

YOUNGSVILLE MUNICIPAL POLICE CIVIL SERVICE BOARD

CITY OF YOUNGSVILLE

PARISH OF LAFAYETTE

STATE OF LOUISIANA

SUPPLEMENTAL AND AMENDING PETITION FOR INVESTIGATION

NO: \_\_\_\_\_

FILED: AUGUST 3, 2023

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BEFORE THE BOARD, comes the Professional Association of Law Enforcement Officers (PALEO) and Citizens for a New Louisiana (CNL), who seek to supplement and amend the *Petition for Investigation* filed with the Youngsville Municipal Police Civil Service Board (the Board) on July 26, 2023. Petitioners hereby incorporate by reference as if copied herein *in extenso* all of the allegations contained in paragraphs 1 through 11 in the original *Petition for Investigation* and supplement same as follows:

12.

UNSAFE WORKPLACE: LSA-RS 23:13 provides that “every employer shall furnish employment which shall be reasonably safe for the employees therein. They shall furnish and use safety devices and safeguards, shall adopt and use methods and processes reasonably adequate to render such employment and the place of employment safe in accordance with the accepted and approved practice in such or similar industry or places of employment considering the normal hazard of such employment, and shall do every other thing reasonably necessary to protect the life, health, safety and welfare of such employees.”

On July 17, 2023, a clerical employee of the Youngsville Police Department discovered schedule II narcotics within the Youngsville Police Department. A criminal investigation was initiated by the Lafayette Parish Sheriff's Office and a search warrant was obtained to secure video surveillance footage from the Youngsville Police Department. The target of the investigation is believed to be Chief Rickey Boudreaux.

While Youngsville Police Department officers are generally prepared and able to use universal precautions, such as gloves and other protective devices when handling hazardous materials, members of the clerical staff within the Department are less aware and quite frankly do not expect to be exposed to such dangers.

Petitioners are unaware of the identification of the particular substance. However, fentanyl is a very potent opioid circulating in our community. Fentanyl is often found laced with other narcotics and is the culprit in many accidental overdoses. According to the United States Drug Enforcement Administration fentanyl is "approximately 100 times more potent than morphine and 50 times more potent than heroin." The presence of unsecured narcotics within the Youngsville Police Department is an issue that represents a serious health and safety concern for the employees of the City of Youngsville and unnecessarily exposes the City to liability. This is an area of concern which demands further investigation and is clearly within the purview of the Board.

13.

WITNESS INTIMIDATION: LSA-RS 14:129.1 makes it a criminal offense to "intimidate or impede, by threat of force or force, or attempt to intimidate or impede, by threat of force or force, a witness or a member of his immediate family with intent to influence his testimony, his reporting

of criminal conduct, or his appearance at a judicial proceeding” or to “injure or attempt to injure a witness in his person or property, or a member of his immediate family, with intent to influence his testimony, his reporting of criminal conduct, or his appearance at a judicial proceeding.” In the criminal statutes the terms “bodily injury” or “physical injury” are often used, but there is a clear distinction within this statute by simply referring “to injure.” At least one court has ruled that causing a person “anxiety” by threats alone rose to the level of injury for the purposes of this statute.

On July 29, 2023, Chief Rickey Boudreaux initiated a text message to a Youngsville Police Department officer. In that message Boudreaux stated “I’m still the Chief and I make all the decisions. Watch what is coming... It’s my turn to make those who have turned on me pay for what they have done. You might be number 1 on my list... I don’t get even I always get ahead.” This officer is just one of several witnesses expected to appear before this Board and other governmental agencies, including but not limited to the Louisiana Board of Ethics, to offer testimony into the culture of corruption which exists within the Youngsville Police Department.

Further, LSA-RS 42:1169 states that “any public employee who reports to a person or entity of competent authority or jurisdiction information which he reasonably believes indicates a violation of any law or of any order, rule, or regulation issued in accordance with law or any other alleged acts of impropriety related to the scope or duties of public employment or public office within any branch of state government or any political subdivision shall be free from discipline, reprisal, or threats of discipline or reprisal by the public employer for reporting such acts of alleged impropriety.” Again, this is an area of concern which exposes the City of Youngsville to civil liability

and is clearly within the purview of the Board, demanding further investigation.

WHEREFORE, premises considered, Petitioners, the Professional Association of Law Enforcement Officers and Citizens for a New Louisiana pray that this Board receive this Supplemental and Amending Petition, grant the request for an investigation, conduct said investigation, and make a report to the governing body and/or take any action which it determines to be desirable or necessary in the public interest or to carry out effectively the provisions and purposes of LSA-R.S. 33:2537.