

OATH IN SUPPORT OF SEARCH WARRANT

FILED
MAR 21 2017
JUDICIAL DISTRICT COURT
OUACHITA PARISH, LOUISIANA

Before me, the undersigned Judge of the Fourth Judicial District Court, personally came and appeared James W. Humphrey, Jr., Ouachita Parish Sheriff's Office, who, being duly sworn, stated upon oath that a Search Warrant should be issued authorizing the search of the following described:

2006 Tower Drive, Monroe, Louisiana 71201. This address is the office building of the Monroe City School Board. It is further described as a two tone tan brick and red brick single story structure with the numbers "2006" plainly displayed above the entry doors. The words "MONROE CITY SCHOOL BOARD ADMINISTRATION BUILDING" is plainly displayed on the front of the building that faces Tower Drive.

Appearer further states that the search is to be conducted for the purpose of seizing the following described property:

- 1.) A "Smart Board Wand". It is weighted on one end while being shaped like a "Mickey Mouse Hand". This device is used as an instructional device in conjunction with a Smart Board in the classroom.
- 2.) All internal investigation files relating to the abuse, neglect or sexual abuse of a child by a Monroe City School employee including, but not limited to open, closed, founded, unfounded, resolved, unresolved, pending, active and inactive. These are to include, but not limited to handwritten notes, computer generated spreadsheets, audio and/or video recorded statements and interviews, photographic images, drug testing laboratory documentation results, identities of children, victims, students, parents, teachers, coaches, principals, assistant principals, witnesses, and innocent bystanders interviewed during the

unfounded, resolved, unresolved, pending, active and inactive. These are to include, but not limited to, payroll records, job application(s), background check(s), internal investigation(s), disciplinary action(s), promotion(s), job assignment(s), school assignment(s), letters of accommodation(s), letters of recommendation(s), letters of warning(s), letters of accusation(s), random drug testing laboratory documentation results, letters of termination(s), student teaching records and letters of resignation.

4.) All Monroe City School Board Meeting Agendas to include, but not limited to, Human Resources Agendas since January 25, 2017 to present date.

The reason for and facts in support of the issuance of the Search Warrant are:

On February 10, 2017, I, Senior Investigator James W. Humphrey, Jr. was assigned the follow-up investigation into criminal allegations that accuse Neville High School choir teacher, Christian Amos, of providing marijuana to students and possibly trying to entice the students into sexual relationships. The original complaint was filed by the parent of one of the victims with the Monroe Police Department on January 12, 2017 (MPD File number 2017-00002116). The Monroe Police report listed Mr. Amos as a current teacher at Neville High School, while the report with the Ouachita Parish Sheriff's Office filed on February 9, 2017 by the same parent lists Mr. Amos as a former teacher at Neville High School. The Monroe Police report also listed Mr. Amos as living in an apartment complex outside the city limits of Monroe and that the matter needed to be forwarded to the Ouachita Parish Sheriff's Office for investigating. The original Monroe Police report also listed evidence that consisted of copies of text messages between Mr. Amos and the complainant. The Monroe Police report listed information that had been provided by the complainant that there was an internal investigation taking place by the

the whereabouts of the above mentioned written statements. Dr. Dawson confirmed that there was an internal investigation and she referred investigator to Mr. David Breithaupt at the Monroe City School Board Office. Dr. Dawson provided investigator with a contact phone number where Mr. Breithaupt could be contacted. Investigator made phone contact with Mr. Breithaupt, identified myself, told him that I was investigating the criminal allegations against Mr. Christian Amos and that I needed copies of the written statements. Mr. Breithaupt stated that he was not aware of a police investigation into Mr. Amos' actions and that he had to get permission from his supervisor before he could release written statements to investigator. A short time later, Mr. Breithaupt called investigator and explained that he had been granted permission to release written statements to investigator. Investigator traveled to the Monroe City School Board Office and met Mr. Breithaupt face to face. While handing investigator the envelope that contained the written statements, Mr. Breithaupt stated that the attorney for the Monroe City School Board wanted to remind the investigator that the written statements are confidential. Investigator acknowledged knowing that the statements were confidential and in return advised Mr. Breithaupt he needed to remind everyone, including the school board's lawyer that they were mandated reporters to sexual abuse allegations. Investigator opened the envelope which contained four statements and copies of some text messages. The written statements were from the mother of one of the victims, two victims and Mr. Amos. Noting the discrepancy between the number of victims listed on the Monroe Police report and the number of written statements provided in the envelope, investigator asked about other students that were questioned during the internal investigation. Mr. Breithaupt provided investigator with their names, dates of birth and brief details of what they told him during their interview. Mr. Breithaupt confirmed that Mr. Amos had resigned. While talking with Mr. Breithaupt, investigator learned that his official title at the Monroe City School Board is Personnel Coordinator. Mr. Breithaupt was instructed to conduct the internal

was instructed by his superiors not to provide investigator with any information or detail that the investigator did not explicitly ask for with regards to this investigation.

Investigator began to schedule and conduct interviews with the victims that were listed in the reports and with the victims that were identified after speaking with Mr. Breithaupt. As the interviews progressed, investigator identified additional victims and additional details. Investigator learned that Neville High School Assistant Principal Whitney Martin was made aware that Mr. Christian Amos was allowing students to smoke marijuana at his apartment in the middle of December of 2016. Assistant Principal Martin warned Mr. Amos that if he was having students come to his apartment, he needed to stop. Although Mr. Amos denied all allegations during these interactions, law enforcement was never contacted about the criminal activity. Assistant Principal Martin cooperated during a majority of the investigative process and even provided investigators with photographic evidence of a student's vehicle parked next to Mr. Amos' vehicle in December of 2016. Assistant Principal Martin cited that she made Principal Dawson aware of the situation in December of 2016 in order to "get it off of her plate". While interviewing a parent of a different victim, this parent cited that Assistant Principal Martin claimed that she (Assistant Principal Martin) made "HR" aware of the allegations back in December of 2016. During a follow-up interview with Assistant Principal Martin, to clear up who was aware of the allegations of criminal activity in December of 2016, she exercised her Miranda rights to have an attorney citing both concerns of facing criminal charges herself and civil litigation for herself, Neville High School and the Monroe City School Board.

On the morning of March 1, 2017, investigators with the Ouachita Parish Sheriff's Office Special Victim's Unit, the Monroe Police Department, the FBI Violent Crimes Against Children Task Force, the FBI Safe Streets Task Force and the Louisiana State

borrow \$20.00. Christian says he could give that student \$20.00 in exchange for performing oral sex on the student. During Christian's interview, Christian kept saying that the police were never suppose to be called and that was the deal. Christian explained that he was called into Dr. Dawson's office and told that three students were accusing him of giving them illegal substances in exchange for sexual favors. Christian had to prepare a written statement that he gave to Dr. Dawson the following morning. Around noon that same date, Mr. Breithaupt met with Christian and suspended him and placed him on paid leave due to the allegations. Christian had to submit to a drug screening for which he passed. On January 25, 2017, Christian was called to an interview with school board personnel that consisted of Dr. Vidrine, Mr. Breithaupt and Phredra Brandley. Christian explained that Dr. Vidrine told him that he (Dr. Vidrine) had spoken to the parent and told her not to worry about Christian and for her to take care of her son. Dr. Vidrine assured Christian that the parents had been taken care of and that Christian had nothing to worry about as long as Christian resigned, Christian could then put all this behind him and he would be in a better position to look for another teaching job in the future. According to Christian, Dr. Vidrine told him that they didn't want to contact the police and that the parents needed to make sure their children didn't get involved in something like this again. Christian claimed that his resignation letter was prepared by someone at the Monroe City School Board office and awaiting his signature. Christian stated that he spoke to Mr. Breithaupt on the phone and Mr. Breithaupt told him that the school board had no intentions of pressing charges and were going to make sure the parents did not either. Christian provided a written statement and a recorded statement about this incident.

On March 6, 2017, a search warrant was prepared and presented to and signed by Fourth Judicial District Court Judge H. Stephens Winters. The location of the search warrant was the Monroe City School Board Office, located at 2006 Tower Drive in Monroe

Dawson and was from SearchSoft. In the body of the email, it explains that Christian Amos is applying for employment at Atlanta Public Schools and is seeking feedback from Christella Dawson. Within Christian Amos' personnel file, there was an envelope postmarked January 27, 2017 (two days after Mr. Amos' resignation) to the Monroe City School Board Office from the Lincoln Parish School Board Office. Along with this envelope, there was a form letter titled "SEXUAL MISCONDUCT DISCLOSURE STATEMENT". The top portion appears to be an original signed by Christian Amos during the hiring process on June 27, 2016. The lower portion has a handwritten note and is dated January 27, 2017 (two days after Mr. Amos' resignation). The note is in reference to Christian Amos' status with the Lincoln Parish School Board. Within the internal investigation file, investigator located an email exchange between Mr. David Breithaupt and Monroe City School Board Attorney, Doug Lawrence. The content of the email is in reference to Mr. Breithaupt seeking permission to release the written statements to law enforcement. The wording of the email demonstrates that Mr. Breithaupt was not aware a police report had been filed by the mother of one of the victims.

Investigator continued to conduct numerous interviews with Monroe City School Board teachers, administrators and employees. At least two persons expressed concerns over how Mr. Christian Amos' internal investigation was handled by the Monroe City School Board Office. Investigator learned that the "HR" department had no knowledge of Christian Amos' illegal activities until January 12, 2017. According to Mr. David Breithaupt and Dr. Phedra Brantley, they both expressed their concerns to Dr. Brent Vidrine that this internal investigation into Christian Amos' criminal allegations needed to be turned over to law enforcement. These concerns were ignored by Dr. Brent Vidrine. Dr. Brantley recalled a portion of the meeting that occurred on January 25, 2017 between Mr. Breithaupt, Christian Amos, Dr. Vidrine and herself. Dr. Vidrine had instructed her to prepare the resignation paperwork prior to the meeting. Dr. Brantley described the superintendent's meeting and both she and Mr. Breithaupt kept their mouth

Investigator learned details of another internal investigation that should have been turned over to local law enforcement due to the mandatory reporter statute. This internal investigation began in February of 2017. It involves a special needs student at Lexington Elementary School, located at 1905 Spencer Avenue in Monroe, Louisiana. The child came home with injuries that had been sustained at school. A teacher that was suspected of striking the child had been placed on administrative leave while an internal investigation was being conducted. There was no police report filed during this internal investigation. Investigator learned that the teacher had possibly used a "smart board wand" to strike the child. The "smart board wand" was described as being weighted on one end while being shaped like a "Mickey Mouse hand". It is an interactive instructional device used in conjunction with a smart board to assist teaching children in the classroom. After the allegations were brought forward, the device was removed from the classroom and is currently being stored at the Monroe City School Board Office on Tower Drive in Monroe. Investigator was initially told by one Monroe City School employee that the teacher had been terminated at the conclusion of the internal investigation. While speaking with a second Monroe City School employee about this same teacher, investigator learned that the teacher had not been terminated, but that Dr. Vidrine was going to allow the teacher to resign with a future effective date of April 1, 2017. Investigator also learned that the only individual at the school who is authorized to administer corporal punishment of any student is the principal of the school.

Christian Amos was a certified teacher until his arrest on March 1, 2017. Upon his arrest, his teaching certificate was suspended pending the outcome of the court case. Investigator is still in the process of identifying victims connected to the Amos investigation. Investigator is unsure of the status of the teaching certificate of the teacher at Lexington Elementary and only knows that her name is "Mrs. Ross". Both the sexual

law enforcement as required as a mandated reporter by Louisiana Revised Statute (R.S. 14:403).

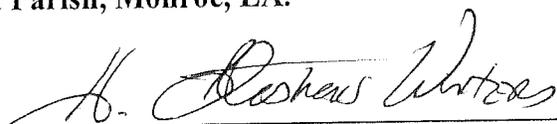
After the signing and execution of this search warrant, investigators will be able to review all internal investigations that have been conducted. Investigators will be able to secure evidence in the case of the physical abuse involving the child at Lexington Elementary School. Investigators will be able to identify other criminal allegations that were investigated as internal investigations that should have been forwarded to law enforcement as required by Louisiana R.S. 14:403, but instead were resolved with either resignations, terminations or determined to be unfounded. Due to the conflicting statements as to the employment status of "Mrs. Ross", investigator will be able to determine if she were terminated, resigned, still employed, employed elsewhere and the current status of her teaching certificate.

A search warrant is respectfully requested for:

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James W. Humphrey, Jr.

Sworn to and subscribed before me, on the 20th day of March, 2017, at
9:29 A.M. o'clock, in Ouachita Parish, Monroe, LA.



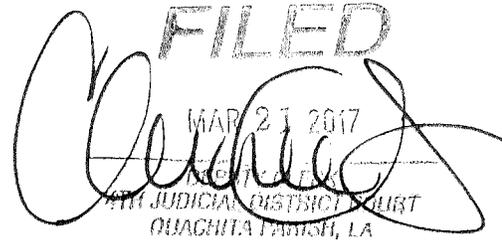
STATE OF LOUISIANA * PARISH OF OUACHITA * FOURTH JUDICIAL DISTRICT

SEARCH WARRANT

STATE OF LOUISIANA

PARISH OF OUACHITA

TO ANY LAWFUL PEACE OFFICER
HAVING JURISDICTION OF THE
SITUS OF THIS SEARCH:



GREETINGS:

Considering the Affidavit in support hereof, a copy of which is attached, and the Court finding hereby the Affiant, James W. Humphrey, Jr., Ouachita Parish Sheriff's Office, that the facts recited in the affidavit establish to the Court's satisfaction that there is probable cause to make the search of:

2006 Tower Drive, Monroe, Louisiana 71201. This address is the office building of the Monroe City School Board. It is further described as a two tone tan brick and red brick single story structure with the numbers "2006" plainly displayed above the entry doors. The words "MONROE CITY SCHOOL BOARD ADMINISTRATION BUILDING" is plainly displayed on the front of the building that faces Tower Drive.

You are hereby authorized to search forthwith the following described:

2006 Tower Drive, Monroe, Louisiana 71201. This address is the office building of the Monroe City School Board. It is further described as a two tone tan brick and red brick single story structure with the numbers "2006" plainly displayed above the entry doors. The words "MONROE CITY SCHOOL BOARD ADMINISTRATION BUILDING" is plainly displayed on the front of the building that faces Tower Drive.

2.) All internal investigation files relating to the abuse, neglect or sexual abuse of a child by a Monroe City School employee including, but not limited to open, closed, founded, unfounded, resolved, unresolved, pending, active and inactive. These are to include, but not limited to handwritten notes, computer generated spreadsheets, audio and/or video recorded statements and interviews, photographic images, drug testing laboratory documentation results, identities of children, victims, students, parents, teachers, coaches, principals, assistant principals, witnesses, and innocent bystanders interviewed during the investigation and written statements of all parties involved for the date(s) to include when Dr. Brent Vidrine was hired and/or assigned as the Superintendent of the Monroe City School Board.

3.) All personnel files, either active or inactive, which corresponds with the internal investigation files cited above which include, but not limited to open, closed, founded, unfounded, resolved, unresolved, pending, active and inactive. These are to include, but not limited to, payroll records, job application(s), background check(s), internal investigation(s), disciplinary action(s), promotion(s), job assignment(s), school assignment(s), letters of accommodation(s), letters of recommendation(s), letters of warning(s), letters of accusation(s), random drug testing laboratory documentation results, letters of termination(s), student teaching records and letters of resignation.

4.) All Monroe City School Board Meeting Agendas to include, but not limited to, Human Resources Agendas since January 25, 2017 to present date.

Given under my hand seal of office on this 20th day of March,
2017, at 9:29 o'clock, in Ouachita Parish, Monroe, LA.
A.M.


H. Andrew Waters

FILED

RECEIVED THIS SEARCH WARRANT IN DUE COURSE

[Handwritten signature]
MAR 21 2017
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SEARCHED FOR THE GOODS DESCRIBED WITHIN THE SEARCH WARRANT AND SEIZED THE FOLLOWING ITEMS:

page 1 of 2

TIME: LOCATED BY: DESCRIPTION OF ITEM & LOCATION FOUND:

10:35	J. Asmussen	1 - Smart board wand, Red & White, recovered by J. Asmussen from D. Breithaupt's office.
10:39	J. Asmussen	1 - Monroe City Schools - Human Resources Division Agenda dated Feb 7, 2017 recovered by R. Williams a (MCSB employee) from the Human Resources Office.
11:11	J. Humphrey	1 - Internal Investigation file & the corresponding personnel file for Connerita Ross, a MCSB employee.
11:41	J. Humphrey	1 - Internal Investigation file & the corresponding personnel file for Mr. Gregory Glover, a MCSB employee.
11:49	J. Humphrey	1 - Internal Investigation file & the corresponding personnel file for Ms. Julie Kicey, a MCSB employee.
11:57	J. Humphrey	1 - Internal Investigation file & the corresponding personnel file for Ms. Gabrielle Jones, a MCSB employee.
12:20	J. Humphrey	1 - Personnel file & multiple Internal Investigation files for Mr. Theodis Tarver, a MCSB employee.
12:43	J. Humphrey	1 - Personnel file & Internal Investigation file for Mr. Carl Leonard, a MCSB employee.
13:27	J. Humphrey	1 - Personnel file & empty internal investigation file for Mr. Nicholas Lewis, a MCSB employee.
13:41	J. Humphrey	1 - Internal Investigation & Personnel file for Ms. Alliance Scoby, a MCSB employee.
13:49	J. Humphrey	1 - Personnel file & 1 letter recommending disciplinary action of Mr. Willie Allen, a MCSB employee.
14:06	J. Asmussen	1 - Payroll History sheet for Mr. Willie Allen for the months of Feb 1, 2016 through 03/31/2016.
14:30	J. Humphrey	1 - File folder labeled "Investigations" found in the office of Dr. Brantley.
15:20	J. Asmussen	11 stapled pages of a photocopy hand written notes from a parent of a victim concerning allegations of abuse. Found in the office of Dr. B. Vidrine.
15:55	J. Humphrey	1 - handwritten statement by Mrs. Julie Kicey found in Dr. B. Vidrine's office.

This search was commenced at 10:15 o'clock, A m. on the 20th day of March 20 17, and completed this 20th day of March, 20 17, at 16:22 o'clock, P m.

DEPUTY IN CHARGE:

[Handwritten signature: X.J. Humphrey]

