

Chris Martin  
February 17, 2022

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

ANNE WHITE HAT, RAMON \*  
MEJIA, and KAREN SAVAGE \*

v. \*

BECKET BREAU, in his \*  
official capacity as \*  
Sheriff of St. Martin \*  
Parish; BOFILL DUHE, in \*  
his official capacity as \*  
District Attorney of the \*  
16th Judicial District \*  
Attorney's Office \*

CIVIL ACTION NO.  
6:20-cv-00983

JUDGE ROBERT R.  
SUMMERHAYS

MAGISTRATE JUDGE  
CAROL B. WHITEHURST

\* \* \* \* \*

The deposition of CHRIS MARTIN, taken in connection with the captioned cause, pursuant to the following stipulations before Mary LeJeune-Kephart, via Zoom Videoconferencing, on the 18th day of February 2022 beginning at 9:09 A.M.

Exhibit Q

Chris Martin  
February 17, 2022

Page 18

1 a -- another beat before you answer. So what was the  
2 date of -- of that arrest of -- of the arrest report  
3 that you authored?  
4 A Don't remember the date specifically.  
5 Q Okay. But you remember the events?  
6 A Yes, ma'am.  
7 Q And were you working private security at that time?  
8 A I don't know. I don't recall.  
9 Q Okay. Were -- did you work with a -- any private  
10 security company in relation to the Bayou Bridge  
11 Pipeline?  
12 A Yes, ma'am.  
13 Q Okay. And how -- how much do you think you worked  
14 security, private security, in relation to the  
15 pipeline?  
16 A I don't remember actual dates or totals.  
17 Q What company was that?  
18 A I believe there was two companies. One was HUB  
19 Security and the other one was Sunbelt.  
20 Q And were those companies, to your knowledge,  
21 retained by Bayou Bridge to provide security to the  
22 pipeline?  
23 A I wasn't part of the contract process, so I'm not  
24 sure who specifically retained them but they were  
25 related to the Bayou Bridge Pipeline.

Page 20

1 over the years and I don't remember at what point it  
2 changed.  
3 Q When you're working private security for a company  
4 like HUB or, I believe you said it was Sunbelt, do  
5 you normally work in -- show up for work in your --  
6 your sheriff's office uniform?  
7 A Yes, ma'am.  
8 Q Do you normally wear a body cam?  
9 A No, ma'am.  
10 Q Okay. Would you have been wearing a body cam at the  
11 time of -- of these arrests that you wrote about?  
12 A I don't recall.  
13 Q Okay. What is your -- so you've been at the  
14 sheriff's office for about twenty years, are you a  
15 supervisor to any other deputies?  
16 A Yes, ma'am.  
17 Q And how long have you been a supervisor?  
18 A I don't recall exactly when I became a supervisor,  
19 but it's been a while.  
20 Q Okay. Were you supervising, is it Lieutenant  
21 Gauthier, at the time of -- of this incident?  
22 A As far as what happened with the security detail or  
23 as my duties in the sheriff's office?  
24 Q Both.  
25 A As my duties within the office, no. As my -- as far

Page 19

1 Q Did you have to -- did you sign a contract for --  
2 for that work with -- with those companies?  
3 A I signed paperwork but I don't remember if it was  
4 with them or internal paperwork for our office.  
5 Q Do you normally have to fill out paperwork before  
6 you work private security?  
7 A Sometimes.  
8 Q And how -- what is the -- the -- your understanding  
9 of the sheriff's office policy when it comes to  
10 working private security?  
11 A I'm not completely sure. Typically it's a  
12 supervisor that does all that and will tell you if he  
13 needs employment form or not.  
14 Q So there might be paperwork, internal -- internal  
15 paperwork at the sheriff's office regarding these  
16 security details?  
17 A Yes, ma'am.  
18 Q Okay. What -- what do you get paid for that private  
19 security work, is it by the hour?  
20 A It is but it varies on contract to contract.  
21 Q Do you remember what you got paid for your work in  
22 regard to the Bayou Bridge Pipeline?  
23 A No, ma'am, I don't.  
24 Q Do you remember approximately what you get paid?  
25 A I'm sorry, I don't. It's changed a couple of times

Page 21

1 as the pipeline concern, yes.  
2 Q And -- and why is that?  
3 A I was tasked with dealing with any day-to-day issues  
4 that came up dealing with the pipeline.  
5 Q And -- and you -- okay, so you were -- you were  
6 tasked with dealing with day-to-day issues with the  
7 pipeline through -- through the private security  
8 company that you were working with at the time?  
9 A No, ma'am, through one of the supervisors at the  
10 sheriff's office or supervisors here.  
11 Q Oh, okay, sorry. So I'm sorry, can you -- can you  
12 clarify that. So you weren't supervising Deputy  
13 Gauthier on a day-to-day basis normally, but because  
14 of the pipeline you, the pipeline business, you were  
15 sup -- you were what, supervising the activities  
16 related to the pipeline?  
17 A And I'm sorry -- portions of it, yes.  
18 Q And -- and which portions were you -- were you  
19 supervising?  
20 A We had one supervisor that dealt with scheduling and  
21 where everybody was working and then I would deal  
22 with any issues that came up. I was, I guess, their  
23 point of contact if they had problems while working.  
24 Q And that was in your capacity as -- as an employee  
25 of the sheriff's office?

Chris Martin  
February 17, 2022

Page 26

1 Gauthier. Can you describe how you were involved in  
2 those arrests?  
3 A Yes, ma'am. Lieutenant, I don't remember his rank  
4 at the time, Lieutenant Gauthier had contacted me and  
5 told me they had some people trespassing or on the  
6 right-of-way for the pipeline. They had constructed  
7 a platform in a tree and tied that platform to the  
8 pipeline so the pipeline couldn't -- couldn't work,  
9 it couldn't move.  
10 I instructed Deputy, or Lieutenant Gauthier, to  
11 tell the people they were trespassing if they were on  
12 the right-of-way and give them a certain amount of  
13 time to leave, a half an hour to forty minutes, and  
14 if they still refused to leave after that time frame  
15 that we would be able to make an arrest. I in turn  
16 started heading that way to help him. It's a long  
17 trip to get there.  
18 I don't remember where I was, but from a boat  
19 landing to the site was, I'm gonna guess an hour,  
20 forty minutes to a hour twenty minutes. When I got  
21 there, I believe me and him crossed at a push rack,  
22 which was a couple of hundred yards from the actual  
23 site that it happened where they -- they were.  
24 He explained to me that -- I don't recall if he  
25 explained to me there or on the radio or phone, but

Page 28

1 hanging from the tree and see that -- that would have  
2 been in that right-of-way for the pipeline. I was  
3 able to contact Lieutenant Gauthier and advise him  
4 that what I was able to determine there and that it  
5 was on the right-of-way and then we stayed out there  
6 another day and a half dealing with the sky pod and  
7 people in it.  
8 Q So when you -- when you say "that you saw some  
9 stakes at some point along the berm", how -- how --  
10 how far would you say that was from where the -- from  
11 where the sky pod was?  
12 A My report said fifty, about fifty yards, but I  
13 didn't remember before reading it.  
14 Q Okay. Did you -- did you review any paperwork or  
15 have any communications with anyone connected with  
16 Bayou Bridge that would have told you how many feet  
17 what the right-of-way was?  
18 A I reviewed some plats, but I don't remember the  
19 distance the right-of-way was.  
20 Q Did you have any communications with anyone  
21 connected with the Bayou Bridge Pipeline Company  
22 about what -- what they would have said was  
23 constituted the right-of-way?  
24 A They provided the plat information to us, but I  
25 don't recall having a specific conversation other

Page 27

1 he explained to me that they had re -- the protestors  
2 had removed some survey spikes in the direct area  
3 that they were standing in. He explained to me that  
4 they had set up the tripod in the tree and the people  
5 he had arrested were standing directly under the  
6 tripod in relation to the pipeline.  
7 So I was able to go to the scene, it takes a  
8 little while longer, you had to take an airboat to  
9 get there, you couldn't walk. Me and another deputy,  
10 Deputy Dupuis, when we get to the scene I was able to  
11 follow the pipeline berm. There was a berm that they  
12 dug to lay -- then lay the dirt over to lay a pipe in  
13 the trench where they were gonna bury it and the  
14 stakes, the marker stakes, would have been on the  
15 other side of that berm.  
16 So I was able to follow the berm south-ish,  
17 southwest, I guess, further back towards the push  
18 rack and fins some survey markers that weren't pulled  
19 out and I was able to see they were approximately  
20 five yards from the dirt berm on two separate  
21 markers. I was then able to line that up with a tree  
22 further down that was also five, about five yards off  
23 of the berm.  
24 And then from that access point I was able to  
25 see the three trees under the sky pod that was still

Page 29

1 than them -- them telling us the markers, the survey  
2 stakes, would have been the right-of-way.  
3 Q Did you -- did you come to know at any point or were  
4 you aware that Bayou Bridge did not have legal  
5 authority to be there on that property constructing  
6 the pipeline?  
7 MR. MCINTIRE:  
8 Objection to form.  
9 MS. SPEES:  
10 Q You can answer.  
11 A I'm understanding you're asking two questions.  
12 You're asking if I knew and did I come to know?  
13 Q Did you --  
14 A If I understand right?  
15 Q That's correct.  
16 A At the time I did not know, now I do.  
17 Q Okay. Knowing -- knowing that, at the time you were  
18 out there, Bayou Bridge did not have a legal  
19 authority to be there, would that -- would that have  
20 changed your opinion as to any applicability of the  
21 critical infrastructure law of Louisiana Revised  
22 Statute 1461?  
23 MR. MCINTIRE:  
24 Objection to form.  
25 MR. MOLL:

Chris Martin  
February 17, 2022

Page 30

1 Same objection.  
 2 A So I can make sure I understand what you're asking.  
 3 If I did know at that time if my thought would have  
 4 changed?  
 5 MS. SPEES:  
 6 Q Yes.  
 7 A Yes, ma'am.  
 8 Q Okay. How would -- how would it have changed?  
 9 A If I knew they couldn't be there we would have  
 10 enforced them not being there.  
 11 Q Okay. Do you recall -- did you have any  
 12 communications with anyone in the sheriff's office  
 13 about the applicability of Revised Statute 1461 to  
 14 these in -- to these incidents?  
 15 A Don't recall specifically, but there was three  
 16 supervisors, myself and two other supervisors, in the  
 17 patrol division that I would imagine we would have  
 18 discussed it.  
 19 Q Who were the other supervisors?  
 20 A It would have been Waverson Guidry and Robley  
 21 Picard.  
 22 Q Okay. What -- you say you probably would have  
 23 discussed it, why -- why is that?  
 24 A To the previous question of who I would have  
 25 discussed it with or did?

Page 32

1 connected with the Bayou Bridge Pipeline Company  
 2 about the enforcement of Revised Statute 1461?  
 3 A No.  
 4 MR. MCINTIRE:  
 5 Objection to form. He said no.  
 6 A No, ma'am.  
 7 MS. SPEES:  
 8 Q Did you have any conversations with anyone at the  
 9 private security companies that you mentioned, HUB or  
 10 Sunbelt, concerning the applicability of 1461?  
 11 MR. MCINTIRE:  
 12 Objection to form.  
 13 A No, ma'am.  
 14 MS. SPEES:  
 15 Q Okay. Did you -- you -- you testified that you  
 16 advised Lieutenant Gauthier that -- that you believed  
 17 the protestors were on critical infrastructure. Did  
 18 you -- did you, in the course of your supervision,  
 19 advise other deputies about the parameters of the  
 20 critical infrastructure law?  
 21 MR. MCINTIRE:  
 22 Objection to form.  
 23 A Not that I can remember specifically.  
 24 MS. SPEES:  
 25 Q Did you receive any written instructions, either

Page 31

1 Q Why would -- why would it have come up? Why -- why  
 2 would you have discussed the applicability of this  
 3 law?  
 4 MR. MCINTIRE:  
 5 Well, can he add to his previous answer  
 6 is what he was asking.  
 7 MS. SPEES:  
 8 Q Oh, I'm sorry. I didn't hear the -- I didn't hear  
 9 that. Of course.  
 10 A Finish the previous answer, I'm sorry. I also  
 11 discussed it with our risk manager, Jack Bienvenu.  
 12 Q And why would you have discussed it with the risk  
 13 manager?  
 14 A Because it was a new law that came about and several  
 15 of our deputies were told during the process of our  
 16 dealing with the protestors that they were gonna sue  
 17 us about making these arrests, so we just wanted to  
 18 make sure that we were doing what we needed to do the  
 19 correct way.  
 20 Q And what was -- what was your understanding of that  
 21 new law and what it prohibited?  
 22 A My understanding was that it prohibited you from  
 23 being in a -- inside of a critical infrastructure or  
 24 trespassing on a critical infrastructure.  
 25 Q Did you have any communications with anyone

Page 33

1 from your risk management officer or anyone within  
 2 the sheriff's office, about Revised Statute 1461?  
 3 A No, ma'am.  
 4 Q Okay. So just to -- did you receive any written  
 5 instructions or communications at all from anyone  
 6 about the applicability of 1461?  
 7 A Specifically written or did I talk to anybody about  
 8 it?  
 9 Q Written.  
 10 A No, ma'am.  
 11 Q Okay. You -- you indicated that you would have  
 12 spoken with your other supervisors and the risk  
 13 manager about the -- the new law, 1461, who else did  
 14 you speak to about it?  
 15 A I may have spoken to deputies that made arrests on  
 16 it after they encountered people trespassing on a  
 17 day-to-day basis, but that would be it, oh, and the  
 18 district attorney.  
 19 Q When did you speak with the district attorney?  
 20 A I don't recall. It would have --  
 21 Q Would it -- sorry, go ahead.  
 22 A It would have been before our first arrest and then  
 23 when I turned all the case files in for any arrests  
 24 we made.  
 25 Q And who were you communicating with at the DA's

Chris Martin  
February 17, 2022

Page 38

1 A Yes, ma'am.  
 2 Q When were those meetings?  
 3 A I don't recall specifically.  
 4 Q Would they have been in 2018?  
 5 A Yes, ma'am.  
 6 Q Did you have meetings with Mr. Langlinais after this  
 7 -- this meeting you're referring to where he first  
 8 notified you about the new law?  
 9 A I talked to him several times. I don't remember if  
 10 we actually had an official meeting with him or not.  
 11 Q What were -- what did you discuss in those  
 12 conversations?  
 13 A It would have been different incidents they were  
 14 having trouble with on the pipeline day to day.  
 15 Q And what about those incidents?  
 16 A If we -- they had something going on or any problems  
 17 with something on the pipeline he would have  
 18 contacted me to inform me about them.  
 19 Q Was anyone from the DA's office in the meeting you  
 20 had with Mr. Langlinais at the sheriff's office about  
 21 the new law?  
 22 MR. MOLL:  
 23 Objection to form.  
 24 A No, ma'am.  
 25 MS. SPEES:

Page 40

1 in and -- and see how you're doing. Do you feel like  
 2 you need or want a break?  
 3 A No, ma'am. I think I'm good for another half an  
 4 hour or so.  
 5 Q Okay.  
 6 MR. MCINTIRE:  
 7 Yeah, I could use a break in another ten,  
 8 fifteen minutes, I think, not right now.  
 9 MS. SPEES:  
 10 Okay. We can make that happen, Mr.  
 11 McIntire.  
 12 MS. SPEES:  
 13 Q So just to go back to when you showed up at the site  
 14 on August 18th and you, I just want to confirm, that  
 15 you estimated that the markers that you did see were  
 16 about fifty yards away from the sky pod, I noted that  
 17 you said that was about fifty yards, right?  
 18 MR. MOLL:  
 19 Objection to form.  
 20 A Yes, ma'am.  
 21 MS. SPEES:  
 22 Q And so you -- you're basically eyeballing from  
 23 stakes that are fifty yards away and -- and -- and  
 24 making a determination that that sky pod would have  
 25 been on the right-of-way, correct?

Page 39

1 Q Was Mr. Langlinais ever out on the site when you  
 2 were there?  
 3 A Any site?  
 4 Q Any of the pipeline sites?  
 5 A Yes, ma'am.  
 6 Q Was he -- was he there the day that you went to  
 7 follow up after -- after Lieutenant Gauthier's arrest  
 8 on August 18th?  
 9 A I don't believe.  
 10 Q Okay. Is Mr. Langlinais connected with a private  
 11 security firm, to your knowledge?  
 12 A I don't know.  
 13 Q Okay. Does Mr. Langlinais have any law enforcement  
 14 experience?  
 15 A I believe he was a retired marshal, US Marshal.  
 16 Q Do you know if he was from Louisiana or was he from  
 17 out of state?  
 18 A I'm not a hundred percent sure. I think he was from  
 19 Louisiana but not a hundred percent sure.  
 20 MR. MCINTIRE:  
 21 But with a name like Langlinais.  
 22 MS. SPEES:  
 23 Q Right. I -- I want to go back to the -- to the --  
 24 the question of your private security employment. I  
 25 see we're coming up on an hour and just want to check

Page 41

1 MR. MOLL:  
 2 Objection to form.  
 3 A Yes, ma'am.  
 4 MS. SPEES:  
 5 Q But you didn't see where Mr. Mejia and Ms. Savage  
 6 were standing at the time they were arrested,  
 7 correct?  
 8 A No, ma'am, I did not.  
 9 Q Okay. Were you in contact with any of the  
 10 landowners of this property?  
 11 A No, ma'am.  
 12 Q Do you know if anyone from the sheriff's office was  
 13 in contact with the landowners?  
 14 A I don't believe directly.  
 15 Q Okay. Did you receive any communications about  
 16 landowners and whether or not they were granting  
 17 their permission to the protestors to be on the  
 18 property?  
 19 A I don't remember. I did see a text message in the  
 20 report I reviewed, but I don't remember seeing that  
 21 at that time. I'm not -- I'm sorry, I don't know if  
 22 it's a text message or email, but it's a picture of a  
 23 phone with a letter on it.  
 24 Q How -- how -- how did you become aware that the  
 25 protestors did not have permission to be on that

Chris Martin  
February 17, 2022

Page 46

1                   Yeah.

2                   --OFF THE RECORD--

3       Reporter's Note: (Technical difficulty; signal lost after

4       which testimony continues as follows)

5                   --ON THE RECORD--

6       MS. SPEES:

7       Q    So I -- I was saying that I don't think we have much

8       longer to go, Sergeant Martin, just want to follow up

9       on a couple of things. One is just -- just to

10       clarify that you -- you testified that you -- you

11       came to know that Bayou Bridge Pipeline did not have

12       the legal authority to be out on that property in

13       Bayou Chene at the time of these -- these arrests,

14       correct?

15       MR. MCINTIRE:

16       Objection to form.

17       A    Yes, ma'am.

18       MS. SPEES:

19       Q    And that had you -- had you known that at the time

20       you would not have made these arrests for

21       unauthorized entry of a critical infrastructure,

22       correct?

23       MR. MCINTIRE:

24       Objection to form.

25       A    Don't know if I would have made them or not. I

Page 48

1       there's a few.

2       Q    And would you agree that a lot of these pipelines

3       are underground?

4       A    Yes, ma'am.

5       Q    Okay. And would you agree that sometimes they're

6       underground in places where you wouldn't have reason

7       to know that, just from looking at it, that there's a

8       pipeline there?

9       MR. MCINTIRE:

10       Objection to form.

11       A    I would agree.

12       MS. SPEES:

13       Q    Okay. As a -- as a sheriff's deputy and a law

14       enforcement officer, how would you go about enforcing

15       1461 in situations like that?

16       MR. MCINTIRE:

17       Objection to form.

18       A    Can you clarify exactly what kind of situation

19       you're talking about?

20       MS. SPEES:

21       Q    In the -- in the situation where there's a,

22       supposedly, a pipeline underground that you can't see

23       and you -- you're being asked to enforce 1461, how

24       would you go about doing that?

25       MR. MCINTIRE:

Page 47

1       definitely would have consulted with risk management

2       and our attorneys about what do we do from there.

3       MS. SPEES:

4       Q    You also testified that Mr. Langlinois gave you a

5       packet, I believe you said, of information that

6       included the plat information and who -- who would

7       have those documents now?

8       A    They're attached to the report that Lieutenant

9       Gauthier had, the report packet in our system.

10       Q    Okay. And that would include the plat information

11       and any communications, any other communication from

12       Mr. Langlinois that was in that packet?

13       A    It's -- yes, ma'am. It's two different PDF files.

14       I don't know how many pages one of them is, but it's

15       all the Clerk of Court information with the plat for

16       a couple of different plots including that one. It's

17       all Bayou Chene plots. And I want to say an affidavit

18       is a Stockstill document, whether it's signed for

19       saying Glenn Stockstill was the majority shareholder

20       and giving Bayou Bridge permission to say who can and

21       can't be on his property.

22       Q    So would you agree with me that -- that we, here in

23       Louisiana, have a lot -- a lot of pipelines, is that

24       a fair statement? Would you agree with that?

25       A    I'm not sure how many we have, but I would imagine

Page 49

1                   Objection. Objection to form.

2       A    One more question, 1461 is the trespassing on a

3       critical infrastructure? I don't remember the

4       statute code.

5       MS. SPEES:

6       Q    Yes, that's correct.

7       A    If I was asked to enforce that statute on a pipeline

8       that wasn't underground and not clearly marked, I

9       wouldn't enforce it there.

10       Q    What if you have a landowner or a -- or a pipeline

11       company that is -- is complaining about presence on

12       that pipeline?

13       MR. MCINTIRE:

14       Objection to form.

15       A    The statute would allow me to make an arrest in

16       those circumstances. They -- he can complain and we

17       can look at a trespassing offense or a different

18       offense, but I don't know that that statute would

19       apply.

20       MS. SPEES:

21       Q    How would you -- why -- why wouldn't -- why wouldn't

22       it apply?

23       A    I don't remember verbatim and I don't have the

24       actual statute in front of me to quote it, but from

25       what I could remember there were several subsections

Chris Martin  
February 17, 2022

Page 50

1 that said it either had to be clearly marked,  
 2 designated, fenced off, where somebody would know it  
 3 was a restricted area and not just a pipeline or  
 4 under construction. And if none of those applied you  
 5 wouldn't be able to apply that statute to that crime.  
 6 Q Okay. I want to go back to the private security  
 7 work because I -- I may have misunderstood your  
 8 testimony. I want to make sure I'm clear. Were --  
 9 did you testify that you were not working private  
 10 security during -- between, let's say, May and  
 11 September in relation to the Bayou Bridge Pipeline?  
 12 MR. MCINTIRE:  
 13 Objection to form.  
 14 A I don't remember when I specifically started. I  
 15 don't remember. From what I remember, my first  
 16 actual dealing with a protestor was June-ish and I  
 17 would have worked after that point some -- some time  
 18 period and I would have worked between June and  
 19 August, but I don't remember specific days I worked.  
 20 MS. SPEES:  
 21 Q Okay.  
 22 A I'm gonna retract that. I'm not a hundred percent  
 23 sure. I may have worked one or two days in May.  
 24 Q Okay.  
 25 A Don't remember. I'm sorry.

Page 52

1 A Majority of it would be HUB. I think really early  
 2 on I worked a few days for Sunland [sic], maybe -- I  
 3 don't want to give you a wrong number, but I'm gonna  
 4 say under five days, under -- maybe closer to two,  
 5 but it would have been before we started any HUB  
 6 security and everything else would have been through  
 7 HUB.  
 8 Q Okay. And who -- who was -- who were you dealing  
 9 with at HUB, who was your contact point?  
 10 MR. MCINTIRE:  
 11 Objection to form.  
 12 A It depends at which point. Once I took over  
 13 scheduling it would have been Angela Deer.  
 14 MS. SPEES:  
 15 Q Okay. What about before you took over scheduling?  
 16 A I didn't have a contact at HUB before that.  
 17 Q How was it that you came to be working for HUB?  
 18 A The office entered a contract with them and they  
 19 asked for deputies who wanted to work the security  
 20 detail.  
 21 Q When you say "the office", do you mean the St.  
 22 Martin Parish Sheriff's Office?  
 23 A Yes, ma'am, our sheriff's office.  
 24 Q Okay. And you say there was a contract with HUB?  
 25 A I'm -- I'm assuming. We started a work detail with

Page 51

1 Q Well, that clarifies because I -- I -- your -- your  
 2 -- your memory is that you did work private security  
 3 at some points during -- during that period?  
 4 A Yes, ma'am, it is.  
 5 Q Okay, all right. Just give me a moment. We might  
 6 be close to -- to done here.  
 7 A Yes, ma'am.  
 8 Q I just want to make sure. Who is the -- who's  
 9 considered the custodian of records at the sheriff's  
 10 office?  
 11 A We have a records department.  
 12 Q Okay. And is it the records department that houses  
 13 documents like you were referring to that Lieutenant  
 14 Gauthier would have with the plat information?  
 15 A They would have the actual original document that  
 16 would have been turned over with a case file to the  
 17 DA's office, but we have a scanned copy attached in  
 18 our reporting system and they would have access to  
 19 that.  
 20 Q Okay. And back to the private security question,  
 21 who -- who -- you don't recall whether you were  
 22 working for HUB or Sunbelt or do you recall whether  
 23 you were working for HUB or Sunbelt?  
 24 A At which point?  
 25 Q Between June and May and August of 2018.

Page 53

1 them as my knowledge.  
 2 Q I see, okay. Did the -- do -- to your knowledge,  
 3 did the sheriff's office keep a record of which  
 4 sheriff's office employees were working for HUB  
 5 during that time?  
 6 A Not that I'm aware of.  
 7 Q Okay. Do you have records of when you worked for  
 8 HUB and how much you were paid?  
 9 A I don't have records of when I worked. I have a, I  
 10 don't know the tax form, but I have -- I filed taxes  
 11 that year and it's on my tax documents, a total, but  
 12 I don't know days.  
 13 Q Okay. Do you -- do you recall how many times you  
 14 met with Mr. Chevalier at the DA's office about these  
 15 arrests?  
 16 A No, ma'am, but it wouldn't have been more than one  
 17 or two. I don't remember if he was that first  
 18 person, like I said, or if it was Chester Cedars, but  
 19 two would have been the max if it was him the first  
 20 time.  
 21 Q Okay, all right. I think that's all I have. I'm  
 22 gonna ask my co-counsel to let me know if there's  
 23 anything else. Just on that note with -- with the  
 24 DA's office, did you meet before the arrests --  
 25 before there were any arrests about this law?

Gabriel Gauthier  
February 18, 2022

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

ANNE WHITE HAT, RAMON \*  
MEJIA, and KAREN SAVAGE \*

v. \*

BECKET BREAU, in his \*  
official capacity as \*  
Sheriff of St. Martin \*  
Parish; BOFILL DUHE, in \*  
his official capacity as \*  
District Attorney of the \*  
16th Judicial District \*  
Attorney's Office \*

CIVIL ACTION NO.  
6:20-cv-00983

JUDGE ROBERT R.  
SUMMERHAYS

MAGISTRATE JUDGE  
CAROL B. WHITEHURST

\* \* \* \* \*

The deposition of GABRIEL GAUTHIER, taken in connection with the captioned cause, pursuant to the following stipulations before Mary LeJeune-Kephart, via Zoom Videoconferencing, on the 18th day of February 2022 beginning at 9:04 A.M.

Exhibit R



Gabriel Gauthier  
February 18, 2022

Page 2

1 APPEARANCES:  
2  
3 FOR THE PLAINTIFFS, ANNE WHITE HAT, RAMON MEJIA, and  
KAREN SAVAGE:  
4  
5 PAMELA C. SPEES  
LUNA MARTINEZ  
CENTER FOR CONSTITUTIONAL RIGHTS  
6 666 BROADWAY, 7TH FLOOR  
NEW YORK, NEW YORK 10012  
7  
8 WILLIAM QUIGLEY  
PROFESSOR OF LAW  
LOYOLA UNIVERSITY COLLEGE OF LAW  
9 7214 ST. CHARLES AVENUE  
NEW ORLEANS, LOUISIANA 70118  
10  
11 FOR THE DEFENDANT, BECKET BREAUX:  
12  
13 PATRICK B. MCINTIRE  
OATS & MARINO  
100 EAST VERMILION STREET SUITE 400  
14 LAFAYETTE, LOUISIANA 70501  
15  
16 FOR THE DEFENDANT, BOFILL DUHE:  
17 COREY MOLL  
PORTEOUS, HAINKEL AND JOHNSON  
18 704 CARONDELET STREET  
NEW ORLEANS, LOUISIANA 70130  
19  
20  
21  
22  
23  
24  
25

Page 4

1 INDEX  
2  
3 EXAMINATION BY MS. SPEES. . . . . 7  
4 EXAMINATION BY MR. MCINTIRE . . . . . 35  
5  
6 OBJECTIONS:  
7 BY MR. MCINTIRE . . . . . 18  
8 BY MR. MCINTIRE . . . . . 19  
9 BY MR. MCINTIRE . . . . . 22  
10 BY MR. MCINTIRE . . . . . 23  
11 BY MR. MCINTIRE . . . . . 24  
12 BY MR. MCINTIRE . . . . . 25  
13 BY MR. MCINTIRE . . . . . 26  
14 BY MR. MCINTIRE . . . . . 27  
15 BY MR. MCINTIRE . . . . . 28  
16 BY MR. MCINTIRE . . . . . 29  
17 BY MS. SPEES. . . . . 31  
18 BY MR. MCINTIRE . . . . . 32  
19 BY MR. MCINTIRE . . . . . 33  
20 BY MR. MCINTIRE . . . . . 34  
21  
22 EXHIBITS:  
23 EXHIBIT #1 MEJIA ARREST AFFIDAVIT . . . . . 38  
24 (NOT PROVIDED FOR ATTACHMENT)  
25

Page 3

1 STIPULATION  
2 It is hereby stipulated by and among counsel for  
3 plaintiff and counsel for defense that the deposition of  
4 GABRIEL GAUTHIER  
5 be taken before Mary LeJeune-Kephart, Certified Court  
6 Reporter, by counsel for the plaintiff for all purposes,  
7 pursuant to notice and to the provisions of the appropriate  
8 statutes of the Code of Civil Procedure of the State of  
9 Louisiana.  
10 The parties hereto waive all formalities in  
11 connection with the taking of said deposition, except the  
12 reading and signing thereof, the swearing of the witness  
13 and the reduction of the questions and answers to  
14 typewriting.  
15 Per Article 1443(D) of the Louisiana Code of Civil  
16 Procedure, counsel for all parties reserve all objections  
17 until trial or other use of the deposition.  
18 \* \* \*  
19  
20  
21  
22  
23  
24  
25

Page 5

1 MADAME COURT REPORTER:  
2 We're now on the Record. The time is  
3 9:04 A.M. Central Standard Time. The attorneys  
4 participating in this deposition acknowledge  
5 that I am not physically present in the  
6 deposition room and that I will be reporting  
7 this deposition remotely via video  
8 conferencing.  
9 They further acknowledge that in lieu of  
10 an oath administered in person the witness will  
11 verbally declare his testimony in this manner  
12 and is under penalty of perjury. Please state  
13 your name, the party you represent, your  
14 current location and agreement on the Record  
15 please.  
16 MS. SPEES:  
17 Pam Spees representing the plaintiffs.  
18 MR. QUIGLEY:  
19 Bill Quigley also representing the  
20 plaintiffs.  
21 MR. MCINTIRE:  
22 Patrick McIntire representing the  
23 sheriff.  
24 MR. MOLL:  
25 Corey Moll representing District Attorney

Gabriel Gauthier  
February 18, 2022

Page 6

1 Bo Duhe in his official capacity.  
 2 MADAME COURT REPORTER:  
 3 Mr. McIntire, you got -- you got  
 4 everything out?  
 5 MR. MCINTIRE:  
 6 Yeah, you wanted us to say we agreed with  
 7 the --  
 8 MADAME COURT REPORTER:  
 9 Right, yeah.  
 10 MR. MCINTIRE:  
 11 -- what you stipulated. Right.  
 12 MADAME COURT REPORTER:  
 13 Yeah, I think I might have had -- I might  
 14 have had a little tiny delay on mine. Okay.  
 15 Will the witness please raise your right hand?  
 16 Do you solemnly swear or affirm that the  
 17 testimony you're about to give will be the  
 18 truth, the whole truth and nothing but the  
 19 truth?  
 20 THE WITNESS:  
 21 I do.  
 22 MADAME COURT REPORTER:  
 23 Thank you.  
 24 THE WITNESS:  
 25 I think our camera shifted.

Page 8

1 Q And do you understand why we're here today?  
 2 A I do.  
 3 Q And -- and what is your understanding of that?  
 4 A It's in reference to an arrest I made on the  
 5 pipeline in 2018, I believe.  
 6 Q Okay. And did you review any documents in  
 7 preparation for your deposition today?  
 8 A I did.  
 9 Q And what -- and what documents did you review?  
 10 A My investigative report.  
 11 Q Okay.  
 12 A Along with other statements.  
 13 Q What -- what were those?  
 14 A They are in the investigative packet.  
 15 Q What did the packet include?  
 16 A ADSI report along with warrants, huh-uh, affidavits,  
 17 arrest affidavits, booking sheets and so on.  
 18 Q Okay. And did you bring any documents with you  
 19 today?  
 20 A I did.  
 21 Q And -- and what were those?  
 22 A I have a printout of the -- the criminal statute,  
 23 1461, unauthorized entry of a critical infrastructure  
 24 along with a printout of my report from ADSI.  
 25 Q Okay, great. Have you ever been deposed before?

Page 7

1 MS. SPEES:  
 2 Yeah, it shifted a bit. It's okay.  
 3 GABRIEL GAUTHIER,  
 4 after having been duly sworn, was examined and did  
 5 testify as follows:  
 6 EXAMINATION BY MS. SPEES:  
 7 Q Good morning.  
 8 A Good morning.  
 9 Q Just a note that something we realized yesterday is  
 10 that microphone in front of you, it's -- if you could  
 11 pull it a little bit closer. It's not -- we were  
 12 losing some audio occasionally yesterday, so I think  
 13 that's good. So good morning, my name is Pam Spees  
 14 and I am -- I'm representing Karen Savage, Anne White  
 15 Hat and Ramon Mejia in this matter. Could you --  
 16 could you state your full name and -- yeah, state  
 17 your full name please.  
 18 A Gabriel Thomas Gauthier.  
 19 Q And could you give us your date of birth?  
 20 A May 31st of 1977.  
 21 Q Okay, great. And what is your -- what is your rank  
 22 at this point?  
 23 A I'm a captain.  
 24 Q Captain. Okay, so I can call you Captain Gauthier?  
 25 A Yes, ma'am.

Page 9

1 A Yes.  
 2 Q How many times?  
 3 A Three or four times.  
 4 Q Okay. And -- and what were those depositions in  
 5 reference to, if you recall?  
 6 A One was involving a trespassing in Atchafalaya  
 7 Basin. It was -- I believe I was being sued for  
 8 violation of civil rights, civil rights violation.  
 9 Q And the --  
 10 A And -- and that's it. It was an arrest for  
 11 trespassing. They were -- crawfisherman was fishing  
 12 on somebody else's property.  
 13 Q I see. And -- and what about the other times, you  
 14 mentioned three or four times?  
 15 A One time before involving a separate pipeline issue.  
 16 I think it was about -- about a month ago.  
 17 Q Okay.  
 18 A It may have not even been a month ago.  
 19 Q Okay. Was -- was that in the Spoon case?  
 20 A Yes.  
 21 Q Okay. And -- and what about the others?  
 22 A One time was a contractor fraud, a personal  
 23 contractor fraud. Not a contractor fraud, I sued a  
 24 contractor and I had -- I was deposed in -- in that  
 25 when I was building my house.

Gabriel Gauthier  
February 18, 2022

Page 10

1 Q I see, okay. And any other -- any other  
2 depositions?  
3 A That's it.  
4 Q Okay. And so, you mentioned the lawsuit involving  
5 the crawfisherman, what -- have you -- are there any  
6 other times that you've been sued?  
7 A No, ma'am.  
8 Q Okay, all right. So you -- you've been deposed  
9 pretty recently. You -- I don't know if it was over  
10 Zoom. These sets of depositions are my first time  
11 doing this over Zoom, so it's pretty awkward for me  
12 and we've had some glitches. My internet's gone out.  
13 I think someone else's internet went out yesterday.  
14 So if -- if you don't hear all of my question,  
15 you know, just please -- please stop, let Mr.  
16 McIntire know or let me know that, you know, cause  
17 it's just really important that you hear my question.  
18 And what we found is if you give it a couple of  
19 beats after I ask, I think it's -- the -- the sound  
20 works better that way and Mrs. Kephart can -- can  
21 make sure she's getting everything down.  
22 And then sometimes my questions just aren't  
23 clear, just because of me, not because of any  
24 technological thing, so please feel free to ask me  
25 for clarification if -- if you're not sure what I'm

Page 12

1 Q And who have you worked for in that capacity?  
2 A I've worked for Breaux Bridge Casino doing security.  
3 It's through the sheriff's office. I worked for UL  
4 Police Department during their football games and  
5 events. And there are probably several more that I  
6 can't think of right off the top of my head.  
7 Q Okay. Were you working for a private security  
8 company on the -- at the time of the arrests we're  
9 here to discuss today?  
10 A I was -- I was working for the sheriff's office. We  
11 were working for a private security company. I think  
12 it was HUB Security.  
13 Q Okay. When you say "we were working", what do you  
14 -- what do you mean?  
15 A I was getting -- yes, I was working for HUB Security  
16 cause the, I believe, the checks were from HUB  
17 Security.  
18 Q Okay. Do you recall how often or how much you  
19 worked for HUB Security during, let's say, between  
20 July and -- and October of that year?  
21 A I don't.  
22 Q Okay. Do you recall how much you got paid?  
23 A No.  
24 Q Okay. Were there timesheets you had to -- you had  
25 to keep as part of your work on -- on this detail?

Page 11

1 asking. Does that sound good?  
2 A Yes, ma'am.  
3 Q Okay. How long have you been with the St. Martin  
4 Parish Sheriff's Office?  
5 A I've been with them since '96, but I left and came  
6 back in '04.  
7 Q Why did you leave?  
8 A I went to another agency.  
9 Q What agency was that?  
10 A Broussard Police Department and Iberia Parish  
11 Sheriff's Office.  
12 Q Okay. How long have you been a captain?  
13 A Six months.  
14 Q Okay. Where did you work before '96 when you joined  
15 the sheriff's office?  
16 A I was in high school.  
17 Q Okay.  
18 A I worked at a grocery store. I mean, I had jobs in  
19 high school and you know.  
20 Q Were -- were you there in St. Martinville or?  
21 A Yes, ma'am.  
22 Q Okay. Have you worked private security since you've  
23 been at the sheriff's office? Do you take on private  
24 security jobs?  
25 A Yes.

Page 13

1 A No, ma'am.  
2 Q Okay. I'm sorry, we have -- we lost Mr. Moll.  
3 MS. SPEES:  
4 Mr. Moll, are you with us?  
5 MR. MOLL:  
6 I'm here. Sorry, was having some issues  
7 there. I think I'm good now.  
8 MS. SPEES:  
9 Okay. Did you -- do -- how much -- how  
10 long were you gone?  
11 MR. MOLL:  
12 It was -- it was just a blip, just a  
13 second. I'm good.  
14 MS. SPEES:  
15 All right, good.  
16 MS. SPEES:  
17 Q Okay. So -- so you -- you were working for HUB at  
18 -- at the time of this -- these arrests, which were  
19 on August 18th, correct?  
20 A Yes, ma'am.  
21 Q Okay. And was anyone else with you on that day,  
22 anyone else from the sheriff's office with you on  
23 that day?  
24 A Yes.  
25 Q Who -- who was with you?

Gabriel Gauthier  
February 18, 2022

Page 14

1 A Chris Champagne.  
 2 Q Okay. And -- and who is -- who is Mr. Champagne?  
 3 A He's a coworker. He works for the sheriff's office  
 4 here and was scheduled the same day as me working  
 5 that area.  
 6 Q Okay. Would he also have been working for HUB on  
 7 that day?  
 8 A I don't know what he would have been doing. I  
 9 assume he was.  
 10 Q Okay. Were either of you wearing a body camera on  
 11 that day?  
 12 A Yes.  
 13 Q Who -- who was wearing one?  
 14 A I -- I believe I was wearing one and I don't know if  
 15 Chris was or not. He may have been.  
 16 Q Okay. Do you know what would have happened with  
 17 that footage?  
 18 A I don't.  
 19 Q What do you normally do with -- with the footage  
 20 captured by your -- by your camera after -- after --  
 21 after working an incident like this?  
 22 A It's downloaded into a server here at the sheriff's  
 23 office. That particular camera -- camera, I believe  
 24 I had taken it from patrol and given it back to Chris  
 25 Martin.

Page 16

1 A I don't recall exactly what -- they may have.  
 2 Q What -- you said you walked a coup -- maybe a couple  
 3 of miles from Bayou Crook Chene and --  
 4 A It was a long distance from where I was dropped off.  
 5 I don't remember exactly how far it was.  
 6 Q Okay. So you don't remember once you got to the  
 7 four people that you saw standing under the tree, you  
 8 don't remember if anyone -- did you -- did they  
 9 communicate with you in any way?  
 10 A I don't remember.  
 11 Q Okay. Now, initially -- so -- so then what  
 12 happened?  
 13 A They were told to leave and they had thirty minutes  
 14 to leave and when we -- when I came back they were --  
 15 they were still there so they were arrested.  
 16 Q Okay. And what were they arrested for?  
 17 A Trespassing.  
 18 Q And -- and how did you come to believe they were  
 19 trespassing?  
 20 A Because they were -- they were on property that was  
 21 -- didn't belong to them. It was in the right of  
 22 passage within the construction site.  
 23 Q How -- how do you define the construction site?  
 24 A There were survey markers along the borders of the  
 25 -- the easement or right of passage, I don't really

Page 15

1 Q Okay. Do you know when you did that?  
 2 A Shortly after the event.  
 3 Q Would it have been the same day or a day or two  
 4 later?  
 5 A I don't know.  
 6 Q Okay. Can you describe for me what -- how you came  
 7 to be out on the property that day, and by the  
 8 property we're talking about the -- the property you  
 9 -- you're describing in your report, sounds like you  
 10 -- you were near Bayou Crook Chene.  
 11 A Yes, ma'am.  
 12 Q Can you tell me how you came to be out there that  
 13 day?  
 14 A I took a boat there, was delivered to a construction  
 15 site. And when we got there the construction workers  
 16 were saying they had four people on the -- on the  
 17 right-of-way. And then we walked down about, I -- I  
 18 don't even know if it was -- might have been a couple  
 19 of miles, down a pipeline and saw four people.  
 20 Q Okay. What -- you say you saw four people, what was  
 21 happening when you -- when you saw the four people?  
 22 A They were standing beneath a tree.  
 23 Q And -- and then what happened?  
 24 A They were told to leave.  
 25 Q And what did they -- did anyone respond?

Page 17

1 know what to refer to it as, that marked it.  
 2 Q Yeah. Sometimes people refer to it as a  
 3 right-of-way or an easement.  
 4 A A right-of-way, yeah.  
 5 Q So you're saying there were -- there were markers  
 6 there at that time?  
 7 A Yes.  
 8 Q And where were they standing in relation to the  
 9 markers?  
 10 A Within the -- the boundary of the marker.  
 11 Q Okay. What did the marker --  
 12 A Closer to the pipeline.  
 13 Q What did the markers look like?  
 14 A It was a stick with a flag on the top.  
 15 Q Okay. Do you recall who made the complaint that --  
 16 or -- or how did you come to believe that they did  
 17 not have permission to be there?  
 18 A The construction -- the construction, that's who  
 19 prompted me to the area was the construction workers.  
 20 And then I spoke to Chris Martin and he -- he  
 21 verified that they weren't supposed to be there.  
 22 Q Okay. Did you -- but you yourself didn't have any  
 23 contact with property owners?  
 24 A No, ma'am.  
 25 Q Okay. And -- and do you know the names of any

Gabriel Gauthier  
February 18, 2022

Page 18

1 property owners who -- who might have complained?  
 2 A I don't.  
 3 Q Okay. Do you -- are -- are you aware that Bayou  
 4 Bridge Pipeline Company was later found by a Court to  
 5 have been -- have been trespassing on that property?  
 6 A I --  
 7 MR. MCINTIRE:  
 8 Objection to form.  
 9 MS. SPEES:  
 10 Q You--  
 11 A I'm not.  
 12 Q I'm sorry, could you -- could you say that again?  
 13 A I'm not aware of anything.  
 14 Q So -- so you didn't -- you didn't know that later on  
 15 a Court found Bayou Bridge to have been trespassing  
 16 on that property at the time?  
 17 MR. MCINTIRE:  
 18 Objection to form. Go ahead.  
 19 A No.  
 20 MS. SPEES:  
 21 Q Okay. If I represent to you that that in fact  
 22 happened, that -- that a Court in St. Martin Parish  
 23 found that at the time of -- of the arrests that you  
 24 made, Bayou Bridge itself was trespassing, would that  
 25 have affected your decision as to whether to arrest

Page 20

1 A Not that I'm aware of.  
 2 Q Okay. Now, you initially arrested -- well, can you  
 3 -- can you tell me -- let's go back to the moment  
 4 when you said you'd let thirty minutes pass, the --  
 5 the people were still standing under the tree, what  
 6 happened then?  
 7 A I went back and I saw four people that were still  
 8 under the tree and identified them to be Brittany  
 9 Osland, Ramon Mejia and Madeline Hicks and Karen  
 10 Savage.  
 11 Q You -- you identified them at that point?  
 12 A Upon arrest, after they were arrested.  
 13 Q Okay. So -- so how -- how did you effectuate the  
 14 arrests?  
 15 A Went down to the area where they were, detained them  
 16 with handcuffs and -- and then started to identify  
 17 them. They identified themselves.  
 18 Q And -- and was it just you and -- and is it Deputy  
 19 Champagne at the time who were effectuating the  
 20 arrests?  
 21 A That I remember.  
 22 Q Okay. And do you recall what you arrested them for  
 23 at the time?  
 24 A It was trespassing.  
 25 Q Just basic trespassing?

Page 19

1 the people standing there that day?  
 2 MR. MCINTIRE:  
 3 Objection to form.  
 4 A I don't -- I don't know.  
 5 MS. SPEES:  
 6 Q So -- but it was the -- the pipeline company that --  
 7 well, what is your understanding of who hired HUB,  
 8 you say you were working for HUB, what's your  
 9 understanding of who -- who -- who contracted with  
 10 HUB?  
 11 A I have no understanding of who contracted with HUB.  
 12 Q Okay. Did you ever encounter someone named Eddie  
 13 Langlinais?  
 14 A Yes.  
 15 Q How so?  
 16 A I saw him on a construction site. I'm -- I was  
 17 familiar with him from before and I saw him on a  
 18 construction site out there one time.  
 19 Q What was your understanding of what he was doing  
 20 there?  
 21 A I don't have any understanding of what he was doing  
 22 there.  
 23 Q Okay. Did you ever interact with anybody working  
 24 for the, other than construction workers, anybody  
 25 working for the pipeline company?

Page 21

1 A Yes. No, I arrested them for critical  
 2 infrastructure, that's 61.  
 3 Q Okay.  
 4 A 1461.  
 5 Q All right. So just going -- going to your report,  
 6 and this I'm looking at, let's -- let's look at the  
 7 -- let me go ahead and I'm just gonna put this on the  
 8 screen. Let's see here, see if I can do this right.  
 9 Now, can you still hear me?  
 10 A Yes.  
 11 Q Okay. My computer is just frozen so I'm gonna stop  
 12 the share and ask you to look at --  
 13 MS. SPEES:  
 14 Mr. McIntire, can we look at the Ramon  
 15 Mejia affidavit?  
 16 MR. MCINTIRE:  
 17 Let me double check with the PEL. That's  
 18 the Ramon Mejia jail affidavit, is that what  
 19 you're looking at?  
 20 MS. SPEES:  
 21 That's correct, yes.  
 22 MR. MCINTIRE:  
 23 Okay, we've got it.  
 24 MS. SPEES:  
 25 Okay, great.

Gabriel Gauthier  
February 18, 2022

Page 22

1 MS. SPEES:  
 2 Q So just for the Record, Mr. -- Captain Gauthier is  
 3 -- is looking at the affidavit of the -- the -- the  
 4 arrest affidavit for Ramon Mejia. It's dated August  
 5 18, 2018 and Captain Gauthier, would you just refer  
 6 to the last paragraph of this affidavit?  
 7 A While in transport Lieutenant Chris Martin -- you  
 8 want me to refer to it or read it?  
 9 Q You don't need to read it. I just wanted to direct  
 10 your attention to it. So there it says that -- I  
 11 mean, could you basically just describe what it says  
 12 there?  
 13 A Lieutenant Chris Martin came out there and observed  
 14 the sight and positively identified that they were  
 15 within the right-of-way and -- and suggested that  
 16 they in violation of unauthorized entry of -- of  
 17 criminal infrastructure.  
 18 Q Okay. Who was in charge out there that day? Who --  
 19 who would you say was in charge?  
 20 MR. MCINTIRE:  
 21 Objection to form.  
 22 MS. SPEES:  
 23 Q You -- you can answer if you understand.  
 24 A Are you -- are you talking about whenever --  
 25 Lieutenant Chris Martin when he -- when he got there

Page 24

1 tried to turn it off but I can still hear you.  
 2 A Keep going?  
 3 MR. MCINTIRE:  
 4 Yeah. Yeah.  
 5 A Okay. So when I arrested them I believe they were  
 6 trespassing and then when I was made aware of this --  
 7 this unauthorized entry of a critical infrastructure  
 8 it better fit what I observed out there.  
 9 MS. SPEES:  
 10 Q How did it better fit what you observed?  
 11 A It was upon a critical infrastructure which is a  
 12 pipeline, construction site of a pipeline.  
 13 Q Why would you not have -- have thought to charge  
 14 them with that immediately?  
 15 MR. MCINTIRE:  
 16 Objection to form.  
 17 A I wasn't fam -- I might -- I might have known about  
 18 the law, but I wasn't very familiar with the law.  
 19 MS. SPEES:  
 20 Q Okay. So you -- you've had a chance to review the  
 21 law and -- and are you more familiar with it now?  
 22 A Yes.  
 23 Q Okay. What -- what is your understanding of what is  
 24 prohibited by that law with respect to pipelines?  
 25 MR. MCINTIRE:

Page 23

1 cause he outranked everybody.  
 2 Q Okay. Was there anyone affiliated with the pipeline  
 3 company or the construction company that you would  
 4 say was in charge that was the go to person that was  
 5 telling you what was going on out there?  
 6 MR. MCINTIRE:  
 7 Objection to form.  
 8 A No, not that I remember.  
 9 MS. SPEES:  
 10 Q Okay. Do you remember the names of the -- the --  
 11 the people you interacted with when you got to Bayou  
 12 Crook Chene?  
 13 A I don't.  
 14 Q Okay. So could you -- could you just describe why  
 15 it was -- it was only when you were transporting the  
 16 people that you arrested that you -- you learned from  
 17 -- from now Sergeant Martin that they should be  
 18 charged with violation of the critical infrastructure  
 19 law?  
 20 A Because it was -- he -- he made me aware of it, the  
 21 critical infrastructure law, and I think you --  
 22 you're gone.  
 23 Q Can you hear me?  
 24 A Yes.  
 25 Q Okay. Yeah, I had -- my camera's frozen. I've just

Page 25

1 Objection to form.  
 2 A The -- a pipeline or construction site's considered  
 3 critical infrastructure. And their entering upon  
 4 that pipeline is a violation of that law.  
 5 MS. SPEES:  
 6 Q Okay. Would --  
 7 A And the remained there after they were told to  
 8 leave.  
 9 Q Okay. How do you determine whether someone is  
 10 trespassing on a pipeline that's not, I'm not talking  
 11 about a construction site, I'm asking how -- how  
 12 would you determine when you're trying to enforce  
 13 this law whether someone is -- is trespassing on a  
 14 pipeline?  
 15 MR. MCINTIRE:  
 16 Objection to form.  
 17 A What I used to determine was the -- the survey lines  
 18 placed there by the surveyors and they were clearly  
 19 within the survey lines. I determined that that was  
 20 the premise of the pipeline or construction site.  
 21 MS. SPEES:  
 22 Q Okay. What -- I understand that's what you're --  
 23 you're testifying happened that day and I'm asking  
 24 you to speak just as a general matter. As -- as an  
 25 officer, when you are trying to figure out how to

Gabriel Gauthier  
February 18, 2022

Page 26

1 enforce this law, what are you gonna look for in  
 2 terms of violating or -- or trespassing on a  
 3 pipeline, not a construction site, a pipeline?  
 4 MR. MCINTIRE:  
 5 Objection to form.  
 6 A I -- I don't understand the question.  
 7 MS. SPEES:  
 8 Q So if -- if you are called to property, let's say,  
 9 and you have a landowner who's saying this person or  
 10 -- or a pipeline company, which is saying that this  
 11 -- these people are -- are on our pipeline and it's  
 12 not a construction site and let's say it's a pipeline  
 13 that's underground, how are you gonna determine  
 14 whether that person is violating the critical  
 15 infrastructure law?  
 16 MR. MCINTIRE:  
 17 Objection to form.  
 18 A I'm very -- I really don't know how to answer that  
 19 question.  
 20 MS. SPEES:  
 21 Q Okay. All right, so you -- you testified that there  
 22 were -- that there were survey markers and that these  
 23 -- these folks, these four people, were standing  
 24 within the survey marker line; is that correct?  
 25 A Yes.

Page 28

1 what was the time span?  
 2 A It was over several months.  
 3 Q Okay. And what -- what did your work consist of?  
 4 Where were -- where were you working this detail?  
 5 A At different sites throughout the Atchafalaya Basin.  
 6 Q Was it all in St. Martin Parish?  
 7 A Yes.  
 8 Q Okay. Do you recall how much you were -- you were  
 9 getting paid by HUB?  
 10 A I don't.  
 11 Q Was it hourly?  
 12 A Yes.  
 13 Q Do you have -- recall an approximation?  
 14 A You want me to approximate?  
 15 Q If you --  
 16 A Thirty -- probably Thirty -- Thirty Dollars an hour,  
 17 Thirty-Five Dollars an hour. It was a -- it was  
 18 north of Thirty, I think.  
 19 Q Okay, that's helpful. Thank you. Now, you -- you  
 20 indicated that you -- you weren't familiar with the  
 21 -- the law at the time, did you -- did anyone ever  
 22 provide you with instructions about enforcing it?  
 23 MR. MCINTIRE:  
 24 Objection to form.  
 25 A No, not that I recall.

Page 27

1 Q Okay. Now, Sergeant Martin testified that when he  
 2 -- when he arrived he did not see survey markers  
 3 there and so I'm -- I'm not trying to catch you up on  
 4 anything, I'm just letting you know that that was his  
 5 testimony and -- and does that not accord with your  
 6 recollection?  
 7 MR. MCINTIRE:  
 8 Objection to form.  
 9 A I -- I remember seeing survey markers. They may not  
 10 have been right where they were standing and some of  
 11 them may have been removed.  
 12 MS. SPEES:  
 13 Q Okay. I'm still here. I'm just -- I haven't  
 14 frozen, I'm just looking at my notes. Were you  
 15 involved in any other arrests of protestors with  
 16 respect to the Bayou Bridge Pipeline?  
 17 A I don't believe so.  
 18 Q How often or how many times did you -- do you recall  
 19 working on the Bayou Bridge Pipeline detail?  
 20 A Probably twenty times.  
 21 Q And what -- where --  
 22 A That's an approximate time. I don't recall every  
 23 time.  
 24 Q Sure. No, I understand. What -- what period was  
 25 that, was that in August or September of 2018, how --

Page 29

1 MS. SPEES:  
 2 Q Did you have -- so did you have any written  
 3 communications about the law and its -- how to  
 4 enforce it?  
 5 A Not that I remember.  
 6 Q Okay. If the -- if, as I said, the -- a Court later  
 7 found that Bayou Bridge was trespassing on that  
 8 property, do you believe -- well, Bayou -- a Court  
 9 found that Bayou Bridge was trespassing at the time  
 10 you made these arrests and so it did not have a legal  
 11 right to be there, do you believe you had a -- had a  
 12 -- do you believe that these -- these folks were  
 13 trespassing on critical infrastructure at the time?  
 14 MR. MCINTIRE:  
 15 Objection to form.  
 16 A I can't really say what I believe right now based  
 17 upon that.  
 18 MS. SPEES:  
 19 Q Okay, fair enough. So when you were working this  
 20 detail for HUB, your -- did you show up in your St.  
 21 Martin Parish Sheriff's Office uniform?  
 22 A Yes.  
 23 Q And the same firearm you would use if you were on  
 24 official duty?  
 25 A Yes.

Gabriel Gauthier  
February 18, 2022

Page 30

1 Q And -- and you do recall that you were wearing a  
2 body cam that day, correct? I believe that was your  
3 testimony.  
4 A I can't be -- I can't be absolutely correct about if  
5 I was wearing a body cam that day. I believe I was.  
6 Q Okay, all right. That's -- that's fair.  
7 MS. SPEES:  
8 So I think we -- we may be close to done,  
9 Mr. McIntire. I just want to take a minute and  
10 check with my client and co-counsel and we can  
11 come back in ten minutes?  
12 MR. MCINTIRE:  
13 That's fine.  
14 MS. SPEES:  
15 Okay. And -- and just before we go off  
16 the Record, Mrs. Kephart, I did want to just  
17 put -- put back on the Record in this  
18 deposition as well our -- the fact that Mr.  
19 McIntire produced some documents on Wednesday  
20 evening, the 16th, but -- but did so in -- in  
21 spite of the objection that Captain Gauthier  
22 and the other deponents are not parties and  
23 subject to the docu -- discovery requirements  
24 of Rule 34.  
25 Putting that on the Record and the -- and

Page 32

1 can call it a day, I think. You -- you said that you  
2 had to walk a couple of miles, approximately, to get  
3 to where these folks were standing under the tree.  
4 Do -- did I hear you say correctly -- am I correct  
5 that you walked along the -- the right-of-way to get  
6 there?  
7 MR. MCINTIRE:  
8 Objection to form.  
9 MS. SPEES:  
10 Q You can answer.  
11 A Within the right-of-way. I'm not sure where I  
12 remember walking there. I walked within the -- the  
13 very near to the berm or the dirt that was dug out of  
14 the pipeline.  
15 Q Okay. And -- and did it seem that -- that a lot of  
16 trees had been cleared along that route?  
17 A I don't remember seeing any trees that were cleared.  
18 Q Okay. Okay, let me just check my notes here. Let's  
19 see. Okay, I want to just go back and -- and ask a  
20 question I tried to ask earlier, but I may not have  
21 been clear. The hypothetical question about how you  
22 might enforce this law and I'm over here in Southwest  
23 Louisiana and we have a lot of pipelines in this part  
24 of the state. Would you agree that there -- you got  
25 a lot of pipelines over there too?

Page 31

1 -- and noting that we are objecting to the  
2 timing and substance and we'll leave this  
3 deposition open pending resolution and any  
4 further documents that come to us. Sound good?  
5 MR. MCINTIRE:  
6 Yeah and -- and our objection to leaving  
7 the deposition open. I think we -- Rule 34  
8 doesn't apply to non-parties and the request  
9 that accompanied the deposition notice was  
10 under Rule 34. We have produced some  
11 documents, do not pretend that that's a  
12 comprehensive document production, but we don't  
13 believe that that's grounds for leaving the  
14 deposition record open.  
15 MS. SPEES:  
16 Okay. All right and on that note we'll  
17 come back at -- let's come back at 10:00.  
18 MR. MCINTIRE:  
19 Okay.  
20 MS. SPEES:  
21 All right, great, thank you.  
22 --OFF THE RECORD--  
23 --ON THE RECORD--  
24 MS. SPEES:  
25 Q Just a couple more questions and then we can -- we

Page 33

1 MR. MCINTIRE:  
2 Objection to form.  
3 A I -- I don't know if we have a lot or not.  
4 MS. SPEES:  
5 Q Okay. Would you agree that pipelines run under the  
6 ground?  
7 A Yes.  
8 Q Okay. Have you seen markings for pipelines that are  
9 underground?  
10 A Yes.  
11 Q Have you -- are you also aware that there are  
12 pipelines sometimes without markings?  
13 A I'm not aware of it.  
14 Q Okay. So I -- I just want to go back to this  
15 hypothetical one more time. Let's say that a -- a  
16 pipeline operator calls you out to some property and  
17 says there are protestors on -- on our pipeline and  
18 the pipeline is -- has already -- it's underground,  
19 it's already been constructed.  
20 There's no construction site. The pipeline's  
21 underground and my question to you is you have  
22 someone who's complaining, how do you, as a law  
23 enforcement officer, determine whether they are  
24 violating the critical infrastructure law?  
25 MR. MCINTIRE:



Gabriel Gauthier  
February 18, 2022

Page 34

1           Objection to form.  
2    A    I would confirm that there's a pipeline there.  
3    MS. SPEES:  
4    Q    How would you confirm it?  
5    A    Through the man -- the pipeline manager that called  
6        us there.  
7    Q    And in your mind, what would the -- where would the  
8        protestors need to be in order to be charged with  
9        this with respect to the pipeline that the pipeline  
10       manager tells you it's in the ground?  
11       MR. MCINTIRE:  
12       Objection to form.  
13    A    I would establish the boundary of being the clear  
14       cut portion at the sides of the pipeline and if they  
15       were in there that -- they would -- they would be in  
16       violation of that.  
17    MS. SPEES:  
18    Q    How would you go about establishing that?  
19       MADAME COURT REPORTER:  
20       I -- I think you cut out.  
21    A    I'm having trouble -- somebody started talking.  
22       MADAME COURT REPORTER:  
23       That was me, the Court Reporter. I think  
24       Ms. Pam's last question cut out. I only caught  
25       the tail end.

Page 36

1       the 18th?  
2    A    I believe those were from the 19th.  
3    Q    So the day after the --  
4    A    Cause the date on the video was the 19th. I didn't  
5       see any from the 18th.  
6    Q    Would these be the videos of the body cam that you  
7       might have been thinking of when you testified  
8       earlier?  
9    A    Yes, it could have been.  
10   Q    Thank you. That's all I have.  
11       MR. MCINTIRE:  
12       I will say, Pam, we are gonna make a  
13       search for additional body cam videos and see  
14       if there are some from the 18th. I just didn't  
15       want to leave the Record, you know, the way it  
16       was if in fact the -- the camera he was  
17       thinking of was the 19th.  
18       MS. SPEES:  
19       Okay. Was the -- the footage of the 19th  
20       of the same location?  
21   A    Yes.  
22       MS. SPEES:  
23       Okay. Then -- then I think we'd want to  
24       see that too, Mr. McIntire.  
25       MR. MCINTIRE:

Page 35

1    MS. SPEES:  
2    Q    I asked -- okay, I'll ask it again. How would you  
3       go about determining -- determining that area?  
4    A    It's -- it's hard for me to answer these  
5       hypothetical questions because there would be several  
6       other -- there would possibly be several other  
7       circumstances on each complaint.  
8       MS. SPEES:  
9       Okay. I think that's all I have, Mr.  
10       McIntire, so we'll follow up about -- well, we  
11       need to see if Mr. Moll has any questions.  
12       MR. MOLL:  
13       I do not have any questions at this time.  
14       MR. MCINTIRE:  
15       I do have a -- a couple of questions for  
16       clarification.  
17       MS. SPEES:  
18       Sure.  
19       EXAMINATION BY MR. MCINTIRE:  
20    Q    Deputy Gauthier, during the break just now, with the  
21       help of IT from this morning, we were able to get  
22       some of the videos, body cam videos, to play; is that  
23       correct?  
24    A    Yes.  
25    Q    The videos that we've seen, were those from August

Page 37

1       Yeah.  
2       MS. SPEES:  
3       Okay, great. Okay, Mr. Moll has nothing.  
4       I have nothing further. I think we can  
5       conclude for now.  
6       MADAME COURT REPORTER:  
7       Okay, so Mr. Moll and Mr. McIntire want a  
8       copy of the transcript?  
9       MR. MCINTIRE:  
10       Yes, please.  
11       MADAME COURT REPORTER:  
12       And read and sign to you, Mr. McIntire?  
13       MR. MCINTIRE:  
14       Yes, please.  
15       MADAME COURT REPORTER:  
16       Okay.  
17       MR. MOLL:  
18       And yes, yes for me on a copy.  
19       MADAME COURT REPORTER:  
20       Okay. Did you put any -- I don't think  
21       you put any exhibits on, did you Ms. Pam? Did  
22       you attach any exhibits?  
23       MS. SPEES:  
24       We -- we referenced Mr. Mejia's warrant  
25       af -- arrest affidavit. I'll send you that.

Gabriel Gauthier  
February 18, 2022

Page 38

1 MADAME COURT REPORTER:  
 2 Okay, so you do want to attach it as  
 3 "Exhibit 1"?  
 4 MS. SPEES:  
 5 Yes.  
 6 MADAME COURT REPORTER:  
 7 And you still have my email address?  
 8 MS. SPEES:  
 9 Yes, I do.  
 10 MADAME COURT REPORTER:  
 11 All right, thank you so much.  
 12 THE WITNESS WAS EXCUSED.  
 13 DEPOSITION CONCLUDED AT 10:14 A.M.  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 40

1 CERTIFICATE  
 2  
 3 This certification is valid only for a transcript  
 4 accompanied by my original signature and original required  
 5 seal on this certificate.  
 6 I, Mary LeJeune-Kephart, Certified Court Reporter in  
 7 and for the State of Louisiana, as the officer before whom  
 8 this testimony was taken, do hereby certify that GABRIEL  
 9 GAUTHIER, after having been duly sworn by me upon authority  
 10 of R.S. 37:2554, did testify on the 18th day of February  
 11 2022, via Zoom Videoconferencing, as hereinbefore set forth  
 12 in the 38 foregoing pages; that this testimony was reported  
 13 by me in the voice-reporting method, was prepared and  
 14 transcribed by me or under my personal direction and  
 15 supervision, and is true and correct to the best of my  
 16 ability and understanding; that the transcript has been  
 17 prepared in compliance with the transcript format  
 18 guidelines required by statute and rules of the board; that  
 19 I am informed about the complete arrangement, financial or  
 20 otherwise, with the person or entity making arrangements  
 21 for deposition services; that I have acted in compliance  
 22 with the prohibition on contractual relationships, as  
 23 defined by Louisiana Code of Civil Procedure Article 1434  
 24 and rules of the board; that I have no actual knowledge of  
 25 any prohibited employment or contractual relationship,

Page 39

1 REPORTER'S PAGE  
 2  
 3 I, Mary LeJeune-Kephart, Certified Court Reporter in  
 4 and for the State of Louisiana, the officer, as defined in  
 5 Rule 28 of the Federal Rules of Civil Procedure and/or the  
 6 Article 1434(B) of the Louisiana Code of Civil Procedure,  
 7 before whom this proceeding was taken, do hereby state on  
 8 the Record:  
 9 That due to the spontaneous nature of the interaction  
 10 and discourse of the proceeding, double-dashes (--) have  
 11 been used to indicate pauses, changes of thought and/or  
 12 talkovers; that such is the universally accepted method for  
 13 a court reporter's transcription of a proceeding; that  
 14 double-dashes (--) do not indicate that words or phrases  
 15 have been left out of the transcript.  
 16 And that the spelling of any words and/or names which  
 17 could not be verified through reference resources have been  
 18 denoted with the parenthetical phrase "(spelled  
 19 phonetically)."  
 20  
 21  
 22  
 23  
 24  
 25

Page 41

1 direct or indirect, between a court reporting firm and any  
 2 party litigant in this matter, nor is there any such  
 3 relationship between myself and a party litigant in this  
 4 matter; that I am not related to counsel or to any of the  
 5 parties hereto, I am in no manner associated with counsel  
 6 for any of the interested parties to this litigation, and I  
 7 am in no way concerned with the outcome thereof.  
 8 This 18th day of February 2022, New Orleans,  
 9 Louisiana.  
 10  
 11  
 12  
 13  
 14  
 15 \_\_\_\_\_  
 16 Certified Court Reporter  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Andrew Bonvillain  
February 17, 2022

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA

ANNE WHITE HAT, RAMON	*	
MEJIA, and KAREN SAVAGE	*	
	*	
	*	CIVIL ACTION NO.
v.	*	6:20-cv-00983
	*	
BECKET BREAUUX, in his	*	
official capacity as	*	JUDGE ROBERT R.
Sheriff of St. Martin	*	SUMMERHAYS
Parish; BOFILL DUHE, in	*	
his official capacity as	*	
District Attorney of the	*	MAGISTRATE JUDGE
16th Judicial District	*	CAROL B. WHITEHURST
Attorney's Office	*	
* * * * *		

The deposition of ANDREW BONVILLAIN, taken in connection with the captioned cause, pursuant to the following stipulations before Mary LeJeune-Kephart, via Zoom Videoconferencing, on the 17th day of February 2022 beginning at 1:00 P.M.

Exhibit S

Andrew Bonvillain  
February 17, 2022

Page 2

1 APPEARANCES:  
2  
3 FOR THE PLAINTIFFS, ANNE WHITE HAT, RAMON MEJIA, and KAREN SAVAGE:  
4  
5 PAMELA C. SPEES  
6 LUNA MARTINEZ  
7 CENTER FOR CONSTITUTIONAL RIGHTS  
8 666 BROADWAY, 7TH FLOOR  
9 NEW YORK, NEW YORK 10012  
10  
11 WILLIAM QUIGLEY  
12 PROFESSOR OF LAW  
13 LOYOLA UNIVERSITY COLLEGE OF LAW  
14 7214 ST. CHARLES AVENUE  
15 NEW ORLEANS, LOUISIANA 70118  
16  
17 FOR THE DEFENDANT, BECKET BREAUX:  
18  
19 PATRICK B. MCINTIRE  
20 OATS & MARINO  
21 100 EAST VERMILION STREET SUITE 400  
22 LAFAYETTE, LOUISIANA 70501  
23  
24 FOR THE DEFENDANT, BOFILL DUHE:  
25 COREY MOLL  
PORTEOUS, HAINKEL AND JOHNSON  
704 CARONDELET STREET  
NEW ORLEANS, LOUISIANA 70130

ALSO PRESENT:  
GREGORY MOROUX  
IN-HOUSE COUNSEL FOR SMPPO

Page 4

1 INDEX  
2  
3 EXAMINATION BY MS. SPEES..... 6  
4  
5 OBJECTIONS:  
6 BY MS. SPEES..... 7  
7 BY MR. MCINTIRE ..... 10  
8 BY MR. MCINTIRE ..... 21  
9 BY MR. MCINTIRE ..... 24  
10 BY MR. MCINTIRE ..... 27  
11 BY MR. MCINTIRE ..... 29  
12 BY MR. MCINTIRE ..... 31  
13 BY MR. MCINTIRE ..... 32  
14 BY MR. MCINTIRE ..... 34  
15 BY MR. MCINTIRE ..... 36  
16 BY MR. MCINTIRE ..... 37  
17 BY MR. MCINTIRE ..... 38  
18 BY MR. MCINTIRE ..... 39  
19 BY MR. MCINTIRE ..... 40  
20  
21 EXHIBITS:  
22 EXHIBIT #1 TYPED REPORT ..... 42  
23  
24  
25

Page 3

1 STIPULATION  
2 It is hereby stipulated by and among counsel for  
3 plaintiff and counsel for defense that the deposition of  
4 ANDREW BONVILLAIN  
5 be taken before Mary LeJeune-Kephart, Certified Court  
6 Reporter, by counsel for the plaintiff for all purposes,  
7 pursuant to notice and to the provisions of the appropriate  
8 statutes of the Code of Civil Procedure of the State of  
9 Louisiana.  
10 The parties hereto waive all formalities in  
11 connection with the taking of said deposition, except the  
12 reading and signing thereof, the swearing of the witness  
13 and the reduction of the questions and answers to  
14 typewriting.  
15 Per Article 1443(D) of the Louisiana Code of Civil  
16 Procedure, counsel for all parties reserve all objections  
17 until trial or other use of the deposition.  
18 \* \* \*  
19  
20  
21  
22  
23  
24  
25

Page 5

1 MADAME COURT REPORTER:  
2 The remote swearing in or I can read the  
3 summary into the record again. It's your  
4 preference.  
5 MR. MCINTIRE:  
6 We'll stipulate.  
7 MS. SPEES:  
8 We'll do the same.  
9 MADAME COURT REPORTER:  
10 Okay.  
11 MR. MOLL:  
12 Agree.  
13 MADAME COURT REPORTER:  
14 Okay, thank you. All right, so if our  
15 witness would raise your right hand. Do you  
16 solemnly or affirm that the testimony you're  
17 about to give will be the truth, the whole  
18 truth and nothing but the truth?  
19 THE WITNESS:  
20 I do.  
21 MADAME COURT REPORTER:  
22 Okay, thank you.  
23 ANDREW BONVILLAIN,  
24 after having been duly sworn, was examined and did  
25 testify as follows:

Andrew Bonvillain  
February 17, 2022

Page 6

1 EXAMINATION BY MS. SPEES:  
 2 Q Okay. Can you hear my okay?  
 3 A Yes.  
 4 Q Great. Good afternoon, my name is Pam Spees and I'm  
 5 an attorney representing the plaintiffs in this  
 6 matter. Can I get you to spell or -- or pronounce  
 7 your last name and spell it?  
 8 A Bonvillain, B-O-N-V-I-L-L-A-I-N.  
 9 Q And I guess we'll note your address as St. Martin  
 10 Parish Sheriff's Office again.  
 11 MS. SPEES:  
 12 Mr. McIntire?  
 13 Mr. McIntire:  
 14 Yes, please, rather than give home  
 15 addresses.  
 16 MS. SPEES:  
 17 Sure.  
 18 MS. SPEES:  
 19 Q And can you give us your -- your date of birth?  
 20 A 6/4/74.  
 21 MS. SPEES:  
 22 Just to get started here, I want to put  
 23 something on the Record that we related to a  
 24 communication we got from Mr. McIntire last  
 25 night. When he delivered some documents to us

Page 8

1 A Yes.  
 2 Q Am I saying that right?  
 3 A Yes.  
 4 Q We've noted earlier that there's sometimes an issue  
 5 with the microphone picking up your responses, so we  
 6 found that it works better if that's closer to you.  
 7 Yeah, I think that'll -- that'll work for Mrs.  
 8 Kephart, who's our Court Reporter.  
 9 As we go through this I'm going to -- we --  
 10 we've had some issues that I also think with -- with  
 11 the delay, so if you want to give it two or three  
 12 beats after my question and then -- and then respond,  
 13 I think it works better for picking up the fullness  
 14 of your response if we do it that way.  
 15 I'm going to try to keep my questions clear and  
 16 not as compound as they sometimes are. If you have  
 17 any questions or -- or need clarification, don't  
 18 hesitate to -- to stop me and -- and ask for that and  
 19 I'll try to rephrase the question so that it's clear.  
 20 The -- you -- you heard Mrs. Kephart refer to  
 21 the usual stipulations and that has to do with  
 22 objections that your attorney may make and for the  
 23 most part Mr. McIntire may make some objections but  
 24 you -- you're still required to answer unless he  
 25 instructs you not to and that we shouldn't have to

Page 7

1 in advance of these depositions today, Mr.  
 2 McIntire expressed the position that -- that as  
 3 a -- as a deputy you're not a party to this  
 4 proceeding and are not subject to the document  
 5 production under Rule 34 of the Federal Rules  
 6 of Civil Procedure.  
 7 And I just want to note that for the  
 8 Record and that we are objecting to that, both  
 9 the timing, the substance and the -- timing and  
 10 the substance of that and will plan to leave  
 11 this deposition open pending resolution of that  
 12 further down the road.  
 13 MR. MCINTIRE:  
 14 And of course -- and of course we had our  
 15 objection to the document production request to  
 16 the deputy under Rule 34 of the Federal Rules.  
 17 MS. SPEES:  
 18 That we received last night, right.  
 19 MS. SPEES:  
 20 Q Okay. And just a note as we go forward into it, are  
 21 you -- what is your rank now or your position with  
 22 the sheriff's office now?  
 23 A Sergeant of the narcotics unit.  
 24 Q Okay. So it's okay if I -- if I refer to you as  
 25 Sergeant Bonvillain?

Page 9

1 encounter that today. I'm noticing that something's  
 2 happening with the camera, it's shifting  
 3 occasionally.  
 4 MR. MCINTIRE:  
 5 It's supposed to be a smart camera that  
 6 focuses on -- the best we can tell is it -- it  
 7 tracks movement. See, it shifted over toward  
 8 me just now and then Mr. Moreau moved and it  
 9 included him in the picture. If that becomes  
 10 too much of a distraction we may take a break  
 11 and get IT to look at that.  
 12 MS. SPEES:  
 13 Okay, all right. Well, hopefully it  
 14 won't.  
 15 MR. MCINTIRE:  
 16 Maybe just move every now and then. Yeah  
 17 and it'll keep you in the picture.  
 18 MS. SPEES:  
 19 And I'm just realizing I forgot to start  
 20 the recording. I'm gonna start that now, Mrs.  
 21 Kephart.  
 22 MADAME COURT REPORTER:  
 23 Okay, go ahead.  
 24 MS. SPEES:  
 25 Q Sergeant, do you understand why we're here today?

Andrew Bonvillain  
February 17, 2022

Page 10

1 A Yes.  
 2 Q And -- and what's your understanding of that?  
 3 A That there's a lawsuit filed against the sheriff's  
 4 office about arrests were made on the pipeline.  
 5 Q That's right. And did you see, have a chance to  
 6 review the deposition notice?  
 7 A Yes.  
 8 Q Okay. And did you see that there were -- there was  
 9 a document request attached to that deposition  
 10 notice?  
 11 A Yes.  
 12 Q And did you bring any documents with you today?  
 13 A No.  
 14 Q Okay. Did you review any documents in preparation  
 15 for your deposition today?  
 16 A Yes.  
 17 Q And what were those?  
 18 A My arrest report.  
 19 Q Okay.  
 20 MR. MCINTIRE:  
 21 And if you could -- let me just caution  
 22 the witness. Give it that beat because it is  
 23 on Zoom and -- and somebody may have an  
 24 objection, so give us just a beat after she  
 25 finishes the question before you give the

Page 12

1 A And the text message.  
 2 Q And what was the text message?  
 3 A Saying that they had permission to be on the  
 4 property.  
 5 MR. MCINTIRE:  
 6 It -- it's one of the documents that we  
 7 included in the production from last night.  
 8 MS. SPEES:  
 9 Q Okay. Was there anything else you reviewed?  
 10 A And part of the lawsuit.  
 11 Q Which part?  
 12 A The statute.  
 13 Q The -- when you refer to the statute, are you  
 14 referring to the law prohibiting unauthorized entry  
 15 onto a critical infrastructure?  
 16 A Yes.  
 17 Q Okay. And that's Louisiana Revised Statute 14:61?  
 18 A I believe it is. I'm not sure what the -- I'm not  
 19 sure what the statute number is offhand.  
 20 Q Okay. Well, just for the sake of this deposition  
 21 we'll refer to it as the critical infrastructure law,  
 22 if that's okay with you?  
 23 A Yes.  
 24 Q Okay. Have you ever been deposed before?  
 25 A Yes.

Page 11

1 answer. That'll help a lot.  
 2 MS. SPEES:  
 3 Q Okay. The arrest report, I'm gonna just share a  
 4 document on the screen for a moment just to make sure  
 5 that we're talking about the -- the right thing here.  
 6 Can you see my screen?  
 7 A Yes.  
 8 Q And you see a document on that screen?  
 9 A Yes.  
 10 Q Do you recognize that document?  
 11 A Yes.  
 12 MR. MCINTIRE:  
 13 We have a copy here.  
 14 MS. SPEES:  
 15 Q Okay. And can you tell us what that document is?  
 16 A The narrative to my report.  
 17 Q Okay. Is this the document you were just referring  
 18 to that you said you reviewed?  
 19 A Yes.  
 20 Q Okay, great. Stop sharing now, make sure I didn't  
 21 end the recording. Okay, so -- so before we get into  
 22 the substance of that, was there -- were there any  
 23 other documents that you reviewed?  
 24 A The letter from the landowner.  
 25 Q Okay.

Page 13

1 Q When was that?  
 2 A 2014 or '15.  
 3 Q Was that the only time?  
 4 A Then prior to that, I don't remember the year, I did  
 5 a deposition for an auto accident.  
 6 Q Okay. In 2014 or 2015, what was that in reference  
 7 to?  
 8 MR. MCINTIRE:  
 9 Yeah, you can tell them.  
 10 A Officer involved shooting I was in.  
 11 MS. SPEES:  
 12 Q Okay, all right. Have you ever -- have you ever  
 13 been sued?  
 14 A Not that I'm aware of.  
 15 Q Okay, good. Okay. So you've been deposed before,  
 16 you -- you -- you know how this generally goes and --  
 17 and like I said, if -- if there's anything that's not  
 18 clear, feel free to ask me to clarify as we move  
 19 forward. How long have you been with the sheriff's  
 20 office?  
 21 A Over thirteen years.  
 22 Q Thirteen years. What's your position now?  
 23 A Sergeant of the narcotics investigations unit.  
 24 Q Okay. How long have you been in that position?  
 25 A Since October of 2020.

Andrew Bonvillain  
February 17, 2022

Page 14

1 Q Okay. What was your position before that?  
 2 A I was a patrol sergeant.  
 3 Q What was your position at the time of the arrests  
 4 that we're going to be discussing today?  
 5 A A deputy in the patrol division.  
 6 Q Okay. Where did you work before the sheriff's  
 7 office?  
 8 A I was in the National Guard.  
 9 Q Anything before that?  
 10 A I was in -- I worked for Stuller Settings.  
 11 Q What is that?  
 12 A It's a jewelry manufacturer in Lafayette.  
 13 Q Oh, okay. And did you have any employment before  
 14 that?  
 15 A Yes, I worked for the St. Landry Parish Sheriff's  
 16 Office, then the Opelousas Police Department before  
 17 that, then the Arnaudville Police Department prior to  
 18 that, the St. Landry Parish Sheriff's Department  
 19 prior to that and then US Marine Corps prior to that.  
 20 Q Okay. Have you -- do you ever work private  
 21 security?  
 22 A Just went I worked at Stullers.  
 23 Q Oh, you were work -- were you working as private  
 24 security at -- in that --  
 25 A Yes, I worked in their security division.

Page 16

1 and that are the subject of the -- the report that  
 2 you prepared. First of all, let me ask you about  
 3 this report. How did you -- how did prepare this  
 4 report? Did you yourself type it up?  
 5 A Yes.  
 6 Q When did you type up this report?  
 7 A I don't recall the exact day that I typed it up.  
 8 Q Do you -- do you have a sense of how close to the  
 9 actual events of September 3rd, I'm -- I'm referring  
 10 to your report now and it starts out on September  
 11 3rd. You're describing some events that took place  
 12 on that date. Do you recall how soon after that you  
 13 would have typed it up general -- approximately?  
 14 A Sometime within that week.  
 15 Q I'm sorry, could you repeat that?  
 16 A Sometime within that week.  
 17 Q Okay. Could you describe to us how you came to be  
 18 at the property that day that you're describing in  
 19 this report?  
 20 A I was working off-duty security and the location was  
 21 on this property.  
 22 Q Okay. When you say "off-duty security", what do you  
 23 mean?  
 24 A It means I was working and not getting paid by the  
 25 sheriff's office.

Page 15

1 Q Okay. Do you ever work private security in -- in  
 2 addition to your employment with the St. Martin  
 3 Parish Sheriff's Office?  
 4 A How do you mean private security?  
 5 Q Do you -- have you ever -- have you ever provided  
 6 security services for a private security company  
 7 while you've been employed with the St. Martin Parish  
 8 Sheriff's Office?  
 9 A No, I'm not allowed to.  
 10 Q Why is that?  
 11 A That we're not allowed to so I -- I don't work for a  
 12 private security company.  
 13 Q Can I ask what -- what you -- what you mean by  
 14 you're not allowed to? Do you -- is there a policy  
 15 at the St. Martin Parish Sheriff's Office that  
 16 prohibits it?  
 17 A If I work for a private security company it would be  
 18 secondary employment and I'd have to get that  
 19 approved.  
 20 Q And so, you've -- you've never sought to have that  
 21 approved?  
 22 A I've never tried to get outside employment with  
 23 another job since I've been at the sheriff's office.  
 24 Q Okay, all right, thank you. I want to turn to the  
 25 -- the arrests that we're here to talk about today

Page 17

1 Q Who were you working for?  
 2 A The pipeline company.  
 3 Q Okay, all right. So you said you were working  
 4 off-duty security for the pipeline company and then  
 5 how did you come to -- to be out on the site that  
 6 day?  
 7 A That's the area I was assigned to work.  
 8 Q Okay. Who assigned you?  
 9 A I want to say Lieutenant Martin.  
 10 Q Okay. Do you recall if you were in uniform that --  
 11 that day?  
 12 A Yes, I was in uniform.  
 13 Q Okay. Do you normally wear a body camera?  
 14 A Yes.  
 15 Q Were you wearing a body camera that day?  
 16 A No, I did not have one on that day.  
 17 Q Okay. Did any -- I noticed that you referred to  
 18 Lieutenant Jay Capterville, Sergeant Todd Noel and  
 19 Deputy John Deglandon, I don't know how you say that  
 20 name. They were with you that day?  
 21 A Yes.  
 22 Q Were any of them wearing a body camera?  
 23 A Lieutenant Capterville for sure that I can remember.  
 24 Q Okay. Were they also working private off-duty  
 25 security?

Andrew Bonvillain  
February 17, 2022

Page 18

1 A Yes, we were all working off-duty security.  
 2 Q Okay. And I'm sorry, what was the company?  
 3 A I don't remember the company's name.  
 4 Q Okay. So how did you -- how were you notified that  
 5 you should go out to the property that day?  
 6 A When we reported for work.  
 7 Q Right, you reported for work and then what happened?  
 8 A So we went to our sites and that's where we were  
 9 working.  
 10 Q Okay. So can you -- can you describe what happened  
 11 after you got there?  
 12 A When we first got there?  
 13 Q Sure.  
 14 A We were at the guard shack.  
 15 Q And then what happened?  
 16 A We were at the guard shack most of the day.  
 17 Q Okay. And so, you were at the guard shack, did you  
 18 have any conversations with any of the -- with anyone  
 19 out there?  
 20 A With who specifically?  
 21 Q No, I'm asking if you had -- had conversations with  
 22 -- you -- your -- you said you were at the guard  
 23 shack most of the day.  
 24 A Yes.  
 25 Q Did you have any conversations while you were at the

Page 20

1 Q Okay. Did Lieutenant Martin, or I guess Sergeant  
 2 Martin now, did Sergeant Martin send you any written  
 3 communications about the property or the protests  
 4 that day?  
 5 A Not that I remember.  
 6 Q Okay. So could you describe your -- what happened  
 7 after you -- you left the guard shack and went to the  
 8 site?  
 9 A So you want me to describe when I got to the site?  
 10 Q Yes, please.  
 11 A There was approximately thirty to thirty-five  
 12 protestors on the pipeline right-of-way.  
 13 Q How -- how do -- do you know it was the pipeline  
 14 right-of-way?  
 15 A Cause it's marked -- it was marked with survey  
 16 stakes, survey markers.  
 17 Q Did anyone show you on a map or a plat what the  
 18 right-of-way was?  
 19 A No.  
 20 Q Did anyone tell you how many -- how many feet wide  
 21 that right-of-way was?  
 22 A No.  
 23 Q Did you ever come to learn that Bayou Bridge  
 24 Pipeline did not have legal authority to be there at  
 25 this time?

Page 19

1 guard shack?  
 2 A With who?  
 3 Q With anyone.  
 4 A I'm sure I did. I don't recall exactly who all I  
 5 had conversations with that day.  
 6 Q Okay. So can you -- can you describe how you came  
 7 to interact with -- with the people you're describing  
 8 in your report?  
 9 A Let's see. I'm gonna refer to my report.  
 10 Q That's fine.  
 11 A Pipeline employee informed us that several  
 12 protestors had come onto the pipeline right-of-way  
 13 and were jumping on the equipment. At that time the  
 14 four of us walked back to where the protestors were  
 15 located at.  
 16 Q How far was that from the guard shack?  
 17 A I'm not sure exactly how far it was.  
 18 Q Was it half a mile, a quarter of a mile, was it a  
 19 few hundred feet?  
 20 A It was more than half a mile. I'm not sure exactly  
 21 how far it was.  
 22 Q Okay. Did you have any written communications or  
 23 text communications with anyone from the pipeline  
 24 company that day about the protests?  
 25 A Did not.

Page 21

1 MR. MCINTIRE:  
 2 Objection to form.  
 3 MS. SPEES:  
 4 Q You can answer.  
 5 A Yes.  
 6 Q When did you come to learn that?  
 7 A When they had their Court case.  
 8 Q And what -- and what did you hear about that?  
 9 A That they didn't have the right of way.  
 10 Q And how did you hear about that?  
 11 A On the news.  
 12 Q Knowing that now, would -- that -- that the pipeline  
 13 company itself didn't have a right to be there, would  
 14 that have affected your decision making as to seeking  
 15 arrest warrants for the protestors that day?  
 16 A No.  
 17 MR. MCINTIRE:  
 18 Object -- objection to form.  
 19 MS. SPEES:  
 20 Q Okay. What happened after you got out there and saw  
 21 them on what -- what you -- what you describe is the  
 22 right-of-way?  
 23 A Once we got there, let's see, so I'm gonna refer to  
 24 my report again. Once we got there Lieutenant  
 25 Capterville was asked by Karen Savage if he would



Andrew Bonvillain  
February 17, 2022

Page 22

1 speak with her. While he was speaking with her, I  
 2 spoke with the employees of the pipeline.  
 3 They said that the protestors are throwing mud  
 4 into the exhaust in the fuel tank of an excavator,  
 5 which caused it to be inoperable, causing damage to  
 6 the machine. Employees pointed out a white female  
 7 who was wearing a purple shirt, purple shorts, as the  
 8 one who threw the mud into the machine. Had her face  
 9 covered with a scarf.  
 10 Employees advised that a protestor went to the  
 11 guard shack located by them and threw mud off -- all  
 12 over the inside of the building. They also locked  
 13 the door to the building and took the keys to it.  
 14 After Lieutenant Capterville finished speaking to Ms.  
 15 Savage, Sergeant Noel, Deputy Deglandon and I  
 16 approached the protestors.  
 17 I advised the protestors four times that they  
 18 were trespassing on a critical infrastructure. I  
 19 told them they needed to move off the right-of-way.  
 20 Protestor's spokesperson, identified as Sherry  
 21 Fortland (phonetic), advised that they were not  
 22 leaving.  
 23 MADAME COURT REPORTER:  
 24 Hello?  
 25 A Hello.

Page 24

1 Q Why -- why was -- what -- why was there a several  
 2 day lag time between the time that you were out on  
 3 the property and seeking arrest warrants?  
 4 MR. MCINTIRE:  
 5 Objection to form.  
 6 A Because there's no internet out on the pipeline, so  
 7 couldn't do the reports there. I had a doctor's  
 8 appointment the next day, so when I came back to work  
 9 I worked on my report.  
 10 MS. SPEES:  
 11 Q Okay. And I notice in this report that you -- can  
 12 you hear me?  
 13 MADAME COURT REPORTER:  
 14 You broke up.  
 15 A Now I can.  
 16 MS. SPEES:  
 17 Q Okay. I'm gonna go off video just in the hopes that  
 18 that helps. Can you hear me now?  
 19 MADAME COURT REPORTER:  
 20 We can hear you, but when you started  
 21 your question a while ago it -- it froze and  
 22 then you came back in but I didn't get the  
 23 question.  
 24 MS. SPEES:  
 25 Okay. I'll repeat the question.

Page 23

1 MADAME COURT REPORTER:  
 2 I thought I froze.  
 3 MR. MCINTIRE:  
 4 Yeah, I think Pam may have frozen there.  
 5 MADAME COURT REPORTER:  
 6 Okay. I heard -- I heard your whole  
 7 answer but I -- I was afraid I went down again  
 8 like earlier. My -- mine still looks like it's  
 9 good, so okay.  
 10 MS. MARTINEZ:  
 11 I am texting her now. She's had troubles  
 12 with the Wi-Fi today.  
 13 MR. MCINTIRE:  
 14 Just go off the Record for a minute.  
 15 --OFF THE RECORD--  
 16 --ON THE RECORD--  
 17 MS. SPEES:  
 18 Q So -- so the events that you've just been describing  
 19 happened on September 3, 2018, correct?  
 20 A Yes.  
 21 Q And after that, though, it was several days after  
 22 that that you, in your report, you indicate that you  
 23 were going to seek or obtained arrest warrants,  
 24 correct?  
 25 A Yes.

Page 25

1 MS. SPEES:  
 2 Q In your report you refer to the fact that you  
 3 reviewed body worn camera video and observed Karen  
 4 Savage on the right-of-way, correct?  
 5 A Yes.  
 6 Q And who -- what was -- what or who was the source of  
 7 that body worn camera?  
 8 A I'm not sure exactly whose body camera it was.  
 9 Q Okay. Does that footage still exist?  
 10 A I do not know if it does or not.  
 11 Q Okay. But it was after reviewing this footage that  
 12 you decided to seek an arrest warrant for Karen  
 13 Savage, correct?  
 14 A Yes.  
 15 Q Okay. Do you recall what date Ms. Savage and Ms.  
 16 White Hat were arrested?  
 17 A No, I do not.  
 18 Q All right. I'm going to attempt to share another  
 19 document with you. Let's see if I can get this.  
 20 Okay, do you see this document?  
 21 A Yes.  
 22 Q I'm sorry, I didn't hear that.  
 23 A Yes.  
 24 Q Do you recognize it?  
 25 A Yes.

Andrew Bonvillain  
February 17, 2022

Page 26

1 Q And can you just identify what it is?  
 2 MR. MCINTIRE:  
 3 I think I've got a hard copy here to show  
 4 the witness as well.  
 5 MS. SPEES:  
 6 Thank you, Mr. McIntire.  
 7 A Yes, it's a booking sheet for the St. Martin Parish  
 8 Sheriff's Office.  
 9 MS. SPEES:  
 10 Q Okay. And it's -- it's the booking sheet for Karen  
 11 Savage?  
 12 A Yes.  
 13 Q Okay. And do you see the date of arrest there?  
 14 A Yes, I do.  
 15 Q Does -- and it says September 18th of 2018, does  
 16 that refresh your memory? Does -- do you agree that  
 17 that's the date on which Ms. Savage and Ms. White  
 18 Hat were arrested?  
 19 A Yes.  
 20 Q Okay. And do you see the place of arrest?  
 21 A You talking about the location of offense?  
 22 Q Place of arrest.  
 23 A Yes.  
 24 Q Can you -- can you just read that into the Record?  
 25 A 2981 Bayou Benoit Levee Road.

Page 28

1 know that Ms. Savage and Ms. White Hat would be at  
 2 that boat landing that day?  
 3 A No, I did not.  
 4 Q I'm going to stop sharing the screen. How -- can  
 5 you describe what happened when you got to the boat  
 6 landing that day?  
 7 A We were on boat patrol and we parked up at the boat  
 8 landing, then people started coming into the boat  
 9 landing and parking.  
 10 Q And then what happened?  
 11 A Then I seen -- observed Karen Savage arrive at the  
 12 boat landing and I had an active arrest warrant for  
 13 her, so I executed the warrant.  
 14 Q And then what happened?  
 15 A I then transported her to the St. Martin Parish  
 16 Correctional Center and booked her in on the active  
 17 arrest warrant.  
 18 Q How far is the correctional center from the boat  
 19 landing?  
 20 A About forty-five minutes.  
 21 Q Did you go straight from the boat landing to the  
 22 correctional center?  
 23 A Yes, I did.  
 24 Q So were you involved in -- in the arrest of Ms.  
 25 White Hat?

Page 27

1 Q Okay. Can you describe that location?  
 2 A It is a boat landing.  
 3 Q So -- so the date of arrest is about two weeks after  
 4 the events you're describing in your report and at a  
 5 boat landing. How did you come to know that Ms.  
 6 Savage and Ms. White Hat were at the boat landing  
 7 that day?  
 8 MR. MCINTIRE:  
 9 Objection to form.  
 10 MS. SPEES:  
 11 Q You can answer.  
 12 A I observed them at the boat landing.  
 13 Q Did you just happen to be there that day? How did  
 14 -- how was it that you -- you came to observe them  
 15 there?  
 16 A I was working off-duty security again and we were  
 17 instructed by Lieutenant Martin to patrol that boat  
 18 landing.  
 19 Q Do you know why you were instructed to patrol that  
 20 boat landing?  
 21 A No, I do not.  
 22 Q Okay. How long had you been patrolling the boat  
 23 landing?  
 24 A I don't recall how long.  
 25 Q Did you have information in advance or reason to

Page 29

1 A No, I was not.  
 2 Q Okay. Who was?  
 3 A Do not know.  
 4 Q Okay. Now, when it comes to the critical  
 5 infrastructure law, what's your understanding of what  
 6 is prohibited by that?  
 7 MR. MCINTIRE:  
 8 Objection to form.  
 9 MS. SPEES:  
 10 Q You can answer.  
 11 A Do you have a copy of it so that I can see?  
 12 Q I can show you a copy of it and I'm happy to do  
 13 that, but I'd first like to hear what your  
 14 understanding is of what that law prohibits.  
 15 A Prohibits trespassing on anything -- anything that's  
 16 deemed critical infrastructure.  
 17 Q Okay. And how do you determine whether something is  
 18 a critical infrastructure?  
 19 A Can I see that statute please?  
 20 Q I will show you the statute, but I'm asking in  
 21 general -- let me -- let me back up.  
 22 A I would read the -- I -- I would read the statute  
 23 then I would determine if something's violating on it  
 24 after reading the statute.  
 25 Q Did you receive any -- any guidance or instructions

Andrew Bonvillain  
February 17, 2022

Page 30

1 from anyone at the sheriff's office about what is  
2 prohibited by that statute?  
3 A No, I read the statute.  
4 Q Did -- so -- so no one gave you any instruction?  
5 A Not that I recall.  
6 Q Okay. Did anyone connected with the pipeline  
7 company give you any instructions or -- about that  
8 law?  
9 A No.  
10 Q Did anyone from the pipeline company communicate  
11 with you in any way about that law?  
12 A No.  
13 Q Did anyone connected to the security company give  
14 you any instructions about that law?  
15 A No.  
16 Q Okay. So in your report you indicate that the  
17 protestors moved off the berm twice; is that correct?  
18 A That is correct.  
19 Q And you indicate that they -- the second time they  
20 left and went back into the woods, correct?  
21 A So you're asking if they went back into the woods  
22 after they left the second time, cause you'd cut out?  
23 Q Yeah, I'm just saying that in your report, that's  
24 what your report indicates, that they actually left,  
25 what you're referring to as the right-of-way, and

Page 32

1 Q Okay. What company were you working with at the  
2 time of these arrests?  
3 A The pipeline company.  
4 Q Okay. And how much were you being paid?  
5 A I honestly don't remember.  
6 Q Okay. Do you recall how much you or how many days  
7 you worked for this pipeline company?  
8 A No, I do not.  
9 Q Do you recall whether it was a matter of fewer than  
10 ten days or more than two weeks?  
11 A I don't recall the exact amount of time, days I  
12 worked.  
13 Q Okay. Who did you answer to at that company?  
14 MR. MCINTIRE:  
15 Objection to form.  
16 A I answered to Lieutenant Martin.  
17 MS. SPEES:  
18 Q Okay. So Lieutenant Martin was -- was also working  
19 for the company at the time?  
20 MR. MCINTIRE:  
21 Objection to form.  
22 A I do not know.  
23 MS. SPEES:  
24 Q Okay. Did you ever communicate with someone named  
25 Eddie Langlinais?

Page 31

1 went back -- went -- went into the woods, correct?  
2 A Yes, that's correct.  
3 Q Okay. Does the sheriff's office have a policy --  
4 well, let me ask you this. So early on in our  
5 conversation you indicated that you had never engaged  
6 in secondary employment, I believe, since you've been  
7 working at the sheriff's office, but then you  
8 mentioned this off-duty security detail, correct?  
9 A Correct. So are you ask -- so to clarify, are you  
10 asking if I had another job with a whole -- because  
11 that's what I took you were asking me if I had a  
12 second job with another business besides the  
13 sheriff's office?  
14 A No and I want to -- I want to get clear on this. I'm  
15 not trying to -- it's just awkward questioning on my  
16 part. I was asking if you had ever worked private  
17 security and did you -- have you gotten paid by  
18 another company for providing security services while  
19 you've been at the sheriff's office?  
20 MR. MCINTIRE:  
21 Objection to form.  
22 A Yes, I have.  
23 MS. SPEES:  
24 Q Okay. And -- and what company was that?  
25 A Oh, I -- I don't remember all of them.

Page 33

1 A Yes.  
2 Q And what did you communicate with Mr. Langlinais  
3 about?  
4 A So when I was assigned to the US Marshals Violent  
5 Offender Task Force, Mr. Langlinais was the deputy US  
6 marshal in charge of the Lafayette office and I that  
7 was my boss. So when I did see him we just caught  
8 up, cause I hadn't seen in a while.  
9 Q And -- and what was his purpose, was he out on the  
10 sight?  
11 A I -- I saw him at a boat landing one day, told him  
12 hi. We talked for about five minutes and that was  
13 it.  
14 Q Did you understand whether he was working for the  
15 pipeline company or --  
16 A I don't know.  
17 Q Okay. If the footage from the body worn camera  
18 still exists, where would it -- where would it be in  
19 the sheriff's office?  
20 A I do not know.  
21 Q Is there a custodian that oversees archival --  
22 archiving of records like that?  
23 A I'm sure there is.  
24 Q Okay. And you don't know who that --  
25 A No.

Andrew Bonvillain  
February 17, 2022

Page 34

1 Q -- person --  
 2 A Can you -- can you repeat that? You were breaking  
 3 up.  
 4 Q Okay. I asked -- I just was asking whether you know  
 5 who that person is in --  
 6 A No, I do not.  
 7 Q When you were working for the pipeline company, you  
 8 -- well, you said you went to the -- the boat launch,  
 9 the boat ramp, that day on the 18th of September 2018  
 10 and were you in a -- in a sheriff's office unit?  
 11 MR. MCINTIRE:  
 12 Objection to form.  
 13 A I started out on a boat and then I went back to the  
 14 other boat landing and I brought my unit to the boat  
 15 landing where they were arrested at.  
 16 MS. SPEES:  
 17 Q Okay. Do you know whether there was a contract or  
 18 agreement between the sheriff's office and the  
 19 pipeline company for security services?  
 20 A No, I do not.  
 21 Q Okay.  
 22 MS. SPEES:  
 23 Mr. McIntire, my co-counsel, Bill  
 24 Quigley, is gonna have to leave soon and I  
 25 would like to confer with him for a couple of

Page 36

1 MR. MCINTIRE:  
 2 Objection to form.  
 3 A Correct.  
 4 MS. SPEES:  
 5 Q How did you become involved in the off-duty work on  
 6 the pipeline? Was it something -- how did -- how --  
 7 did you have to sign up for it, what -- how did that  
 8 come about?  
 9 A They -- they put it out that there was a detail  
 10 starting and you could sign up for days to work it.  
 11 Q Who put that out?  
 12 A Lieutenant Martin was in charge of the detail.  
 13 Q And it went out to (inaudible) --  
 14 A You broke up.  
 15 Q -- office employees?  
 16 A Can you re -- can you say the whole question again?  
 17 You were breaking up.  
 18 Q Yeah, sorry. That communication from -- from  
 19 Sergeant Martin went out to sheriff's office  
 20 employees?  
 21 A Yes.  
 22 Q Okay. So you signed up for that and your  
 23 understanding was you were gonna be paid by the  
 24 pipeline company to do the off -- off-duty security,  
 25 correct?

Page 35

1 minutes. If we could take a break now and  
 2 reconnoiter at 2:00?  
 3 MR. MCINTIRE:  
 4 Sure.  
 5 MS. SPEES:  
 6 Great, thank you.  
 7 --OFF THE RECORD--  
 8 --ON THE RECORD--  
 9 MS. SPEES:  
 10 Q All right. I don't think we're gonna be much  
 11 longer. Just want to clarify a couple of things.  
 12 When -- and I'm just trying to understand the -- the  
 13 difference between when you're working off-duty  
 14 security versus when you're working in your official  
 15 St. Martin Parish Sheriff's Office capacity. You  
 16 indicated that the only person you were -- well, that  
 17 you were working the off-duty detail at the time of  
 18 these arrests on September 18th, correct?  
 19 A Yes.  
 20 Q Okay. And you -- you were reporting to, or getting  
 21 instructions from, Sergeant Martin; is that correct?  
 22 A Yes.  
 23 Q Okay. And you -- you weren't interacting with  
 24 anybody from -- else from the pipeline company or the  
 25 -- or any private security company, correct?

Page 37

1 MR. MCINTIRE:  
 2 Objection to form.  
 3 A Correct.  
 4 MS. SPEES:  
 5 Q Okay. I want to go back to the -- the critical  
 6 infrastructure law.  
 7 MS. SPEES:  
 8 Mr. McIntire, do you have a copy of it  
 9 there?  
 10 MR. MCINTIRE:  
 11 I have the -- the text that's in the  
 12 complaint, which is --  
 13 MS. SPEES:  
 14 We may not need it. Let me -- let me ask  
 15 but I -- I don't want to --  
 16 MR. MCINTIRE:  
 17 -- (Inaudible) --  
 18 MS. SPEES:  
 19 Sorry?  
 20 MR. MCINTIRE:  
 21 The paragraph -- the complaint quotes the  
 22 statute.  
 23 MS. SPEES:  
 24 Okay.  
 25 MR. MCINTIRE:

Andrew Bonvillain  
February 17, 2022

Page 38

1 We got that.  
 2 MS. SPEES:  
 3 Okay. You can hold it there. That's  
 4 fine.  
 5 MS. SPEES:  
 6 Q You would -- did you -- were you aware that  
 7 pipelines had been added to the definition of  
 8 critical infrastructure that year?  
 9 A Yes.  
 10 Q And how would you determine whether someone is  
 11 violating that law with respect to a, let's say, an  
 12 underground pipeline that's already built?  
 13 MR. MCINTIRE:  
 14 Objection to form.  
 15 A First we had a complaint of trespassing, then once  
 16 the people were told that they were trespassing, they  
 17 -- they had a defined area which they were  
 18 trespassing.  
 19 MS. SPEES:  
 20 Q If -- and so now you're speaking to -- to the events  
 21 out on -- out in Bayou Chene, right?  
 22 A Yes.  
 23 Q Okay. I'm asking -- I'm not asking about those  
 24 events. I'm asking about if you have a pipeline  
 25 that's already been built and it's underground, how

Page 40

1 A Because they had the right-of-way marked with survey  
 2 markers and working on the pipeline.  
 3 Q And -- and you testified that you -- you later came  
 4 to know that the pipeline company didn't have  
 5 authority to be there, correct?  
 6 MR. MCINTIRE:  
 7 Objection to form.  
 8 A Yes, I later learned they lost the -- the lawsuit.  
 9 MS. SPEES:  
 10 Q And when you say "lost the lawsuit", you -- you mean  
 11 -- do you mean that they were found to have been  
 12 trespassing on that property?  
 13 A I know they lost the lawsuit.  
 14 Q Okay. Did you ever have any communication with  
 15 anyone at the district attorney's office in St.  
 16 Martin Parish?  
 17 A About what?  
 18 Q About -- I'm sorry, good question. About the --  
 19 about these arrests?  
 20 A No, I have not.  
 21 Q Did you have any communication with anybody at the  
 22 DA's office about the critical infrastructure law?  
 23 A No, I did not.  
 24 Q Okay. This may be one of the shortest depositions  
 25 ever.

Page 39

1 would you determine if someone is violating that law?  
 2 MR. MCINTIRE:  
 3 Objection to form.  
 4 A Again, I would need a complaint of trespassing,  
 5 which is what we had, and it's a marked area.  
 6 MS. SPEES:  
 7 Q Okay. I'm just looking back through your report one  
 8 more time here. You said you reviewed, in  
 9 preparation for today, a text message about  
 10 permission for protestors to be on the property and  
 11 an affidavit. Had you seen those communications  
 12 before the arrests on, or not before the arrests, but  
 13 before you were out there on the property on  
 14 September 3rd?  
 15 MR. MCINTIRE:  
 16 Objection to form.  
 17 A No, I had not.  
 18 MS. SPEES:  
 19 Q When did you come to know of those communications?  
 20 A Yesterday.  
 21 Q Okay. So when you were out there on September 3rd,  
 22 why did you believe that the protestors were not  
 23 authorized to be there?  
 24 A Why did I believe that is what you're asking?  
 25 Q Yes.

Page 41

1 MS. SPEES:  
 2 Mr. McIntire, maybe you can beat the  
 3 weather, beat it back. I -- I'm concluding at  
 4 this point, but leaving it open and Mr. --  
 5 MR. MCINTIRE:  
 6 Mr. Moll?  
 7 MS. SPEES:  
 8 Moll, I don't know if you have -- uh-huh.  
 9 MR. MOLL:  
 10 I don't have any questions of the witness  
 11 at this time.  
 12 MS. SPEES:  
 13 Okay.  
 14 MR. MCINTIRE:  
 15 I don't have any questions, but I would  
 16 ask that his -- the typed report that he was  
 17 reading from previously that we have that  
 18 marked as an exhibit and attached to the  
 19 deposition.  
 20 MADAME COURT REPORTER:  
 21 Yeah, Ms. Spees, you didn't attach any of  
 22 the documents used as exhibits. Did you want  
 23 to?  
 24 MS. SPEES:  
 25 I didn't intend to, but it's fine. Well,

Andrew Bonvillain  
February 17, 2022

Page 42

1 obviously -- Mr. McIntire, do you want to send  
 2 that to Mrs. Kephart?  
 3 MR. MCINTIRE:  
 4 Okay, we will do that and I guess this --  
 5 that'll be just "Exhibit 1".  
 6 MADAME COURT REPORTER:  
 7 Okay. I put my email address in the  
 8 chat.  
 9 MS. SPEES:  
 10 And -- and Mr. McIntire, we'll --  
 11 obviously we're gonna want the -- the camera  
 12 footage.  
 13 MR. MCINTIRE:  
 14 Yeah.  
 15 MS. SPEES:  
 16 And some of the other documentation that  
 17 was referred to earlier, so we'll follow up  
 18 about that.  
 19 MR. MCINTIRE:  
 20 Okay.  
 21 MADAME COURT REPORTER:  
 22 Okay. And Mr. Moll and Mr. McIntire, you  
 23 want copies of the transcript?  
 24 MR. MCINTIRE:  
 25 Yes, please.

Page 44

1 REPORTER'S PAGE  
 2  
 3 I, Mary LeJeune-Kephart, Certified Court Reporter in  
 4 and for the State of Louisiana, the officer, as defined in  
 5 Rule 28 of the Federal Rules of Civil Procedure and/or the  
 6 Article 1434(B) of the Louisiana Code of Civil Procedure,  
 7 before whom this proceeding was taken, do hereby state on  
 8 the Record:  
 9 That due to the spontaneous nature of the interaction  
 10 and discourse of the proceeding, double-dashes (--) have  
 11 been used to indicate pauses, changes of thought and/or  
 12 talkovers; that such is the universally accepted method for  
 13 a court reporter's transcription of a proceeding; that  
 14 double-dashes (--) do not indicate that words or phrases  
 15 have been left out of the transcript.  
 16 And that the spelling of any words and/or names which  
 17 could not be verified through reference resources have been  
 18 denoted with the parenthetical phrase "(spelled  
 19 phonetically)."  
 20  
 21  
 22  
 23  
 24  
 25

Page 43

1 MR. MOLL:  
 2 Yes, please.  
 3 MADAME COURT REPORTER:  
 4 Okay. And did you want to do a read and  
 5 sign on this one also, Mr. McIntire?  
 6 MR. MCINTIRE:  
 7 Yes, please.  
 8 MADAME COURT REPORTER:  
 9 Okay. I'll send that to you as well.  
 10 All right, I think that's all we have. Did you  
 11 get my email address?  
 12 THE WITNESS WAS EXCUSED.  
 13 DEPOSITION CONCLUDED AT 2:14 P.M.  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 45

1 CERTIFICATE  
 2  
 3 This certification is valid only for a transcript  
 4 accompanied by my original signature and original required  
 5 seal on this certificate.  
 6 I, Mary LeJeune-Kephart, Certified Court Reporter in  
 7 and for the State of Louisiana, as the officer before whom  
 8 this testimony was taken, do hereby certify that ANDREW  
 9 BONVILLAIN, after having been duly sworn by me upon  
 10 authority of R.S. 37:2554, did testify on the 17th day of  
 11 February 2022, via Zoom Videoconferencing, as hereinbefore  
 12 set forth in the 43 foregoing pages; that this testimony  
 13 was reported by me in the voice-reporting method, was  
 14 prepared and transcribed by me or under my personal  
 15 direction and supervision, and is true and correct to the  
 16 best of my ability and understanding; that the transcript  
 17 has been prepared in compliance with the transcript format  
 18 guidelines required by statute and rules of the board; that  
 19 I am informed about the complete arrangement, financial or  
 20 otherwise, with the person or entity making arrangements  
 21 for deposition services; that I have acted in compliance  
 22 with the prohibition on contractual relationships, as  
 23 defined by Louisiana Code of Civil Procedure Article 1434  
 24 and rules of the board; that I have no actual knowledge of  
 25 any prohibited employment or contractual relationship,

Andrew Bonvillain  
February 17, 2022

Page 46

1 direct or indirect, between a court reporting firm and any  
2 party litigant in this matter, nor is there any such  
3 relationship between myself and a party litigant in this  
4 matter; that I am not related to counsel or to any of the  
5 parties hereto, I am in no manner associated with counsel  
6 for any of the interested parties to this litigation, and I  
7 am in no way concerned with the outcome thereof.

8 This 17th day of February 2022, New Orleans,  
9 Louisiana.

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

\_\_\_\_\_  
Certified Court Reporter