

ELLIOTT B. STONECIPHER,

Plaintiff,

VERSUS

CADDO PARISH, LOUISIANA, THE  
CADDO PARISH COMMISSION,  
CADDO PARISH COMMISSIONERS  
DOUGLAS DOMINICK, LYNDON B.  
JOHNSON, MICHAEL WILLIAMS,  
MATTHEW LINN, JERALD BOWMAN,  
LINDORA BAKER, STORMY GAGE-  
WATTS, JOHN ESCUDE, MICHAEL  
THIBODEAUX, DAVID COX, JIM  
SMITH, KENNETH EPPERSON, SR.,  
CADDO PARISH ADMINISTRATOR  
WOODROW WILSON, JR., AND  
CADDO PARISH DIRECTOR OF  
FINANCE AND HUMAN  
RESOURCES ERICA BRYANT,

Defendants.

SUIT NUMBER

583,388-A

FILED

MAR 16 2015

SHARON NEWTON  
DEPUTY CLERK OF COURT

FIRST JUDICIAL DISTRICT COURT

CADDO PARISH, LOUISIANA

PERMANENT ASSIGNMENT:  
JUDGE \_\_\_\_\_

**PETITION FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

NOW INTO COURT, through undersigned counsel, comes Elliott B. Stonecipher, plaintiff in the above referenced proceeding (hereinafter sometimes referred to as the "plaintiff" or "Stonecipher"), who respectfully represents as follows:

1.

Elliott B. Stonecipher ("Stonecipher"), is a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is 1651 E. 70<sup>th</sup> Street, Shreveport, Louisiana, 71105. Stonecipher also owns a lot and home located in Shreveport, Louisiana, resides in that lot and home, pays ad valorem taxes to both the City of Shreveport and Caddo Parish, Louisiana, on that lot and home, and is registered to vote and votes in elections held by both the City of Shreveport and Caddo Parish, Louisiana.

2.

Accordingly, Stonecipher is a citizen, property owner, taxpayer, and registered voter of both the City of Shreveport and Caddo Parish, Louisiana, and is therefore directly affected by the operations, activities, and conduct of Caddo Parish, Louisiana, the Caddo Parish Commission, the Commissioners of Caddo Parish, Louisiana, the Caddo Parish Administrator, and the Caddo

3.

Made defendants herein are:

- (a) Caddo Parish, Louisiana (the “Parish”), a governmental subdivision of the State of Louisiana, whose registered office and principal place of business is located in Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (b) the Caddo Parish Commission (the “Commission”), governing authority of Caddo Parish, Louisiana, under the Home Rule Charter of Caddo Parish, Louisiana (effective January 9, 1984), whose registered office and principal place of business is located in Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (c) Douglas Dominick (“Dominick”), Caddo Parish Commissioner for District 1 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (d) Lyndon B. Johnson (“Johnson”), Caddo Parish Commissioner for District 2 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (e) Michael Williams (“Williams”), Caddo Parish Commissioner for District 3 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (f) Matthew Linn (“Linn”), Caddo Parish Commissioner for District 4 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (g) Jerald Bowman (“Bowman”), Caddo Parish Commissioner for District 5 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (h) Lindora Baker (“Baker”), Caddo Parish Commissioner for District 6 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (i) Stormy Gage-Watts (“Gage-Watts”), Caddo Parish Commissioner for District 7 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (j) John Escude (“Escude”), Caddo Parish Commissioner for District 8 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (k) Michael Thibodeaux (“Thibodeaux”), Caddo Parish Commissioner for District 9 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo

Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;

- (l) David Cox (“Cox”), Caddo Parish Commissioner for District 10 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (m) Jim Smith (“Smith”), Caddo Parish Commissioner for District 11 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (n) Kenneth Epperson, Sr. (“Epperson”), Caddo Parish Commissioner for District 12 of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101;
- (o) Dr. Woodrow Wilson, Jr. (“Wilson”), Administrator and Chief Executive Officer of Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 800, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101; and
- (p) Erica Bryant (“Bryant”), Director of Finance and Human Resources for Caddo Parish, Louisiana, a resident and domiciliary of Caddo Parish, Louisiana, whose post office address is Suite 840, Government Plaza, 505 Travis Street, Shreveport, Louisiana, 71101.

4.

For the reasons that follow, plaintiff is entitled to the entry of a judgment against the Parish, the Commission, Dominick, Johnson, Williams, Linn, Bowman, Baker, Gage-Watts, Escude, Thibodeaux, Cox, Smith, Epperson (hereinafter sometimes collectively referred to simply as the “Commissioners”), Wilson (hereinafter sometimes referred to as the “Administrator”), and Bryant (hereinafter sometimes referred to as the “Director of Finance”) which:

- (a) recognizes and declares that all of the Commissioners are now and have always been part-time employees of the Parish, and, accordingly, that none of the Commissioners are now or have ever been eligible to participate in, become members of, or receive any pension or retirement benefits by, from, or through the Caddo Parish Employees Retirement System (“CPERS”) or the Parish;
- (b) enjoins, restrains, and prohibits the Administrator and the Director of Finance from approving, authorizing, permitting, or allowing the transfer, payment, or provision of any further or additional pension or retirement benefits or credits by, from, or through CPERS or the Parish to any of the Commissioners; enjoins, restrains, and prohibits CPERS and the Parish from transferring, paying, or providing any further or additional pension or retirement benefits or credits to any of the Commissioners; and enjoins, restrains, and prohibits any of the Commissioners from accepting, acquiring, or receiving any further or additional pension or retirement benefits or credits from CPERS or the Parish;

- (c) directs each of the Commissioners, the Administrator, and the Director of Finance to pay all of the pension or retirement benefits which each of the Commissioners has received by, from, or through CPERS or the Parish since the inception of CPERS to CPERS or the Parish, together with legal interest on all of those pension or retirement benefits since the date or dates on which those pension or retirement benefits were credited or paid to, for, or on behalf of each of the Commissioners until the date or dates on which those pension or retirement benefits are paid or returned to CPERS or the Parish by the Commissioners, the Administrator, and the Director of Finance;
  
- (d) recognizes and declares that all of the Commissioners are now and have always been part-time employees of the Parish, that none of the Commissioners are now or have ever been entitled to receive any compensation, remuneration, or benefits other than their salary proper, and, accordingly, that none of the Commissioners are now or have ever been entitled to receive, any of the following compensation, remuneration, or benefits:
  - (i) life and health insurance coverage, subsidies, or benefits from the Parish;
  - (ii) a travel allowance of Fifteen Thousand And No/100 Dollars (\$15,000.00) per year from the Parish;
  - (iii) the same cost of living increases in their salaries which are granted to other Parish employees on an annual basis; and
  - (iv) the same mileage reimbursement allowed to state-elected officials for travel outside of Caddo Parish, Louisiana, on parish business;
  
- (e) enjoins, restrains, and prohibits the Administrator and the Director of Finance from approving, authorizing, permitting, or allowing the transfer, payment, or provision of any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements by, from, or through the Parish to any of the Commissioners; enjoins, restrains, and prohibits the Parish from transferring, paying, or providing any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements to any of the Commissioners; and enjoins, restrains, and prohibits any of the Commissioners from accepting, acquiring, or receiving any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements by, from, or through the Parish; and
  
- (f) directs each of the Commissioners, the Administrator, and the Director of Finance to reimburse, restore, return, and/or pay all of the compensation, remuneration, and benefits which each of the Commissioners has received over and above their salaries proper by, from, or through the Parish to the Parish, including, but not limited to, all of the compensation, remuneration, and benefits which each of the Commissioners has received in the form of:
  - (i) life and health insurance coverage, subsidies, or benefits from the Parish;
  - (ii) travel allowances of Fifteen Thousand And No/100 Dollars (\$15,000.00) per year from the Parish;

- (iii) cost of living increases in their salaries equal to the cost of living increases in wages or salary which are granted to other Parish employees on an annual basis; and
- (iv) mileage reimbursements equal to the mileage reimbursements allowed to state-elected officials for travel outside of Caddo Parish, Louisiana, on parish business,

together with legal interest on each of those items of compensation, remuneration, or benefits from the date or dates on which each of those items of compensation, remuneration, or benefits were furnished, paid, or provided to or for each of the Commissioners to and through the date or dates on which each of those items of compensation, remuneration, or benefits are paid or returned to the Parish by the Commissioners, the Administrator, and the Director of Finance.

5.

In 2000 and 2005, the Commission passed the ordinances which created CPERS and which declared that the Commissioners were unclassified employees of the Parish who were eligible to participate in, become members of, and receive pension or retirement benefits from the Parish by, from, and through CPERS. See, e.g., Caddo Parish Commission Ordinance Number 3762 of 2000; Caddo Parish Commission Ordinance Number 4343 of 2005; Caddo Parish, Louisiana - - Code of Ordinances, Part II (“Code of Ordinances”), §§ 2-52 through 2-57 (1/28/2015).

6.

Consequently, the Parish, the Commission, the Commissioner, the Administrator, and the Director of Finance have all recognized, acknowledged, accepted, and agreed that the commissioners are eligible to participate in, become members of, and receive pension and retirement benefits from the Parish by and through CPERS, and have accepted, acknowledged, and approved the Commissioners’ participation, membership in, and receipt of pension or retirement benefits from the Parish through CPERS. Id.

7.

Unfortunately, however, both the ordinances which created CPERS and declared that the Commissioners were unclassified employees of the Parish who were eligible to participate in, become members of, and receive pension or retirement benefits from the Parish by and through CPERS and the Parish’s, the Commissioners’, the Administrator’s, and/or the Director of Finance’s acceptance, acknowledgment, and approval of the Commissioners’ eligibility for, membership in, and receipt of pension and retirement benefits from the Parish by, from, or

through CPERS have always been and are wholly unconstitutional, illegal, invalid, and insufficient as a matter of law.

8.

At all times relevant and material hereto, Article 10, § 29.1 of the Louisiana Constitution of 1974 has recognized, declared, and established that the Commissioners are, at most, part-time employees of the Parish, and as such, persons who are specifically precluded from eligibility for, membership in, or the receipt of any pension or retirement benefits by, from, or through any pension or retirement system, fund, or plan sponsored by the Parish. Instead, Article 10, § 29.1 of the Louisiana Constitution of 1974 declares, in pertinent part:

**“Section 29.1 - - Part-time Public Officials.** (A) Except as provided in Paragraph (B), *the following elected or appointed officials are hereby deemed to be part-time public servants who, based on such part-time service, shall not participate in, or receive credit for service in, any public retirement system, fund, or plan sponsored by the state of Louisiana or any instrumentality or political subdivision thereof:*

- (1) Any legislator or *any member of a* school board, levee board, *police jury, or parish council.*
- (2) *Any member of a* city council, *city-parish council,* or town council or any alderman or any constable.
- (3) *Any member of a board or commission established by the state of Louisiana or any instrumentality or political subdivision thereof* unless authorized by law enacted by two-thirds of the elected members of each house.

\* \* \* \* \*

(B) The provisions of Paragraph (A) shall not apply to any person who is serving on January 1, 1997, in any elected or appointed position set forth in Paragraph (A) and who is also a member on January 1, 1997 of a retirement system covering that position.

\* \* \* \* \*

(D) *This Section shall become effective on January 1, 1997.*

See La. Const., Art. 10, § 29.1 (A), (B), & (D) [Article 10, § 29.1 of the Louisiana Constitution of 1974 became effective on January 1, 1997, more than three (3) years before the ordinance creating CPERS was first passed or adopted by the Commission on March 23, 2000. See La. Const., Art. 10, § 29.1(D); Caddo Parish Commission Ordinance 3762 of 2000 (effective 3/23/2000); Caddo Parish, Louisiana - - Code of Ordinances, Part II (“Code of Ordinances”), §§ 2-52 through 2-57 (1/28/2015).

Furthermore, at all times relevant and material hereto, the statutory law of Louisiana which applies to and governs public retirement systems, funds, and plans generally has recognized, declared, and established that the Commissioners are, at most, part-time employees of the Parish, and, as such, persons who are specifically precluded from eligibility for, membership in, and the receipt of any pension and retirement benefits by, from, or through any system, fund, or plan sponsored by the Parish. Indeed, La. R.S. 11:164 provides, in pertinent part:

**§164. Part-time public officials.**

A. Except as provided in Subsection B of this Section, *the following elected or appointed officials are hereby deemed to be part-time public servants who, based on such part-time service, shall not participate in, or receive credit for service in, any public retirement system, fund, or plan sponsored by the state of Louisiana or any instrumentality or political subdivision thereof:*

- (1) Any legislator or *any member of a* school board, levee board, *police jury, or parish council.*
- (2) *Any member of a* city council, *city-parish council*, or town council or any alderman or any constable.
- (3) *Any member of a* board or *commission established by the state of Louisiana or any instrumentality or political subdivision thereof.*

B. The provisions of Subsection A of this Section shall not apply to any person who is serving on January 1, 1997, in any elected or appointed position set forth in Subsection A of this Section and who is also a member on January 1, 1997, of a retirement system covering that position.” (emphasis added)

See La. R.S. 11:164(A) & (B) (effective January 1, 1997). [La. R.S. 11:164(A) & (B) became effective on January 1, 1997, more than three (3) years before the ordinance creating CPERS was first passed or adopted by the Commission on March 23, 2000. See 1996 La. Acts, 1<sup>st</sup> Ex. Sess., No. 59, § 1 (effective January 1, 1997); La. R.S. 11:164 (A) & (B); Caddo Parish Commission Ordinance Number 3762 of 2000 (effective 3/23/2000); Caddo Parish, Louisiana - - Code of Ordinances, Part II (“Code of Ordinances”), §§ 2-52 through 2-57 (1/28/2015).

In addition, at all times relevant and material hereto, the statutory law of Louisiana which specifically applies to and governs the Parochial Employees Retirement System of Louisiana (“PERS”) and which specifically applies to, authorizes the creation of, and governs CPERS recognizes, declares, and establishes that the Commissioners are, at most part-time employees of

the parish and, as such, are not eligible to participate in, become members of, or receive any pension or benefits from the State or the Parish by or through PERS or CPERS.

11.

The statutory law of Louisiana which specifically applies to, authorizes the creation of, and governs PERS establishes that it only applies to, covers, and provides for payment of pension and retirement benefits to *persons who are employed by a parish on a permanent or full-time basis*, and expressly declares that *any person who is ineligible for membership in a publicly funded retirement system or plan covered by his employment because of his failure to meet requirements or qualifications (i.e., because, among other things, he is a part-time employee) is not eligible to participate in or become a member of PERS*. See La. R.S. 11:1902(12)(a) (“‘Employee’ means *any person who is employed as a permanent employee of a parish who works at least twenty-eight hours a week* and whose compensation is paid wholly or partly by said parish.”); La. R.S. 11:1921(A) (“The membership of this system shall be composed of all employees not specifically excluded by the provisions of this Part, as follows: . . . .”); La. R.S. 11:1922(G) (“Any person who is ineligible for membership in the publicly funded retirement system covered by his employment because of his failure to meet requirements or qualifications shall not be eligible for membership in this system.”); La. Const., Art. 10, § 29.1(A); La. R.S. 11:164(A).

12.

And the statutory law of Louisiana which specifically applies to, authorizes the creation of, and governs CPERS recognizes, declares, and establishes that the Commissioners, as part-time employees of the Parish, have never been and are not now eligible to participate in, become members of, or receive any pension or retirement benefits from the parish by or through CPERS. La. R.S. 11:1921(A)(6)(b)(1) declares, in pertinent part:

***“Each unclassified employee of Caddo Parish Louisiana who is otherwise eligible for membership in this system, whose initial date of employment is on or after August 15, 1999, shall be eligible to irrevocably elect not to be a member of this system provided such election is made either within sixty days commencing from the employee’s initial date of employment or from the earliest date on which he becomes eligible for participation in any retirement plan sponsored by Caddo Parish.”*** (emphasis added)

Although the Commissioners may be unclassified employees of the Parish, the Commissioners are not now and have never been permanent or full-time employees of the Parish. As shown



above, Commissioners are and have always been part-time employees of the Parish. Consequently, none of the Commissioners are or have ever been “otherwise eligible for membership in [PERS],” or, accordingly, eligible for membership in CPERS. See La. R.S. 11:1921(A)(6)(b)(1).

13.

In addition, at all times relevant and material hereto, the Home Rule Charter of Caddo Parish, Louisiana, has recognized that the Commissioners are, at most, part-time employees of the Parish, and has specifically precluded the Commissioners from receiving any compensation, remuneration, or benefits whatsoever other than their salaries. Indeed, Section 3.05 of the Home Rule Charter of Caddo Parish, Louisiana, provides as follows:

**“Sec. 3-05. - - Compensation.**

**A. *The salary of a commissioner shall be established in accordance with this Charter.*** The president of the commission shall receive an additional one hundred dollars (\$100.00) per month, unless and until changed in accordance with this Charter.

**B.** The parish commission may periodically review the compensation paid the commissioners and may change same by ordinance which must be approved by a two-thirds vote of the entire membership of the commission, provided that no ordinance changing such salary shall be passed during the last year of a term and further provided that a salary change shall not become effective during the current term of the parish commissioners adopting the ordinance.

**C.** Compensation for mileage for road inspection or travel to and from the courthouse or any similar purpose will not be paid.

**D. *No commissioner shall receive any additional compensation, benefit or privilege, direct or indirect, because of his office.***

See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05 (“Compensation”) (1/28/2015).

14.

Consequently, the ordinances which create or establish CPERS and which purport to recognize, declare, and establish that the Commissioners are unclassified employees who are eligible to participate in, become members of, and receive pension and retirement benefits from the Parish by, from, or through CPERS are directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and are therefore null, void, and wholly improper, invalid, and illegal. Similarly, the Parish’s, Commission’s, Commissioners’, Administrator’s, and Director of Finance’s actions in recognizing, accepting, and acknowledging

the Commissioners' eligibility for, membership in, and rights to receive pension and retirement benefits by, from, or through CPERS, and the Parish's, Commission's, Commissioners', Administrator's, and Director of Finance's actions in authorizing, approving, and paying pension and retirement benefits to the Commissioners and/or receiving pension and retirement benefits from the Parish by, from, or through CPERS are directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and are therefore null, void, and wholly improper, invalid, and illegal.

15.

Consequently, none of the Commissioners have been or are entitled to participate in, become members of, or receive any pension or retirement benefits by, from, or through CPERS under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. The pension and retirement benefits constitute "additional compensation, benefit[s] or privilege[s], direct or indirect" which the Commissioners are specifically prohibited from receiving by the Home Rule Charter of Caddo Parish, Louisiana. See Caddo Parish, Louisiana- - Code of Ordinances, Part I ("Charter"), Section 3-05(D) (1/28/2015).

16.

Furthermore, Section 6-06(A) of the Home Rule Charter of Caddo Parish, Louisiana, declares, in pertinent part:

***"Any authorization of payment or incurring of obligation in violation of the provisions of this Charter shall be void and any payment so made illegal;. . . . Such persons shall also be liable to the parish government for any amount so paid."***

Accordingly, each of the Commissioners, the Parish Administrator, and the Director of Finance are obligated to reimburse, restore, return, and/or pay all of the pension and retirement benefits which each of the Commissioners has received by, from, or through CPERS to CPERS or the Parish, together with legal interest on all of those pension and retirement benefits since the date or dates on which those pension and retirement benefits were credited or paid to, for, or on behalf of each of the Commissioners until the date or dates on which those pension and retirement benefits are paid or returned to CPERS or the Parish by the Commissioners, the Administrator, and the Director of Finance.

17.

In 2012 and 2013, the Commission passed or adopted Section 2-30 of the Code of Ordinances. Section 2-30 of the Code of Ordinances declares, in pertinent part:

**“Sec. 2-30. - Commission insurance participation.**

Commissioners and their dependents are eligible to participate in the group medical benefits and life insurance plans offered by the parish to its classified and appointed employees on the same terms and conditions as afforded to said employees.”

See Caddo Parish Commission Ordinance Number 5237 (10/4/2012); Caddo Parish Commission Ordinance Number 5333 (8/22/2013); Caddo Parish, Louisiana- - Code of Ordinances, Part II (“Code of Ordinances”), Section 2-30 (1/28/2015).

18.

At all times relevant and material hereto, the Home Rule Charter of Caddo Parish, Louisiana, has recognized that the Commissioners are, at most, part-time employees of the Parish, and has specifically prohibited the Commissioners from receiving any compensation, remuneration, or benefits whatsoever other than their salaries. See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05(D) (1/28/2015). (“D. *No commissioner shall receive any additional compensation, benefit or privilege, direct or indirect, because of his office.*”).

19.

Consequently, Section 2-30 of the Code of Ordinances, which declares that the Commissioners and their dependents are “eligible to participate in the group medical benefits and life insurance plans offered by the Parish to its classified and appointed employees,” is directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and is therefore null, void, and wholly improper, invalid, and illegal.

Similarly, the Parish’s, Commission’s, Commissioners’, Administrator’s, and Director of Finance’s actions in recognizing, accepting, and acknowledging the eligibility of the Commissioners and their dependents to participate in the group medical benefits and life insurance plans offered by the Parish to its classified and appointed employees and the Parish’s, Commission’s, Commissioners’, Administrator’s, and Director of Finance’s actions in authorizing, approving, providing, and/or paying for group medical benefits and life insurance

benefits to the Commissioners and their dependents and/or receiving group medical benefits and life insurance benefits from the Parish are directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and are therefore null, void, and wholly improper, invalid, and illegal.

20.

Consequently, none of the Commissioners or their dependents have been or are entitled to participate in or receive any group medical benefits or life insurance benefits from the Parish under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. The group medical benefits and life insurance benefits constitute “additional compensation, benefit[s] or privilege[s], direct or indirect” which the Commissioners are specifically prohibited from receiving by the Home Rule Charter of Caddo Parish, Louisiana. See Caddo Parish, Louisiana - Code of Ordinances, Part I(“Charter”), Section 3-05(D) (1/28/2015).

21.

Furthermore, as noted above, Section 6-06(A) of the Home Rule Charter of Caddo Parish, Louisiana, declares, in pertinent part:

***“Any authorization of payment or incurring of obligation in violation of the provisions of this Charter shall be void and any payment so made illegal;. . . . Such persons shall also be liable to the parish government for any amount so paid.”***

Accordingly, each of the Commissioners, the Parish Administrator, and the Director of Finance are obligated to reimburse, restore, return, and/or pay the cost or value of each of the group medical benefits and life insurance benefits which each of the Commissioners and any of their dependents has received by, from, or through the Parish to the Parish, together with legal interest on all of the amounts due on, for, or in connection with each of those group medical benefits or life insurance benefits from the date or dates on which each of those group medical benefits or life insurance benefits was credited, furnished, provided, or paid to, for, or on behalf of each of the Commissioners or any of their dependents until the date or dates on which those amounts are reimbursed, restored, returned, or paid to the Parish by the Commissioners or their dependents, the Administrator, and the Director of Finance.

22.

Plaintiff is informed and believes and alleges upon information and belief that the Parish,

Commission, Commissioners, Administrator, and Director of Finance have settled upon, adopted, agreed to, and implemented a policy and practice of providing each of the Commissioners with a travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year to reimburse them for travel costs and expenses outside the parish.

23.

At all times relevant and material hereto, the Home Rule Charter of Caddo Parish, Louisiana, has recognized that the Commissioners are, at most, part-time employees of the Parish, and has specifically prohibited the Commissioners from receiving any compensation, remuneration, or benefits whatsoever other than their salaries. See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05(D) (1/28/2015). (“D. ***No commissioner shall receive any additional compensation, benefit or privilege, direct or indirect, because of his office.***”).

24.

At all times relevant and material hereto, the policy and practice of providing each of the Commissioners with a travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year to reimburse them for travel costs and expenses outside the parish which the Parish, Commission, Commissioners, Administrator, and Director of Finance have settled upon, adopted, agreed to, and/or implemented has been and is directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and has been and is therefore null, void, and wholly improper, invalid, and illegal.

Similarly, the Parish’s, Commission’s, Commissioners’, Administrator’s, and Director of Finance’s actions in recognizing, acknowledging, and implementing a travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year for each of the Commissioners to reimburse them for travel costs and expenses outside the parish and the Parish’s, Commission’s, Commissioners’, Administrator’s, and Director of Finance’s actions in authorizing, approving, furnishing, providing, and/or paying a travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year to, for, or on behalf of each of the Commissioners to reimburse them for travel costs and expenses outside the parish have been and are directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and have been and are therefore null, void, and wholly improper, invalid, and illegal.

25.

Consequently, none of the Commissioners has been or is entitled to receive a travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year to reimburse them for travel costs and expenses outside the parish under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. The travel allowance of up to Fifteen Thousand And No./100 Dollars (\$15,000.00) per year for each of the Commissioners to reimburse them for travel costs and expenses outside the parish constitutes “additional compensation, benefit[s] or privilege[s], direct or indirect” which the Commissioners are specifically prohibited from receiving by the Home Rule Charter of Caddo Parish, Louisiana. See Caddo Parish, Louisiana- - Code of Ordinances, Part I(“Charter”), Section 3-05(D) (1/28/2015).

26.

Furthermore, as noted above, Section 6-06(A) of the Home Rule Charter of Caddo Parish, Louisiana, declares, in pertinent part:

*“Any authorization of payment or incurring of obligation in violation of the provisions of this Charter shall be void and any payment so made illegal;. . . Such persons shall also be liable to the parish government for any amount so paid.”*

Accordingly, each of the Commissioners, the Administrator, and the Director of Finance are obligated to reimburse, restore, return, and/or pay the full amounts of each of the travel allowances which the Parish has paid to, for, or on behalf of each of the Commissioners, together with legal interest on each of those amounts from the date or dates on which each of those amounts was credited, furnished, provided, or paid to, for, or on behalf of each of the Commissioners until the date or dates on which those amounts are reimbursed, restored, returned, or paid to the Parish by the Commissioners, the Administrator, and the Director of Finance in full.

27.

In or about 1993, the Commission passed or adopted Section 2-28(c) of the Code of Ordinances. Section 2-28(c) of the Code of Ordinances declares, in pertinent part:

**“Sec. 2-28. - Compensation of commission members.**

\* \* \* \* \*

(c) Each parish commission member's salary shall be increased by the same percentage as any percentage cost of living increase granted to parish employees

on an annual basis.

See Caddo Parish Commission Ordinance Number 3041 (12/8/93); Caddo Parish, Louisiana - - Code of Ordinances, Part II (“Code of Ordinances”), Section 2-28(c) (1/28/2015).

28.

At all times relevant and matter hereto, the Home Rule Charter of Caddo Parish, Louisiana, has specifically set out the manner in which and methods by which the compensation or salaries of the Commissioners can be established, reviewed, and/or changed, and has specifically prohibited the Commissioners from receiving any compensation, remuneration, or benefits, directly or indirectly, other than their salaries. Indeed, Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana, provides, in pertinent part:

**“Sec. 3-05. - Compensation.**

**A. *The salary of a commissioner shall be established in accordance with this Charter.***  
The president of the commission shall receive an additional one hundred dollars (\$100.00) per month, unless and until changed in accordance with this Charter.

**B. *The parish commission may periodically review the compensation paid the commissioners and may change same by ordinance which must be approved by a two-thirds vote of the entire membership of the commission, provided that no ordinance changing such salary shall be passed during the last year of a term and further provided that a salary change shall not become effective during the current term of the parish commissioners adopting the ordinance.***

\* \* \* \* \*

**D. No commissioner shall receive any additional compensation, benefit or privilege, direct or indirect, because of his office.”**

See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05(A), (B), & (D) (1/28/2015).

29.

It is clear from Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana, that while the Commissioners have the authority to periodically review and change their compensation or salary by ordinance, they can only do so by specifically reviewing and evaluating their compensation or salary, and by endorsing and approving any changes to be made in their compensation or salary by a two-thirds vote of the entire membership of the Commission. Furthermore, they are specifically prohibited from reviewing or changing their compensation or salary during the last year of their terms, and are specifically prohibited from making any changes in their compensation or salary which become effective during their current terms in office.

30.

Section 2-28(c) of the Code of Ordinances - - the ordinance which provides that each Commissioner's salary shall be increased by the same percentage as any cost of living increase granted to parish employees on an annual basis - - violates each and every one of those strictures. It authorizes and permits automatic increases in the Commissioners' compensation or salaries - - i.e., increases which are not specifically considered and evaluated by the Commissioners, and increases which are not specifically endorsed and approved by a two-thirds vote of the entire membership of the Commission. It also authorizes, permits, and allows increases in the compensation or salaries of the Commissioners during the last year of their terms, and authorizes, permits, and allows the Commissioners to receive increases in their compensation or salaries prior to the expiration of their current terms, in direct violation of the provisions of Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana.

31.

Consequently, Section 2-28(c) of the Code of Ordinances is directly at odds with Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. It negates, undercuts, and/or circumvents each and every one of the protections against the abuse of the Commissioners' authority to set or establish their own compensation or salaries which are so carefully laid out in Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana, and is therefore null, void, and wholly improper, invalid, and illegal.

32.

Similarly, the Parish's, Commission's, Commissioners', Administrator's, and Director of Finance's actions in recognizing, accepting, and acknowledging the eligibility of the Commissioners to receive the same cost of living increases in their compensation or salaries granted to other parish employees on an annual basis and the Parish's, Commission's, Commissioners', Administrator's, and Director of Finance's actions in authorizing, approving, providing, and/or paying the Commissioners the same cost of living increases in their compensation or salaries granted to other parish employees on an annual basis are directly at odds with the express provisions of the Home Rule Charter of Caddo Parish, Louisiana, and are therefore null, void, and wholly improper, invalid, and illegal.



Consequently, none of the Commissioners have been or are eligible for or have been or are entitled to participate in or receive any cost of living increases in their compensation or salaries from the Parish under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. The award of the same cost of living increases in their compensation or salaries to the Commissioners which are granted to other parish employees, without more, has violated and continues to violate the manner in which and methods by which their compensation or salaries can properly be increased or modified under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. In addition, the award of cost of living increases in their compensation or salaries to the Commissioners in violation of the manner in which and methods by which their compensation or salaries can properly be increased or modified also constitutes the payment of “additional compensation, benefit[s] or privilege[s]” to the Commissioners - - i.e., compensation benefits, and privileges which are specifically prohibited by Section 3-05(D) of the Home Rule Charter of Caddo Parish, Louisiana. See Caddo Parish, Louisiana- - Code of Ordinances, Part I(“Charter”), Section 3-05(D) (1/28/2015).

Moreover, as noted above, Section 6-06(A) of the Home Rule Charter of Caddo Parish, Louisiana, declares, in pertinent part:

***“Any authorization of payment or incurring of obligation in violation of the provisions of this Charter shall be void and any payment so made illegal;. . . . Such persons shall also be liable to the parish government for any amount so paid.”***

Accordingly, each of the Commissioners, the Administrator, and the Director of Finance are obligated to reimburse, restore, return, and/or pay the full amounts of each of the cost of living increases in their compensation or salaries which each of the Commissioners has received from the Parish, together with legal interest on each of those amounts from the date or dates on which those amounts were credited, furnished, provided, or paid to, for, or on behalf of each of the Commissioners until the date or dates on which each of those amounts are reimbursed, restored, returned, or paid to the Parish by the Commissioners, the Administrator, and the Director of Finance.

35.

Finally, in or about 1985, the Commissioners passed or adopted Section 2-27 of the Code of Ordinances. Section 2-27 of the Code of Ordinances provides as follows:

**Sec. 2-27. - Mileage allowance.**

“Except when such reimbursement would conflict with the Charter, each member of the parish commission shall receive the mileage allowance allowed to state-elected officials for travel outside of the parish on parish business.”

See Caddo Parish, Louisiana - - Code of Ordinances, Part II (“Code of Ordinances”), § 2-27 (1/28/20015).

36.

At all times relevant and material hereto, the Home Rule Charter of Caddo Parish, Louisiana, has recognized that the Commissioners are, at most, part-time employees of the Parish, and has specifically prohibited the Commissioners from receiving any compensation, remuneration, or benefits whatsoever other than their salaries. See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05(D) (1/28/2015). (“**No commissioner shall receive any additional compensation, benefit or privilege, direct or indirect, because of his office.**”).

37.

Furthermore, the payment of mileage or a mileage allowance to the Commissioners for road inspection, travel to and from the courthouse, or other travel within the parish on parish business is specifically listed in the Home Rule Charter of Caddo Parish, Louisiana, as one of the types of additional compensation, benefits, or privileges which **will not** be paid to, for, or on behalf of the Commissioners. See Caddo Parish, Louisiana - - Code of Ordinances, Part I (“Charter”), § 3-05(C) (1/28/2015) (“**Compensation for mileage** for road inspection or travel to and from the courthouse or any similar purpose **will not be paid.**”).

38.

Consequently, the declaration in Section 2-27 of the Code of Ordinances that the Commissioners are entitled to “receive the mileage allowance allowed to state-elected officials for travel outside of the parish on parish business” is directly at odds with the provisions of the Home Rule Charter of Caddo Parish, Louisiana, and is therefore null, void, and wholly improper, invalid, and illegal.

39.

Similarly, the Parish's, Commission's, Commissioners', Administrator's, and Director of Finance's actions in recognizing, accepting, and acknowledging that the Commissioners are entitled to receive "the mileage allowance allowed to state-elected officials for travel outside of the parish on parish business" and the Parish's, Commission's, Commissioners', Administrator's, and Director of Finance's actions in authorizing, approving, furnishing, providing, and/or paying the Commissioners the mileage allowance allowed to state-elected officials for travel outside of the parish on parish business have been and are directly at odds with the provisions of the Home Rule Charter of Caddo Parish, Louisiana, and have been and are therefore null, void, and wholly improper, invalid, and illegal.

40.

Consequently, none of the Commissioners has been or is entitled to receive the mileage allowance allowed to state-elected officials for travel outside of the parish on parish business under Section 3-05 of the Home Rule Charter of Caddo Parish, Louisiana. The mileage allowance allowed to state-elected officials for travel outside of the parish on parish business constitutes "additional compensation, benefit[s] or privilege[s]" which the Commissioners are prohibited from receiving by the Home Rule Charter of Caddo Parish, Louisiana. See Caddo Parish, Louisiana- - Code of Ordinances, Part I("Charter"), Section 3-05(D) (1/28/2015).

41.

Furthermore, as noted above, Section 6-06(A) of the Home Rule Charter of Caddo Parish, Louisiana, declares, in pertinent part:

***"Any authorization of payment or incurring of obligation in violation of the provisions of this Charter shall be void and any payment so made illegal;. . . . Such persons shall also be liable to the parish government for any amount so paid."***

Accordingly, each of the Commissioners, the Administrator, and the Director of Finance are obligated to reimburse, restore, return, and/or pay the full amounts of each of the mileage allowances which the Parish has paid to, for, or on behalf of each of the Commissioners for travel outside the parish on parish business, together with legal interest on those amounts from the date or dates on which each of those amounts was credited, furnished, provided, or paid to, for, or on behalf of each of the Commissioners until the date or dates on which each of those

amounts is reimbursed, restored, returned, or paid to the Parish by the Commissioners, the Administrator, and the Director of Finance in full.

WHEREFORE, Elliot B. Stonecipher, plaintiff in the above referenced proceeding, prays, after due proceedings had, that this Court enter a judgment in favor of Elliot B. Stonecipher, plaintiff in the above referenced proceeding, and against Caddo Parish, Louisiana, the Caddo Parish Commission, Caddo Parish Commissioners Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, Kenneth Epperson, Sr., Caddo Parish Administrator Woodrow Wilson, Jr., and Caddo Parish Director of Finance and Human Resources Erica Bryant, defendants in the above referenced proceeding, which:

- (a) recognizes and declares that the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., are now and have always been part-time employees of Caddo Parish, Louisiana, and, accordingly, that none of the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., are now or have ever been eligible to participate in, become members of, or receive any pension or retirement benefits by, from, or through the Caddo Parish Employees Retirement System or Caddo Parish, Louisiana;
- (b) enjoins, restrains, and prohibits the Caddo Parish Administrator, Dr. Woodrow Wilson, Jr., and the Caddo Parish Director of Finance and Human Resources, Erica Bryant, from approving, authorizing, permitting, or allowing the transfer, payment, or provision of any further or additional pension or retirement benefits or credits by, from, or through Caddo Parish Employees Retirement System or Caddo Parish, Louisiana, to any of the Commissioners of Caddo Parish, Louisiana; enjoins, restrains, and prohibits the Caddo Parish Employees Retirement System and Caddo Parish, Louisiana, from transferring, paying, or providing any further or additional pension or retirement benefits or credits to any of the Commissioners of Caddo Parish, Louisiana; and enjoins, restrains, and prohibits any of the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., from accepting, acquiring, or receiving any further or additional pension or retirement benefits or credits from the Caddo Parish Employees Retirement System or Caddo Parish, Louisiana;
- (c) directs each of the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., the

Caddo Parish Administrator, Dr. Woodrow Wilson, Jr., and the Caddo Parish Director of Finance and Human Resources, Erica Bryant, to pay all of the pension and retirement benefits which each of the Commissioners of Caddo Parish, Louisiana, has received by, from, or through Caddo Parish Employees Retirement System and Caddo Parish, Louisiana, since the inception of the Caddo Parish Employees Retirement System to the Caddo Parish Employees Retirement System or Caddo Parish, Louisiana, together with legal interest on all of those pension and retirement benefits since the date or dates on which those pension and retirement benefits were credited or paid to, for, or on behalf of each of the Commissioners of Caddo Parish, Louisiana, until the date or dates on which those pension and retirement benefits are paid or returned to the Caddo Parish Employees Retirement System or Caddo Parish, Louisiana, by the Commissioners of Caddo Parish, Louisiana, the Caddo Parish Administrator, and the Caddo Parish Director of Finance and Human Resources;

- (d) recognizes and declares that all of the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., are now and have always been part-time employees of the Parish, that none of the Commissioners of Caddo Parish, Louisiana, are now or have ever been entitled to receive any compensation, remuneration, or benefits other than their salary proper, and, accordingly, that none of the Commissioners of Caddo Parish, Louisiana are now or have ever been entitled to receive, any of the following compensation, remuneration, or benefits:
  - (i) life and health insurance coverage, subsidies, or benefits from Caddo Parish, Louisiana;
  - (ii) a travel allowance of Fifteen Thousand And No/100 Dollars (\$15,000.00) per year from Caddo Parish, Louisiana;
  - (iii) the same cost of living increases in their compensation or salaries which are granted to other employees of Caddo Parish, Louisiana, on an annual basis; and
  - (iv) the same mileage reimbursement allowed to state-elected officials for travel outside of Caddo Parish, Louisiana, on parish business;
- (e) enjoins, restrains, and prohibits the Caddo Parish Administrator, Dr. Woodrow Wilson, Jr., and the Caddo Parish Director of Finance and Human Resources, Erica Bryant, from approving, authorizing, permitting, or allowing the transfer, payment, or provision of any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements by, from, or through Caddo Parish, Louisiana, to any of the Commissioners of Caddo Parish, Louisiana; enjoins, restrains, and prohibits Caddo Parish, Louisiana, from transferring, paying, or providing any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements to any of the Commissioners of Caddo Parish, Louisiana; and enjoins, restrains, and prohibits any of the Commissioners of Caddo Parish, Louisiana, from accepting, acquiring, or receiving any further or additional life and health insurance coverage, subsidies, or benefits, travel allowances, cost of living increases in wages or salaries, and mileage reimbursements by, from, or through Caddo Parish, Louisiana; and

- (f) directs each of the Commissioners of Caddo Parish, Louisiana, Douglas Dominick, Lyndon B. Johnson, Michael Williams, Matthew Linn, Jerald Bowman, Lindora Baker, Stormy Gage-Watts, John Escude, Michael, Thibodeaux, David Cox, Jim Smith, and Kenneth Epperson, Sr., the Caddo Parish Administrator, Dr. Woodrow Wilson, Jr., and the Caddo Parish Director of Finance and Human Resources, Erica Bryant, to reimburse, restore, return, and/or pay all of the compensation, remuneration, and benefits which each of the Commissioners Caddo Parish, Louisiana, has received over and above their salaries proper by, from, or through the Caddo Parish, Louisiana, including, but not limited to, all of the compensation, remuneration, and benefits which each of the Commissioners of Caddo Parish, Louisiana, has received in the form of:
- (i) life and health insurance coverage, subsidies, or benefits from Caddo Parish, Louisiana;
  - (ii) travel allowances of up to Fifteen Thousand And No/100 Dollars (\$15,000.00) per year from Caddo Parish, Louisiana;
  - (iii) cost of living increases in their compensation or salaries equal to the cost of living increases in wages or salaries which are granted to the other employees of Caddo Parish, Louisiana, on an annual basis; and
  - (iv) mileage reimbursements equal to the mileage reimbursements allowed to state-elected officials for travel outside of Caddo Parish, Louisiana, on parish business,

together with legal interest on each of those items of compensation, remuneration, or benefits from the date or dates on which each of those items of compensation, remuneration, or benefits were furnished, provided, or paid to, for, or on behalf of each of the Commissioners of Caddo Parish, Louisiana, to and through the date or dates on which each of those items of compensation, remuneration, or benefits are paid or returned to Caddo Parish, Louisiana, by the Commissioners of Caddo Parish, Louisiana, the Caddo Parish Administrator, and the Caddo Parish Director of Finance and Human Resources.

Elliot B. Stonecipher, plaintiff in the above referenced proceeding, further prays for full general and equitable relief and for all orders and decrees which are necessary or proper in the premises.

THE PESNELL LAW FIRM  
(A Professional Law Corporation)

By: \_\_\_\_\_

Billy R. Pesnell  
Louisiana Bar Roll #10533  
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Louisiana Bar Roll #15035  
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-- ATTORNEYS FOR PLAINTIFF, ELLIOTT B.  
STONECIPHER.

PLEASE SERVE:

Caddo Parish, Louisiana,  
through its designated agent  
for service of process:

Dr. Woodrow Wilson, Jr.  
Administrator And Chief Executive  
Officer of Caddo Parish, Louisiana  
505 Travis Street, Suite 800  
Shreveport, Louisiana 71101

The Caddo Parish Commission, through its  
President, member, and duly authorized  
agent and attorney-in-fact:

Lyndon B. Johnson  
President and Commissioner  
Caddo Parish Commission  
505 Travis Street, Suite 800  
Shreveport, Louisiana 71101

Douglas Dominick  
Caddo Parish Commissioner  
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Lyndon B. Johnson  
Caddo Parish Commissioner  
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Michael Williams  
Caddo Parish Commissioner  
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Matthew Linn  
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District 4

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Lindora Baker  
Caddo Parish Commissioner  
District 6  
Caddo Parish Commission  
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Stormy Gage-Watts  
Caddo Parish Commissioner  
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Caddo Parish Commission  
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John Escude  
Caddo Parish Commissioner  
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Jim Smith  
Caddo Parish Commissioner  
District 11  
Caddo Parish Commission  
505 Travis Street, Suite 800  
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Kenneth Epperson Sr.  
Caddo Parish Commissioner  
District 12  
Caddo Parish Commission  
505 Travis Street, Suite 800  
Shreveport, Louisiana 71101

Dr. Woodrow Wilson, Jr.  
Caddo Parish Administrator  
505 Travis Street, Suite 800  
Shreveport, Louisiana 71101; and

Erica Bryant  
Director of Finance and Human  
Resources for Caddo Parish, Louisiana  
505 Travis Street, Suite 840  
Shreveport, Louisiana 71101.

The Honorable James D. "Buddy" Caldwell  
Attorney General, State of Louisiana  
Civil Division  
Office of the Attorney General  
1885 North 3<sup>rd</sup> Street, Sixth Floor  
Baton Rouge, Louisiana 70802

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing "Petition For Declaratory And Injunctive Relief" has this date been served on all counsel of record and all parties not represented by counsel by depositing same in the United States mail, postage prepaid and properly addressed.

Shreveport, Louisiana, this \_\_\_\_ day of March, 2015.

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Of Counsel