

**FIFTH ASSESSMENT OF SETTLEMENT AGREEMENT COMPLIANCE**  
**BY THE VILLE PLATTE POLICE DEPARTMENT**

July 2023 – June 2024



October 21, 2024

## I. INTRODUCTION

On December 19, 2016, the United States Department of Justice (DOJ) issued an investigative report finding reasonable cause to believe that the Ville Platte Police Department (VPPD) and the City of Ville Platte (City) engage in a pattern or practice of conducting arrests without probable cause for the purposes of investigating crimes. The investigation, conducted pursuant to the Violent Crime Control and Law Enforcement Act of 1994, 34 U.S.C. § 12601, determined that systemic deficiencies contributed to unlawful conduct, including deficiencies in VPPD's policies, training, supervision, data collection, and accountability. On June 4, 2018, DOJ entered into an agreement (Agreement) with the City of Ville Platte and VPPD to remedy the deficiencies. This report assesses VPPD and the City's compliance with the Agreement for the period July 2023 through June 2024.

Since issuing our last assessment in October 2023,<sup>1</sup> we conducted two site visits and met with members of VPPD, the City, and the Ville Platte community. We also reviewed documentation of VPPD activity, including Records Management System (RMS) reports, warrant documents, probable cause affidavits, body-worn camera video, policies and procedures, training materials, jail logs, and various data tables. We continued meeting biweekly with VPPD representatives, though the VPPD Chief continued to regularly miss those meetings during this compliance period.

Although there have been some improvements, VPPD remains an organization in crisis. Timely supervisory approval of affidavits and officer reports remains an issue, though warrant affidavits are markedly improved. People with possible behavioral health disabilities continue to cycle through the jail without getting appropriate help. And officers are not held accountable for possible misconduct, including failing to activate body-worn cameras (BWC) in clear violation of policy. Our assessment addresses the extent to which jail operations do not comply with the specific requirements of the Agreement, but these longstanding problems indicate that the jail operates without a solid operational foundation. The problems at the jail reflect cultural and systemic obstacles that are inhibiting VPPD's ability to comply with the Agreement.

Despite our last report's warnings about the VPPD jail and local stakeholders' pledges to help with jail reform, VPPD had several problematic incidents during this review period, including a serious misconduct allegation against the warden (July 2023), two inmate deaths (August and September 2023), and one inmate escape (February 2024). We remain concerned about security issues at the jail. The jail is often staffed with only one person to manage approximately 20 male and female inmates, and the internal doors linking the jail to the police station are often unlocked. The problematic incidents should have resulted in improvements within the jail, but VPPD has not addressed the conditions with appropriate urgency. We asked VPPD to implement the following changes during this compliance period:

- Revise the intake checklist to include documentation of the exact times that a person is brought into the VPPD facility, placed on the holding bench, and placed in a holding cell;
- Ensure that the file for each inmate contains the underlying charging documents, including documentation of the expected release times and court dates for each inmate;

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<sup>1</sup> Fourth Assessment of Settlement Agreement Compliance of the Ville Platte Police Department, January 2022-June 2023, United States Department of Justice, October 27, 2023.

- Revise the daily jail list/roster to include the expected release dates and court dates for each person;
- Add DOJ to the daily distribution of the RMS jail inmate list that goes to local judges; and
- Immediately forward to DOJ the underlying probable cause affidavit, warrant or sentencing order when someone is brought to the VPPD jail for detention, regardless of the arresting agency.

VPPD fully implemented only one of these recommendations: the daily distribution of the jail inmate list. VPPD must still ensure that RMS captures the exact times on the intake checklist, accurately document expected release times and court dates, and forward DOJ underlying detention documentation in a timely manner. The jail must take significant steps to be more organized, respectful of constitutional rights, and attentive to duty of care. We do credit VPPD and the Municipal Court with making some modifications to improve the likelihood that inmates will receive timely probable cause determinations.

In the last assessment, we observed VPPD officers generally demonstrate professionalism and respect for the law. Although that is still true most of the time, we saw disturbing instances of unprofessional language and behavior during this period, even at the highest levels of the department. We saw abrasive and intolerant attitudes on BWC, with VPPD staff responding, “I have no sympathy for that,” to a mother requesting patience for her son with a behavioral health disability; declaring “I done got enough of this shit,” while using force; or saying “You need to get that shit fixed” to a woman stopped for broken car mirror. We also saw a command level officer engage in conduct unbecoming in the presence of at least one subordinate. Such actions risk compromising law enforcement objectives in many ways, including by eroding trust within the community. Community trust is critical to the mission of law enforcement, and VPPD should not tolerate misconduct.

A lack of technology or resources does not appear to be a factor in VPPD’s non-compliance. Although VPPD has new patrol cars, new body-worn cameras, and new data collection and storage systems, none of these technologies are being leveraged effectively to improve VPPD. VPPD is not using its new electronic records management system appropriately, and record keeping remains cumbersome, disorganized, and inadequate. New technology is meaningless without leadership and organizational practices to guarantee effective use. The fact that VPPD increased compliance in a number of areas during this period suggests that the City and VPPD have the potential to make the improvements necessary for compliance with Agreement.

In the pages that follow, we detail our assessment of VPPD’s compliance with each Agreement paragraph through a series of tables that identify: (1) the current assessment status for each numbered paragraph; (2) prior assessment status; and (3) reason for current assessment status.

## II. COMPLIANCE STATUS SUMMARY

This report assesses the City’s and VPPD’s implementation efforts from July 2023 through June 2024. The following tables describe the categories of compliance, indicate the aggregate compliance status of the provisions by year, and summarize the current status of each provision area:

Compliance Status by Year (Number of Paragraphs)			
Category	2021	2022-23	2023-24
<b>Substantial Compliance</b> - Implemented the specific provision as required by the Settlement Agreement and now has an ongoing obligation to sustain implementation to remain in compliance	1	1	10
<b>Partial Compliance</b> - Made progress with implementation but specific areas need further attention to achieve substantial compliance	16	17	26
<b>Beginning Compliance</b> - Made initial efforts to implement required reforms and achieve the outcome envisioned by the provision but significant work remains	9	8	11
<b>Pending/Insufficient Information</b> - Provision is not ready for evaluation or DOJ has not been able to fully assess compliance	31	0	0
<b>Non-Compliance</b> - Not met most or all of the requirements of the provision	15	46	25

<b>Compliance Status by Settlement Agreement Paragraph</b>	
FOURTH AMENDMENT ACTIVITY	
Public Interactions and Investigative Holds (Paragraphs 4, 5)	Beginning Compliance
Investigative Holds (Paragraph 6)	Substantial Compliance
ARRESTS AND CITATIONS	
Probable Cause Arrests (Paragraphs 7, 8)	Partial Compliance
Obtaining Valid Arrest Warrants (Paragraph 9)	Non-Compliance
Probable Cause Affidavits (Paragraph 10)	Non-Compliance
Prisoners Released Without Probable Cause (Paragraph 11)	Substantial Compliance
Communication While Incarcerated (Paragraph 12)	Substantial Compliance
Quality of Life Arrests (Paragraph 13)	Non-Compliance
INVESTIGATORY STOPS	
Reasonable Suspicion Requirements (Paragraph 14)	Partial Compliance
Transporting Subjects (Paragraphs 15, 16)	Partial Compliance
Probable Cause Stops (Paragraph 17)	Beginning Compliance
DOCUMENTATION OF FOURTH AMENDMENT ACTIVITIES	
System Development (Paragraph 18)	Partial Compliance
Documenting Stops, Citations, and Arrests (Paragraphs 19, 20)	Partial Compliance
Storing and Retaining Data Collected (Paragraph 21)	Partial Compliance
SUPERVISION REGARDING FOURTH AMENDMENT ACTIVITIES	
Report Reviews (Paragraphs 22, 23)	Non-Compliance
Addressing Policy Violations (Paragraphs 24, 25, 26)	Non-Compliance

CRIMINAL INVESTIGATIONS	
Interrogations (Paragraphs 27, 28)	Partial Compliance
<i>Miranda</i> Adherence (Paragraphs 29, 30, 31)	Partial Compliance
Documentation of Interrogations (Paragraph 32)	Partial Compliance
Recording Interrogations (Paragraph 33)	Beginning Compliance
Investigative File Creation and Maintenance (Paragraph 34)	Beginning Compliance
Investigative File Identification and Tracking (Paragraph 35)	Beginning Compliance
Investigative File Management (Paragraph 36)	Beginning Compliance
COMMUNITY ENGAGEMENT	
Community Outreach (Paragraph 37)	Partial Compliance
JAIL OPERATIONS	
Booking (Paragraphs 38, 39)	Non-Compliance
Detainee Searches (Paragraphs 40, 41)	Substantial Compliance
Inmate Files (Paragraph 42)	Beginning Compliance
Inmate Lists (Paragraphs 43, 44)	Substantial Compliance
Jail Supervision (Paragraphs 45, 46)	Beginning Compliance
Providing Inmate Lists to Court (Paragraph 47)	Substantial Compliance
Telephone Access (Paragraphs 48)	Substantial Compliance
Hygiene Provisions (Paragraphs 49)	Partial Compliance
POLICIES	
Settlement Agreement Requirements (Paragraphs 50, 51, 52)	Partial Compliance
Policy Manual (Paragraph 53)	Partial Compliance

Publicly Available Policies (Paragraph 54)	Non-Compliance
TRAINING	
Basic Training and Certifications (Paragraphs 55, 56, 57, 58)	Partial Compliance
Training of Lateral Hires (Paragraphs 59)	Partial Compliance
Annual In-Service Training (Paragraph 60)	Substantial Compliance
ACCOUNTABILITY AND OVERSIGHT	
Misconduct Reporting (Paragraphs 61, 62)	Non-Compliance
Body-Worn Cameras (Paragraph 63)	Non-Compliance
DATA COLLECTION AND REPORTING	
Eliminating Unlawful Practices (Paragraph 64)	Non-Compliance
Developing Data Collection System (Paragraphs 65, 66, 67, 68)	Non-Compliance
Annual Reports (Paragraphs 69, 70)	Non-Compliance
Status Reports (Paragraph 71)	Beginning Compliance
OUTCOME ASSESSMENTS	
Conducting Annual Outcome Assessments (Paragraphs 72, 73, 74)	Non-Compliance
Creating Outcome Assessments Plan and Protocol (Paragraph 75)	Non-Compliance

### III. ASSESSMENT

#### FOURTH AMENDMENT ACTIVITY

4. The City will ensure that VPPD officers conduct all interactions with the public consistent with the requirements of the Fourth Amendment of the Constitution of the United States.
5. The City will ensure that VPPD officers do not rely on information known at the time of reliance to be materially false or incorrect to justify an investigatory stop, search, interrogation, citation, or arrest.

Status (4,5)	Beginning Compliance
Prior Status	Beginning Compliance
Assessment	<p>We reviewed a sample of probable cause (PC) affidavits (22), warrant affidavits (32), and numerous RMS entries, including incident narratives, spanning the compliance period. We also reviewed jail documentation and over 100 body-worn camera videos for more than 60 officer encounters.</p> <p>Officers generally abide by the Fourth Amendment in their written documentation and interactions with the public. In particular, the warrant applications of VPPD detectives generally appear well written and thorough, demonstrating an understanding of Fourth Amendment law. We did not find evidence that suggests officers relied on information known to be materially false or incorrect to justify law enforcement activities or used “investigative holds” during any of their interactions with community members. However, we did observe deficiencies in documentation about arrests and detentions. In one case a command level officer held a person at the jail without charges for several hours, shackled to a bench, until a relative was able to pick him up from the jail. Despite the serious nature of this detention, and the obvious probable cause requirement for such a seizure, there is no affidavit of probable cause for this incident or any associated record in VPPD’s RMS system. Despite the lack of documentation, there was no indication that this incident was an “investigative hold.”</p> <p>We also saw BWC footage of officers being unclear about the scope of authority to conduct searches. VPPD should deliver better training on the Fourth Amendment to provide officers with sufficient guidance to understand their legal obligations. As we note in the BWC section below, the significant lack of BWC video raises questions about VPPD’s documentation practices and precludes an improved rating here.</p> <p>In the assessment of accountability provisions 61-63 below, we also note concerns that uses of force are not being reported, tracked, or evaluated. Of the 22 PC affidavits we reviewed, four (18%) involved a use of force. We did not see any evidence that supervisors evaluated the appropriateness of any of the uses of force.</p>

6. VPPD will explicitly prohibit the practice of “investigative holds,” and will make clear in policy and training that investigative holds without probable cause violate the Constitution and will subject officers to discipline, including possible termination.



Status (6)	Substantial Compliance
Prior Status	Substantial Compliance
Assessment	VPPD has explicitly prohibited “investigative holds” in policy and training. We have seen no evidence of investigative holds as a continued practice. As we note in the BWC section below, the significant lack of BWC video raises questions about VPPD’s documentation practices.

## Arrests and Citations

7. The City will ensure that all arrests made by VPPD officers, including detentions that rise to the level of de facto arrests, are supported by probable cause that a person has committed or is committing a crime based on reliable facts and evidence known to the officer at the time of the arrest. VPPD’s need or desire to question a person about a crime will not be considered in determining whether probable cause exists for the arrest of that person.
8. Officers will not arrest persons for the sole purpose of questioning the person regarding criminal activity of another person, or because of personal animus.

Status (7,8)	Partial Compliance
Prior Status	Partial Compliance
Assessment	<p>We reviewed a sample of probable cause (PC) affidavits (22), warrant affidavits (32), and numerous RMS entries, including incident narratives, spanning the compliance period. We also reviewed over 100 body-worn camera videos for more than 60 encounters.</p> <p>Of the 22 PC affidavits we reviewed, three were deficient in articulating probable cause, 14 had no clear supervisor signature, and four involved uses of force (and were signed by a supervisor). None of the supervisor signatures had time notations, and only three had a date. Of those three, two of the affidavits were signed by a supervisor two days after the date of the arrest, and the other one was signed one day after the date of arrest.</p> <p>Although arrest and search warrant affidavits of detectives appeared sufficient for the most part, some of the PC affidavits and videos suggest that de facto arrests are occurring without probable cause. For example, in one video an officer tells an intoxicated woman “you’re not under arrest” as she sits with her leg shackled to the booking bench being attended by Emergency Medical Services. It’s unclear what occurred prior given the officer’s late camera activation, but presumably the woman was somehow transported to the jail and was chained to the bench, not free to leave. Interestingly, the officer told EMS to bill the woman for their services, which appeared to be bandaging a cut on the woman’s finger. There does not appear to be any record in RMS that matches the approximate time of the video. We saw other instances where this officer handcuffed people, sometimes placing them in the back of his car, while telling them, “You are not under arrest.”</p> <p>In another example, a woman with a behavioral health concern was arrested standing on the street outside of a school. She claimed to be working for a federal law</p>

	<p>enforcement agency. The officer handcuffed her and told her that she was being arrested for impersonating a law enforcement officer. Although the officer later spoke with witnesses in the school and established probable cause for a different charge, his initial arrest was questionable because he did not appear to have facts establishing probable cause when he initially contacted the woman.</p> <p>We reviewed the VPPD jail handwritten control room log recording booking and release of inmates for a 45-day period. VPPD recorded 11 arrests, but we received PC affidavits for only four of those arrests. The jail log suggests that four of the remaining arrests may have involved warrants. Even when someone is stopped and ultimately arrested on a warrant, officers should as a best practice still write a probable cause affidavit documenting the existence of a valid warrant and information confirming the identity of that person as the one subject to the warrant.</p> <p>VPPD did not have any Field Interview Cards (FICs) in RMS for the period January 1 – June 30, 2024, despite having a policy requiring FICs for certain encounters.</p> <p>We did not identify any evidence that suggests officers arrested persons for the sole purpose of questioning the person regarding criminal activity of another person, or because of personal animus.</p> <p>As noted below in our assessment of paragraphs 22-26, we continue to have concerns that supervisors are not conducting meaningful reviews of officer activity.</p>
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9. The City will ensure that officers obtain a valid arrest warrant signed by a judge prior to making an arrest, unless an offense was committed in the officer's presence, or the officer has positive and reliable information establishing probable cause that an offense was committed outside the officer's presence.
- If the arrest takes place inside a person's home, the City will ensure that officers obtain a valid arrest warrant signed by a judge prior to making the arrest, unless exigent circumstances exist.
  - Individuals may be arrested as material witnesses only pursuant to a valid court order for their arrest.
  - If a warrantless arrest is made, VPPD will ensure that the arresting officer fills out an affidavit of probable cause as soon as reasonably possible after the arrest, and in no case later than six (6) hours after the arrest or at the conclusion of the officer's shift, whichever is earlier.
  - Once an affidavit of probable cause has been filled out, VPPD will ensure that it is immediately reviewed by a supervisor.
  - If a warrantless arrest is made, VPPD will ensure that the arresting officer also completes an arrest report that describes, in non-boilerplate language, the facts and circumstances leading up to and justifying the arrest.
  - Once approved by a supervisor, VPPD will ensure that the affidavit is immediately transmitted to a judge or magistrate for review. The transmission may be either physical or electronic.

Status (9)	Non-Compliance
Prior Status	Non-Compliance

Assessment	<p>Supervisors do not review documentation supporting arrests in a timely fashion and that documentation is sometimes deficient to establish probable cause. We reviewed probable cause affidavits (typically used for warrantless arrests), arrest warrant affidavits, and RMS entries (which document service calls, arrests, and case developments). Supervisors should review these documents in connection with each arrest in a timely manner.</p> <p>Of 22 probable cause affidavits that we reviewed, only eight were reviewed by supervisors. We cannot confirm whether those affidavits were reviewed prior to booking since the supervisors' signatures typically do not include dates or times. Three of the affidavits contained factual errors (e.g., incorrect dates or names) or omissions (i.e., factually unsupported offense element) that rendered them legally deficient on their face and did not establish probable cause. Of those three deficient affidavits, one was reviewed and approved by supervisor. This suggests that supervisors are not doing a meaningful review of the affidavits to ensure that probable cause exists.</p> <p>We reviewed 32 arrest warrant affidavits, which were generally better supported than the probable cause affidavits. Although judges signed the affidavits (as contemplated in Paragraph 9(f)), there is no indication of prior supervisor reviews on any of the affidavits.</p> <p>Previously we found evidence that people were held in the jail without a timely probable cause hearing before a magistrate or judge. None of the PC affidavits that we reviewed were signed by a judge, though three did have an accompanying arrest warrant signed by a judge. It is essential that VPPD adhere to the requirement of 9(f) that supervisors immediately transfer affidavits to a judge or magistrate for review.</p>
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10. VPPD will not book any person who was arrested without a warrant into the jail unless the affidavit of probable cause is filled out and approved by a supervisor.

Status (10)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD remains out of compliance with this provision because, as noted above, VPPD has not ensured timely review and approval of probable cause affidavits by supervisors. As noted above, it is unclear whether the probable cause affidavits noted in the Paragraph 9 assessment were in fact completed, let alone reviewed and approved by a supervisor, prior to the arrested person being booked into the jail as required by Paragraphs 10 and 38. The supervisors did not consistently mark dates or times by their signatures on the affidavits on those few occasions where they actually reviewed the affidavits.</p>

11. VPPD will immediately and unconditionally release any person who is held at the jail or in VPPD's holding cell(s) if the judge or magistrate rejects the VPPD officer's affidavit of probable cause in support of that person's arrest, unless the court authorizes continued detention pending a timely submission of an affidavit supporting probable cause.

<b>Status (11)</b>	<b>Substantial Compliance</b>
Prior Status	Non-Compliance
Assessment	VPPD has improved its communication with the courts, sending all judges a daily email listing all persons held in the jail, their booking dates, and the status of their case. The jail control room logs indicate when people are released pursuant to judges orders, including where paperwork is deficient.

12. VPPD will ensure that all arrested persons are allowed to use a telephone or send a messenger for the purposes of communicating with friends or with counsel, as soon as reasonably possible.

<b>Status (12)</b>	<b>Substantial Compliance</b>
Prior Status	Partial Compliance
Assessment	<p>VPPD has provided DOJ with a sample telephone log confirming compliance with this provision, and DOJ’s observations during site visits confirmed this compliance. VPPD allows each inmate one free phone call upon admission to the facility and one free phone call every Wednesday while they are incarcerated.</p> <p>In the interest of streamlining data collection and using available technology, VPPD should use its RMS to satisfy documentation for this provision. The RMS’ jail module has a “Visitor/Phone Log” designed for this purpose. VPPD has no entries in the log but should consider using it in the future.</p>

13. Officers will not arrest a person in lieu of issuing the person a citation for a quality of life offense for the purpose of subjecting the person to questioning or interrogation. VPPD will require officers to obtain supervisory approval, where reasonably practical, prior to making a custodial arrest for a quality of life offense. If an officer cannot obtain supervisory approval prior to making an arrest for a quality of life offense, he or she will obtain supervisory approval as soon as possible after the arrest and will explain why the officer could not obtain prior approval.

<b>Status (13)</b>	<b>Non-Compliance</b>
Prior Status	Non-Compliance
Assessment	<p>This paragraph prohibits VPPD from arresting a person in lieu of issuing a citation for a quality of life offense if the purpose is to question or interrogate the person. Supervisors must be able to review quality of life arrests to ensure that officers are complying with the procedural requirements of this paragraph and to assess the officer’s motivation.</p> <p>Of the 22 probable cause affidavits that we reviewed for 2024, four of them involved arrests arising from quality-of-life offenses such as Disturbing the Peace or Remaining After Forbidden (i.e., entry on or remaining in a place after being forbidden). None of the incident/arrest reports that we reviewed indicated that officers sought or received approvals for quality-of-life arrests. Nor did we review any documentation of officers explaining why they could not obtain prior supervisory approval. In some cases, it</p>

	<p>appeared that the person was unhoused or had a mental health challenge and routinely cycled through the jail.</p> <p>VPPD must collect documentation establishing that supervisors are reviewing all quality-of-life arrests and ensuring that officers are obtaining prior supervisor approval. VPPD must also provide documentation of officers' explanations of failures to seek prior supervisor approval. Without supervisory review, VPPD cannot establish that these arrests did not occur for the purpose of questioning or interrogating the person.</p>
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### Investigatory Stops

14. VPPD will ensure that officers do not conduct investigatory stops unless they possess reasonable suspicion, based on specific and articulable facts, that a person has committed, is committing, or is about to commit a crime. VPPD will prohibit officers from relying on gossip, rumors, or hunches to justify an investigatory stop. VPPD's need or desire to question a person about a crime will not be considered in determining whether reasonable suspicion exists for the investigatory stop of that person.

Status (14)	Partial Compliance
Prior Status	Partial Compliance
Assessment	<p>As noted in our below assessment for Paragraph 63, VPPD personnel are not properly recording all interactions with the public as required by policy. For the period January 1, 2024 – May 30, 2024, there were 20 whole days for which there was no BWC footage. This included one four-day period in March for which there was one PC arrest affidavit, two new bookings in RMS, 18 new event numbers in RMS, and eight bulletin entries in RMS, so there should have been video for that period. For the same January to May period, we also noted 10 days for which there was only one video in VPPD's Evidence.com system despite RMS records suggesting there was more police activity. The failure to record all interactions with the public undermines VPPD's compliance with this paragraph.</p> <p>Although VPPD officers generally demonstrated professionalism and respect for the law in available video recordings, we saw some disturbing instances of unprofessional language and behavior, even at the highest levels of the department, and noted a few instances where officers appeared to misunderstand Fourth Amendment law. We did not see any documentation suggesting that VPPD took action to investigate or address possible misconduct in these cases, including violations of the BWC policy.</p>

15. Officers will not transport the subject of an investigatory stop to a different location for questioning or any other investigatory purpose unless the officer has probable cause to make an arrest or the stopped person requests to speak with officers in a different location. Where such a request is made, officers will document the request in writing and ask the person to sign the documentation verifying that the request was made.
16. Officers will not transport a person to jail or otherwise incarcerate a person as part of an investigatory stop unless there is probable cause that the person has committed a crime.

Status (15,16)	Partial Compliance
Prior Status	Partial Compliance
Assessment	Our review of incident reports and BWC video indicates that officers are generally transporting persons after establishing probable cause. We do have concerns about arrests for quality-of-life offenses (explained in our assessment of Paragraph 13).

17. Officers will not stop a vehicle unless there is probable cause that the driver has committed a traffic violation, or reasonable suspicion based on specific and articulable facts that the vehicle or an occupant of the vehicle has been, is, or is about to be engaged in the commission of a crime.

Status (17)	Beginning Compliance
Prior Status	Beginning Compliance
Assessment	VPPD policy requires officers to activate the BWC once a call for service is received and only deactivate when the call is completed and the officer has left the area. VPPD policy also requires that officers activate BWC at the initiation of all traffic stops to allow for assessment of the basis for the stop. Given the high frequency of late BWC activations, the significant absence of BWC footage for known events, and the low number of traffic stops in the BWC sample, we cannot confirm compliance with this provision.

#### Documentation of Fourth Amendment Activities

18. VPPD will develop systems to ensure that all stops citations, arrests, and field interviews are properly documented and that the documentation for each type of activity includes all pertinent information, including the information required in the Data Collection section of this Agreement. VPPD will require officers to document the justification for the particular activity under the relevant legal standard for that activity, where applicable, and specific, individualized descriptions of the facts and circumstances in support of that justification.
19. VPPD will require officers to use specific, individually tailored descriptions of facts in their documentation of all stops, citations, and arrests.
20. VPPD officers will complete their documentation of their activities by the end of the officer's shift in which the activity occurred.
21. VPPD will develop systems for the storage and retention of this documentation, consistent with the Data Collection paragraphs of this Agreement [See Section VIII].

Status (18,19,20,21)	Partial Compliance
Prior Status	Non-Compliance
Assessment	Although there has been significant improvement in the way officers write report narratives and the timeliness of officer reports, VPPD's recordkeeping systems remained disjointed and disorganized. Despite having a new RMS system and



	<p>hardware that should make it easier to document officer activity, VPPD is still failing to record even basic information. Officers should use RMS to document all incident reports, arrest reports, field interview cards (FIC), and evidence related to incidents and arrests. The deficiencies in VPPD's recordkeeping practices are pervasive. Probable cause affidavits for misdemeanor arrests are not kept in RMS or any other centralized system or folder to facilitate timely supervisor approval. Although RMS has the ability to attach documents, photos, videos, and other relevant evidence, we rarely saw this capability being used in our review.</p> <p>VPPD needs to ensure full implementation of their Fourth Amendment policies and develop a system for documenting activity that complies with all of the requirements of Paragraphs 18-21.</p>
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### Supervision Regarding Fourth Amendment Activities

22. Absent exceptional circumstances, within 12 hours of receiving a report documenting a stop, citation, or arrest, a supervisor will conduct a review to determine whether the activity was based upon legally sufficient grounds and complied with VPPD policy, and document the results of their review in writing.
23. If a VPPD officer arrests a person and no warrant was previously issued, the supervisor will review the officer's probable cause affidavit immediately and prior to the person being booked into the jail, consistent with Paragraph 38 of this Agreement. If the activity resulted from an insufficient factual basis, such as a lack of reasonable suspicion or probable cause, the supervisor will immediately release the person and take additional remedial measures, as appropriate. The supervisor will document the review in a report.

Status (22,23)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>We found evidence that supervisors are not reviewing documentation supporting arrests in a timely fashion and that documentation is deficient to establish probable cause in some cases. Supervisors are also not conducting BWC audits as required by policy.</p> <p>Of 22 probable cause affidavits that we reviewed, only eight were reviewed by supervisors. Three of the affidavits contained factual errors (e.g. incorrect dates or names) or omissions (i.e. factually unsupported offense element) that rendered them legally deficient on their face and did not establish probable cause. Of those three deficient affidavits, one was reviewed and approved by supervisor. This suggests that supervisors are not doing a meaningful review of the affidavits to ensure that probable cause exists. Although judges signed arrest warrant affidavits (as contemplated in Paragraph 9(f)), there is no indication of prior supervisor reviews on any of those affidavits.</p> <p>In a random review of 15 RMS reports, we found one approved by a supervisor within four hours, six approved between 8 and 28 days after submission, and eight still</p>

	<p>pending approval up to 55 days after submission. The report sample included multiple arrests, including some for Disturbing the Peace, that should have been approved by supervisors before the person was booked.</p> <p>We found one video involving a use of force where the facts on video appeared inconsistent with the sworn affidavit of the officer. If a supervisor had reviewed the affidavit and accompanying video, VPPD could have taken action to ensure accountability for accurate and honest documentation. Such inconsistencies risk compromising criminal cases and undermining the credibility of VPPD.</p>
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24. Supervisors will take appropriate action to address all violations or deficiencies in law enforcement activities or the documentation thereof, including recommending non-disciplinary corrective action for the involved officer, and/or referring the incident for administrative or criminal investigation.
25. Supervisors will track each violation or deficiency and the corrective action taken to identify officers needing repeated corrective action. Supervisors will ensure that any deficiencies, or patterns of deficiencies, are considered in officers' performance evaluations, as appropriate.
26. VPPD will take into account the quality and completeness of supervisory reviews in the supervisor's own performance evaluations and will take appropriate corrective or disciplinary actions against supervisors who fail to conduct complete, thorough, and accurate reviews of officers' law enforcement activity.

Status (24,25,26)	Non-Compliance
Prior Status	Non-Compliance
Assessment	See above assessments for Paragraphs 9, 13, and 18-23.

## CRIMINAL INVESTIGATIONS

### Interrogations

27. The City will ensure that all interrogations conducted by VPPD employees occur in accordance with the Constitution and laws of the United States.
28. Prior to conducting a custodial interrogation, officers will provide a clear and understandable notification of *Miranda* rights to the person. Prior to any custodial interrogation, officers will have the person read a written waiver of rights form and provide a signature indicating whether the person will waive the rights.
29. If a person who has been notified of their *Miranda* rights indicates that they wish to speak to an attorney or does not wish to answer questions, officers will immediately stop the interrogation and will not ask any further questions.
30. If the person does not appear able to understand the rights or waiver form, or declines to waive the *Miranda* rights, officers will immediately stop the interrogation and not ask any further questions. Officers will not make threats, promises, inducements, or take any other coercive actions in order to obtain a waiver of *Miranda* rights.



31. If a person who has declined to waive their rights informs an officer of their own volition that they have changed their mind and wish to participate in an interrogation, officers may restart the process described in Paragraph 28.

Status (27,28,29,30,31)	Partial Compliance
Prior Status	Partial Compliance
Assessment	<p>VPPD reports that officers received refresher training on Constitutional law, including the class “Understanding the Fourth Amendment” and “Understanding <i>Miranda</i> Rights,” which instructed them on the requirements of the Fourth Amendment and <i>Miranda</i> requirements. VPPD also reports that officers are required and trained to stop questioning when a suspect invokes the right to speak to an attorney.</p> <p>In our review of BWC video, officers appeared to be properly advising individuals of their <i>Miranda</i> rights, appropriately using forms, and abstaining from interrogation once rights are invoked. Officers stopped questioning when the person said they no longer wished to talk. VPPD needs to consistently file waiver forms in the RMS system and link BWC footage to the arrest to allow for further review.</p>

### Documentation of Criminal Investigations

32. VPPD will develop systems to ensure that all interrogations are documented, including the date, time, location, and duration of the interrogation, and all persons present for the interrogation.

Status (32)	Partial Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD reports that all officers and supervisors are trained to document all information regarding <i>Miranda</i> rights in writing and with audio/visual recordings. We consistently observed written documentation of <i>Miranda</i> rights in paper files and observed officers advising of <i>Miranda</i> rights on BWC video. However, missing BWC video raises questions about whether VPPD’s systems are substantially satisfying this provision. We also note that interrogations are not being uploaded to RMS as VPPD indicated.</p>

33. VPPD will continue to record all interrogations on audio or video and ensure that all recordings are preserved in the investigative file.

Status (33)	Beginning Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD reports that all officers and supervisors are trained to document all information regarding <i>Miranda</i> rights in writing and with audio/visual recordings, and that all records are maintained for a minimum of five years. When comparing affidavits and RMS entries to video footage available in Evidence.com, VPPD does not appear to be consistently capturing interrogation recordings for preservation in the investigative file.</p>

34. VPPD will ensure that an investigative file is created and maintained for all criminal investigations, to contain all reports and documentation associated with the investigation, including all recordings of interrogations. Investigative files will be maintained in good order, preserved in a secure manner, and effectively organized to provide for accessibility by VPPD employees.
35. VPPD will ensure that every investigative file contains a unique tracking number that may be cross-referenced with other associated files and documents.
36. VPPD will ensure that a copy of all documentation related to investigatory stops, interrogations, citations, arrests, interrogations, and *Miranda* waivers, and all documents related to court proceedings, including all affidavits, warrants, reports, and supervisory reviews, are included in the corresponding investigative file(s).

Status (34,35,36)	Beginning Compliance
Prior Status	Beginning Compliance
Assessment	<p>VPPD is not using its RMS system effectively, as noted in the assessment for paragraphs 18-21. Although officers are starting to use the RMS system to consolidate some case file records, not all case information appears in the system. Records appear to be spread between paper files, RMS and the online platform used to share warrant information with judges. Some misdemeanor arrests appear to be handled completely outside the RMS system or online warrant platform.</p> <p>In our review of VPPD’s paper files for jail inmates and electronic files in the RMS system, we did not find unique identifying numbers that would allow for the files to be easily cross-referenced. None of the paper files have unique identifying numbers. The paper files are also inconsistent, at best, and often appear to be incomplete.</p>

### Community Engagement

37. Within 120 days of the Effective Date, VPPD will develop a public education effort to notify the public about changes to VPPD’s practices, including that it will no longer conduct investigative holds. As part of this effort, VPPD will also educate the public on VPPD’s practices and the constitutional limits on VPPD’s ability to stop, search, and arrest members of the Ville Platte community.

Status (37)	Partial Compliance
Prior Status	Partial Compliance
Assessment	<p>Although VPPD initiated a public service program to inform the public of changes to practices, it still has not educated the public on the constitutional limits of its authority to stop, search and arrest members of the public. VPPD did modify it’s website to include civilian complaint forms and a copy of the DOJ settlement agreement, but the information does not include the requirements of this provision.</p>

## JAIL OPERATIONS

38. Prior to booking any person into the VPPD jail, VPPD employees will ensure that either a valid arrest warrant was issued prior to arrest, or an affidavit of probable cause has been completed by the arresting officer and approved by a supervisor.
39. Absent exigent circumstances, VPPD will not conduct a strip search or book the person into the jail before an affidavit of probable cause is entered in the case file or an arrest warrant is issued.

Status (38,39)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>During one of our site visits, we informed VPPD that an inmate in their custody believed that he was being held past his release date. VPPD was unable to tell us what the inmate's release date was, as it was not written anywhere in the paper case file or in the inmate's record in RMS. In fact, VPPD was still unable to tell us for almost a week after our inquiry, as the inmate's release date calculation was part of a paperwork confusion purportedly involving the Louisiana Department of Correction and the Evangeline Parish Sheriff's Office. Once VPPD did determine a future release date for the individual, he was released prior to that date. Still, we are not confident that VPPD is releasing everyone on time given VPPD's continued documentation deficiencies. Although VPPD presented us with jail policies, they were not thorough or logically organized, and they did not provide clear guidance to jailers on how to document or sequence necessary processes. VPPD is revising those policies, and we look forward to reviewing them.</p> <p>As noted above in Paragraphs 9-10 and 22-26, supervisors are not reviewing and approving probable cause affidavits in a timely manner, let alone prior to booking. When someone is arrested pursuant to a warrant, the VPPD jail should have a copy of that warrant to keep the person detained, regardless of the arresting agency, and the arresting officer should still complete an arrest report. As noted above in paragraphs 18-21, officers are not completing reports in a timely manner. VPPD appears to be booking people into the jail prior to completion of probable cause affidavits, in violation of both Paragraphs 38 and 39. As noted in the assessment for Paragraph 40, VPPD is not conducting strip searches without a warrant. We also noted serious concerns with jail operations in our assessment of Paragraph 4.</p>

40. Strip searches may only be conducted pursuant to a standardized protocol for persons admitted to jail.
41. No body cavity search, other than the mouth, may be performed without a warrant, unless the search is part of a standardized protocol for persons admitted to jail and a body cavity search is determined to be necessary for security of the facility. Unless exigent circumstances exist, all body cavity searches must be conducted by qualified, trained personnel of the same gender as the individual being searched, or if such personnel are unavailable, by a trained medical professional. Opposite-gender supervisors and staff or other non-medical personnel will not be permitted to observe the search.

Status (40,41)	Substantial Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD reports that no strip search is conducted unless there is a signed warrant and supervisory oversight and that in accordance with policy and training all requests for strip searches are to be approved by a supervisor pursuant to a signed warrant. In addition, it is the policy of VPPD that all approved cavity searches will be performed by an officer of the same gender.</p> <p>A review of “Body of” search warrants did not reveal any requests for cavity searches. We received no other information indicating that VPPD is performing cavity searches.</p>

42. For each arrested person detained in the VPPD jail, VPPD will maintain a case file that contains copies of the warrant or affidavit of probable cause with documentation of supervisor approval and all other documentation related to the person’s incarceration, such as booking forms, transportation logs, hygiene and bedding allocation, health and screening forms, and classification. The case file will be assigned a unique identifying number that will allow it to be cross-referenced with the investigative file and other relevant files. VPPD will maintain case files for a period of no less than 10 years from when they are released from the VPPD jail.

Status (42)	Beginning Compliance
Prior Status	Non-Compliance
Assessment	<p>In our review of VPPD’s paper files for jail inmates and electronic files in the RMS system, we did not consistently find unique identifying numbers that would allow for the files to be easily cross-referenced. The only number VPPD uses in RMS is the Event Number, which the department might also want to use as the unique identifier for paper files.</p> <p>Although officers are starting to use the RMS system to consolidate some case file records, not all cases appear in the system. Some misdemeanor arrests appear to be handled completely outside the RMS system through use of paper PC affidavits.</p>

43. Within 30 days of the Effective Date, VPPD will create an electronic list or spreadsheet of all persons incarcerated in the VPPD jail. The list will be updated every time a person is booked into or released from the jail. The list will contain, at a minimum, the following information:
- Name;
  - Date of birth;
  - Sex;
  - Race and/or ethnicity;
  - Case status (e.g. pre-trial, post-conviction, parole revocation, etc.);
  - Offense(s) for which the person is detained, along with applicable statute or code provision;
  - Date and time of booking;
  - Amount of bond, if any;
  - Next court date; and

j. Release date, if known.

44. VPPD’s list of incarcerated persons will be maintained so that information on incarcerated persons, including the information listed above, may be reviewed and audited for a period of no less than 10 years from the date the person is released from VPPD jail.

Status (43,44)	Substantial Compliance
Prior Status	Non-Compliance
Assessment	VPPD resumed using the RMS Jail Module to capture all of the information required by Paragraph 43. All judges receive a summary of this information daily.

45. VPPD will ensure that, at least once per day, a supervisory employee of VPPD reviews the list of incarcerated persons to ensure that each person’s incarceration is consistent with VPPD policy and the Constitution and that the database contains all information required by VPPD policy and this Agreement. The supervisory employee also will review the case file of each person arrested that day to ensure that documentation of probable cause exists.

46. If, at any time, a VPPD employee becomes aware that information required to be kept on the list of incarcerated persons is missing, that a person is improperly detained, or that the case file of an arrested person does not contain a warrant or affidavit of probable cause, the employee will immediately notify the Chief of Police or the Chief’s designee. The Chief of Police or designee will take immediate and appropriate action, up to and including immediate release of the incarcerated person. VPPD will ensure that the notification and responsive action is made part of the case file.

Status (45,46)	Beginning Compliance
Prior Status	Non-Compliance
Assessment	VPPD is not fulfilling the obligations of Paragraph 45 but has created policy for the requirements in Paragraph 46.

47. Once per week, VPPD will provide the list of incarcerated persons and related information, including bond status and amount, to the City and Parish judges for review.

Status (47)	Substantial Compliance
Prior Status	Non-Compliance
Assessment	VPPD resumed providing the City Court and Evangeline Parish judges with a list of incarcerated persons and related information on a daily basis.

48. VPPD will ensure that all incarcerated persons in the VPPD jail are provided with reasonable access to a telephone, or other means to contact friends, family members and/or counsel. Efforts to procure a statement or other information from the person will not be considered a legitimate reason to restrict access to a telephone or other means of contact.

Status (48)	Substantial Compliance
Prior Status	Partial Compliance
Assessment	<p>VPPD has provided DOJ with telephone logs. VPPD states that each inmate is allowed one free phone call upon admission to the facility and one free phone call every Wednesday while they are incarcerated.</p> <p>VPPD reports that once an arrestee has been brought into the jail and booked, they are then afforded the opportunity of a phone call. The arrestee is allowed to use the phone until such time he contacts a family member, friend, or counsel.</p> <p>VPPD has provided documentation to confirm that incarcerated persons are given reasonable access to a telephone and that efforts to procure a statement are not offered as a reason to deny access. We also confirmed this through interviews with inmates.</p>

49. VPPD will ensure that all incarcerated persons in the VPPD jail are provided with access to appropriate sanitation supplies, including toilet paper, prescription medications, and menstrual supplies.

Status (49)	Partial Compliance
Prior Status	Non-Compliance
Assessment	VPPD has partially developed policies and procedures to provide inmates with better access to supplies to meet basic needs. Records raise concerns about whether the City and VPPD are providing medication to inmates in a timely manner.

## POLICIES

50. Within 365 days of the Effective Date, VPPD will ensure that its policies incorporate the requirements of this Agreement, and that the policies related to this Agreement comply with applicable law and are consistent with best practices. VPPD policies will be plainly written, logically organized, use clearly defined terms, and be sufficiently instructive to effectively guide employees' conduct. To the extent that existing policies meet the requirements of this Agreement, they do not need to be revised. If policies do not yet exist, VPPD will work with DOJ to identify model policies that may be adapted to fit the needs of VPPD and the terms of this Agreement. VPPD will implement all policies required by this Agreement.
51. The City will submit all policies related to this Agreement, as well as any proposed policy revisions, to DOJ for review and approval prior to publication and implementation, which approval will not be unreasonably withheld. DOJ will approve policies based upon consistency with this Agreement, best practices, and applicable law.
52. The Parties will act with reasonable diligence to timely draft and respond to proposed policies.
53. VPPD will maintain a complete, up-to-date, indexed policy manual. Employees will have ready access to hard or electronic copies of the manual. VPPD will promptly incorporate policy revisions or updates in their manuals.

Status (50,51,52,53)	Partial Compliance
Prior Status	Partial Compliance
Assessment	<p>VPPD does not maintain a complete, up-to-date policy manual that can be offered to new officers upon arrival. VPPD is still in the process of creating a comprehensive policy manual, and updated policies were not publicly available on a website during the compliance period.</p> <p>Although VPPD previously made significant progress in finalizing and training on Fourth Amendment policies and finalizing a use of force policy, it did not have finalized policies for use of force investigations, supervision, or jail practices during the compliance period. VPPD did make considerable progress on finalizing its use of force policy, which is a priority, and should be commended for seeking external expertise to help craft a model policy that is appropriate for Ville Platte. VPPD also completed a taser/CEW during this period.</p>

54. The City will make all VPPD policies publicly available on its websites, except for policies that are reasonably deemed sensitive, such as procedures regarding undercover officers or operations.

Status (54)	Non-Compliance
Prior Status	Non-Compliance
Assessment	As with the last report, no policies were available on VPPD’s website during the compliance period.

## TRAINING

55. VPPD will ensure that its officers receive basic training and certification prior to commencing work, as well as ongoing in-service and remedial training in order to ensure that officers are aware of their Fourth Amendment obligations and all policies incorporating the terms of this Agreement.
56. No VPPD employee, whether full-time or part-time, will be allowed to perform the full duties of a law enforcement officer until they have successfully completed all requirements for POST certification under state law, including training requirements. Duties performed by employees without POST certification may include non-law enforcement functions, such as administrative work or augmenting neighborhood policing efforts, that the employee has been trained to perform. Uncertified officers may not interact with members of the community while armed with a service weapon, respond to calls for service, or perform or issue any stop, search, interrogation, citation, or arrest.
57. In addition to POST-required training, prior to commencing service involving the full duties of a law enforcement officer, all VPPD employees will receive at least eight (8) hours of VPPD-specific supplemental training on VPPD policies. VPPD will ensure that officers understand the requirements of the Fourth Amendment, including prohibitions on “investigative holds.”
58. Within 365 days of the Effective Date, VPPD will ensure that its field training program incorporates best practices for police training officer programs in similarly-sized agencies. VPPD will ensure that there are sufficient and appropriate policies governing the operation of the field training program.



59. VPPD, will train all lateral police hires, within 10 days of joining the VPPD, on VPPD policy and ensure that they understand the requirements of the Fourth Amendment, including prohibitions on “investigative holds.”

Status (55,56,57,58,59)	Partial Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD officers received eight hours of in-service training during this compliance period, including:</p> <ul style="list-style-type: none"> <li>- Suicide prevention</li> <li>- Fourth Amendment refresher</li> <li>- Defensive Driving</li> <li>- Use of Force</li> <li>- Warrants and Arrests refresher</li> </ul> <p>These trainings totaled more than eight hours. VPPD also signed officers up for additional online training.</p> <p>VPPD failed to provide any training to officers on the Field Training Officer program during the compliance period although those trainings were previously finalized. The failure to provide the Field Training Officer training is especially troubling given the high turnover in VPPD.</p>

60. VPPD will ensure its officers receive at least eight (8) hours of annual in-service training.

Status (60)	Substantial Compliance
Prior Status	Non-Compliance
Assessment	<p>VPPD officers received eight hours of in-service training during this compliance period, including:</p> <ul style="list-style-type: none"> <li>- Suicide prevention</li> <li>- Fourth Amendment refresher</li> <li>- Defensive Driving</li> <li>- Use of Force</li> <li>- Warrants and Arrests refresher</li> </ul> <p>These trainings totaled more than eight hours. VPPD also signed officers up for additional online training.</p>

## ACCOUNTABILITY AND OVERSIGHT

61. Within 180 days of the Effective Date, VPPD will develop and implement policies to ensure that all allegations of misconduct, whether internally or externally generated, are courteously received by a VPPD supervisor, centrally documented and tracked, and fully and fairly investigated as required by best practices.



62. Where allegations of misconduct are sustained, VPPD will ensure that discipline is imposed fairly and consistently and that officers and complainants are provided information as appropriate and consistent with best practices.

Status (61,62)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>We are concerned about whether VPPD investigates force incidents sufficiently to discern whether force was excessive or amounted to misconduct. Four of the 22 PC affidavits we reviewed involved uses of force that were not reviewed separately by supervisors. When we compared one of those affidavits to available BWC footage, there appeared to be significant inconsistencies between the report and the video. In the video, the officer appears to drop his camera outside his patrol car before entering the backseat and saying, “Chill the fuck out” while the detained person seems to say, “He choking me.” VPPD did not identify any concerns with the report or video. And although RMS contains a form section specifically designed to capture information about each use of force, no VPPD officer has used that form to enter details about a use of force.</p> <p>We also note that officers are not being held accountable for failing to activate body-worn cameras appropriately, in clear violation of VPPD policy.</p> <p>VPPD has developed a complaint intake form and process for reviewing complaints, and posted these on the VPPD website.</p>

63. VPPD currently equips its officers with body-worn cameras. If VPPD continues to equip its officers with body-worn cameras, it will utilize this technology consistent with best practices, and to ensure officers are complying with this Agreement.

Status (63)	Non-Compliance
Prior Status	Beginning Compliance
Assessment	<p>According to VPPD’s new BWC policy, “Officers shall activate the BWC to record all contacts with citizens in the performance of official duties.” If an officer is performing patrol duties or warrant execution duties, regardless of rank, they should be recording BWC video during those activities. Furthermore, “[a]ny deviation from the Policy requirements and expectations ... will result in disciplinary action which can range from written reprimand to termination.”</p> <p>For the period January 1, 2024 – May 30, 2024, there were 20 days for which there was no BWC footage, including one four-day period in March. We reviewed one PC affidavit, two RMS booking records, 18 new event numbers in RMS, and eight bulletin entries in RMS, so there should have been video for that four-day period. For the January to May period, we also noted 10 days for which there was only one video for each day in VPPD’s Evidence.com system despite RMS suggesting there was more police activity.</p>

	<p>We did not see any documentation suggesting that VPPD took action to address late BWC activations or failures to activate BWC. During our review of video, we often noticed VPPD officers, including the Chief, in videos without their BWC or without it activated. Supervisors are supposed to audit BWC footage monthly to facilitate enforcement of this policy, but we did not see any evidence of supervisory reviews. In Evidence.com, the platform VPPD uses to store footage, we saw many videos that did not clearly identify the person who was wearing the camera. The videos are also not labeled with a case or event number, which further hampers VPPD’s ability to easily locate and review footage.</p>
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## DATA COLLECTION AND REPORTING

64. Elimination of the harmful and unlawful practice of arrests for investigative purposes without probable cause requires ongoing and active collection of data, analysis, and periodic review to ensure that the practice has been eliminated and does not recur. VPPD will collect and maintain all data and records necessary to review VPPD’s compliance with this Agreement, and to ensure transparency and wide public access to information related to the lawfulness of VPPD’s field interviews, investigatory stops, interrogations, and citations as permitted by law.
65. Within 270 days of the Effective Date, VPPD will develop a data collection system that will provide for the review of officer investigatory stops, citations, arrests, and interrogations to ensure that officers comply with constitutional standards and this Agreement.
66. VPPD will regularly analyze the data collected to ensure that all stops, arrests, and interrogations are lawfully conducted and meet constitutional standards, and to inform necessary changes to policies and training.
67. Within 60 days of the Effective Date, VPPD will develop a system to track interrogations conducted by VPPD employees. The system will include documentation of the person interrogated, the date and time of the interrogation, the length of the interrogation, the officer(s) present, and the corresponding investigative file number.
68. VPPD’s data collection system will require officers to document the following for investigatory stops and arrests:
  - a. The identity of the person(s), if known;
  - b. The officer’s name and badge number;
  - c. The date, time, and location of the stop;
  - d. The approximate duration of the stop;
  - e. If a non-vehicle stop (e.g., pedestrian or bicycle), the number of persons stopped;
  - f. The reason for the stop, including a specific, individualized description of the facts creating reasonable suspicion;
  - g. If a vehicle stop, whether the driver or any passenger was required to exit the vehicle, and reason;
  - h. Whether any person was asked to consent to a search and whether such consent was given;
  - i. Whether officers conducted a weapons frisk during the stop and, if so, the specific and articulable facts establishing reasonable suspicion that the person was armed and dangerous;
  - j. Whether officers conducted a search based on probable cause and, if so, the facts establishing probable cause to conduct a search;

- k. Whether any weapon, contraband or evidence was seized from any person, and nature of the weapon, contraband or evidence;
- l. The outcome of the stop, including whether officers issued a civil or criminal citation, made an arrest, or issued a warning; and
- m. A unique identifying report number, allowing the documentation to be matched with the investigative file and documentation of any criminal or civil citations or arrests that result from the stop.

Status (64,65,66,67,68)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>Although VPPD now uses an RMS system, VPPD does not collect all the data required by these provisions or conduct any analysis of the data. The RMS is a highly customizable system that includes many standard fields to capture data. When officers do complete reports, the information required in 68-a, b, c, f, k, and l is often captured, though not consistently. Information for all other 68 subparagraphs is rarely captured.</p> <p>In our review of RMS entries, we did not notice any record of consent searches or weapons pat-downs although our review of BWC videos found that that they do occur. VPPD should make sure that all Paragraph 68 information is documented in RMS, as required by policy.</p>

69. The City will produce an annual report describing VPPD activity and will make that report publicly available on the City’s website and also upon request. The City will not be required to make public information that must remain confidential to protect public safety. The annual report will further provide information regarding the City’s implementation and status of this Agreement.
70. Subject to applicable law, the annual report will address:
- a. Stop and arrest data and any analysis of that data that was undertaken;
  - b. Data related to complaints of improper stops, arrests, or interrogations, including but not limited to the number of misconduct complaints made and investigated, the outcome of the investigations, and the mode of resolution, as well as analysis of that data to identify trends; and
  - c. Additional topics as deemed appropriate by the City in its discretion to promote transparency and identify the accomplishments, actions, and continuing needs of the City.

Status (69,70)	Non-Compliance
Prior Status	Non-Compliance
Assessment	<p>The City and VPPD have not developed annual reports to provide any statistical data about law enforcement activity or misconduct complaints. VPPD is obligated to provide the community with a minimal level of transparency by publishing annual reports, status reports and outcome assessments on a regular basis.</p>

71. Within six months of the Effective Date, the City will publicly post a status report. This report will delineate the steps taken by the City during the reporting period to implement this Agreement, the City's assessment of the status of its progress, and plans to correct any problems. Following this initial status report, VPPD will file a status report every six months thereafter while this Agreement is in effect, in which it will additionally respond to any concerns raised by the DOJ or identified in the previous report.

Status (71)	Beginning Compliance
Prior Status	Beginning Compliance
Assessment	The City and VPPD have not publicly posted any report about the status of their implementation efforts, plans to correct any problems, or their responses to DOJ concerns. VPPD provided DOJ with a self-assessment in February 2024, but that was not shared with the public.

## OUTCOME ASSESSMENTS

72. The City will conduct Outcome Assessments on an annual basis, as specified by this section of the Agreement, to measure whether VPPD's revised practices and procedures are achieving the purposes of this Agreement and are having an overall beneficial effect on policing in Ville Platte. Outcome Assessments should be conducted in a reliable, cost-effective manner based on accepted and trustworthy means and methods. Any statistical analysis used as part of an Outcome Assessment must conform to statistical techniques that are accepted in the relevant field. The City will provide DOJ with the underlying data, analysis, methods, and sources relied upon in the Assessments.
73. The City will develop a plan and protocol within 270 days of the Effective Date to conduct these assessments. The plan and protocol will be subject to the approval of DOJ, which approval shall not be unreasonably withheld.
74. The outcome assessments will include analysis:
- To determine whether VPPD is conducting stops consistent with the Constitution and this Agreement, analysis of the rate at which stops uncover criminal activity;
  - To determine whether arrests are consistent with the Constitution and this Agreement, analysis of the rate at which arrests are found to lack probable cause or otherwise violate the Fourth Amendment, the number of probable cause affidavits rejected by supervisors or the criminal courts, and a qualitative analysis of the sufficiency of probable cause affidavits and other documentation supporting arrests;
  - To determine whether VPPD officers are providing adequate *Miranda* warnings and conducting interrogations consistent with the Constitution and this Agreement, an analysis of data related to the length and frequency of interrogations and documentation of *Miranda* warnings and waivers, and an analysis of the rate at which motions to exclude confessions are granted by the criminal courts;
  - To assess whether VPPD officers receive sufficient training on the Fourth Amendment and proper interrogation techniques, an analysis of the rate of completed trainings, performance evaluations from field trainings, and qualitative analysis of the content, structure, adequacy, and efficacy of trainings provided under this Agreement; and
  - To determine that all detentions are appropriately documented and supported by probable cause, audit data of all investigative files and jail detention files to ensure there is a file on each person detained by VPPD and that files contain adequate documentation in support of the detention.

75. The City will include the results of all outcome assessments in its status reports and in its annual report published pursuant to Paragraph 69, above.

Status (72,73,74,75)	Non-Compliance
Prior Status	Non-Compliance
Assessment	Neither VPPD nor the City has developed a plan to conduct any annual outcome assessments. VPPD's self-assessment does not contain the analyses required by Paragraph 74.