

August 24, 2020

Re: Public Records Act Request

Dear Sir/Madam:

I write to request the opportunity to inspect and copy public records in your control and custody, pursuant to Public Records Act, La.R.S. 44:1, et seq. I wish to inspect and perhaps copy *any and all documents and tangible items* involving the Lafayette Police Department concerning:

- 1) **The incident report from August 21, 2020 where Trayford Pellerin was killed by someone(s) either employed by or acting under the authority of the Lafayette Police Department;**
 - a. **By law, this incident report *must* include, *see* La. R.S. 44:3(A)(4)(b):**
 - (i) A narrative description of the alleged offense, including appropriate details thereof as determined by the law enforcement agency.
 - (ii) The name and identification of each person charged with or arrested for the alleged offense.
 - (iii) The time and date of the alleged offense.
 - (iv) The location of the alleged offense.
 - (v) The property involved.
 - (vi) The vehicles involved.
 - (vii) The names of investigating officers.
- 2) **Any and all 911 tapes on August 21, 2020 from 7 p.m. to 11:59 p.m. regarding any incidents near or between the Circle K gas station on Northeast Evangeline Thruway near the intersection of Castille Avenue, and the Shell gas station on Northeast Evangeline Thruway at the intersection of Chalmette Drive;**
- 3) **Any and all 911 tapes on August 21, 2020 from 7p.m. to 11:59 p.m. to which a member of the Lafayette Police Department responded;**
- 4) **Any and all incident recalls on August 21, 2020 from 7 p.m. to 11:59 p.m. regarding any incidents near or between the Circle K gas station on Northeast Evangeline Thruway near the intersection of Castille Avenue, and the Shell gas station on Northeast Evangeline Thruway at the intersection of Chalmette Drive.**
- 5) **Any and all incident recalls on May 27, 2020 from 7 p.m. to 11:59 p.m. to which a member of the Lafayette Police Department responded;**
- 6) **Any and all footage or recordings, audio, video, or digital, from the body worn cameras capturing the killing of Trayford Pellerin;**

- 7) Any and all footage or recordings, audio, video, or digital, from the taser camera recording the killing of Trayford Pellerin;**
- 8) Any and all dashboard camera footage, audio and video, recorded from any squad car responding to calls regarding Trayford Pellerin between 7 p.m. to 11:59 p.m. on August 21, 2020;**
- 9) Disciplinary complaints, grievances, hearings, reprimands, actions, and all other disciplinary records for all officers involved in the pursuit and/or killing of Trayford Pellerin;**
- 10) Disciplinary complaints, grievances, hearings, reprimands, actions, and all other disciplinary records for Scott Morgan;**
- 11) Any and all civil service records regarding Scott Morgan;**
- 12) Any policies, procedures, or trainings regarding de-escalation, use of force, and use of deadly force;**
- 13) Any policies, procedures, or trainings regarding racially-biased policing, racial profiling, or implicit bias;**
- 14) Policies and procedures regarding foot pursuits;**
- 15) Insurance policies held by Lafayette Parish to cover police officer involved incidences.**

Please check for any reports, related documents, or tangible items, including but not limited to incident reports; supplemental reports; crime scene reports; crime lab analyses, graphs, reports, transcripts, memos, handwritten notes, correspondence, diagrams, photographs, drawings, audio and visual recording, digital recordings, email correspondence, protocols and any other reports you have stored related to above charges.

Under R.S. 44:34, "If any public record applied for by any authorized person is not in the custody or control of the person to whom the application is made, such person shall promptly certify this in writing to the applicant, and shall in the certificate state in detail to the best of his knowledge and belief, the reason for the absence of the record from his custody or control, its location, what person has custody of the record and the manner and method in which, and the exact time at which it was taken from his custody and control. He shall include in the certificate ample and detailed answers to inquiries of the applicant which may facilitate the exercise of the right granted by this Chapter.

If you are invoking R.S. 44:34 to deny this request, please answer the following questions in detail.

1. Is a copy of the requested public record usually located in your office?

2. Why is your copy of the requested public record absent from your office?
3. Where is your copy of the requested public record?
4. Who has received a copy of the requested public record?
5. How and from whom did the present custodian gain control of your copy of the requested public record?
6. What was the exact time your copy of the public record was taken from your custody and control?
7. When will your copy of the requested public record be returned to your office?
8. Is there any other public official who has a copy of the requested record?
9. What is/are the name(s) of anyone who has a copy of the requested public record?
10. What is/are the location(s) where the public record can be viewed?
11. What are the hours and dates when the requested public record can be viewed?

Please notify me at (225) 328-5103 when these records are ready for me to inspect, and I will arrange a time to review these documents. We request that any and all documents that are available be made available in electronic form. This request includes any documents that are in paper form but that can be scanned to electronic form, as well as digital copies of any recordings. For those documents that cannot be produced in electronic form, if the cost of copies does not exceed \$50.00, proceed without further approval and send us an invoice with the records; otherwise, call to advise and gain approval to proceed. As you are aware, failure to abide by the Public Records Law may result in certain penalties and the award of attorney's fees. Please notify me within three days, as required by law, regarding your response. *See* La. R.S. 44:32(D). I appreciate your cooperation with this request being made under Louisiana's Public Records Act.

Respectfully,

Ronald S. Haley