

**FOURTH ASSESSMENT OF SETTLEMENT AGREEMENT**  
**COMPLIANCE BY THE EVANGELINE PARISH SHERIFF'S OFFICE** December  
2021 through November 2022



October 26, 2023

## I. INTRODUCTION

The United States Department of Justice (DOJ) investigated the policies and practices of the Evangeline Parish Sheriff's Office (EPSO) under the authority granted by the Violent Crime Control and Law Enforcement Act of 1994, 34 U.S.C. § 12601. In December 2016, we issued a report concluding that there is reasonable cause to believe that EPSO engages in a pattern or practice of conducting arrests without probable cause for the purposes of investigating crimes, which EPSO calls "investigative holds." These holds resulted in problematic interrogation practices. We also identified other deficiencies that contributed to systemic problems in EPSO's policies, trainings, community engagement, supervision, data collection, and transparency.

In June 2018, DOJ and EPSO entered into a Settlement Agreement (Agreement) to ensure that EPSO provides police services in a manner that complies with the Constitution and the laws of the United States. This Report, the Fourth Enforcement Assessment, covers the period from December 1, 2021, through November 30, 2022.

During this reporting period, we conducted a site visit where members of our team met with EPSO leadership and accompanied officers on ride-alongs. We continued to participate in bi-weekly meetings with the Sheriff, his executive staff, and members from EPSO's Patrol and Jail Operations. We also worked closely with EPSO's Compliance Coordinator, identifying policies, procedures, and general orders that needed to be updated or revised. We reviewed hundreds of incident files, including viewing body-worn camera footage, and we reviewed hundreds of documents, including policies, training materials, police reports, and internal affairs files. We also conducted statistical analyses of the data that EPSO maintains in its records management system.

We appreciate Sheriff Charles Guillory's leadership as EPSO has improved in nearly every subject area of the Agreement. EPSO issued a Special Order to ensure that officers do not use "investigative holds" or rely on materially false or incorrect information to justify law enforcement activities. EPSO greatly improved in maintaining field interaction data in its electronic database. EPSO also developed and implemented protocols for conducting strip searches at the jail and a system for supervisors to evaluate employee performance. These improvements are positive and necessary steps that EPSO has taken toward durable, sustainable reform.

In addition to the above, we found that EPSO continued to sustain reforms in the following areas: ensuring that civilians were not arrested without probable cause; developing and implementing policies and procedures that have resulted in improved practices throughout the office; ensuring that officers attend mandatory POST certification courses throughout the year; using a web-based system to improve its practices of initiating, documenting, and submitting arrest warrants for approval; and documenting and conducting thorough criminal investigations.

We also identified areas of the Agreement where EPSO did not show improvement during this reporting period. We continued to find deficiencies in supervision, noting that supervisors continued to conduct cursory reviews of officers' activities. We also identified shortcomings in EPSO's ability to conduct meaningful outcome assessments of police activities. Although EPSO has data systems that could be used to conduct outcome assessments, it has yet to access these systems to satisfy various requirements of the Agreement. Furthermore, we found that the Sheriff has not published an annual report describing EPSO's implementation efforts during this reporting period.

## II. COMPLIANCE STATUS SUMMARY

This assessment documents EPSO’s implementation efforts from December 1, 2021, through November 30, 2022. We use the following compliance categories to report the status of each Agreement provision and show compliance progress by year.

<b>Compliance Status by Year (Number of Paragraphs)</b>				
<b>Category</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Non-Compliance</b> - Not met most or all of the requirements of the provision.	0	0	7	0
<b>Pending/Insufficient Information</b> – Provision is not ready for evaluation or has not been able to fully assess compliance.	73	29	3	0
<b>Beginning Compliance</b> - Made initial efforts to implement required reforms and achieve the outcome envisioned by the provision but significant work remains.	0	39	28	7
<b>Partial Compliance</b> - Made progress with implementation but specific areas need further attention to achieve substantial compliance.	1	6	26	20
<b>Substantial Compliance</b> - Implemented the specific provision as required by the Settlement Agreement and now has an ongoing obligation to sustain implementation to remain in compliance.	0	0	10	47

## III. SUMMARY

<b>Settlement Agreement Topic Areas</b>	<b>Status of Compliance</b>
FOURTH AMENDMENT ACTIVITY	

Public Interactions and Investigative Holds (Paragraphs 4, 5)	Substantial Compliance
Investigative Holds (Paragraph 6)	Substantial Compliance
ARRESTS AND CITATIONS	
Probable Cause Arrests (Paragraphs 7, 8)	Substantial Compliance
Obtaining Valid Arrest Warrants (Paragraph 9)	Substantial Compliance
Probable Cause Affidavits (Paragraph 10)	Substantial Compliance
Prisoners Released without Probable Cause (Paragraph 11)	Substantial Compliance
Communicating with friends and counsel while incarcerated (Paragraph 12)	Substantial Compliance
Quality of Life Arrests (Paragraph 13)	Substantial Compliance
INVESTIGATORY STOPS	
Reasonable Suspicion Requirements (Paragraph 14)	Substantial Compliance
Transporting Subjects (Paragraphs 15, 16)	Substantial Compliance
Probable Cause Stops (Paragraph 17)	Substantial Compliance
DOCUMENTATION OF FOURTH AMENDMENT ACTIVITIES	
System Development (Paragraph 18)	Partial Compliance
Documenting Stops, Citations, and Arrests (Paragraphs 19, 20)	Partial Compliance
Storing and Retaining Data Collected (Paragraph 21)	Partial Compliance
SUPERVISION REGARDING FOURTH AMENDMENT ACTIVITIES	
Report Reviews (Paragraph 22)	Partial Compliance
Supervisory Reviews of Probable Cause Affidavits (Paragraph 23)	Substantial Compliance
Addressing Policy Violations (Paragraphs 24, 25)	Beginning Compliance
Quality and Completeness of Supervisory Reviews (Paragraph 26)	Beginning Compliance
CRIMINAL INVESTIGATIONS	
Interrogations (Paragraphs 27, 28)	Substantial Compliance
<i>Miranda</i> adherence (Paragraphs 29, 30, 31)	Substantial Compliance

Documentation of Interrogations (Paragraph 32)	Substantial Compliance
Recording Interrogations (Paragraph 33)	Substantial Compliance
Investigative File Creation and Maintenance (Paragraph 34)	Substantial Compliance
Investigative File Identification and Tracking (Paragraph 35)	Substantial Compliance
Investigative File Management (Paragraph 36)	Substantial Compliance
COMMUNITY ENGAGEMENT	
Community Outreach (Paragraph 37)	Substantial Compliance
JAIL OPERATIONS	
Booking (Paragraphs 38, 39)	Beginning Compliance
Detainee Searches (Paragraphs 40, 41)	Beginning Compliance
Inmate Files (Paragraph 42)	Substantial Compliance
Inmate Lists (Paragraphs 43, 44)	Substantial Compliance
Jail Supervision (Paragraphs 45, 46)	Substantial Compliance
Providing Inmate Lists to Court (Paragraph 47)	Substantial Compliance
Access Provisions (Paragraphs 48, 49)	Substantial Compliance
POLICIES	
Settlement Agreement Requirements (Paragraphs 50, 51, 52)	Substantial Compliance
Policy Manual (Paragraph 53)	Substantial Compliance
Publicly Available Policies (Paragraph 54)	Substantial Compliance
TRAINING	
Basic Training and Certifications (Paragraphs 55, 56, 57, 58)	Substantial Compliance
Annual Training Requirements and Field Training Program (Paragraphs 59, 60)	Substantial Compliance
Lateral and In-Service Training (Paragraphs 61, 62)	Substantial Compliance
ACCOUNTABILITY AND OVERSIGHT	
Misconduct Reporting (Paragraphs 63, 64)	Partial Compliance

Body-Worn Cameras (Paragraph 65)	Partial Compliance
DATA COLLECTION AND REPORTING	
Eliminating Unlawful practices (Paragraph 66)	Partial Compliance
Developing Data Collection System (Paragraphs 67, 68, 69, 70)	Partial Compliance
Annual Reports (Paragraph 71, 72)	Partial Compliance
Status Reports (Paragraph 73)	Partial Compliance
OUTCOME ASSESSMENTS	
Conducting Annual Outcome Assessments (Paragraph 74)	Partial Compliance
Creating Outcome Assessments Plan and Protocol (Paragraph 75)	Partial Compliance
Outcome Assessments Analysis (Paragraph 76)	Partial Compliance
Outcome Assessments Status and Annual Reports (Paragraph 77)	Partial Compliance

#### **IV. ANALYSIS OF EPSO'S COMPLIANCE TO DATE**

##### **FOURTH AMENDMENT ACTIVITY**

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4. The Sheriff will ensure that EPSO officers conduct all interactions with the public consistent with the requirements of the Fourth Amendment of the Constitution of the United States.
  
  5. The Sheriff will ensure that EPSO officers do not rely on information known at the time of reliance to be materially false or incorrect to justify an investigatory stop, search, interrogation, citation, or arrest.

Status (4,5)	Substantial Compliance
2021 Status	Beginning Compliance

<p>Assessment</p>	<p>EPSO continues to ensure that deputies receive annual training on a suite of policies developed to ensure that officers' contact with community members is consistent with the requirements of the Fourth Amendment and due process. Annual training covered the following topics:</p> <ul style="list-style-type: none"> <li>• Arrests;</li> <li>• Voluntary Contacts, Investigative Stops, and Weapons Pat Downs;</li> <li>• Fair and Impartial Policing;</li> <li>• Field Interview Cards;</li> <li>• Miranda Rights;</li> <li>• Search Warrants;</li> <li>• Law Enforcement Role and Authority; and</li> <li>• Vehicle Stops.</li> </ul> <p>During this reporting period, EPSO reviewed and updated policies and distributed them to its officers, ensuring that officers received current versions of these policies. EPSO's Compliance Coordinator ensured that updated policies were placed on its website. All current policies are now accessible on EPSO's webpage.</p> <p>We reviewed over 180 incident reports and 200 body-worn camera videos during this reporting period and did not identify any evidence that suggests officers have relied on information known to be materially false or incorrect to justify law enforcement activities or have used "investigative holds" during any of their interactions with community members. Furthermore, we did not identify any incidents where officers unnecessarily lengthened stops, conducted warrantless searches, or used inappropriate or unprofessional statements during these interactions.</p> <p>We also reviewed EPSO's internal body-worn camera auditing documents, confirming that EPSO designated the captain in charge of investigations and the captain assigned to the Executive Staff to conduct independent, random video audits of officers' field interactions that occurred in December 2021 and from January to September of 2022 to ensure that department standards were being met.</p> <p>In our reviews of these auditing logs, we found that EPSO did not identify additional actions needed to improve practices at the department. The only action that was identified in the auditing logs was "adjust camera angle." Moreover, in our</p>
	<p>reviews of 200 body-worn camera videos, we did not identify unconstitutional or unprofessional practices. EPSO officers typically activated their cameras before interactions with motorists and captured the entirety of these interactions.</p>
<p>Next Steps</p>	<p>We will continue to audit body-worn camera videos of officers' arrests, searches, and citations to ensure that EPSO continues to comply with this provision of the Agreement. We also will continue to ensure that EPSO has its captains conduct random monthly audits of body-worn camera videos. We will also focus our reviews on whether EPSO takes remedial action to address policy violations.</p>

6. EPSO will explicitly prohibit the practice of "investigative holds," and will make clear in policy and training that investigative holds without probable cause violate the Constitution and will subject officers to discipline, including possible termination.



<b>Status (6)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	EPSO used an internal subject-matter expert to develop and deliver annual trainings on all its policies related to Fourth Amendment activities. EPSO also submitted documentation confirming that all officers received these trainings during this reporting period. The Sheriff also issued a Special Order in October 2022 prohibiting investigative holds. EPSO did not discipline any officers for conducting “investigative holds,” and we found no evidence that EPSO officers had done so. EPSO also updated its website with the most recent version of its Fourth Amendment policies.
Next Steps	We will continue to audit body-worn camera videos of officers’ arrests, searches, and citations to ensure that EPSO continues to comply with this provision of the Agreement.

**A. Arrests and Citations**

7. The Sheriff will ensure that all arrests made by EPSO officers, including detentions that rise to the level of de facto arrests, are supported by probable cause that a person has committed or is committing a crime, based on reliable facts and evidence known to the officer at the time of the arrest. EPSO’s need or desire to question a person about a crime will not be considered in determining whether probable cause exists for the arrest of that person.
  
8. Officers will not arrest persons for the sole purpose of questioning the person regarding criminal activity of another person, or because of personal animus.

<b>Status (7,8)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	EPSO recently developed policies and conducted training that addressed the requirements of these provisions. We reviewed over 180 incident reports and over 200 stops during this reporting period and found no evidence that suggests officers are stopping or arresting people for the sole purpose of questioning them regarding criminal activity of another person, or because of personal animus. We also found no evidence that officers either detained or arrested subjects without articulating probable cause that a person has committed or is committing a crime.
Next Steps	We will continue to review body-worn camera videos of officers’ arrests and citations to ensure that they continue to comply with these provisions of the Agreement.

9. The Sheriff will ensure that officers obtain a valid arrest warrant signed by a judge prior to making an arrest, unless an offense was committed in the officer’s presence, or the officer has positive and reliable information establishing probable cause that an offense was committed outside the officer’s presence.

- a. If the arrest takes place inside a person’s home, the Sheriff will ensure that officers obtain a valid arrest warrant signed by a judge prior to making the arrest, unless exigent circumstances exist.
- b. Individuals may be arrested as material witnesses only pursuant to a valid court order for their arrest.
- c. If a warrantless arrest is made, EPSO will ensure that the arresting officer fills out an affidavit of probable cause as soon as reasonably possible after the arrest, and in no case later than 6 hours after the arrest or at the conclusion of the officer’s shift, whichever is earlier.
- d. Once an affidavit of probable cause has been filled out, EPSO will ensure that it is immediately reviewed by a supervisor.
- e. If a warrantless arrest is made, EPSO will ensure that the arresting officer also completes an arrest report that describes, in non-boilerplate language, the facts and circumstances leading up to and justifying the arrest.
- f. Once approved by a supervisor, EPSO will ensure that the affidavit is immediately transmitted to a judge or magistrate for review. The transmission may be either physical or electronic.

Status (9)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	<p>During the last reporting period, EPSO began using CloudGavel, a web-based system, to initiate, document, and submit warrants to judges for rapid review and approval. CloudGavel replaced WarrantNow, the previous system used for these purposes. Our review determined that the new system continues to satisfy the requirements of the Agreement.</p> <p>During our October 2022 site visit, EPSO’s CloudGavel Department Administrator delivered a presentation on how the agency was using CloudGavel to assist in expediting warrant services in the parish. In addition to expediting warrant services, we learned that EPSO could use CloudGavel to assist in identifying trends, allowing supervisors to monitor officers’ submissions and to correct practices that did not comply with policy.</p> <p>We randomly selected and reviewed 20 arrest warrants during this reporting period. Of these 20 arrest warrants, five involved distribution of controlled substances; four involved possession of controlled substances; three involved aggravated assaults; and two involved thefts. There was one arrest warrant for each of the following: an escape; unauthorized use of vehicle; failure to register; criminal conspiracy; possession of firearm; and criminal conspiracy and forgery.</p>

	<p>In each of these instances, we confirmed that a supervisor reviewed each warrant submission within one hour; warrants were submitted to a judge within one hour; and a judge signed and returned warrants for execution.</p> <p>During this reporting period, we did not identify any instances where EPSO officers made warrantless arrests or arrested material witnesses. In all instances where persons were booked at the jail, EPSO ensured that booking sheets and arrest warrants were submitted before people were booked at the jail. We confirmed that arrest reports did not contain boilerplate language when describing the facts and circumstances leading up to and justifying arrests.</p>
Next Steps	<p>During the next reporting period, we will: (1) continue to audit EPSO's electronic warrant system to ensure that warrant processing continues to comply with the Agreement; (2) continue to randomly select and review warrant submission; and (3) ensure that EPSO creates reports to monitor trends in the department.</p>

10. EPSO will not book any person who was arrested without a warrant into the jail unless the affidavit of probable cause is filled out and approved by a supervisor.

Status (10)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	<p>EPSO previously trained officers on proper implementation of new policies and new documentation systems consistent with those policies. During this reporting period, we were able to access EPSO's records on CloudGavel, confirming that people were not arrested without a warrant in situations where a warrant was required. We reviewed 20 probable cause affidavits, concluding that the shift supervisors or an EPSO Captain approved these affidavits before a person was arrested.</p> <p>Although we identified instances where courts rejected warrants for a variety of reasons (including insufficient information in warrant; need more investigation; wrong name on warrant; no probable cause; or need more information to determine probable cause), we did not identify any instances where people were arrested before warrants were ultimately approved. Furthermore, we did not find any instances where warrants were rejected but people remained jailed when they should have been released.</p>
Next Steps	<p>EPSO continued to use its electronic record-keeping system, for all booking records and other applicable jail activity.</p>

11. EPSO will immediately and unconditionally release any person who is held at the jail or in EPSO's holding cell(s) if the judge or magistrate rejects the EPSO officer's affidavit of probable cause in support of that person's arrest, unless the court authorizes continued detention pending a timely submission of an affidavit supporting probable cause.

<b>Status (11)</b>	<b>Substantial Compliance</b>
2021 Status	Pending/Insufficient Information
Assessment	We reviewed two instances where EPSO immediately released persons because a judge rejected affidavits of probable cause.
Next Steps	We will continue to audit documentation of law enforcement activity to assess compliance with this provision.

12. EPSO will ensure that all arrested persons are allowed to use a telephone or send a message for the purposes of communicating with friends or with counsel, as soon as reasonably possible.

<b>Status (12)</b>	<b>Substantial Compliance</b>
2021 Status	Beginning Compliance
Assessment	<p>EPSO officials reported that arrested persons were allowed to use the telephone or send a message to friends or counsel after their arrests, unless EPSO officials identified evidentiary issues (i.e., multiple arrestees involved in a crime) that would delay access to these communication portals while EPSO staff members were gathering evidence.</p> <p>We reviewed prisoner telephone logs on EPSO’s E-Force system, documenting outgoing calls to attorneys and family members. We did not review any evidence that suggest that EPSO failed to allow prisoners access to phones or systems to send messages to family member or counsel.</p>
Next Steps	We will continue to review prisoner-release materials that EPSO provides throughout the reporting period.

13. Officers will not arrest a person in lieu of issuing the person a citation for a quality-of-life offense for the purpose of subjecting the person to questioning or interrogation. EPSO will require officers to obtain supervisory approval, where reasonably practical, prior to making a custodial arrest for a quality-of-life offense. If an officer cannot obtain supervisory approval prior to making an arrest for a quality-of-life offense, he or she will obtain supervisory approval as soon as possible after the arrest and will explain why the officer could not obtain prior approval.

<b>Status (13)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	In our reviews of over 180 incident reports and 200 body-worn camera videos, we did not identify any instances where persons were arrested on quality-of-life offenses.
Next Steps	We will continue to monitor implementation of the EPSO’s Vehicle Stops, Field Interviews, Investigative Stops, Voluntary Contacts, and Quality-of-Life policies;

	and audit documentation of law enforcement activity to assess compliance with this Agreement provision.
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**B. Investigatory Stops**

14. EPSO will ensure that officers do not conduct investigatory stops unless they possess reasonable suspicion, based on specific and articulable facts, that a person has committed, is committing, or is about to commit a crime. EPSO will prohibit officers from relying on gossip, rumors, or hunches to justify an investigatory stop. EPSO’s need or desire to question a person about a crime will not be considered in determining whether reasonable suspicion exists for the investigatory stop of that person.

Status (14)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	<p>EPSO uses E-Force as its web-based system to manage its computer-aided dispatch (CAD) systems, records management system (RMS), and jail records system. EForce is EPSO’s repository for storing, maintaining, and reviewing records, documents, and files pertaining to law enforcement and jail operations. We audited a sample of incident reports and body-worn camera videos from December 2021, May 2022, and November 2022. In these reviews, officer activity appeared to comply with this provision, and we saw no evidence that EPSO officers violated the requirements of this provision.</p> <p>EPSO also produced body-worn camera review logs that supervisors used to assess vehicle stops to ensure that officers were adhering to constitutional requirements and complying with EPSO policy and this Agreement. In our reviews of these auditing logs, EPSO did not identify additional actions needed to improve practices at the department. The only action that was identified in any of these audits was “adjust camera angle.” Moreover, in our reviews of 200 body-worn camera videos, we did not identify unconstitutional or unprofessional practices.</p> <p>EPSO officers typically activated their cameras before interactions with motorists and captured the entirety of these interactions.</p>
Next Steps	We will continue to assess enforcement activity to determine compliance with this Agreement provision and ensure that supervisors continue to conduct random audits of stops to determine whether officers are complying with the Constitution and EPSO policy.

15. Officers will not transport the subject of an investigatory stop to a different location for questioning or any other investigatory purpose unless the officer has probable cause to make an arrest or the stopped person requests to speak with officers in a different location. Where such a request is made, officers will document the request in writing and ask the person to sign the documentation verifying that the request was made.

16. Officers will not transport a person to jail or otherwise incarcerate a person as part of an investigatory stop unless there is probable cause that the person has committed a crime.

<b>Status (15,16)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	<p>EPSO uses E-Force as its web-based system to manage its CAD systems and RMS. EPSO uses E-Force for accurately documenting investigative stops as part of its new policies and has fully integrated its CAD systems and RMS under this webbased system. We audited samples of incident reports and body-worn camera footage from December 2021, May 2022, and November 2022. These reviews confirmed that officers' activities complied with these provisions of the Agreement.</p>
	<p>In our reviews of over 200 stops, we did not review any instances where subjects were either taken to a different location and questioned or requested to speak to officers in a different location. We also did not review any evidence that suggests that EPSO officers transported subjects to different locations or to jail for questioning.</p>
Next Steps	We will continue to evaluate enforcement activity and ensure that all field interactions are documented and maintained in E-Force.


17. Officers will not stop a vehicle unless there is probable cause that the driver has committed a traffic violation, or reasonable suspicion based on specific and articulable facts that the vehicle or an occupant of the vehicle has been, is, or is about to be engaged in the commission of a crime.

<b>Status (17)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	<p>EPSO uses E-Force as its web-based system to manage its computer-aided dispatch and records management system. EPSO uses E-Force for accurately documenting investigative stops as part of its new policies and has fully integrated CAD systems and RMS under this web-based system.</p> <p>We reviewed 180 incident reports and 200 body-worn camera videos from December 2021, May 2022, and November 2022, concluding that officer activity appeared to comply with this provision.</p> <p>We saw no evidence that EPSO officers conducted stops without probable cause. EPSO also produced internal auditing reports that supervisors used to assess stops to ensure that officers were adhering to constitutional requirements and complying with EPSO policy and this Agreement.</p>
Next Steps	We will continue to evaluate enforcement activity and ensure that field interactions are documented and maintained in E-Force.

**C. Documentation of Fourth Amendment Activities**



- 18. EPSO will develop systems to ensure that all stops citations, arrests, and field interviews are properly documented and that the documentation for each type of activity includes all pertinent information, including the information required in the Data Collection section of this Agreement. EPSO will require officers to document the justification for the particular activity under the relevant legal standard for that activity, where applicable, and specific, individualized descriptions of the facts and circumstances in support of that justification.
  
- 19. EPSO will require officers to use specific, individually tailored descriptions of facts in their documentation of all stops, citations, and arrests.
  
- 20. EPSO officers will complete their documentation of their activities by the end of the officer’s shift in which the activity occurred.
  
- 21. EPSO will develop systems for the storage and retention of this documentation, consistent with the Data Collection paragraphs of this Agreement [*See Section VIII*].

Status (18,19,20,21)	Partial Compliance
2021 Status	Beginning Compliance
Assessment	<p>EPSO continued to use E-Force as its web-based system to enable supervisors to easily access its CAD systems, RMS, and jail management system. During this reporting period, EPSO began using E-Force to store its field interaction data.</p> <p>We reviewed hundreds of field interview reports, and we confirmed that officers adhered to EPSO’s Field Interview policy, including properly documenting enforcement activities, and ensuring that these activities were timely uploaded into E-Force. More specifically, these reports documented the reason for the encounter, including the name of the involved person, location of the encounter, call type, vehicle information, and duration of the encounter. We were also able to confirm that all reports were completed and maintained in E-Force by the end of the officer’s shift.</p> <p>EPSO’s current practice is a stark contrast from the last reporting period, during which EPSO rarely documented or even assessed field interviews. We commend EPSO for using E-Force and dispatch to assist in documenting field encounters with subjects.</p>
Next Steps	We will: (1) continue to audit EPSO’s E-force system to ensure that EPSO continues to comply with the requirements of the Agreement; and (2) ensure that officers continue to follow field interview protocols

<b>Response:</b>	<p>EPSO has implemented the Field Interview Policy. The policy states that all information required to fulfill the requirements of the agreement Dispatch will enter</p> <div style="text-align: center;">           SECTION 1001          FIELD INTERVIEWS C       </div> <p>all information into the EFORCE CAD system.</p>
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D. Supervision Regarding Fourth Amendment Activities

22. Absent exceptional circumstances, within 12 hours of receiving a report documenting a stop, citation, or arrest, a supervisor will conduct a review to determine whether the activity was based upon legally sufficient grounds and complied with EPSO policy and document the results of their review in writing.

<b>Status (22)</b>	<b>Partial Compliance</b>
2021 Status	Beginning Compliance
Assessment	<p>In our review of E-Force data, we were able to determine that supervisors reviewed reports within 12 hours. These reviews are maintained in a history tab on E-Force. The supervisor reviews were captured in the Audit History. Although we were able to confirm that supervisors reviewed documents, these reviews were cursory and did not assess narratives for legal sufficiency or policy compliance.</p> <p>EPSO supervisors appeared to review reports on the web-based system without determining whether officers' activities were legally justified and complied with EPSO policy. Though we did not identify problematic or unconstitutional practices during our records and video reviews, we would like to see improved supervisory reviews after documented stops, citations, or arrests.</p>
Next Steps	<p>We will continue to audit EPSO's electronic-warrant system and ensure that EPSO documents thorough supervisory reviews of officers' activities and maintains</p> <p>thorough reports on these activities. We will also continue to monitor closely EPSO's supervision of Fourth Amendment activities.</p>
<b>Response:</b>	<div style="text-align: center;">           SECTION 221          LAWFUL ARREST, PR       </div> <div style="text-align: center; margin-left: 100px;">           SECTION 403          WARRANTS.docx       </div> <p>Reports are reviewed initially by the Sergeant of the shift. The Sergeant is also responsible for the review of the warrants before they are sent to the On Duty Judge for approval. There are policies set forth and practiced the Sheriff Office to ensure that on 4<sup>th</sup> amendment rights are violated. All documentation can be reviewed through EFORCE AND CLOUD GAVEL.</p>

23. If an EPSO officer arrests a person and no warrant was previously issued, the supervisor will review the officer's probable cause affidavit immediately and prior to the person being booked into the jail, consistent with Paragraph 38 of this Agreement. If the activity resulted from an insufficient factual basis, such as a lack of reasonable suspicion or probable cause, the supervisor





will immediately release the person and take additional remedial measures, as appropriate. The supervisor will document the review in a report.

Status (23)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	We reviewed various booking reports and affidavits that described the reasons for arrests. In these reports and affidavits, we confirmed that supervisors timely reviewed these documents before persons were booked into the jail. We did not identify any reports or affidavits that a supervisor returned because they lacked reasonable suspicion or probable cause.
Next Steps	EPSO must continue to provide evidence that supervisors are reviewing documentation for legal sufficiency and taking action to correct deficiencies.



24. Supervisors will take appropriate action to address all violations or deficiencies in law enforcement activities or the documentation thereof, including recommending non-disciplinary corrective action for the involved officer, and/or referring the incident for administrative or criminal investigation.

25. Supervisors will track each violation or deficiency and the corrective action taken to identify officers needing repeated corrective action. Supervisors will ensure that any deficiencies, or patterns of deficiencies, are considered in officers' performance evaluations, as appropriate.

Status (24,25)	Beginning Compliance
2021 Status	Non-Compliance
Assessment	<p>During this reporting period, EPSO supervisors began auditing body-worn camera videos to assess stops to ensure that officers were adhering to constitutional requirements and complying with EPSO policy and this Agreement. Supervisors conducted these audits in each month from December 2021 to September 2022. In addition to supervisors completing monthly audits, EPSO also developed and implemented a system for supervisors to evaluate employee performance.</p> <p>We reviewed several completed employee evaluations and recommended that EPSO consider including more narrative descriptions of supervisors' assessments. While the current system is a step in the right direction, we nevertheless would like to see more descriptive evaluations prospectively, including noting whether corrective actions were taken during the review period.</p>
	During this reporting period, we did not identify any violations or deficiencies in law enforcement activities or problematic documentation practices.

<b>RESPONSE:</b>	<p>The EPSO has implemented the policy to review videos. This practice will be continuous. See copy of logs.</p>  <p>BODY CAMERA VIDEO REVIEWS.pdf</p>  <p>SECTION 621 BODY WORN CAMERA REC</p>
Next Steps	<p>We will continue to audit EPSO’s implementation of these requirements in the next reporting period. We will ensure that monthly audits are completed during each month of the reporting period. We also plan to examine employee evaluations to ensure that supervisors are documenting violations or deficiencies and recommending corrective action when issues are identified.</p>

26. EPSO will take into account the quality and completeness of supervisory reviews in the supervisor’s own performance evaluations and will take appropriate corrective or disciplinary actions against supervisors who fail to conduct complete, thorough, and accurate reviews of officers’ law enforcement activity.

<b>Status (26)</b>	<b>Beginning Compliance</b>
2021 Status	Non-Compliance
Assessment	<p>EPSO’s new policies include requirements for supervisory reviews and action. EPSO implemented these policies to assess the quality of supervisory reviews. In our reviews of various reports, we found that EPSO supervisors completed cursory reviews of officers’ law enforcement activities. Furthermore, we did not find any evidence that showed that EPSO took corrective or disciplinary action against supervisors who failed to conduct thorough and objective reviews of officers’ activities.</p>
Next Steps	<p>We will audit EPSO’s implementation of these requirements in the next reporting period. We also plan to examine supervisory evaluations to ensure that EPSO is considering the quality and completeness of supervisory reviews and taking appropriate actions when supervisors fail to conduct complete, thorough, and accurate reviews.</p>
<b>Response:</b>	  <p>Section 226 Field Training &amp; Evaluation System    Section 103 Policy Evaluation System</p> <p>The EPSO has policies in place to ensure that reviews and action by employees are monitored and documented.</p>

### III. CRIMINAL INVESTIGATIONS A. Interrogations

27. The Sheriff will ensure that all interrogations conducted by EPSO employees occur in accordance with the Constitution and laws of the United States.

28. Prior to conducting a custodial interrogation, officers will provide a clear and understandable notification of *Miranda* rights to the person. Prior to any custodial interrogation, officers will have the person read a written waiver of rights form and provide a signature indicating whether the person will waive the rights.

Status (27,28)	Substantial Compliance
2021 Status	Substantial Compliance
Assessment	EPSO provided training on how to conduct lawful interrogations and provide proper notification of <i>Miranda</i> rights. EPSO also implemented a standardized <i>Miranda</i> rights form to ensure consistency throughout the department.
	During this review period, we watched several taped investigation interviews and audited closed criminal investigation files, confirming that investigators consistently notified individuals of their <i>Miranda</i> rights. Furthermore, we also were able to confirm that EPSO maintains all materials that we reviewed in its EForce system.
Next Steps	We will continue to review criminal investigations interviews and audit closed investigation files to ensure that EPSO complies with these provisions of the Agreement.

29. If a person who has been notified of their *Miranda* rights indicates that they wish to speak to an attorney or does not wish to answer questions, officers will immediately stop the interrogation and will not ask any further questions.

30. If the person does not appear able to understand the rights or waiver form, or declines to waive the *Miranda* rights, officers will immediately stop the interrogation and not ask any further questions. Officers will not make threats, promises, inducements, or take any other coercive actions in order to obtain a waiver of *Miranda* rights.

31. If a person who has declined to waive their rights informs an officer of their own volition that they have changed their mind and wish to participate in an interrogation, officers may restart the process described in Paragraph 28.

Status (29, 30, 31)	Substantial Compliance
2021 Status	Substantial Compliance

Assessment	EPSO has trained personnel on how to conduct lawful interrogations and provide proper notification of <i>Miranda</i> rights. Our review of a sample of taped criminal investigation interviews and closed investigative files that involved an interrogation indicates that officers are consistently providing notification of <i>Miranda</i> rights to individuals. We saw no evidence in these interviews and closed files that officers were continuing interrogations after individuals invoked their <i>Miranda</i> rights, that individuals failed to understand their rights or waiver of those rights, or that officers were taking any coercive actions in interrogations.
Next Steps	We will continue to audit EPSO's implementation of these requirements in the next reporting period.

### B. Documentation of Criminal Investigations

32. EPSO will develop systems to ensure that all interrogations are documented, including the date, time, location, and duration of the interrogation, and all persons present for the interrogation.

Status (32)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	EPSO created a standardized <i>Miranda</i> rights form for interrogation to ensure consistency throughout the department. We reviewed several closed investigative files that involved an interrogation, confirming that each contained completed rights forms. Each form contained the date, location of interrogation, time of interrogation, duration of interrogation, and persons present for the interrogation. The completed forms are also stored on EPSO's E-Force platform.
Next Steps	We will continue to review EPSO's system for documenting interrogations.

33. EPSO will continue to record all interrogations on audio or video and ensure that all recordings are preserved in the investigative file.

Status (33)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	EPSO reports that all interrogations are recorded by audio or video. The recordings are transferred to the secretary's computer and saved after transcription, and the video is kept on the body-worn camera footage computer. We reviewed several taped interrogations during this reporting period, confirming that EPSO's business practice is to record all interrogations on audio or video. These recording are also maintained in an investigative file, which are stored on E-Force once the case is closed.
Next Steps	We will continue to audit EPSO's implementation of these requirements in the next reporting period.

34. EPSO will ensure that an investigative file is created and maintained for all criminal investigations, to contain all reports and documentation associated with the investigation, including all recordings of interrogations. Investigative files will be maintained in good order, preserved in a secure manner, and effectively organized to provide for accessibility by EPSO employees.

Status (34)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	EPSO uses E-Force as its case-management system. EPSO maintains all reports and documents associated with investigations on this system. We reviewed several investigative files, concluding that these files were in good order, preserved in a secure manner, and organized in a way to allow for easy accessibility for EPSO employees.
Next Steps	We will continue to audit EPSO's implementation of these requirements in the next reporting period.

35. EPSO will ensure that every investigative file contains a unique tracking number that may be cross-referenced with other associated files and documents.

Status (35)	Substantial Compliance
2021 Status	Substantial Compliance
Assessment	EPSO assigns a unique investigation tracker number at the beginning of each investigation. This number is used through the duration of the investigation.
Next Steps	We will continue to audit EPSO's implementation of these requirements during the next reporting period.

36. EPSO will ensure that a copy of all documentation related to investigatory stops, interrogations, citations, arrests, interrogations, and *Miranda* waivers, and all documents related to court proceedings, including all affidavits, warrants, reports, and supervisory reviews, are included in the corresponding investigative file(s).

Status (36)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	EPSO takes steps to create an investigative file once an arrest has been made. We reviewed closed investigative files, confirming that these files were appropriately organized and contained all documents related to court proceedings, including all affidavits, warrants, reports, and supervisory reviews. EPSO maintains all investigative files on E-Force.
Next Steps	We will continue to audit EPSO's implementation of this requirement in the next reporting period.

### C. Community Engagement

37. Within 120 of the Effective Date, EPSO will develop a public education effort to notify the public about changes to EPSO’s practices, including that it will no longer conduct investigative holds. As part of this effort, EPSO will also educate the public on EPSO’s practices and the constitutional limits on EPSO’s ability to stop, search, and arrest members of the Ville Platte community.


Status (37)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	In 2018, EPSO developed a community education document and met with community leaders to discuss the changes to EPSO policies and practices that are required by the Agreement. Since that time, EPSO has made numerous changes to policies and practices that were not part of the initial education document. EPSO added all updated polices to its website so community stakeholders could have access to these documents. EPSO also created an alerts-and-update feature on its website, allowing it to send out changes to policies, procedures, and practices via text and email to stakeholders who signed up for these specific notifications.
Next Steps	We will audit EPSO’s progress in the next period.

### V. JAIL OPERATIONS

38. Prior to booking any person into the EPSO jail, EPSO employees will ensure that either a valid arrest warrant was issued prior to arrest, or an affidavit of probable cause has been completed by the arresting officer and approved by a supervisor.


39. Absent exigent circumstances, EPSO will not conduct a strip search or book the person into the jail before an affidavit of probable cause is entered in the case file or an arrest warrant is issued.

Status (38,39)	Beginning Compliance
2021 Status	Pending/Insufficient Information
Assessment	In July 2022, EPSO revised and updated its jail intake procedures. These procedures ensure that jail supervisors approve arrest warrants or affidavits of probable cause before a person is booked into the jail. We were able to confirm these processes through EPSO’s E-Force management system.  We also reviewed information illustrating that when a person is brought to the jail and there is not a valid warrant, EPSO immediately released the person.
Next Steps	We will continue to audit and run reports on E-Force to ensure that persons are not booked without a valid arrest warrant and that jail personnel are following the July 2022 revised jail intake procedures.

Response:	All Jail personnel are trained in the procedures of intake. Jail personnel will not  intake a suspect unless there is an approved warrant by the Judge. SECTION 501 INTAKE AND BOOKIN
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40. Strip searches may only be conducted pursuant to a standardized protocol for persons admitted to jail.

41. No body cavity search, other than the mouth, may be performed without a warrant, unless the search is part of a standardized protocol for persons admitted to jail and a body cavity search is determined to be necessary for security of the facility. Unless exigent circumstances exist, all body cavity searches must be conducted by qualified, trained personnel of the same gender as the individual being searched, or if such personnel are unavailable, by a trained medical professional. Opposite-gender supervisors and staff or other non-medical personnel will not be permitted to observe the search.

Status (40,41)	Beginning Compliance
2021 Status	Non-Compliance
Assessment	In July 2022, EPSO revised and implemented its strip search procedures. EPSO deputies conduct strip searches when subjects are arrested, returned to the jail, or when subjects exhibit suspicious activity. EPSO’s strip search procedures also articulate the jail’s protocol for admitting subjects to the jail. EPSPO also reported that all corrections staff member received training on these procedures.  EPSO does not permit correctional staff members to perform body-cavity searches. When necessary, prisoners are sent to the hospital for an X-ray.
Next Steps	We will continue to audit EPSO’s newly implemented procedures involving stripsearch practices.
Response:	 Jail Procedures.docx The jail has implemented the attached policy in reference to searching. No strip search is conducted unless it required to ensure the safety of the function of the Jail.

42. For each arrested person detained in the EPSO jail, EPSO will maintain a case file that contains copies of the warrant or affidavit of probable cause with documentation of supervisor approval and all other documentation related to the person’s incarceration, such as booking forms, transportation logs, hygiene and bedding allocation, health and screening forms, and classification. The case file will be assigned a unique identifying number that will allow it to be cross-referenced with the investigative file and other relevant files. EPSO will maintain case files for a period of no less than 10 years from when they are released from the EPSO jail.

Status (42)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	EPSO continues to make significant efforts to improve organization of inmate case files and has taken steps towards complying with the unique identifier requirement as part of its new software system. EPSO also uses E-Force to store all jail records. We reviewed dozens of inmate records, confirming that EPSO maintains case files that meet the requirement of this Agreement provision. EPSO is also able to crossreference files between CloudGavel and E-Force to ensure that relevant records are maintained in these case-management systems.
Next Steps	We will continue to audit EPSO's case management system.

43. Within 60 of the Effective Date, EPSO will create an electronic list or spreadsheet of all persons incarcerated in the EPSO jail. The list will be updated every time a person is booked into or released from the jail. The list will contain, at a minimum, the following information:
- a. Name;
  - b. Date of birth;
  - c. Sex;
  - d. Race and/or ethnicity;
  - e. Case status (e.g., pre-trial, post-conviction, parole revocation, etc.);
  - f. Offense(s) for which the person is detained, along with applicable statute or code provision;
  - g. Date and time of booking;
  - h. Amount of bond, if any;
  - i. Next court date; and
  - j. Release date, if known.

44. EPSO's list of incarcerated persons will be maintained so that information on incarcerated persons, including the information listed above, may be reviewed and audited for a period of no less than 10 years from the date the person is released from EPSO jail.

Status (43,44)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	EPSO maintains an electronic case management system that contains all information on persons incarcerated at the EPSO jail, as this Agreement provision requires. During this reporting period, we were able to run various searches in E-Force, enabling us to retrieve inmate rosters that contained all required information that is included in this provision.
Next Steps	We will continue to audit EPSO's case management system and run random searches to ensure that EPSO maintains inmate information in E-Force.

45. EPSO will ensure that, at least once per day, a supervisory employee of EPSO reviews the list of incarcerated persons to ensure that each person's incarceration is consistent with EPSO policy and the Constitution and that the database contains all information required by EPSO policy and this



Agreement. The supervisory employee also will review the case file of each person arrested that day to ensure that documentation of probable cause exists.

46. If, at any time, an EPSO employee becomes aware that information required to be kept on the list of incarcerated persons is missing, that a person is improperly detained, or that the case file of an arrested person does not contain a warrant or affidavit of probable cause, the employee will immediately notify the Chief of Police or the Chief’s designee. The Chief of Police or designee will take immediate and appropriate action, up to and including immediate release of the incarcerated person. EPSO will ensure that the notification and responsive action is made part of the case file.

<b>Status (45,46)</b>	<b>Substantial Compliance</b>
2021 Status	Beginning Compliance
Assessment	<p>EPSO reported that supervisory employees review jail lists and files daily. EPSO also reported that these employees have consistently notified the jail lieutenant, assistant warden, or warden when information is missing. Missing information is thereafter shared with the duty judge and incarcerated persons are released once this information is confirmed and updated.</p> <p>During this reporting period, we were able to create and review various reports that EPSO maintains in E-Force, confirming that it maintains a database that tracks the requirements of these Agreement provisions.</p>
Next Steps	We will continue to audit EPSO’s case management system.

47. Once per week, EPSO will provide the list of incarcerated persons and related information, including bond status and amount, to Ville Platte and Evangeline Parish judges for review.

<b>Status (47)</b>	<b>Substantial Compliance</b>
2021 Status	Partial Compliance
Assessment	<p>We reviewed copies of the incarcerated persons lists that EPSO provided to parish judges during this reporting period. These lists contained the names of incarcerated persons, date booked, pending charges, docket number, bond amount, holds, and housing location. We also learned that EPSO has granted E-Force view-only access to the District Attorney’s Office, allowing it to review inmate jail records, including pending charges and bond amounts.</p>
Next Steps	We will continue to audit EPSO’s case management system and ensure that the District Attorney’s Office continues to have E-Force access.

48. EPSO will ensure that all incarcerated persons in the EPSO jail are provided with reasonable access to a telephone, or other means to contact friends, family members and/or counsel. Efforts to procure a statement or other information from the person will not be considered a legitimate reason to restrict access to a telephone or other means of contact.

Status (48)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	EPSO reports that the Public Defender’s Office sends daily emails identifying incarcerated persons that it represents and scheduling visits that it plans to conduct on a weekly basis. EPSO maintains a visitation log, confirming the date, time, and persons visited at the jail. EPSO also reports that incarcerated persons have access to phones at the facility, and for those persons unable to afford phone cards, EPSO has a phone log request book for those persons to ensure that they have access to a telephone. We were able to access and review Visitor/Phone Log Reports on EForce.
Next Steps	We will continue to audit EPSO’s case management system, including reviewing Visitor/Phone Log Reports.

49. EPSO will ensure that all incarcerated persons in the EPSO jail are provided with access to appropriate sanitation supplies, including toilet paper, prescription medications, and menstrual supplies (where applicable).

Status (49)	Substantial Compliance
2021 Status	Beginning Compliance
Assessment	EPSO provides sanitation supplies to all incarcerated persons weekly. Incarcerated persons also can purchase hygiene products through the commissary, and their family members are also permitted to bring sanitation supplies to the jail. EPSO jail staff members search these supplies before they are distributed to incarcerated persons. EPSO also ensures that indigent persons receive “hygiene packs” weekly, which contain a toothbrush, toothpaste, soap, and shampoo. We were able to access and review Jail Log Reports, confirming that EPSO provides and tracks distribution of these items to prisoners.
Next Steps	We will continue to audit EPSO’s case management system, including reviewing Jail Log Reports.

## VI. POLICIES

50. Within 270 days of the Effective Date, EPSO will ensure that its policies incorporate the requirements of this Agreement, and that the policies related to this Agreement comply with applicable law and are consistent with best practices. EPSO policies will be plainly written, logically organized, use clearly defined terms, and sufficiently instructive to effectively guide employees’ conduct. To the extent that existing policies meet the requirements of this Agreement, they do not need to be revised. If policies do not yet exist, EPSO will work with DOJ to identify model policies that may be adapted to fit the needs of EPSO and the terms of this Agreement. EPSO will implement all policies required by this Agreement.

51. The Sheriff will submit all policies related to this Agreement, as well as any proposed policy revisions, to DOJ for review and approval prior to publication and implementation, which approval will not be unreasonably withheld. DOJ will approve policies based upon consistency with this Agreement, best practices, and applicable law.

52. The Parties will act with reasonable diligence to timely draft and respond to proposed policies.

53. EPSO will maintain a complete, up-to-date, indexed policy manual. Employees will have ready access to hard or electronic copies of the manual. EPSO will promptly incorporate policy revisions or updates in their manuals.

54. The Sheriff will make all EPSO policies publicly available on its websites, except for policies that are reasonably deemed sensitive, such as procedures regarding undercover officers or operations.

<b>Status</b> (50,51,52,53, 54)	<b>Substantial Compliance</b>
<b>2021 Status</b>	<b>Partial Compliance</b>
<b>Assessment</b>	<p>EPSO has developed a suite of new policies to ensure that officers’ contact with community members is consistent with the requirements of the Fourth Amendment and Due Process. The policies include:</p> <ul style="list-style-type: none"> <li>• Arrests;</li> <li>• Contacts, Stops and Weapons Pat Downs;</li> <li>• Fair and Impartial Policing;</li> <li>• Field Interview Cards;</li> <li>• Miranda Warnings; • Search Warrants; and</li> <li>• Vehicle Stops.</li> </ul> <p>EPSO did not have a comprehensive set of law enforcement policies prior to entry of the Agreement. Adopting these new policies is a significant step towards developing a complete policy manual to guide officer conduct in every law enforcement encounter. All final, dated policies have been distributed to officers, and these policies are on EPSO’s website.</p>
<b>Next Steps</b>	<p>We will continue to work with EPSO on developing additional policies in the next reporting period.</p>

**VII. TRAINING**

55. EPSO will ensure that its officers receive basic training and certification prior to commencing work, as well as ongoing in-service and remedial training in order to ensure that officers are aware of their Fourth Amendment obligations and all policies incorporating the terms of this Agreement.

56. No EPSO employee, whether full-time or part-time, will be allowed to perform the full duties of a law enforcement officer until they have successfully completed all requirements for POST certification under state law, including training requirements. Duties performed by employees without POST certification may include non-law enforcement functions, such as administrative work or augmenting neighborhood policing efforts, that the employee has been trained to perform. Uncertified officers may not interact with members of the community while armed with a service

weapon, respond to calls for service, or perform or issue any stop, search, interrogation, citation, or arrest. Part-time officers who are firearm qualified and whose duties are restricted to paper service may perform paper service while armed with a service weapon. EPSO will comply with this paragraph within 270 days of the Effective Date.

57. EPSO’s two current non-certified, full-time officers will be POST certified by February 1, 2019 and may continue their current duties until that time.

58. The Parties may agree that full and part-time officers who are not POST certified may temporarily perform some law-enforcement functions if they have received additional training sufficient to allow them to perform those tasks. The law enforcement functions and training will be subject to DOJ review and approval.

Status (55,56,57, 58)	Substantial Compliance
2021 Status	Substantial Compliance
Assessment	<p>EPSO requires any newly hired officer to be POST certified. EPSO continued to ensure that officers attended mandated POST certification courses throughout the year. Each EPSO investigator, patrol officer, criminal patrol officer, traffic officer, and one dispatcher attended these courses during this reporting period.</p> <p>EPSO assigned a lieutenant to track and report when officers attended courses and completed their annual training requirements.</p>
Next Steps	We will continue to audit POST certification attendance documents and work closely with EPSO to ensure that it provides the POST annual training calendar and officers’ completion certificates on a rolling basis.

59. In addition to POST-required training, prior to commencing service involving the full duties of a law enforcement officer, all EPSO employees will receive at least eight hours of EPSO-specific supplemental training on EPSO policies. EPSO will ensure that officers understand the requirements of the Fourth Amendment, including prohibitions on “investigative holds.”

60. Within 365 days of the Effective Date, EPSO will ensure that its field training program incorporates best practices for police training officer programs in similarly-sized agencies. EPSO will ensure that there are sufficient and appropriate policies governing the operation of the field training program.


61. EPSO, will train all lateral police hires, within 30 days date of joining the EPSO, on EPSO policy and ensure that they understand the requirements of the Fourth Amendment, including prohibitions on “investigative holds.”

62. EPSO will ensure its officers receive at least eight hours of annual in-service training.

Status (59,60,61, 62)	Substantial Compliance
2021 Status	Partial Compliance
Assessment	EPSO continued to ensure that its officers received training on its suite of policies. In November 2022, EPSO provided annual in-service training to its officers, including a block of instruction on the Fourth Amendment.
Next Steps	We will continue to monitor and assess annual training and improvements to the field training selection process, focusing on selecting more experienced officers to serve as training officers. We also plan to audit all training records, including the records of lateral hires.

## VIII. ACCOUNTABILITY AND OVERSIGHT

63. Within 180 days of the Effective Date, EPSO will develop and implement policies to ensure that all allegations of misconduct, whether internally or externally generated, are courteously received by an EPSO supervisor, centrally documented and tracked, and fully and fairly investigated as required by best practices.
64. Where allegations of misconduct are sustained, EPSO will ensure that discipline is imposed fairly and consistently, and that officers and complainants are provided information as appropriate and consistent with best practices.

Status (63,64)	Partial Compliance
2021 Status	Non-Compliance
Assessment	<p>EPSO offers a “Citizen’s Complaint Form” on its website, allowing complainants multiple ways to submit complaints. EPSO also designated its Compliance Coordinator as the point of contact for all complaint submissions.</p> <p>EPSO also developed and implemented citizen complaint protocols to ensure that all citizen complaints were reviewed and submitted to the Sheriff for final approval. During our onsite visit, the Sheriff reiterated his commitment to reviewing and resolving citizen complaints as quickly as possible, recognizing the need for transparency in the complaint process. The Sheriff also told us that he maintains a copy of all complaints in his office. During this reporting period, we reviewed the only complaint that was filed against an EPSO officer.</p> <p>We suggested that EPSO use E-Force as a depository for all closed complaints. We also suggested that EPSO send close-out summaries to all complainants.</p>
Next Steps	We will continue to review EPSO’s complaint protocols during the next reporting period and ensure that discipline is imposed when misconduct is identified.
Response:	 <p>SECTION 223 DISCIPLINARY POLIC</p> <p>The EPSO has a strict no tolerance policy for misconduct. Disciplinary action is investigated and if needed referred to another agency for investigation. Complaints are fully reviewed by the Sheriff and taken seriously.</p>

65. EPSO currently equips its officers with body-worn cameras. If EPSO continues to equip its officers with body-worn cameras, it will utilize this technology consistent with best practices, and to ensure officers are complying with this Agreement.

Status (65)	Partial Compliance
2021 Status	Partial Compliance
Assessment	We reviewed a sample of body-worn camera videos and incident reports from December 2021, May 2022, and November 2022, confirming continued improvement in complying with this provision. In most of the cases that we

	<p>reviewed, we confirmed that EPSO officers on the scene turned their body-worn cameras on and off at appropriate times and in accordance with EPSO policy.</p> <p>While we were able to review videos from the sample of videos that EPSO provided from the three months that we audited, we learned during our review that EPSO lost various other videos during its migration to a new video vendor. We only learned about this loss after speaking with members from the community. When confronted about this breach, EPSO acknowledge that it lost various videos, and it was unable to recover these lost videos. We plan to monitor EPSO's migration practices to ensure that no other videos are lost prospectively.</p>
Next Steps	We will continue to audit body-worn camera footage and ensure that first-line supervisors audit officers' activities on a consistent basis.

## IX. DATA COLLECTION AND REPORTING

66. Elimination of the harmful and unlawful practice of arrests for investigative purposes without probable cause requires ongoing and active collection of data, analysis, and periodic review to ensure that the practice has been eliminated and does not recur. EPSO will collect and maintain all data and records necessary to review EPSO's compliance with this Agreement, and to ensure transparency and wide public access to information related to the lawfulness of EPSO's field interviews, investigatory stops, interrogations, and citations as permitted by law.
67. Within 365 days of the Effective Date, EPSO will develop a data collection system that will provide for the review of officer investigatory stops, citations, arrests, and interrogations to ensure that officers comply with constitutional standards and this Agreement.
68. EPSO will regularly analyze the data collected to ensure that all stops, arrests, and interrogations are lawfully conducted and meet constitutional standards, and to inform necessary changes to policies and training.
69. Within 90 days of the Effective Date, EPSO will develop a system to track interrogations conducted by EPSO officers or detectives. The system will include documentation of the person interrogated, the date and time of the interrogation, the length of the interrogation, the officer(s) present, and the corresponding investigative file number.
70. EPSO's data collection system will require officers to document the following for investigatory stops and arrests:
  - a. The identity of the person(s), if known;
  - b. The officer's name and badge number;
  - c. The date, time, and location of the stop;
  - d. The approximate duration of the stop;
  - e. If a non-vehicle stop (e.g., pedestrian or bicycle), the number of persons stopped;

- f. The reason for the stop, including a specific, individualized description of the facts creating reasonable suspicion;
- g. If a vehicle stop, whether the driver or any passenger was required to exit the vehicle, and reason;
- h. Whether any person was asked to consent to a search and whether such consent was given;
- i. Whether officers conducted a weapons frisk during the stop and, if so, the specific and articulable facts establishing reasonable suspicion that the person was armed and dangerous;
- j. Whether officers conducted a search based on probable cause and, if so, the facts establishing probable cause to conduct a search;
- k. Whether any weapon, contraband or evidence was seized from any person, and nature of the weapon, contraband, or evidence;
- l. The outcome of the stop, including whether officers issued a civil or criminal citation, made an arrest, or issued a warning; and
- m. A unique identifying report number, allowing the documentation to be matched with the investigative file and documentation of any criminal or civil citations or arrests that result from the stop.

71. The Sheriff will produce an annual report describing EPSO activity and will make that report publicly available on the Sheriff’s website and also upon request. The Sheriff will not be required to make public information that must remain confidential to protect public safety. The annual report will further provide information regarding the Sheriff’s implementation and status of this Agreement.

72. Subject to applicable law, the annual report will address:

- a. Stop and arrest data and any analysis of that data that was undertaken;
- b. Data related to complaints of improper stops, arrests, or interrogations, including but not limited to the number of misconduct complaints made and investigated; the outcome of the investigations; and the mode of resolution, as well as analysis of that data to identify trends;
- c. Additional topics as deemed appropriate by the Sheriff in its discretion to promote transparency and identify the accomplishments, actions, and continuing needs of the Sheriff.

73. Within six months of the Effective Date, the Sheriff will publicly post a status report. This report will delineate the steps taken by the Sheriff during the reporting period to implement this Agreement; the Sheriff’s assessment of the status of its progress; and plans to correct any problems. Following this initial status report, EPSO will file a status report every six months thereafter while this Agreement is in effect, in which it will additionally respond to any concerns raised by the DOJ or identified in the previous report.

<b>Status</b> (66,67,68,69,70,71,72,73)	<b>Partial Compliance</b>
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2021 Status	Beginning Compliance
Assessment	EPSO has improved its data collection requirements through its newly adopted policies and has implemented a new software system that can capture all relevant data. EPSO however has not yet demonstrated that it
	is consistently collecting all the information that the data collection and reporting provisions require. Furthermore, EPSO has not publicly posted status or annual reports on its webpage.
Next Steps	EPSO will ensure that it consistently collects all data required by these provisions and use this data to assess its compliance with this Agreement and the Fourth Amendment, allowing for greater public access to information about its activities.
Response:	The EPSO has implemented the Daily Activity post for our Website and Facebook page to be transparent with the Public per the Sheriff. The EPSO will do an end of year report beginning this year with the highlights good and bad of the year events.

## IX. OUTCOME ASSESSMENTS

74. The Sheriff will conduct Outcome Assessments on an annual basis, as specified by this section of the Agreement, to measure whether EPSO’s revised practices and procedures are achieving the purposes of this Agreement and are having an overall beneficial effect on policing in Ville Platte. Outcome Assessments should be conducted in a reliable, cost-effective manner based on accepted and trustworthy means and methods. Any statistical analysis used as part of an Outcome Assessment must conform to statistical techniques that are accepted in the relevant field. The Sheriff will provide DOJ with the underlying data, analysis, methods, and sources relied upon in the Assessments.
75. The Sheriff will develop a plan and protocol within 365 days of the Effective Date to conduct these assessments. The plan and protocol will be subject to the approval of DOJ, which approval shall not be unreasonably withheld.
76. The outcome assessments will include analysis:
- a. To determine whether EPSO is conducting stops consistent with the Constitution and this Agreement, analysis of the rate at which stops uncover criminal activity;
  - b. To determine whether arrests are consistent with the Constitution and this Agreement, analysis of the rate at which arrests are found to lack probable cause or otherwise violate the Fourth Amendment; the number of probable cause affidavits rejected by supervisors or the criminal courts; and a qualitative analysis of the sufficiency of probable cause affidavits and other documentation supporting arrests;
  - c. To determine whether EPSO officers are providing adequate Miranda warnings and conducting interrogations consistent with the Constitution and this Agreement, an analysis of data related to the length and frequency of interrogations and documentation of

Miranda warnings and waivers; and analysis of the rate at which motions to exclude confessions are granted by the criminal courts;

- d. To assess whether EPSO officers receive sufficient training on the Fourth Amendment and proper interrogation techniques, an analysis of the rate of completed trainings, performance evaluations from field trainings, and qualitative analysis of the content, structure, adequacy, and efficacy of trainings provided under this Agreement; and
- e. To determine that all detentions are appropriately documented and supported by probable cause, audit data of all investigative files and jail detention files to ensure there is a file on each person detained by EPSO and that files contain adequate documentation in support of the detention.

77. The Sheriff will include the results of all outcome assessments in its status reports and in its annual report published pursuant to Paragraph 71, above.

Status (74,75,76,77)	Partial Compliance
2021 Status	Beginning Compliance
Assessment	EPSO has greatly improved its data collection practices through its newly adopted policies and new software system. EPSO’s system has the capacity to capture the information contained in these paragraphs. EPSO unfortunately has not done critical reviews of data that already exists in its case management system. EPSO therefore has not aggregated data and completed outcome assessments. Furthermore, EPSO has yet to complete status reports, documenting its implementation efforts.
Next Steps	We will ensure that EPSO creates and implements protocols to use E-Force and CloudGavel to conduct outcome assessments.
Response:	The EPSO will continue to develop ways to use EFORCE AND CLOUD GAVEL to the benefit of the department in all areas. We will use the tools provided to be transparent with the people we serve, and develop a stronger community bond.