

**FIFTH ASSESSMENT OF SETTLEMENT AGREEMENT**  
**COMPLIANCE BY THE EVANGELINE PARISH SHERIFF'S OFFICE**  
December 2022 through March 2024



United States Department of Justice Civil Rights Division

October 18, 2024

## I. INTRODUCTION

The United States of America (United States) 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, the United States 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 Fifth Enforcement Assessment, covers the period from December 1, 2022, through March 31, 2024.

We conducted three site visits during this reporting period in which members of our team met with EPSO leadership, examined documents, interviewed staff members, and reviewed outcome data materials. We also participated in monthly virtual meetings with the Sheriff, his executive staff, and members from EPSO's Patrol and Jail Operations. We worked closely with EPSO's Compliance Coordinator, identifying policies, procedures, and general orders that needed to be updated or revised. EPSO's Compliance Coordinator also worked with an external information technology vendor to improve EPSO's ability to collect and use data for organizational improvement. The vendor also assisted with improving EPSO's webpage, allowing for greater community access.

In conducting this assessment, we reviewed over 50 incident files, including body-worn camera footage, and we reviewed hundreds of documents, including policies, training materials, police reports, disciplinary records, and internal affairs investigative files. We also conducted statistical analyses of the data that EPSO maintains in its records management systems. Given past improvements with EPSO's patrol practices, this assessment focused on assessing EPSO's investigative practices.

We appreciate Sheriff Charles Guillory's leadership as EPSO focused its implementation efforts on the 27 provisions of the Agreement for which EPSO had not achieved substantial compliance in the Fourth Enforcement Assessment. As a result, EPSO has achieved substantial compliance with 23 of those provisions and 70 of the 74 provisions overall. The Agreement requires EPSO to either comply with the material requirements of the Agreement or to illustrate its sustained and continuing improvement through outcome assessments. The Agreement further does not require EPSO to maintain sustained compliance before satisfying the requirements of the Agreement. Based on EPSO's efforts, we have concluded that it has demonstrated significant progress and improved practices throughout the department.

During the past 18 months, the Compliance Coordinator revised and updated a compliance plan, met with our subject-matter expert regarding areas where EPSO had not achieved substantial compliance, and implemented a strategy to achieve substantial compliance with all 74 provisions of the Agreement. More specifically, EPSO prioritized improving its supervision practices and building durable, reliable data systems over this reporting period. These improvements resulted in better internal and external accountability systems, and these changes will better serve EPSO and the communities it serves.

EPSO also 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 attended 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.

## II. COMPLIANCE STATUS SUMMARY

This assessment documents EPSO's implementation efforts from December 1, 2022, through March 31, 2024. We use the following compliance categories to report the status of each Agreement provision and show compliance progress by year.

Compliance Status by Year (Number of Paragraphs)					
Category	2019	2020	2021	2022	2023-2024
<b>Non-Compliance</b> - Not met most or all of the requirements of the provision.	0	0	7	0	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	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	0
<b>Partial Compliance</b> - Made progress with implementation but specific areas need further attention to achieve substantial compliance.	1	6	26	20	4
<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	70

### III. SUMMARY

Settlement Agreement Topic Areas	Status of Compliance
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)	Substantial Compliance
Documenting Stops, Citations, and Arrests (Paragraphs 19, 20)	Substantial Compliance
Storing and Retaining Data Collected (Paragraph 21)	Substantial Compliance
SUPERVISION REGARDING FOURTH AMENDMENT ACTIVITIES	
Report Reviews (Paragraph 22)	Substantial Compliance
Supervisory Reviews of Probable Cause Affidavits (Paragraph 23)	Substantial Compliance
Addressing Policy Violations (Paragraphs 24, 25)	Substantial Compliance
Quality and Completeness of Supervisory Reviews (Paragraph 26)	Substantial 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)	Substantial Compliance
Detainee Searches (Paragraphs 40, 41)	Substantial 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)	Substantial Compliance
Body-Worn Cameras (Paragraph 65)	Substantial Compliance
DATA COLLECTION AND REPORTING	
Eliminating Unlawful practices (Paragraph 66)	Substantial Compliance
Developing Data Collection System (Paragraphs 67, 68, 69, 70)	Substantial Compliance
Annual Reports (Paragraph 71, 72)	Substantial Compliance
Status Reports (Paragraph 73)	Substantial 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

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
Assessment	<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>Over the past 18 months, EPSO reviewed and updated 16 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 50 incident reports, 100 call detail reports, and 75 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. Our reviews did not uncover any incidents where officers unnecessarily lengthened stops, conducted warrantless searches, or used inappropriate or unprofessional statements during these interactions.</p> <p>Consistent with past practices, EPSO ensured that the captains in charge of investigations, patrol, and narcotics conducted independent, random video audits of officers' field interactions that occurred between December 2022 through March 2024 to ensure that department standards were being met. EPSO also maintains a video-audit log for each month, documenting supervisors' video reviews.</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 auditing logs identified the review dates, names of deputies involved in the interactions, and general descriptions of the facts, circumstances that resulted in the law enforcement interactions. Moreover, in our reviews of 75 body-worn camera videos, we did not</p>

	identify unconstitutional or unprofessional practices. EPSO officers typically activated their cameras before interactions with motorists and captured the entirety of these interactions.
Next Steps	EPSO has assured the United States that it will continue its practices of randomly documenting and auditing body-worn camera video reviews.

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>
2022 Status	Substantial Compliance
Assessment	EPSO conducted its annual in-service training for 2023 in December. It used an internal subject-matter expert to develop and deliver these trainings on all policies related to Fourth Amendment activities. We also examined training documents, confirming that all officers received these trainings during this reporting period. As noted in a previous compliance report, the sheriff issued a Special Order that explicitly prohibited the practice of “investigative holds.” EPSO did not discipline any officers for conducting “investigative holds,” and we found no evidence that EPSO officers had returned to using investigative holds in any manner.
Next Steps	EPSO has assured the United States that it will continue to prohibit the practice of using investigative holds.

#### 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>
2022 Status	Substantial Compliance
Assessment	<p>As noted in a previous compliance report, EPSO developed policies and conducted training that addressed the requirements of these provisions. We reviewed over 50 incident reports and over 50 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.</p> <p>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.</p>

Next Steps	EPSO has assured the United States that it will continue to audit arrests to ensure that subjects are neither detained without reasonable and articulate suspicion nor arrested without probable cause.
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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
2022 Status	Substantial Compliance
Assessment	<p>As noted in a previous compliance report, EPSO implemented a web-based system to initiate, document, and submit warrants to judges for rapid review and approval. EPSO continues to use the system, allowing it to expedite warrant processes.</p> <p>In addition to using a web-based system to ensure improved efficiency in processing warrants, EPSO's Compliance Coordinator and System Administrator began using expanded features on the system, allowing EPSO to create data reports, track arrest trends, and audit officers' warrant submissions more effectively.</p> <p>During our November 2023 and February 2024 site visits, EPSO's System Administrator demonstrated how EPSO was using the system to ensure that warrants were submitted and reviewed in a more efficient manner. The System Administrator also demonstrated how he and the Compliance Coordinator were using the expanded features of the system to create transparency data (i.e., data charts and aggregate reports) and produce outcome data required by the Agreement.</p> <p>We also confirmed that the Compliance Coordinator and System Administrator provided training to EPSO supervisors to enable them to use these expanded</p>

	<p>features in their day-to-day practices, which could assist in identifying arrest trends, monitor officers' submissions, and 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, six involved distributions of controlled substances; two involved possession of controlled substances; two involved possession of stolen property; two involved theft/criminal trespass; and two involved domestic violence. There was one arrest warrant for each of the following: negligent homicide; burglary; theft by fraud; attempted murder; grand larceny, and indecent behavior.</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 warrants did not contain boilerplate language when describing the facts and circumstances leading up to and justifying arrests.</p>
Next Steps	EPSO has assured the United States that it will continue to use a web-based system to initiate, document, and submit warrants to judges for rapid review and approval.

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
2022 Status	Substantial Compliance
Assessment	<p>As noted in a previous compliance report, EPSO trained officers on proper implementation of new policies and new documentation systems consistent with those policies. During this reporting period, we toured jail facilities on two separate occasions and interviewed the warden and his staff, discussing intake protocols and circumstances when EPSO would not accept arrested subjects.</p> <p>We also examined intake records and observed intake practices, confirming that people were not booked into the jail without one of the following: an affidavit of probable cause; an arrest warrant; or an active bench warrant. We also were able to access EPSO's jail records via web-based systems, 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>In the instances where parish magistrates rejected warrants (i.e., insufficient information in warrant; need more investigation; no probable cause; or need more information to determine probable cause), EPSO staff did not process these persons into the jail. Furthermore, we did not find any instances where warrants were rejected but people remained jailed when they should have been released.</p>

Next Steps	EPSO will continue to use its web-based system, for all booking records and other applicable jail activity.
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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.

Status (11)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	We reviewed three instances where EPSO immediately released persons because a judge rejected affidavits of probable cause. In one of these instances, the person was released because the person needed to be hospitalized, and the other two involved instances where the persons were released after the judge determined that there was insufficient evidence to arrest them.
Next Steps	EPSO will continue to use its electronic record-keeping system for all booking records and other applicable jail activity.

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.

Status (12)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	<p>EPSO officials reported that arrested persons were allowed to use the telephone or send direct messages via computerized tablets 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 web-based system documenting outgoing calls to attorneys and family members. We also confirmed that prisoners had access to computerized tablets in the housing units, allowing them to communicate with family members and counsel when necessary. We did not review any evidence that suggested that EPSO failed to allow prisoners access to phones or systems to send messages to family members or counsel.</p>
Next Steps	EPSO agreed to continue to allow arrested persons access to telephone or computerized tablets to contact friends or counsel.

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.

Status (13)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	In our reviews of over 50 incident reports and 75 body-worn camera videos, we did not identify any instances where persons were arrested on quality-of-life offenses.
Next Steps	EPSO agreed to continue to review body-worn camera videos to ensure that subjects are not arrested on quality-of-life offenses. EPSO also agreed to continue having the captains in charge of investigations, patrol, and narcotics conduct monthly independent, random video audits of officers' field interactions.

## 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
2022 Status	Substantial Compliance
Assessment	<p>EPSO uses a web-based system to manage its computer-aided dispatch (CAD) systems, records management system (RMS), and jail records system. The system is EPSO's repository for storing, maintaining, and reviewing records, documents, and files pertaining to law enforcement and jail operations.</p> <p>We audited a sample of incident reports and body-worn camera videos from December 2022 through March 2024. In these reviews, 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 officer interactions to ensure that officers were adhering to constitutional requirements and complying with EPSO policy and this Agreement. The auditing logs documented the date that the reviewed occurred, the name of the deputy involved in the interaction, and a general description of the law enforcement interaction. In our reviews of these auditing logs, officers conducted stops only when they had reasonable suspicion based on specific and articulable facts, and EPSO supervisors did not identify additional actions needed to improve practices at the department. Moreover, in our reviews of 75 body-worn camera videos, we did not identify unconstitutional or unprofessional practices.</p> <p>EPSO officers typically activated their cameras before interactions and captured the entirety of these interactions.</p>
Next Steps	EPSO agreed to continue the practice of auditing the basis for officers' investigatory stops.

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.

Status (15,16)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	<p>EPSO uses a web-based system to manage its CAD systems and RMS. EPSO uses the system for accurately documenting investigative stops as part of its new policies and has fully integrated its CAD systems and RMS under this web-based system. We audited samples of incident reports and body-worn camera footage from December 2022 through March 2024. These reviews confirmed that officers' activities complied with these provisions of the Agreement.</p> <p>In our reviews of over 50 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	EPSO agreed to continue the practice of auditing the basis for officers' investigatory stops.

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.

Status (17)	Substantial Compliance
2022 Status	Partial Compliance
Assessment	<p>EPSO uses a web-based system to manage its computer-aided dispatch and records management system. EPSO uses the system 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 50 incident reports, 75 body-worn camera videos from December 2022 through March 2024. We conclude 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, and those auditing reports indicated that officers' vehicle stops were supported by probable cause.</p>
Next Steps	EPSO agreed to continue the practice of auditing the basis for officers' investigatory stops.

### 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)	Substantial Compliance
2022 Status	Partial Compliance
Assessment	<p>As noted in a previous compliance report, EPSO implemented a web-based system to enable supervisors to easily access its CAD, Records Management, and jail management systems. EPSO also uses this system 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 the system. Consistent with past practices, we were able to confirm that completed 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 uploaded in the system by the end of the officer's shift.</p>
Next Steps	We recommend that EPSO continue to use a web-based system to document and maintain field interactions with persons.

### 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.

Status (22)	Substantial Compliance
2022 Status	Partial Compliance
Assessment	In our review of system data, we were able to determine that supervisors reviewed reports within 12 hours. These reviews are maintained in a history tab on a web-based system. In addition to capturing supervisory feedback in the history tab, we were able to conclude that supervisors provided feedback on rejected reports.

	We also learned that EPSO began using another web-based system to document feedback that supervisors provided to officers on this new platform. Even though we concluded that supervisors were using electronic systems to provide feedback, we encourage EPSO to ensure that supervisory reviews after documented stops, citations, or arrests contain more details.
Next Steps	We recommend that EPSO continue to monitor closely supervision of Fourth Amendment activities.

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
2022 Status	Substantial Compliance
Assessment	We reviewed various booking reports and probable cause 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 where a supervisor returned a report because it lacked appropriate justification.
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)	Substantial Compliance
2022 Status	Beginning Compliance
Assessment	<p>During this reporting period, EPSO supervisors continued to conduct body-worn camera video audits, assessing stops to ensure that officers are adhering to constitutional requirements and complying with EPSO policy and this Agreement.</p> <p>In addition to assessing stops, supervisors reviewed other calls, including those involving complaints, welfare checks, disturbances, and assault and battery to ensure that officer interactions adhered to constitutional requirements. We also confirmed that supervisors completed monthly audits from April 2023 through January 2024. In addition to supervisors completing monthly audits, EPSO ensured</p>

	<p>that supervisors completed annual employee performance evaluations for all staff members assigned to them.</p> <p>We reviewed several completed employee evaluations. We found some improvement in how supervisors were evaluating subordinates. Even though we found general improvement in documentation, we recommend that EPSO leadership carefully examine its evaluation practices to ensure that evaluations are completed in a uniform, succinct, and concise manner.</p> <p>During this reporting period, we reviewed nine incidents where supervisors identified policy violations and recommended corrective action or discipline. In six of these instances, a deputy was issued a written or verbal reprimand. In the other three instances, a deputy was demoted, a deputy was suspended, and a deputy was terminated.</p>
Next Steps	EPSO must continue to ensure that supervisors complete annual performance evaluations, documenting staff performance and identifying areas of improvement.

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.

Status (26)	Substantial Compliance
2022 Status	Beginning 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 supervisory evaluation reports, we found that EPSO assessed the overall performance of each supervisor to determine whether the supervisors were performing in an acceptable manner. Besides creating a standardized grading systems to assess supervisor performance, we found instances where supervisors were provided feedback on the quality of their performance.</p> <p>Furthermore, we did not find any evidence that showed that EPSO failed to take appropriate corrective or disciplinary action against supervisors who failed to conduct thorough and objective reviews of officers' activities.</p>
Next Steps	EPSO agreed to continue conducting annual evaluations prospectively.

### 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
2022 Status	Substantial Compliance
Assessment	<p>As noted in a previous compliance report, 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.</p> <p>During this review period, we examined five taped investigation interviews and audited five closed criminal investigation files, confirming that investigators consistently notified individuals of their <i>Miranda</i> rights. We also were able to confirm that EPSO maintained signed waiver forms in each investigative file. Furthermore, we also were able to confirm that EPSO maintains all materials that we reviewed in its system.</p>
Next Steps	EPSO agreed to ensure that investigative files are maintained in a standardized format.

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
2022 Status	Substantial Compliance
Assessment	<p>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.</p>
Next Steps	EPSO agreed to ensure that investigative files are maintained in a standardized format

## 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
2022 Status	Beginning Compliance
Assessment	As noted in a previous compliance report, EPSO created a standardized <i>Miranda</i> rights form for interrogation to ensure consistency throughout the department. We reviewed five 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 web-based platform.
Next Steps	EPSO agreed to ensure that all interrogations are maintained on a web-based system

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
2022 Status	Substantial 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 recordings are also maintained in an investigative file, which are stored on a web-based system once the case is closed.
Next Steps	EPSO agrees to use a web-based system as its repository for maintaining investigative files.

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
2022 Status	Substantial Compliance
Assessment	EPSO uses a web-based 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	EPSO agrees to use a web-based system as its repository for maintaining investigative files.

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
2022 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	EPSO agrees to use a web-based system as its repository for maintaining investigative files.

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
2022 Status	Substantial Compliance
Assessment	EPSO creates 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 a web-based system.
Next Steps	EPSO agrees to continue using a web-based system as a repository for all ongoing and closed investigative files.

### 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
2022 Status	Substantial Compliance
Assessment	<p>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 policies 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.</p> <p>During this reporting period, EPSO updated its homepage, including a Transparency tab to provide updates on special orders, policies, announcements, and outcome data.</p>
Next Steps	EPSO agrees to continue using its Transparency tab to provide updates to community stakeholders.

## 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)	Substantial Compliance
2022 Status	Beginning Compliance
Assessment	<p>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 web-based system.</p> <p>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. In November 2023, the sheriff issued a Special Order, prohibiting the practice of unlawful detainments, and the Special Order reiterated the requirements of the Agreement. We observed a consistent practice of deputies following this Special Order, and we did not identify any instances where persons were booked into the jail without a valid arrest warrant, affidavit of probable cause, or a bench warrant.</p>
Next Steps	EPSO assured us that it will continue to ensure that persons will not be admitted to the jail without a valid arrest warrant or an affidavit of probable cause.

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)	Substantial Compliance
2022 Status	Beginning Compliance
Assessment	<p>As noted in a previous compliance report, EPSO revised and implemented its strip search procedures. EPSO deputies continue to 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</p>

	<p>subjects to the jail. EPSO also reported that all corrections staff members received training on these procedures.</p> <p>EPSO does not permit correctional staff to perform body-cavity searches. When necessary, prisoners are sent to the hospital for an X-ray.</p>
Next Steps	EPSO assured that it will continue current practices related to strip- and body-cavity searches.

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
2022 Status	Substantial Compliance
Assessment	<p>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 a system to store all jail records.</p> <p>We reviewed 20 inmate records, confirming that EPSO maintains case files that contain all documentation related to the person's incarceration and meets the requirement of this Agreement provision. EPSO is also able to cross-reference files between its web-based systems to ensure that relevant records are maintained in these case-management systems.</p>
Next Steps	EPSO agrees to continue using web-based systems to maintain jail records.

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:
- Name;
  - Date of birth;
  - Sex;
  - Race and/or ethnicity;
  - Case status (e.g., pre-trial, post-conviction, parole revocation, etc.);
  - Offense(s) for which the person is detained, along with applicable statute or code provision;
  - Date and time of booking;
  - Amount of bond, if any;
  - Next court date; and
  - 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
2022 Status	Substantial 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 the web-based system, enabling us to retrieve inmate rosters that contained all required information that is included in this provision.
Next Steps	EPSO agrees to continue using a web-based system to maintain inmate information.

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.

Status (45,46)	Substantial Compliance
2022 Status	Substantial 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 its system, confirming that it maintains a database that tracks the requirements of these Agreement provisions.</p>
Next Steps	EPSO agrees to continue using a web-based system to maintain inmate information.

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.

Status (47)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	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. As noted in a previous compliance report, EPSO granted system view-only access to the District Attorney's Office and parish judges, allowing them to review inmate jail records, including pending charges and bond amounts.
Next Steps	EPSO agrees to ensure that the District Attorney's Office and parish judges continue to have system 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
2022 Status	Substantial 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 EPSO's system.
Next Steps	EPSO agree to continue to audit its 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
2022 Status	Substantial 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	EPSO agrees to continue to audit its 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.

Status (50,51,52,53, 54)	Substantial Compliance
2022 Status	Substantial Compliance
Assessment	<p>As noted in a previous compliance report, EPSO developed a suite of 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;</li><li>• Search Warrants; and</li><li>• Vehicle Stops.</li></ul> <p>EPSO did not have a comprehensive set of law enforcement policies before entering the Agreement. EPSO has created systems to evaluate policies and implement changes when necessary. The sheriff has also taken a proactive role in issuing Special Orders when his staff identify issues that require an immediate response. All final, dated policies have been distributed to officers, and these policies are on EPSO's website.</p>
Next Steps	EPSO will continue to review and update policies as necessary. EPSO also agrees to continue making all EPSO policies available on its webpage.

## 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
2022 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	EPSO will continue to assign a lieutenant to track POST certifications and monitor officers' annual training requirements.

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
2022 Status	Substantial Compliance
Assessment	EPSO continued to ensure that its officers received training on its suite of policies. In December 2023, EPSO provided annual in-service training to its officers, including a block of instruction on the Fourth Amendment.
Next Steps	EPSO agrees 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.

### 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)	Substantial Compliance
2022 Status	Partial Compliance
Assessment	<p>EPSO offers a “Citizen’s Complaint Form” on its website, allowing complainants multiple ways to submit complaints. Furthermore, the sheriff issued a Special Order in November 2023 directing that all closed complaint investigations will be stored on its web-based system, which now serves as a depository for closed investigations. EPSO’s Compliance Coordinator continued to serve as the point of contact for all complaint submissions.</p> <p>During our February site visit, the sheriff decided to remove himself from investigating allegations of police misconduct to ensure greater transparency in the complaint process. In the past, the sheriff had taken an active role in investigating and determining findings for complaints. After speaking with our police consultant, the sheriff decided to delegate investigative authority to his Chief Deputy. The sheriff retains responsibility to review and approve investigations and decide on appropriate discipline.</p> <p>All citizen complaints thereafter were routed to the Chief Deputy for review. The Chief Deputy is now responsible for investigating allegations and developing findings</p>

	<p>for the sheriff. Once the Chief Deputy completes his review, he will submit an investigative report and recommendation to the sheriff for review and approval.</p> <p>In addition to the above, the sheriff issued a Special Order in November 2023 directing staff members to send all disciplinary actions to the United States once closed. During this reporting period, we reviewed nine internal complaints investigations. We did not review any external complaints filed against EPSO officers because none were filed. In each of the internal complaints, we were able to conclude that EPSO thoroughly and objectively reviewed the complaints, and the officer received a copy of the Disciplinary Report after the investigation was completed. We also found that EPSO imposed discipline when appropriate.</p>
Next Steps	EPSO agrees to continue using its current citizen complaint process for reviewing submitted complaints.

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.

<b>Status (65)</b>	<b>Substantial Compliance</b>
2022 Status	Partial Compliance
Assessment	We reviewed a sample of body-worn camera videos and incident reports from December 2022 through March 2024, confirming continued improvement in complying with this provision. In the cases that we 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.
Next Steps	EPSO agrees to continue to audit body-worn camera footage and ensure that 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.

Status (66,67,68,69,70,71,72,73)	Substantial Compliance
2022 Status	Partial Compliance
Assessment	EPSO has improved its data collection requirements through its newly adopted policies and has implemented a new software system that captures all data required in Paragraphs 66-73. EPSO also 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.

## 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
2022 Status	Partial Compliance
Assessment	<p>EPSO has greatly improved its data collection practices through its newly adopted policies and new software systems. EPSO's Compliance Coordinator and System Administrator began using expanded features on the system, allowing EPSO to create data reports, track arrest trends, and audit officers' warrant submissions more effectively. In addition to using the system, EPSO uses another web-based system to create reports related to stops and arrests.</p> <p>EPSO produces biannual reports regarding event-activities; property and narcotics incidents; arrests; stops; warrant volumes; and transparency data. The Compliance Coordinator reported that she meets with the Chief Deputy to discuss these reports and other department trends. The Compliance Coordinator and Chief Deputy then meet with the sheriff to discuss trends and other unexpected changes in enforcement actions, including unexpected increases in stops, searches, arrests, or discipline.</p> <p>During this reporting period, EPSO began producing various reports on its Transparency page, allowing for greater access to EPSO reports, materials, and broader visibility for community stakeholders. All of these efforts are a promising start in the direction of substantial compliance. The aggregate data on its Transparency page however does not meet the requirements of a comprehensive, reliable outcome assessment. To comply with Paragraphs 74-77, EPSO must conduct analysis to illustrate its use of the data contained in these paragraphs to ensure compliance. EPSO's ability to complete outcome assessments will reflect its capacity to self-monitor practices and determine whether it continues to improve practices and comply with the Agreements and the Constitution. These efforts will also provide greater public transparency and enhance community engagement.</p>
Next Steps	<p>We recommend that EPSO continue to collect aggregate data and post on its Transparency page. We also recommend that EPSO conduct analysis and benchmarking to demonstrate use of these data to ensure compliance with these paragraphs of the Agreement.</p>