

November 19, 2021

Duane E. Evans
U.S. Attorney
Office of the U.S. Attorney for the Eastern District of Louisiana
U.S. Department of Justice
650 Poydras Street, Suite 1600
New Orleans, LA 70130

Re: Pattern-or-Practice Investigation into the Jefferson Parish Sheriff's Office

Dear Mr. Evans,

We write to ask the United States Attorney's Office ("USAO") for the Eastern District of Louisiana to open a pattern-or-practice investigation into the Jefferson Parish Sheriff's Office ("JPSO" or the "Sheriff's Office"). The Violent Crime Control and Law Enforcement Act of 1994 authorizes the Department of Justice to open such an investigation whenever it has "reasonable cause to believe" that police are "engag[ing] in a pattern or practice . . . that deprives persons of rights, privileges, or immunities protected by the Constitution or laws of the United States."¹ This authorization extends to local USAOs, which may conduct pattern-or-practice investigations into state-run, local law enforcement agencies.²

JPSO is a stand-alone local government entity with jurisdiction over the entirety of Jefferson Parish, including cities within the Parish that have their own police departments.³ As this letter details further below, there is far more than "reasonable cause to believe" that JPSO is engaging in a pattern or practice of unconstitutional conduct. By way of example:

- On September 20, 2021, a JPSO officer held Shantel Arnold by her hair as he violently and repeatedly slammed her head onto the pavement.⁴ The brutality—memorialized in a video that has since gone viral—shocked and disgusted the nation, renewing decades-long calls for JPSO to be held accountable for its history of violence against Black people.⁵

¹ 34 U.S.C. § 12601 (1994).

² See U.S. DOJ CIV. RIGHTS DIV. & U.S. ATTY'S OFF. N. DIST. OF OHIO, INVESTIGATION OF THE CLEVELAND DIVISION OF POLICE 1 (2014), https://www.justice.gov/sites/default/files/opa/press-releases/attachments/2014/12/04/cleveland_division_of_police_findings_letter.pdf; U.S. DOJ CIV. RIGHTS DIV. & U.S. ATTY'S OFF. W. DIST. OF WASH., INVESTIGATION OF THE SEATTLE POLICE DEPARTMENT 1 (2011), https://www.justice.gov/sites/default/files/crt/legacy/2011/12/16/spd_findletter_12-16-11.pdf.

³ *Overview of Office and Mission Statement*, JEFFERSON PARISH SHERIFF'S OFFICE, <https://www.jpso.com/276/Overview-of-Office-and-Mission-Statement> (last visited Nov. 3, 2021); Richard A. Webster, *They Saw Me and Thought the Worst*, PROPUBLICA (Sept. 24, 2021), <https://www.propublica.org/article/across-the-parish-line>.

⁴ Richard A. Webster, *Three Children Attacked a Black Woman. A Sheriff's Deputy Arrived—and Beat Her More*, PROPUBLICA (Oct. 16, 2021), <https://www.propublica.org/article/three-children-attacked-a-black-woman-a-sheriffs-deputy-arrived-and-beat-her-more>.

⁵ *Id.*



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- On September 2, 2020, Xavimen Decquir was beaten by JPSO officers while in their custody.⁶ This beating continued when Mr. Decquir was allegedly restrained and handcuffed.⁷ He eventually lost consciousness at these officers' hands.⁸
- On May 27, 2020, Modesto Reyes was shot and killed by a JPSO officer as he allegedly laid on the ground after tripping and falling.⁹
- On March 20, 2020, JPSO officers allegedly shot 14-year-old Tre'mall McGee in the back as he lay face down on the ground.¹⁰
- On May 10, 2018, JPSO officers killed Keeven Robinson after a short foot chase.¹¹ When officers apprehended Mr. Robinson, they allegedly squeezed, grabbed, and leaned on his neck, causing him to stop breathing at the scene.¹²

The stories of those mentioned above—all of whom are Black—are, sadly, nothing more than a snapshot of JPSO's longstanding, systematic targeting of Black and Brown people. The American Civil Liberties Union of Louisiana can confirm that, of the more than 400 racist policing complaints its [Justice Lab](#) initiative has received within the last 15 months, 51 are isolated in Jefferson Parish, and 26 name JPSO in particular.

To date, we have filed five cases against JPSO officers, all of which echo the racist treatment Ms. Arnold, Mr. Decquir, Mr. Reyes, Mr. McGee, and Mr. Robinson received at

⁶ Compl. at 1, *Decquir v. Bentel et al.*, No. 2:21-cv-1652 (E.D. La. Aug. 31, 2021).

⁷ *Id.*

⁸ *Id.* at 14.

⁹ Matt Sledge, *In Deputy Killing of Modesto Reyes, Mother Files Wrongful Death Suit Against JPSO Sheriff*, NOLA.COM (May 28, 2021), https://www.nola.com/news/courts/article_651bb508-bfdd-11eb-93a3-278d0fa88426.html.

¹⁰ Compl. at 6, *McGee v. Lopinto et al.*, No. 2:21-cv-00571 (E.D. La. Mar. 19, 2021).

¹¹ Paul Dudley, *JPSO Officers Involved in Keeven Robinson's Death Were Previously Accused of Using Excessive Force*, 4WWL (Mar. 3, 2020, 5:23 AM), <https://www.wwtv.com/article/news/local/jefferson/four-jps0-officers-involved-in-keeven-robinsons-death-were-previously-accused-of-using-excessive-force/289-ea241955-6302-41ec-8e8f-1944744cf2f1>; Ramon Antonio Vargas, *Family of Keeven Robinson, Killed in Struggle with JPSO Deputies, Files Suit Claiming Wrongful Death*, NOLA.COM (Apr. 23, 2019, 4:42 PM), https://www.nola.com/news/courts/article_5207700a-e066-5107-9e3b-cc49bb94ef77.html.

¹² *Id.* Unfortunately, there are several other excessive force incidents targeting Black people that involve JPSO:

Eric Harris, 22, was killed by JPSO, who fired at least nine bullets into his car after Harris attempted to avoid arrest on February 8, 2016. Ken Daley, *JPSO Deputies Won't Face Charges in Fatal Shooting of Eric Harris in New Orleans, Officials Confirm*, NOLA.COM (Mar. 17, 2017, 1:30 AM), https://www.nola.com/news/crime_police/article_bc28b2fc-3cb1-58d2-b127-f23d6c55a42f.html.

Chris Joseph, 38, and Daviri Robertson, 39, were killed by JPSO officers while sitting inside a parked car during an undercover drug sting on March 27, 2019. John Simerman et al., *Jefferson Parish Sheriff's Office an Outlier on Body Cams as Criticism Swirls Around Deadly Force*, THE TIMES-PICAYUNE / THE NEW ORLEANS ADVOCATE (June 27, 2020), https://www.nola.com/news/crime_police/article_cb8b82da-b8a1-11ea-bfec-6bf1ae8b2595.html.

Leo Brooks, 23, was shot and killed by JPSO officers inside an apartment building on July 17, 2019. *Id.*

the hands of JPSO.¹³ We have eight more cases currently under investigation, with two more likely to be filed before year end. When viewed in conjunction with the most recent series of investigative news articles published about the Sheriff’s Office by *Pro Publica*,¹⁴ these cases illustrate a concerning pattern: JPSO officers target and use objectively unreasonable force against civilians, particularly Black and Brown people, and thereafter are not held accountable.

The history of JPSO’s conduct does nothing more than underscore what the statistics and the stories of the victims already tell us: in the absence of external oversight, more Black and Brown lives will be traumatized and lost. The USAO for the Eastern District of Louisiana can and should step in to rectify the deeply troubling trends that preserve this country’s racist history.¹⁵



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JPSO’s History of Racial Discrimination and Violence Extends Back Decades

The Sheriff’s Office, which often controls the narratives of its victims,¹⁶ has a long history of discriminatory conduct that plagues communities of color.

Harry Lee, who served as the Sheriff of Jefferson Parish from the late 1970s through the early 2000s, underscored as recently as 2006 that “[t]he sheriff of Jefferson Parish is the closest thing there is to being a king in the U.S.”¹⁷ It is this mentality that has cemented impunity for wrongdoing within the very culture of JPSO. Indeed, because the Sheriff of Jefferson Parish is nothing short of a monarch—*i.e.*, lacks any direct or immediate oversight—his deputies are unrestrained in carrying out policing tactics that are inherently anti-Black and Brown and, accordingly, disproportionately affect communities of color.¹⁸

¹³ *Paul v. Walsdorf, et al.*, No. 2:21-cv-02144 (E.D. La. Nov. 18, 2021); *Decquir v. Bentel et al.*, No. 2:21-cv-1652 (E.D. La. Aug. 31, 2021); *Suggs v. Mikkelsen et al.*, No. 2:21-cv-01327 (E.D. La. July 12, 2021); *Durapau v. McLin et al.*, No. 2:21-cv-01157 (E.D. La. June 15, 2021); *Williams et al. v. Ferguson et al.*, No. 2:21-cv-00852 (E.D. La. Apr. 28, 2021). Each case that Justice Lab files is featured on our [website](#), including the five identified here.

¹⁴ Webster, “*They Saw Me and Thought the Worst*,” *supra* note 3; Richard A. Webster, *ACLU Calls on Federal Prosecutors to Investigate the Jefferson Parish Sheriff’s Office*, WWNO (Sept. 28, 2021), <https://www.wwno.org/news/2021-09-28/aclu-calls-on-federal-prosecutors-to-investigate-the-jefferson-parish-sheriffs-office>; Richard A. Webster, *Three Children Attacked a Black Woman. A Sheriff’s Deputy Arrived—and Beat Her More.*, WWNO (Oct. 16, 2021), <https://www.wwno.org/news/2021-10-16/three-children-attacked-a-black-woman-a-sheriffs-deputy-arrived-and-beat-her-more>; Richard A. Webster et al., *Louisiana Deputy Who Slammed a Black Woman on the Pavement Was Named in Multiple Suits, Records Show*, WWNO (Oct. 21, 2021), <https://www.wwno.org/news/2021-10-21/louisiana-deputy-who-slammed-a-black-woman-on-the-pavement-was-named-in-multiple-suits-records-show>.

¹⁵ 34 U.S.C. § 12601.

¹⁶ See Lisa Riordan Seville & Hannah Rappleye, *A Sheriff’s Deputy Shot a 14-year-old Boy. It Went Unreported for Months.*, NBC NEWS (July 16, 2020), <https://www.nbcnews.com/news/us-news/sheriff-s-deputy-shot-14-year-old-boy-it-went-n1234057>.

¹⁷ John Burnett, *Larger-Than-Life Sheriff Rules Louisiana Parish*, NPR (Nov. 28, 2006), <https://www.npr.org/templates/story/story.php?storyId=6549329>.

¹⁸ See *Jefferson Parish Sheriff’s Department*, POLICE SCORECARD (2020), <https://policescorecard.org/la/sheriff/jefferson-parish> (concluding that a Black person is 11.3 times as likely to be killed by police than a white person in Jefferson Parish). The Police Scorecard, built by Samuel Sinyangwe and a team of data scientists, designers, developers, organizers, and students, is a



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For nearly three decades, Lee wove his overtly anti-Black beliefs into JPSO. After Hurricane Katrina caused a spike in crime in Jefferson Parish, Lee proudly and publicly announced: “[w]e know where the problem areas are. If we see some black guys on the corner milling around, we would confront them.”¹⁹ Driving while Black was also a crime according to Lee, who “vowed to stop and question blacks driving ‘rinky-dink cars’ in white neighborhoods.”²⁰ In 2006, he plainly admitted: “[w]e’re only stopping black people.”²¹ Over and over, all while using the royal “We,” Lee emphasized: “[w]e know the crime is in the black community. Why should I waste time in the white community?”²²

Lee and his views were unfortunately popular among those Jefferson Parish residents who re-elected him seven times.²³ His longtime reign allowed his views to become firmly entrenched within the fabric of JPSO.²⁴ It is no secret that Lee hand-picked his successor, Newell Normand, his close aide and protégé, who went on to win 90% of the vote.²⁵ Normand was re-elected three times before he decided to resign,²⁶ at which point he endorsed the current Sheriff: Joseph Lopinto, III.²⁷ Lopinto most recently won re-election on October 12, 2019.²⁸

Lopinto proudly follows in the footsteps of his predecessors, both of whom he has identified as “great role models” over his career.²⁹ Crucially, he “ha[s] never uttered anything less than a compliment about [Lee],”³⁰ whose racist views continue to drive JPSO’s behavior. “‘The Black community . . . fear[s] the Jefferson Parish Sheriff’s Office,’”³¹ and this fear is justified. There is no question that “[JPSO] deputies follow

nationwide public evaluation of policing in the United States. *Police Scorecard Project Methodology*, POLICE SCORECARD, <https://policescorecard.org/about> (last visited Nov. 3, 2021). The Scorecard calculates levels of police violence, accountability, racial bias, and other policing outcomes for over 16,000 municipal and county law enforcement agencies. *Id.*

¹⁹ Burnett, *supra* note 17.

²⁰ *Id.*

²¹ Adam Nossiter, *Harry Lee, Outspoken Louisiana Sheriff, Dies at 75*, NEW YORK TIMES (Oct. 2, 2007), <https://www.nytimes.com/2007/10/02/us/02lee.html>.

²² Burnett, *supra* note 17.

²³ Nossiter, *supra* note 21.

²⁴ *See id.*; Burnett, *supra* note 17.

²⁵ Michelle Hunter, *Jefferson Parish Sheriff Newell Normand Says He’s ‘Going Out on Top,’* NOLA.COM (July 26, 2017), https://www.nola.com/news/crime_police/article_d2bc031d-617f-52ea-85fb-df44d0039826.html.

²⁶ *Id.*

²⁷ Advocate Staff Report, *Learn More About Joe Lopinto -- Newell Normand’s Successor as Jefferson Parish Sheriff*, NOLA.COM (July 25, 2017), https://www.nola.com/article_596c4bd3-cb80-5e1f-bbf5-9b62b1ded48f.html.

²⁸ WWL Staff, *Joseph Lopinto Reelected as Jefferson Parish Sheriff*, 4WWL (Oct. 12, 2019), <https://www.wwltv.com/article/news/politics/elections/joseph-lopinto-re-elected-as-jefferson-parish-sheriff/289-ea717f9f-540d-4819-8435-899ad2fe119a>.

²⁹ Christopher Tidmore, *From Beating Lee to Becoming Sheriff, Newell Normand Retires*, LOUISIANA WEEKLY (July 31, 2017), <http://www.louisianaweekly.com/from-beating-lee-to-becoming-sheriff-newell-normand-retires/>.

³⁰ *Id.*

³¹ *Id.*

starkly different rules [from other major Louisiana law enforcement organizations]—over stops, chases, use of force, and the disciplinary process.”³²

The Data Confirms JPSO Discriminates Against Black and Brown People

The interactions between JPSO and Black and Brown communities in the Parish have a quantifiable discriminatory impact. JPSO’s well-settled policies, practices, and customs disproportionately subject Black and Brown people to excessive violence and, in many cases, death. The data reveals deeply concerning trends:

- Based on data collected from 2013 to 2020, a Black person was 11.3 times as likely to be killed by police than a white person in Jefferson Parish.³³
- Though Black people only made up 27% of the Jefferson Parish population, they made up 73% of the people killed by the police.³⁴
- 40 people have been shot by JPSO officers since 2013, of which 73% were Black.³⁵ The officers’ statements in at least 12 of 35 incidents are disputed by witnesses or the victims themselves.³⁶
- Since 2015, at least 12 men and boys have died during an arrest or pursuit by JPSO. All were Black or Latino; three were minors.³⁷
- Since 2018, at least five Black people were killed by JPSO.³⁸
- The racial disparity in deadly force by JPSO is worse than 95% of other police departments.³⁹

These statistics are further buttressed by 30 federal civil rights lawsuits filed against JPSO since 2010—the vast majority of which involve excessive force against people of color.⁴⁰ JPSO’s open history of excessive violence against Black and Brown people evinces the agency’s longtime failure to train JPSO officers to avoid the use of excessive force and its failure to discipline those officers who engage in such uses of force. Because

³² Simerman et al., *Jefferson Parish Sheriff’s Office an Outlier on Body Cams as Criticism Swirls Around Deadly Force*, *supra* note 12.

³³ *Jefferson Parish Sheriff’s Department*, POLICE SCORECARD, *supra* note 18.

³⁴ Webster, “*They Saw Me and Thought the Worst*,” *supra* note 3.

³⁵ *Id.*

³⁶ *Id.*

³⁷ Seville and Rappleye, *supra* note 16.

³⁸ Simerman et al., *Jefferson Parish Sheriff’s Office an Outlier on Body Cams as Criticism Swirls Around Deadly Force*, *supra* note 12.

³⁹ *Jefferson Parish Sheriff’s Department*, POLICE SCORECARD, *supra* note 18.

⁴⁰ Kathryn Casteel, *Demanding Accountability: SPLC Sues La. Sheriff’s Office for Public Records Regarding Officer Brutality*, SOUTHERN POVERTY LAW CENTER (Apr. 16, 2021), <https://www.splcenter.org/news/2021/04/16/demanding-accountability-splc-sues-la-sheriffs-office-public-records-regarding-officer>.



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JPSO has been allowed to act with impunity for years, Black and Brown people subject to such abuse have largely had no remedy or recourse—especially when, unbeknownst to many, the one-year statute of limitations runs on the prospect of seeking accountability through a federal civil rights legal action.

Both quantitative and qualitative data provide a sufficient basis for the USAO for the Eastern District of Louisiana to initiate a pattern-or-practice investigation.

The Stories of JPSO’s Victims Stress the Urgency of Much-Needed Reform

JPSO’s deep-rooted racism and history of misconduct is not without consequences.⁴¹ But rather than institute reforms in response to public outrage over JPSO’s racist policing regime, the Sheriff’s Office prefers to blame the victims and their families for “spreading a ‘false narrative for the sake of trying to get a payday.’”⁴² This is a disturbing, albeit not a surprising, response from the head of a department tasked with maintaining public safety. Nonetheless, the dominant narrative requires correction.

Only an independent and external body—in this case, the USAO for the Eastern District of Louisiana—is equipped to discover the truth and the stories of those unnamed victims brutalized and traumatized by JPSO. We summarize four victims’ stories for your consideration:

Shantel Arnold

On September 20, 2021, Shantel Arnold, a 34-year-old Black resident of Jefferson Parish, was beaten by a JPSO deputy as she fled from a separate attack on her person.⁴³ During the incident, the JPSO deputy dragged Ms. Arnold by the wrist along the pavement, picked her up by her hair, and slammed her repeatedly on the pavement.⁴⁴ Adding insult to injury, the deputy placed his knee on Ms. Arnold’s back as she lay face down on the pavement.⁴⁵

There are two elements of Ms. Arnold’s story that are sadly not unique. *First*, the deputy involved, Julio Alvarado, had a long history of using unwarranted force.⁴⁶ No fewer than nine federal civil rights lawsuits have been filed against Mr. Alvarado, all for excessive force.⁴⁷ *Second*, Ms. Arnold was doing nothing wrong when she was physically

⁴¹ See, e.g., Compl. at 1, *Decquir v. Bentel et al.*, No. 2:21-cv-1652 (E.D. La. Aug. 31, 2021); Compl. at 6, *McGee v. Lopinto et al.*, No. 2:21-cv-00571 (E.D. La. Mar. 19, 2021); Vargas, *supra* note 11; Webster, “*They Saw Me and Thought the Worst*,” *supra* note 3.

⁴² Webster, “*They Saw Me and Thought the Worst*,” *supra* note 3.

⁴³ Webster, *Three Children Attacked a Black Woman. A Sheriff’s Deputy Arrived—and Beat Her More.*, *supra* note 4.

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ Webster et al., *Louisiana Deputy Who Slammed a Black Woman on the Pavement Was Named in Multiple Suits, Records Show*, *supra* note 14.

⁴⁷ *Id.*



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assaulted by the JPSO deputy.⁴⁸ She had not committed a crime, was not in the process of committing a crime, and had no future plans to commit a crime.⁴⁹ She was merely attempting to return to her home after an attack.⁵⁰ When the JPSO deputy ordered Ms. Arnold to stop, she told him she was going to keep walking so she could get home.⁵¹ But rather than let Ms. Arnold do as she asked, the deputy beat her.⁵²

Tre'mall McGee

Tre'mall McGee, an unarmed 14-year-old boy, was allegedly shot in the back while lying face down on the ground, all while complying with a JPSO officer's orders.⁵³ His friend, an unnamed minor ("N.S."), who was also allegedly unarmed and compliant, received a beating from the officers in the same incident and suffered extensive injuries to his face from the beating.⁵⁴ Both children were passengers in a car that, unbeknownst to them, had been stolen days earlier.⁵⁵ As the police approached the vehicle, Mr. McGee and N.S. got out of the car and ran.⁵⁶ This was instinct—the children did not know the car was stolen and did not know why the police were chasing them.⁵⁷ Once it became clear to Mr. McGee and N.S. that the police were demanding they stop running, they attempted to comply with the officer's commands.⁵⁸ Their compliance was, however, to no avail, as Mr. McGee was shot and N.S. was beaten.⁵⁹

The initial police report about the arrest of Mr. McGee and N.S. does not mention an officer-involved shooting or any injuries to the children.⁶⁰ In fact, JPSO only disclosed the shooting publicly when asked about it at a news conference three months later.⁶¹ Further, Mr. McGee's mother encountered resistance from JPSO at every turn when she sought information about what happened to her son.⁶² For instance, in the months after the shooting and beating, Ms. McGee repeatedly asked JPSO to investigate the incident, only to be met with denials that the incident even occurred.⁶³

⁴⁸ *See id.*

⁴⁹ *See id.*

⁵⁰ *See id.*

⁵¹ *See id.*

⁵² *See id.*

⁵³ Compl. at 6, *McGee v. Lopinto et al.*, No. 2:21-cv-00571 (E.D. La. Mar. 19, 2021).

⁵⁴ *Id.* at 7.

⁵⁵ *Id.* at 4.

⁵⁶ *Id.* at 5.

⁵⁷ *Id.*

⁵⁸ *Id.* at 6.

⁵⁹ *Id.* at 6-7.

⁶⁰ John Simerman, *Family of Teen Shot by Jefferson Parish Deputy Alleges Whitewash in Federal Suit*, NOLA.COM (Mar. 20, 2021, 2:15 PM), https://www.nola.com/news/courts/article_6b1d8a14-898a-11eb-9ba3-6b0fcb3c6b83.html.

⁶¹ *Id.*; Compl. at 12, *McGee v. Lopinto et al.*, No. 2:21-cv-00571 (E.D. La. Mar. 19, 2021).

⁶² *Id.* at 11.

⁶³ *Id.*



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JPSO’s attempts to cover up the shooting and beating of children shows what JPSO is in the absence of oversight: an organization that first and foremost protects officers, not victims of abuse.

Xavimen Decquir

Xavimen Decquir’s federal civil rights complaint asserts that several officers from JPSO violated his constitutional rights by physically attacking him while he was being held in the Jefferson Parish Correctional Center (“JPCC”).⁶⁴ On September 2, 2020, JPSO officers relentlessly attacked Mr. Decquir while he helplessly lay handcuffed on the concrete floor of JPCC.⁶⁵ Mr. Decquir’s family entrusted JPSO with Mr. Decquir, who has mental disabilities, when he was taken into custody.⁶⁶ But rather than protect Mr. Decquir, JPSO beat him.⁶⁷

Several officers allegedly slammed Mr. Decquir’s head multiple times into a concrete wall, threw him on the ground, and punched and kicked him repeatedly, including at least two times in the face with steel-toed boots.⁶⁸ At no point did Mr. Decquir resist the officers or attempt to fight back.⁶⁹ He sustained injuries of fractured bones in his face, extensive facial bleeding, eight staples in his head, a dislocated shoulder, bruised ribs, a concussion, chronic headaches and body aches, loose teeth, and sharp spinal pains.⁷⁰ Additionally, Mr. Decquir has experienced severe emotional distress and an exacerbation of his mental disabilities due to the trauma he endured.⁷¹

Modesto Reyes

On May 27, 2020, Modesto Reyes was shot in the back by JPSO officers while he lay on the ground after tripping and falling in the midst of turning away from officers.⁷² Mr. Reyes’s mother filed a lawsuit against JPSO asserting that Mr. Reyes’s constitutional rights were violated.⁷³ The complaint alleges that Mr. Reyes fled the police because he feared for his life, as this incident occurred in the immediate wake of George Floyd’s killing in Minneapolis, which garnered national attention.⁷⁴ Mr. Reyes was allegedly shot in the back and forearm as he lay flat on the ground.⁷⁵ Multiple rounds were fired at Mr. Reyes.⁷⁶ While Sheriff Lopinto claims Mr. Reyes pointed a gun at the officers, eyewitness accounts

⁶⁴ Compl. at 1, *Decquir v. Bentel et al.*, No. 2:21-cv-1652 (E.D. La. Aug. 31, 2021).

⁶⁵ *Id.*

⁶⁶ *Id.*

⁶⁷ *Id.* at 2.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² Sledge, *supra* note 9.

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ *Id.*

⁷⁶ *See id.*



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insist Mr. Reyes only had a cellphone.⁷⁷ In May 2021, one year after the incident, JPSO still had not released the names of the officers involved in Mr. Reyes's killing.⁷⁸

Keeven Robinson

Keeven Robinson, a 22-year-old Black man, died because of excessive force used during a struggle with JPSO officers.⁷⁹ Mr. Robinson was chased by four JPSO officers in unmarked police cars and apprehended by the officers after a short foot chase.⁸⁰ Handcuffed and prone, Mr. Robinson stopped breathing at the scene.⁸¹ He died after being taken to Ochsner Medical Center.⁸² According to the Jefferson Parish Coroner, Mr. Robinson died from "significant traumatic injuries to the neck" consistent with compressional asphyxia at the hands of the arresting officers.⁸³ His death was ruled a homicide.⁸⁴ All four officers involved in Mr. Robinson's death had previously been defendants in other civil suits alleging excessive force, but none appear to have faced prior discipline from JPSO.⁸⁵



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Conclusion

For decades, JPSO, under color of law, has systematically violated the rights of Black and Brown people in Jefferson Parish. Its history, the data, and the victims' narratives demonstrate the severity of the misconduct and the extent to which JPSO disregards the civil rights and liberties of civilians. A federal investigation is necessary and appropriate to address this pattern and practice of abuse.

We urge the USAO for the Eastern District of Louisiana to use all applicable authority to investigate JPSO. The ACLU of Louisiana looks forward to assisting in this effort and stands ready to facilitate communication among your office and the community.

Sincerely,

A handwritten signature in black ink that reads "Alanah Odoms". The signature is written in a cursive, flowing style.

Alanah Odoms
Executive Director
ACLU of Louisiana

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ Dudley, *supra* note 11.

⁸⁰ Vargas, *supra* note 11.

⁸¹ *Id.*

⁸² *Id.*

⁸³ Dudley, *supra* note 11.

⁸⁴ *Id.*

⁸⁵ *See id.*

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