar with the contents of recently issued communications (email) and Written Directives.
- L. Employees shall not communicate in any manner, directly or indirectly, any information that may delay an arrest or enable persons guilty of criminal acts to escape arrest or punishment. Employees shall not dispose of property or goods obtained illegally from a defendant, or destroy evidence of an unlawful activity.
- M. Found property of value shall be entered into the Youngsville Police Department Evidence Unit at the end of the officer's tour-of-duty, or as defined within the Written Directives regarding specific items and shall not be retained by the employee. See also YPD General Order # 59 Collection and Preservation of Evidence.
- N. No employee will knowingly associate, on a continuing social basis, with individuals who have been convicted of any felony without prior written approval from the Chief of Police, or except as part of an authorized assignment/investigation.
- O. While employees are on duty or officially on call, they shall be directly available by normal means of communications, or if applicable, the Patrol Division Captain, respective supervisor, or Division Head informed of means by which they may be reached.
- P. Employees shall immediately report the following to their supervisor:
 - 1. All traffic accidents involving Department owned vehicles in which they are involved.
 - 2. All personal injuries received in the line of duty.
 - 3. All personal injuries not received in the line of duty, but which are likely to interfere with the performance of police duties.
 - 4. All property damage or injuries to other persons that resulted from the performance of their police duties.

IDENTIFICATION AND RECOGNITION

- A. Upon request from any citizen, all YPD employees, Reserve Officers, and agency volunteers shall display/provide their departmental photo identification card, badge number, and any other pertinent information to any person requesting such credentials unless doing so would jeopardize the successful completion of a police assignment.
- B. Employees shall carry their official police identification on their person at all times.

COOPERATION WITH FELLOW EMPLOYEES AND AGENCIES

- A. Employees shall treat other employees of the Department with respect. They shall be courteous, civil and respectful of their superior officers, other employees, and shall not use threatening, intimidating, or insulting language.
- B. Employees shall cooperate, support, and assist each other whenever necessary.
- C. Employees shall not intentionally interfere with cases assigned to others. Employees shall not intentionally or adversely interfere with the work or operations of any Unit in the Department, or the work or operations of other governmental agencies. Employees whom which a complaint has been made shall not attempt, directly or indirectly, by threat, appeal, persuasion, payment of money or other compensation, to secure the abandonment or withdrawal of the complaint.
- D. Employees shall cooperate with all governmental agencies by providing whatever aid or information such agencies are entitled to receive.

REPORTING TO SUPERVISORS

- A. Every employee shall seek to protect the integrity of the Department.
- B. Employees shall immediately report to their supervisor(s) knowledge of any unusual activity, situations, or issues which involve the duty of the Department to uphold the law, keep the peace, or to protect lives and property.
- C. Employees shall immediately notify their supervisor(s) of any violation of any Federal, State, or Local Ordinance alleged or known to have been committed by another employee.

Cody D. Louviere

CHIEF OF POLICE



Youngsville Police Department

GENERAL ORDERS

DATE ISSUED July 11 th , 2016	EFFECTIVE DATE	REVISION NO:	PROCEDURE NO: G.O.# 26	PAGE of PAGES: 1 of 15
ISSUED BY: Cody D. Louviere, CHIEF OF POLICE			REVISION DATE: June 22 ND , 2016	
SUBJECT: DEPARTMENTAL DISCIPLINE				

PURPOSE

This Order sets forth formal and informal action which may be taken against any employee violating his/her oath and trust by: committing an offense punishable under the laws and statutes of the United States, the State of Louisiana, local ordinances, violating any Written Directive, disobeying any lawful command, or being incompetent in the performance of their duties.

POLICY

It shall be the Department's philosophy that discipline be utilized in a progressive and positive manner. Discipline shall not be administered as punishment, but instead as a tool used in guiding the employee into being productive and accountable for their actions or inactions.

SUPERVISOR'S RESPONSIBILITY

- A. Except for gross breaches of discipline, supervisors shall attempt to begin employee discipline with the least punitive measures. If this fails to bring about positive change, then increasingly more severe measures may be required. While this process may take some time, supervisors shall ensure that each employee is dealt with justly, and in a manner which clearly indicates that positive, constructive measures utilized to change behavior or performance preceded the imposition of more negative sanctions.
- B. First-line supervisors are in the best position to observe employee appearance and conduct. They shall detect those instances where formal or informal actions are warranted. First-line supervisors shall counsel employees informally, for minor infractions such as tardiness, abuse of duty time, inadequate or unsatisfactory job performance, abusive language, or disruptive behavior. Severe acts and misbehavior shall be brought up the chain of command. These types of actions will result in a more severe penalty.

TYPES OF FORMAL AND INFORMAL ACTION

- A. Counseling, Training, Oral Reprimand, Letter of Counseling, Mandated Counseling by E.A.P. or Similar Program.
 1. Supervisors may counsel employees regularly without formal action. Such counseling shall be informal, positive, supportive, and may or may not be documented.
 2. All supervisors shall counsel employees concerning job-related matters, within their capabilities. Many factors can affect an employee's job performance, so job-related counseling may involve the employee's family and other affected persons. Counseling shall include the identification of

unacceptable behaviors or actions, specifically what was performed wrong, and the desired or acceptable performance. Counseling will attempt to determine the reason for a particular behavior and recommend measures to correct or improve the employee's performance.

3. Formal or informal action may involve remedial training. Such training may be deemed necessary to rectify the improper behavior. Remedial training may include attendance of basic academy classes, in-service training, or other training specially created to accomplish the Department's recommended actions. Remedial training shall be reasonably offered until the employee can demonstrate proficiency in the corrected behavior. All remedial training shall be documented by the employee's respective supervisor and or the Training Staff.
4. Oral warnings may be issued when an employee commits a minor infraction of a Written Directive.
 - a. Informal documentation shall be retained by the supervisor giving the warning and used as a reminder in completing Employee Performance Evaluations.
 - b. Informal documentation shall be purged from the employee's personnel file on the first day following the employee's annual evaluation.
 - c. A subsequent violation may result in another warning depending upon the circumstances. Each warning shall be followed with informal documentation of the specific incident, inclusive of what, when, where, why, and how it occurred.
 - d. Comments made by the employee being warned shall be documented by the supervisor giving the warning.
5. The final informal action taken, at the supervisory level prior to formal disciplinary action, shall be a Letter of Counseling. A Letter of Counseling will be served on an employee who is in violation of the rules, regulations, procedures, or policies of the Department. The purpose of the letter is to offer constructive criticism of an employee's behavior, action/inaction or appearance. It shall further advise the employee of their violation, and instruct him/her in the proper procedure on how to correct the violation.
 - a. When documented counseling is to be conducted, a Letter of Counseling shall be completed and approved by the Division Commander prior to being issued or discussed with the employee in question.
 - b. A Letter of Counseling shall be filed in the respective Division Commander's office, the office of the Chief of Police, and the employee's immediate supervisor's file.
 - c. Letters of Counseling shall be purged one year from the date of the incident.
 - d. An employee who continues having documented difficulties may be subject to progressive formal disciplinary action.
 - e. Employees may comment on the Letter of Counseling.
 - f. At the time of the documented counseling, the affected employee shall be counseled as to the correct behavior required.

- g. The employee shall sign the Letter of Counseling. If the employee refuses, the supervisor shall request an additional supervisor to witness the refusal and document the letter accordingly.
- 6. An oral reprimand may only be issued by the Chief of Police or his designee.
 - a. At the time of an oral reprimand, the affected employee shall be counseled as to the correct behavior required.
 - b. A Letter of Counseling shall be completed in the same manner as described above.
- 7. Mandated counseling by E.A.P. in addition to other similar programs may be deemed appropriate if authorized by the Chief of Police.

B. Letter of Reprimand

- 1. Police Civil Service Employees:
 - a. All Letters of Reprimands shall be issued by the Chief of Police or his designee.
 - b. A Letter of Reprimand cautions an employee about poor behavior, sets forth the corrected or modified acceptable behavior mandated by the Department, and specifies the penalty in case of recurrent poor or unacceptable behavior.
 - c. A Letter of Reprimand becomes part of the employee's disciplinary record for a period not to exceed (18) eighteen months.
 - d. An employee may appeal a Letter of Reprimand. This shall be accomplished within (15) fifteen days of the reprimand's issuance and in accordance with Fire and Police Civil Service Law, or Municipal Civil Service Law.
- 2. Municipal Government Employees Civil Service:
 - a. A Letter of Reprimand shall be issued by the Chief of Police or his designee.
 - b. A Letter of Reprimand cautions an employee about poor behavior, sets forth the corrected or modified acceptable behavior mandated by the Department, and specifies the penalty in case of recurrent poor or unacceptable behavior.
 - c. A Letter of Reprimand becomes part of the employee's disciplinary record for a period not to exceed (18) eighteen months.

C. Demotion, Suspension, or Reduction of pay

- 1. If the situation warrants, the Chief of Police or his designee may demote, suspend with/without pay, or reduce an employee's pay for a specific length of time.
- 2. Suspensions without pay will normally be for a specific period of time, as determined by the Chief of Police or his designee.

3. Suspensions resulting from criminal investigations:
 - a. In no case shall an employee convicted of a felony continue to work for the Department.
 - b. If an employee is acquitted of criminal charges, the employee may be disciplined at the discretion of the Chief of Police or his designee, or reinstated with full or partial back pay depending on the status of the suspension with or without pay.
4. During a suspension, the employee shall not undertake any official duties, including (police related) off-duty security.
5. Reduction of pay shall be for a specific length of time and shall be a percentage of the employee's (base) pay.
6. An employee may appeal a demotion, suspension, or reduction of pay. This shall be completed within (15) fifteen days of notification, and in accordance with Fire and Police Civil Service Law or Municipal Civil Service Law.

D. Dismissal

1. Dismissals shall be made in cases of extreme malfeasance, misfeasance, or non-feasance of duty.
2. Employees may appeal a dismissal within (15) days of receipt of notice. This shall be done in accordance with Fire and Police Civil Service Law or Municipal Civil Service Law.

CODE OF DISCIPLINE – CATEGORIES OF OFFENSES

A. Disciplinary actions shall be subdivided into three distinct classes or groups, each resulting in progressive punitive actions. The classes of disciplinary offenses are identified as follows: Category 1 Offenses, Category 2 Offenses, and Category 3 Offenses. The code is structured similar to the Louisiana Criminal Code, with offenses grouped in categories based on the relative seriousness of the offense. The potential penalty is then set according to the level of seriousness and escalates with subsequent offenses. The most serious offenses will be dealt with severely, and at the discretion of the Chief of Police.

DISCIPLINARY ARTICLE DEFINITIONS

The following articles of discipline are intended to be used as a definitive guide as citations of misconduct for a failure to comply with policy, procedure, or departmental regulations, but are not all inclusive of all possible scenarios and shall not be limited to the given articles.

VIOLATORS ARE SUBJECT TO DISCIPLINARY ACTION(S)

All employees of the Youngsville Police Department regardless of rank or assignment are subject to disciplinary action for any violation of the rules, procedures, Written Directives, General Orders, or departmental policy contained herein or in other procedural manuals (S.O.P.) issued by the Department. It is not necessary the violation be intentional, but may be by omission or failure to comply.

1.1.1. The evidentiary standard shall be that of a preponderance of evidence; e.g. would a reasonable person given the evidence at hand determine it is more likely the violation occurred than it did not.

1.1.2. It is the responsibility of each employee to be aware of the current rules, regulations, procedures, or policies established by the Department. No employee shall plead ignorance of the rules as a defense to disciplinary action.

Definition of Letter of Counseling

1.1.3. A Letter of Counseling shall be served on an employee who is in violation of the rules, regulations, procedures, Written Directives, General Orders, or policies of the Department. The purpose of this letter is twofold: to advise the employee of his violation and to instruct him in the proper procedure or how to correct the violation.

1.1.4. A Letter of Counseling shall consist of a brief factual statement covering the violation and surrounding circumstances, a quotation of the applicable section(s), and the preferable method the employee may employ to correct the deficiencies.

1.1.5. A Letter of Counseling will serve as a basis for progressive disciplinary action for a period of (1) one year from the date of issuance. The letter will not be placed in the employee's permanent personnel file, but maintained in the employee's supervisor's file, for evaluation purposes. It shall further be filed in the respective Division Commander's office, and the office of the Chief of Police.

Definition of Letter of Reprimand

1.1.6. A Letter of Reprimand shall be served on an employee who is in violation of the rules, regulations, procedures, Written Directives, General Orders, or policies of the Department. The purpose of this letter is to inform the employee that his actions are intolerable and that repeated actions of the same nature will bring forth harsher corrective measures.

1.1.7. A Letter of Reprimand shall consist of a brief factual statement detailing the violation, a quotation of the applicable section(s) and an order to desist from further behavior.

1.1.8. A Letter of Reprimand will be retained in the employee's personnel jacket for a time period not to exceed (18) eighteen months. This Letter of Reprimand may be utilized as a basis for additional, and/or subsequent disciplinary action.

Definition of Remedial Training

1.1.9. Remedial training is further instructions prescribed by the Chief of Police or his designee and is designed to educate the affected employee and correct improper behavior.

Suspension/Demotion

1.1.10. Please review the above section entitled Types of Formal and Informal Actions, Subsection-C.

CATEGORY OF OFFENSES

1:0 CATEGORY 1 OFFENSES

These violations need not be intentional. This standard is based on the premise that every employee is issued a copy of the rules, regulations and procedures to be followed and trained in their application. It is the responsibility of every employee to be current with regard to departmental policy and the rules and regulations governing conduct. Although not every offense classified as a Category 1 Offense is listed, discretionary use of additional offenses may be subject to this specific category.

1:1 Use of Tobacco Products on Duty

No employees of the Department while on duty shall smoke or use any tobacco products while in direct contact with the public or while in City-Parish buildings except in areas specifically designated for tobacco usage. Employees shall further refrain from utilizing tobacco products in departmentally owned vehicles.

1:2 Dress Code

All employees of the Department shall adhere to the dress code while on duty, working police related security, appearing in court, or when officially representing the Police Department.

1:3 Personal Identification

All employees shall have their Department issued employee identification card and badge with them at all times while in the City limits or in the execution of official duties; in addition to carrying required weapons. Officers shall give their name, badge number, and other pertinent information to any person requesting such facts unless doing so would jeopardize the successful completion of a police assignment.

1:4 Driver's License Required

Any employee who drives a Youngsville Police Department owned vehicle in conjunction with their employment shall obtain and keep a valid Louisiana driver's license with them at all times while on duty.

1:5 Punctuality

All employees of the Department shall be punctual in attendance for duty, courtroom appearance, or at any other departmental function where time is specified.

1:6 Residence and Telephone

Each employee of the Department shall reside within the prescribed geographical limits of the Youngsville Police Department. Employees shall inform the Office of the Chief of Police, the Division Commander and their immediate supervisor within (24) twenty-four hours of moving or changing telephone numbers. Every employee must list their residential street address (no post office boxes) and the telephone number assigned to their address.

1:7 Completion and Submission of Required Forms

Each employee of the Department shall complete all reports, forms, and any other required documents prior to the end of their tour-of-duty unless waived by their supervisor until the next day; in no case shall the time exceed (24) twenty-four hours. These required reports shall be presented to their supervisor for approval as required. In cases of grievance, it shall be processed and forwarded up the chain of command within the time limit specified in YPD G.O. #77.

1:8 Wearing of the Uniform

The Chief of Police will prescribe the uniform to be worn by employees of the Department as indicated in YPD General Order # 78. All clothing and equipment will be worn by employees of the Department as issued, except for alterations to insure proper fit.

- a. All employees of the Department assigned to uniform duties, shall wear the official uniform while on duty, as indicated in YPD General Order #78. At no time will only part of the uniform be worn with civilian clothes. All clothing shall be kept clean and pressed, all leather gear and metal items shall be polished. Shirts will be buttoned/zipped and tucked in at all times.
- b. All members assigned to investigative or administrative divisions shall wear clothing in accordance with YPD General Order # 78.
- c. The name tag shall be worn centered over the right pocket approx. 1/16" above the pocket edge. Any marksmanship award (shooters badge) shall be worn centered above the name tag.
- d. Only personal pins approved by the Chief of Police shall be worn on the uniform. This pin or insignia is to be worn centered above the name tag.
- e. The badge shall be worn on the left side in the designated area of the outer most garment.
- f. The duty belt is to be worn as issued. Belt keepers may be worn which will be black basket weave leather with or without snaps. All extra duty ammunition shall be worn in compliance with departmentally accepted methods.
- g. Officers shall wear only departmental authorized style shoes or boots with plain toe and low heels. Black or dark blue socks shall be worn with shoes or boots that expose socks to view. Medical exceptions may be granted.

1:9 Chain of Command

The current organizational chart illustrates and delineates the chain of command within the Department. All orders, instructions, reports, and communications will follow the channels indicated on this chart, except in emergencies, when otherwise authorized by the Chief of Police, or as denoted in established Written Directives.

1:10 Computer Usage

Employees shall not engage in unauthorized use of computer equipment owned by the City of Youngsville / Youngsville Police Department, including, but not limited to, playing computer games, watching non-police related DVD's or movies, or utilizing such computers for personal business.

1:11 Conduct Unbecoming of an Officer

Employees whether on or off duty shall follow the ordinary and reasonable rules of good conduct and behavior. They shall not commit any act in an official or private capacity that would bring reproach, discredit, or embarrassment to their profession, the Department, or which could constitute conduct unbecoming by an employee. Employees shall follow established procedures in carrying out their duties, and shall at all times use sound judgement.

1:12 TASER

Employees that are annually certified/recertified in the use and deployment of Department owned Tasers shall not violate Administrative Procedures as defined in YPD G.O. # 87- TASER Protocol.

2:0 CATEGORY 2 OFFENSES

2:1 General Orders

Employees shall abide by all Federal, State, and City Laws, as well as any City of Youngsville directives or policies, rules of the Civil Service Board, General Orders, Written Directives, and other properly issued directives of the Chief of Police.

2:2 Use of Alcohol or Controlled Substances

An employee of the Department shall not appear for duty or attempt to take official action while off duty, when under the influence of alcohol or prescription medications which may impair their ability to think clearly.

2:2.1 No employee shall purchase alcoholic beverages, or visit bars or lounges while on duty, or transport alcoholic beverages in a departmental vehicle, or (on-duty) departmental subsidized vehicle unless it is evidence, an authorized investigation, or as directed by the Chief of Police.

2:2.2 Any employee found guilty of an offense in this section, in addition to departmental discipline, is subject to the provisions of the current City of Youngsville Substance Abuse Policies.

2:3 Command of Temper

All employees shall exercise emotional control while in the performance of their duties. No employee while on duty or while acting in an official police capacity off-duty shall use rude or derogatory language, racist terminology, or attempt to deride, offend, or insult anyone. This applies to any social media comments that would otherwise bring discredit or embarrassment to the department or employee.

2:4 Attention to Duty

Employees shall be attentive to their duties at all times, and shall perform all duties assigned.

2:5 AWOL

No employee of the Department shall absent himself without approved leave or informing a supervisor of an illness.

2:6 Interdepartmental Cooperation and Cooperation between Agencies

Employees will fully cooperate, exchange information and provide assistance to other employees of the Department and officers of other law enforcement agencies.

2:7 Failure to Report Lost or Damaged Equipment

No employee shall fail to notify his or her immediate supervisor, either verbally or written, when assigned equipment is lost or damaged.

2:8 Damaging Departmental Equipment

No employee of the Department shall willfully or through neglect or failure to act, abuse, damage, lose or cause to be spoiled, or wrongfully dispose of any property or equipment owned by the Youngsville Police Department/City of Youngsville.

2:8.1 Departmental equipment is to be used only in the manner for which it was designed, consistent with an employee's training.

2:8.2 Employees are responsible for all issued equipment and shall be expected to present any part or all for inspection.

2:8.3 Employees who are issued departmentally owned vehicles shall be responsible for the cleanliness and submission for preventative maintenance of the vehicle as required. No employee shall make unauthorized repairs or adjustments without prior approval.

2:9 Traffic Violations

Any employee receiving a moving traffic citation, whether on or off duty shall immediately notify the Chief of Police through their chain of command.

2:9.1 Any employee convicted of a moving traffic violation excluding OWI, Hit & Run Driving, and or Reckless-Operation as defined by the Louisiana Revised Statutes, shall be subject to additional disciplinary action, whether the offense occurred on or off duty.

2:10 License Suspension

Any employee whose driver's license has been suspended or revoked by the Department of Public Safety (Louisiana Office of Motor Vehicles) will immediately report this to their immediate supervisor. If the suspension is for other regulatory reasons, the employee will be subject to disciplinary action. Until the employee's license is reinstated, he/she shall not drive departmentally owned vehicles and may be reassigned to administrative duties.

2:11 Cooperation with Fellow Employees

Employees shall treat other employees of the Department with respect. They shall be courteous, civil and respectful of their superior officers, other employees, and shall not use threatening or insulting language. Officers shall cooperate, support and assist each other whenever necessary.

2:12 Computer Usage

Unauthorized use of computer equipment owned by the Youngsville Police Department for the purposes of browsing the Internet for sites that are not reasonably related to police functions, including but not limited to, use of Y.P.D. computers to view pornographic Internet sites, unauthorized downloading of programs, pictures, files and/or data from the Internet, and use of Y.P.D. computers to access the Internet for personal business and/or other personal reasons.

3:0 CATEGORY 3 OFFENSES

This section governs the violation of statutes, ordinances, or those provisions of the Disciplinary Code, or Written Directives which could threaten the integrity of the Department, pose a danger or threat to the public or members of

the Department, and/or have criminal consequences. The Internal Affairs Unit shall investigate all violations inclusive of this section. Although not every offense classified as a Category 3 Offense is listed, discretionary use of additional offenses may be subject to this specific category.

3:1 Felony Conviction

Any employee convicted of a felony, whether the offense occurred on or off duty, shall be terminated from the Department.

3:2 Misdemeanor Conviction

Any employee convicted of a misdemeanor, or the offense of Driving While Intoxicated, Hit & Run Driving, and/or Reckless Operation shall be subject to additional disciplinary action, including termination, whether the offense occurred on or off duty.

3:3 Possession of Illegal Narcotics

The use, possession, or attempted possession of illegal drugs, or unlawfully obtained drugs, or prescription drugs prescribed for others as defined in the Louisiana Revised Statutes is prohibited, except as part of an officially authorized investigation regarding possession or attempted possession. Any employee found guilty of an offense in this section, in addition to departmental discipline, is subject to the provisions of the current City of Youngsville's Substance Abuse Policy.

3:4 Evidence Reporting

All found, recovered, or seized evidence shall be entered into the Youngsville Police Department Evidence Unit at the end of the officer's tour-of-duty, or as defined within the Written Directives regarding specific items.

3:5 Unauthorized Public Statements

Except as specified in YPD General Order # 56, no employee shall be authorized to release information to the news media, except as authorized by the Chief of Police.

3:6 Independent Investigations

No employee will institute an independent investigation on any other employee or any public official without first obtaining authorization from the Chief of Police. This shall not be construed to prohibit supervisors from monitoring and controlling personnel under their command. Should the Chief of Police be involved in the activities leading to the investigation, the commanding officer of the Internal Affairs personnel shall be notified of the investigation.

3:6.1 Employees shall immediately report to their supervisor knowledge of any unusual activity, situations, or problems which involve the duty of the Department to uphold the law, keep the peace, or protect lives and property.

3:6.2 Employees shall not communicate in any manner, directly or indirectly, any information that may delay an arrest, or enable persons guilty of criminal acts to escape arrest or punishment, dispose of property or goods obtained illegally, or destroys evidence of unlawful activity.

3:7 Release of Prisoners/Allowing Escape

No employee of the Department shall, without proper authority, release any prisoner, nor through neglect or design allow any prisoner to escape. All escapes shall be investigated by the Shift and/or C.I.D. personnel who will forward a thorough report to the Chief of Police.

3:8 Confidentiality

All departmental business is to be considered confidential and no employee shall release any information to any non-law enforcement entity without proper authorization. No employee shall make known to anyone a proposed action of the Department or the details of any police action/operation.

3:9 Failure to Provide Information to a Supervisor

No employee may keep silent, fail to fully provide information to a supervisor, make any false statements or misrepresent facts regarding misconduct as described in the Written Directives, criminal code, or on his/her part, or part of another employee of the Department.

3:10 Manufacturing Evidence

No employee shall manufacture evidence. Employees shall only collect and transfer evidence consistent with departmental policy and approved collections methods.

3:11 Bribery or Extortion

No employee shall accept any bribes, nor engage in any extortion, or any other unlawful means of obtaining anything of prospective or actual value by utilizing his/her position with the Department. If an employee receives a bribe offer, he shall immediately make a written report to their respective Division Commander.

3:12 Confiscated Property

No employee will convert any property, recovered, found or seized, for his personal use.

3:13 Assault on an Employee

No employee of the Department shall strike, attempt to strike, or point/direct a weapon at another employee in a threatening manner.

3:14 Sexual Harassment

No employees will solicit sexual favors, commit unwanted sexual advances or other verbal or physical conduct of a sexual nature, ridicule, mock, deride, belittle, or harass any person during the course of his/her duties as a member of the Youngsville Police Department.

3:15 Cowardice

No member shall avoid responsibility, actively endanger another officer or member of the public by failure to act or manifest cowardice in any form.

3:16 Desertion

Any employee not reporting for work, without notifying a supervisor for more than (2) two consecutive work days shall be guilty of desertion.

3:17 Carrying Out Orders

Employees of the Department are required to obey any Standing Order or General Order, abide by all policies and procedures and promptly carry out any order relayed from a supervisor by an employee of the same or lesser rank, whether issued verbally, in writing, or by telecommunications (2-way radio, phone, fax, digital communications). Employees shall obey lawful order(s) of a superior. Upon receipt of a conflicting order, the employee receiving the order shall tell the supervisor issuing the second order of this fact. If then directed, the employee shall obey the second order. Upon receipt of a perceived unjust or improper order, the receiving employee shall obey the order to the best of his ability within the limits of the law, and then report the order through the proper chain of command. No employee shall obey an order that is contrary to Federal, State, or City Law.

3:18 Insubordination

Employees shall promptly obey all lawful orders and directions given by supervisors. The failure or deliberate refusal of employees to obey such orders shall be deemed insubordination and is prohibited. Flaunting with the authority of a superior officer by displaying obvious disrespect or by disputing his orders shall likewise be deemed insubordination.

3:19 Falsification of Documents

No employee shall willfully falsify any form, report, or document. Any employee that is alleged to or has been accused of falsifying documents shall also be the subject of a criminal investigation as well as any internal investigations.

3:20 Use of Force

Every employee of the Department shall use only the force necessary to effect an arrest or maintain custody of a suspect. All employees shall abide by the provisions of the Department's policies regarding use of deadly or non-lethal force.

3:20.1 Improper Use of a Taser

Only officers trained and certified in the use of agency owned Tasers shall be authorized by the Department to be carried and deployed. Employees shall not willfully or by neglect or omission violate the sections entitled Prohibited Acts in addition to Precautionary Measures of YPD G.O. #87 – Taser Protocol. The section entitled Administrative Procedures (Prohibited Acts) shall not apply to this Category 3 Offense.

3:21 Association with Known Criminals

No employee will knowingly associate on a continuing social basis with individuals who have been convicted of any felony without prior written approval of the Chief of Police, or except as part of an authorized assignment/investigation.

3:22 Violation of Laws

No employee shall willfully or by neglect or omission violate any Federal, State, or City Ordinance. Any employee receiving any type of summons or arrest shall immediately notify the Chief of Police through his or her chain of command.

3:23 Truthfulness

Employees shall not knowingly make false or untrue statements.

4:0 Table of Penalties

The Chief of Police reserves the right to assign punitive disciplinary measures against employees based on, but not exclusive of the following:

- a. Prior employee disciplinary history.
- b. Severity of violation or infraction.
- c. Level of progressive discipline.
- d. Severity of damages or loss of life, or the potential for loss of life.

The following table of penalties is listed only as a guide for the Chief of Police to follow when assigning discipline to employees; however, it is only a guide and shall not be a template for disciplinary actions based solely on the violation or infraction. The Chief of Police may at any time modify or assign a different level of discipline to employees based on other criteria, such as the topics listed above or other facts of the respective employee's disciplinary situation. The Chief of Police may adjust the level of discipline given which he deems appropriate when considering the totality of the circumstances.

Category	1st Offense	2nd Offense within 1 Year	2nd Offense within 3 Years	3rd Offense within 5 Years
1	Conference, Letter of Counseling, or Letter of Reprimand	Letter of Counseling, Reprimand, or 1 Day Suspension	Letter of Counseling, or Letter of Reprimand	Letter of Reprimand - 5 Days Suspension
2	Letter of Reprimand - Three Days Suspension	3 - 5 Days Suspension	1 - 3 Days Suspension	5 Days Suspension - Dismissal
3	One Day Suspension - Dismissal	45 Days - Dismissal	15 Days - Dismissal	30 Days Suspension - Dismissal

Note: Offenses of any category need not be of the exact same violation in order to qualify as a second or third offense. Progressive discipline shall escalate within the Category regarding similar or like offenses.

FINAL AUTHORITY

- A. Final departmental disciplinary authority and responsibility rests with the Chief of Police or his designee. Other supervisory employees may only take the following disciplinary measures.
 - I. Oral warning or counseling.

2. Emergency suspension.
3. Oral or written reprimands, Municipal Government Employees Civil Service only.

B. In deciding upon disciplinary action, the Chief of Police may consider the nature and severity of the violation, the personnel record of the employee, any recommendations by the employee's supervisor(s), and the disciplinary action imposed in prior cases of a similar nature.

EMERGENCY SUSPENSION

- A. Only the Chief of Police or the Assistant Chief of Police shall impose an emergency suspension when it appears that an employee's continued presence on the job constitutes a substantial and immediate threat to the welfare of the Department, the public, or to himself. This not only includes severe departmental infractions such as gross insubordination, but the question of an employee's physical or psychological fitness for duty.
- B. Employees who are subject to an emergency suspension, in addition to all affected supervisors involved, and the Division Commander, shall report to the office of the Chief of Police at 0900 hours on the next business day following the emergency suspension.

INTER-DIVISIONAL INFORMAL ACTION

- A. When a supervisor or commander of one Unit orally warns an employee of another Unit, he shall notify the supervisor of the warned employee as soon as possible.
- B. The warning supervisor shall submit a written report of his actions and reasons to his supervisor and to the Division Commander of the (warned) employee.

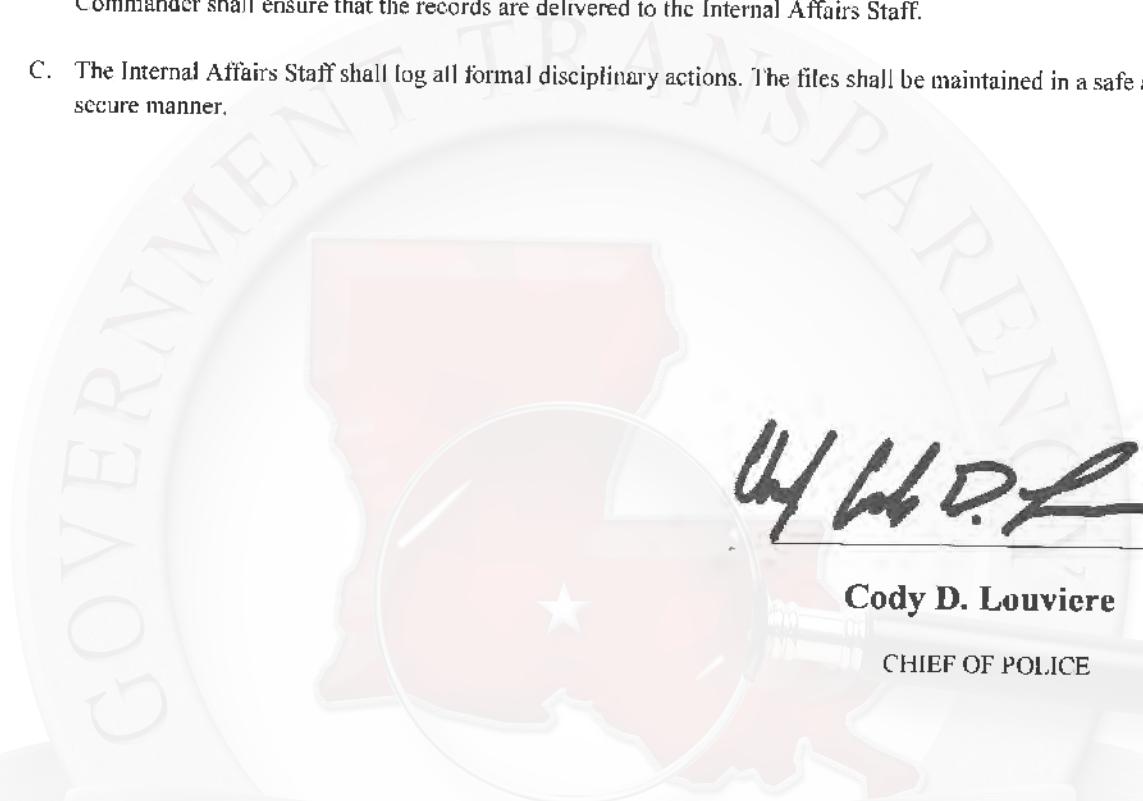
NOTICE TO EMPLOYEE

- A. When any formal disciplinary action is taken against an employee, that employee shall be notified in writing. The notification shall contain the following:
 1. Specific charge or violation.
 2. Factual basis for misconduct.
 3. Effective date of discipline.
 4. Right to appeal.
 5. What shall happen to the employee should similar incidents continue to occur.
- B. When employee misconduct results in dismissal, the letter of dismissal shall contain the following:
 1. A statement citing the reason for dismissal.
 2. The effective date of the dismissal.
 3. The right to appeal.

4. A statement of the status of fringe and retirement benefits after dismissal.
5. A statement as to the content of the employee's employment record relating to the dismissal.

REPOSITORY OF DISCIPLINARY RECORDS

- A. The Internal Affairs personnel files shall be the departmental repository of all disciplinary records.
- B. After the conclusion of any disciplinary action taken against any employee of the Department, the Division Commander shall ensure that the records are delivered to the Internal Affairs Staff.
- C. The Internal Affairs Staff shall log all formal disciplinary actions. The files shall be maintained in a safe and secure manner.



Cody D. Louviere

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CHIEF OF POLICE

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Youngsville Police Department

GENERAL ORDERS

DATE ISSUED July 11 th , 2016	EFFECTIVE DATE	REVISION NO:	PROCEDURE NO: C.O.# 77	PAGE of PAGES: 1 of 3
ISSUED BY: Cody D. Louviere, CHIEF OF POLICE			REVISION DATE: April 18 th , 2016	
SUBJECT: EMPLOYEE GRIEVANCE PROCEDURE				

PURPOSE

This Order establishes rules, timelines and procedures to be followed concerning employee based grievances.

POLICY

It shall be the policy of the Youngsville Police Department to allow employees an outlet to address objections through a request procedure of individual relief, through a formal grievance process, in matters involving working conditions, application of rules or regulations, and/or discrimination. The employee may personally represent himself, or have representation of his/her choice during the process. This process is designed to reduce personnel dissatisfaction, increase morale, identify problems within the organization, increase employees' positive perception of the Department, and to rectify problems at the lowest supervisory level.

REPRESENTATION

- A. All employees shall be afforded equitable representation during their grievance process. Said representation shall be in the form of confidential guidance and advice from a neutral and unbiased resource. Such resources can either be the Office of Internal Affairs and/or the Office of Human Resources. Should an employee desire further representation outside of the two aforementioned avenues, then it will be incumbent upon the grieving employee to seek and retain said services.

PROCEDURES

- A. Levels of Review -- Employees shall follow their established chain of command, beginning at the lowest level, when filing formal grievances. The levels of review are generally:
 1. First Line Supervisor – Supervisors generally on the Squad or Shift level, or their designee.
 2. Division Head – Division Commander, or their designee.
 3. Department Director – The Chief of Police, or his designee.
 4. The City of Youngsville Chief Administrative Officer or Mayor.
- B. Coordination – The Youngsville's Administrative Operations Section coordinates all grievance procedures throughout the organization. The Administrative Services Department shall be the custodial repository of all grievances.

C. Grievance Steps 1 – 4

An employee requesting to file a grievance concerning a specific incident or action, which occurred during the course of his/her employment, must discuss the matter with his/her immediate supervisor as soon as possible, but within **two (2) working days**. A supervisor shall have four (4) working days to resolve the grievance to the employee(s) satisfaction.

1. If a satisfactory solution is not found, the employee requesting to file a grievance must write a formal grievance within two days using the "Grievance - Request for Review" form, (see attached) and have his/her immediate supervisor indicate that the issue is unresolved. The employee must then request a Grievance tracking number from the Department's Internal Affairs Staff within **four (4) working days**. The basis of this complaint should be clearly stated listing the time, place, and other parties involved. The Official Grievance Form shall then be forwarded to the employee's supervisor. The immediate supervisor shall then have **four (4) working days** within which time the supervisor must either render a decision to satisfy the grievance or indicate on the Grievance form that "No satisfactory solution" was agreed upon.
2. In the event a satisfactory settlement has not been reached at the end of the **fourth (4th) working day** following the incident, the employee shall forward the grievance to the Division Commander or designee, as required in "Step 2", indicating on the Grievance form that a satisfactory solution has not been reached.
3. The Division Commander or designee shall render a decision, in writing, within **four (4) working days** from receipt of the grievance. If the employee is not satisfied with the resolution at this step in the Grievance process, then the Grievance form shall be submitted to the Chief of Police. The employee must complete the section of the form entitled "Step 3" prior to submitting the form to the Chief of Police.
4. The Chief of Police has **five (5) working days** to review and resolve the grievance at this level. In the event that the employee is still unsatisfied with the resolution at this step in the process, the employee must then complete the section of the Grievance form titled "Step 4". The formal Grievance form must then be submitted to the Youngsville City Chief Administrative Officer within **three (3) working days**.
 - a. The City Chief Administrative Officer or Mayor shall have **ten (10) working days** in which to review and render a conclusive decision to the employee. This last step in the process is final. In the event that the employee is still not satisfied with the final decision for their grievance, then an appeal may be made to either the Civil Service Board or the employee may seek assistance from a local Court.

Documented Annual Analysis

- A. In an effort to monitor and correct any negative trends or problems within the Department from filed employee grievances, an annual documented analysis shall be conducted by the Internal Affairs Supervisor, or his/her designee, every February for the previous year.

1. This documented annual analysis shall only be limited to generalized summaries of the matters that were aggrieved the previous year and shall not contain or record employee names or numbers and any information contained in these grievances shall be kept in the strictest of confidence.
2. The annual analysis shall be presented to the Chief of Police in an effort to ensure that any policies, employee relations, procedures and any technical protocols that could possibly present a negative issue, or difficulties in the working environment to employees, are resolved in the future and to streamline the grievance process.
3. This annual analysis shall be available to any employee requesting the information where the analysis would suggest any policy or personnel changes and shall not contain any employee related identification information.

B. The Internal Affairs Supervisor shall maintain a yearly record of all filed grievances from the previous year and shall maintain these records for a period not to exceed three (3) years.

1. If no employee grievances were filed from the previous year, the Internal Affairs Supervisor shall still complete an annual analysis stating that no employee grievances were filed for that year.

Jeff Loh D.F.L.

Cody D. Louviere

CHIEF OF POLICE