

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

ABRAHAM WILLIAMS, ET AL

Plaintiffs,

v.

ST. TAMMANY PARISH; ET AL

Defendants,

§
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§

§ CIVIL ACTION NO. 2:24-cv-02877-WBV-EJD

SECOND AMENDED COMPLAINT

NOW INTO COURT, through undersigned counsel, come the Plaintiffs, (“Plaintiffs”), Abraham Williams and Lorraine Williams, who, pursuant to Fed. R. Civ. P. 15, file this Second Amended Complaint and, pursuant to Fed. R. Civ. P. 65, Plaintiffs seek declarative and injunctive relief and, pursuant to 42 U.S.C. § 1988, the Plaintiffs seek attorney fees, and Plaintiffs also seek damages and court costs, at the Defendants’ costs, for the following reasons:

JURISDICTION

1.

This is a civil rights action seeking damages and injunctive relief against the Defendants for committing acts which deprived Plaintiffs of their rights under U.S. Const. art. IV, § 2, cl. 1; U.S. Const. *amend* I; U.S. Const. *amend* IV; U.S. Const. *amend* V; U.S. Const. Amend XIV; La. Const. *art.* I, § II; La. Const. *art.* I, § IV; La. Const. *art.* I, § V; La. Const. *art.* I, § VII *et seq.*; La. Const. *art.* IV § IX; and 42 U.S.C. § 1983. Therefore jurisdiction is proper under 28 U.S.C. § 1331, and 42 U.S.C. § 1983. Plaintiffs also invoke the supplemental jurisdiction of this Honorable Court under 28 U.S.C. § 1367(a) over Plaintiffs’ state law claims pursuant to La. Civ. C. *art.* 2315, *et seq.*

VENUE

2.

Venue is proper pursuant to 28 U.S.C. § 1391 because at least one Defendant resides within this judicial district and a substantial part of the events giving rise to these claims occurred therein.

THE PARTIES

3.

At all times relevant hereto, Plaintiff, Abraham Williams, is a person of full age and majority who is a resident of the Parish of St. Tammany.

4.

At all times relevant hereto, Plaintiff, Lorraine Williams, is a person of full age and majority who is a resident of the Parish of St. Tammany.

5.

At all times relevant hereto, Defendant, St. Tammany Parish Government, (“STPG”), is a political subdivision of the State of Louisiana and municipal corporation which is directly responsible for the acts complained of herein, as well as the enactment of the challenged ordinance, (“Ordinance 7530”), because Ordinance 7530 is the official policy of STPG and is enforced by its other agencies.

6.

At all times relevant hereto, Defendant, Mike Cooper, (“Defendant Cooper”), is hereby sued in his individual capacity and in his official capacity as Parish President of STPG. Defendant Cooper is charged with adopting and enforcing Ordinance 7530.

FACTS

7.

Plaintiffs own several rental properties in the Parish of St. Tammany, including the following: 60207 Hwy. 434, Lacombe, LA 70445; 61028 Shady Pine Road, Lacombe, LA 70445; 60440 Hwy. 434, Lacombe, LA 70445 ; and 61111 Lohman Road, Lacombe, LA 70445. Plaintiffs' above listed rental properties are hereinafter sometimes referred to as "said properties."

8.

To date each of Plaintiffs' said properties' resident population exceeds fifteen percent (15%) of registered sex offenders.

9.

Concerning Plaintiffs' said properties, on or about November 27, 2024 Plaintiff Abraham Williams received a letter from Ross P. Liner, (Director, Planning & Development for STPG), which stated that ". . . beginning January 1, 2025, the facility at the addresses listed above will be required to have a Transitional Facility Permit . . . Failure to obtain a valid permit by January 1, 2024 will result in enforcement proceedings by St. Tammany Parish Government." (*See* Exhibit "A")

10.

Attached to said letter was a copy of Ordinance 7530, which reads as follows:

* * *

ORDINANCE TO AMEND THE CODE OF ORDINANCES OF ST. TAMMANY PARISH, LOUISIANA, PART I, CHAPTER 28 – OFFENSES AND MISCELLANEOUS PROCEDURES, BY ADDING ARTICLE XVII. TRANSITIONAL FACILITY, SECTIONS 28-497; DEFINITIONS, SEC. 28-498; APPLICATION REQUIREMENTS AND PERMIT APPROVAL, AND SEC. 28-499; PERMIT DENIAL TO ESTABLISH A COMPREHENSIVE ORDINANCE REGARDING TRANSITIONAL FACILITIES.

* * *

WHEREAS, there is a concentration of sex offenders, sexually violent predators, and child predators residing within St. Tammany Parish, the following parish wide regulations pertaining to transitional housing will further the governmental interests of public safety. THE PARISH OF ST. TAMMANY HEREBY ORDAINS that, the Code of Ordinances of St. Tammany Parish . . . is hereby amended . . . as follows:

ARTICLE XVII: Transitional Facility

Sec. 28-497. Definitions.

* * *

Any residential or commercial use, apartment building, apartment hotel, dwelling, or residence, as defined by Sec. 130-5, with such registered sex offenders as residents **is hereby considered a “transitional facility” when its resident population is equal to or exceeds fifteen percent (15%)** of registered sex offenders.

* * *

Operator means the owner, operator, agent, representative, and/or approved applicant who owns or operates a transitional facility and must comply with the requirements of this article.

Sec. 28-498. Application Requirements and Permit Approval

(a) In order to operate a transitional facility, an operator of such facility shall make an immediate application for a permit to operate the facility.

* * *

(c) **A site and floor plan that depicts a scaled diagram** of the transitional facility shall be submitted with the transitional facility permit application that includes the number of occupants therein.

(d) Thirty days prior to applying for a transitional facility permit, the operator **shall . . . (2) place a sign in the front yard, readable from street view, alerting the public that a permit for a transitional facility will be sought.**

(e) The transitional facility **shall be available at all times for inspection** of the premises by the Department of Planning and Development and the Department of Permits and Inspections . . .

(f) The owner shall retain and maintain general liability insurance in the amount of \$1,000,000 . . .

(g) The required permit fee shall be \$5000 annually . . .

(h) Transitional facilities . . . shall be surrounded by a privacy fence of no less than six feet (6').

(i) Each transitional facility shall have a person supervising the facility ("supervisor"), who is not a registered sex offender, who shall be on the premises twenty-four (24) hours, seven (7) days per week, to make face-to-face contact with each resident on a daily basis . . .

(j) The operator of a transitional facility shall immediately report to the St. Tammany Parish Sheriff's Office any suspected criminal acts perpetrated by any of the occupants of the transitional facility . . . Failure to report such criminal acts immediately is grounds for immediate revocation of the permit to operate such facility.

* * *

(m) Failure to follow any requirement herein is grounds for immediate revocation of the permit to operate such facility or denial of a permit for said facility. (Emphasis Added)

* * *

(See Exhibit "B")

11.

A copy of the Application for the Transitional Facility Permit, ("Permit"), is attached to Plaintiffs' Second Amended Complaint as Exhibit "C".

12.

Plaintiffs hereby state that Ordinance 7530 and said letter from Ross P. Liner evidence that Plaintiffs' said properties are each "considered a 'transitional facility'" since each said property's "resident population is equal to or exceeds fifteen percent (15%) of registered sex offenders."

13.

Plaintiffs hereby state that pursuant to Ordinance 7530 the Plaintiffs are considered “operators” of each “transitional facility” that is owned by the Plaintiffs.

14.

Regarding Ordinance 7530, the Plaintiffs hereby state that they do not ever intend to apply for a Permit nor do they intend to comply with the pre-Permit requirements and the Plaintiffs further state that they will continue to operate their “transitional facilities” to sex offenders, without obtaining a Permit or completing the steps required to qualify for a Permit.

15.

The Plaintiffs hereby state that their above stated continuing intent to not comply with Ordinance 7530 is proscribed by law and the Plaintiffs realize, pursuant to said letter from Ross P. Liner, that the threat of government prosecution, for the Plaintiffs continuing non-compliance with Ordinance 7530, is substantial. See *Susan B. Anthony List v. Driehaus*, 573 U.S. 149 (2014).

16.

The unconstitutionality of Ordinance 7530, as it directly and personally relates to the Plaintiffs, is explained below as follows:

ORDINANCE 7530 IS SUBJECT TO INTERMEDIATE SCRUTINY PURSUANT TO ITS VIOLATION OF THE PLAINTIFFS’ FIRST AMENDMENT COMMERCIAL SPEECH RIGHTS AND ORDINANCE 7530 IS NOT REASONABLE PROPORTIONED AND UNABLE TO PASS THE DIRECT ADVANCEMENT TEST

17.

U.S. Const. *amend* I states in part that “Congress shall make no law . . . abridging the freedom of speech . . . or the right of the people . . . to petition the Government for a redress of grievances.”

18.

Commercial speech is “usually defined as speech that does no more than propose a commercial transaction.” *United States v. United Foods, Inc.*, 533 U.S. 405, 409 (2001) (citation omitted).

19.

“The First Amendment, as applied to the States through the Fourteenth Amendment, protects commercial speech from unwarranted governmental regulation.” *Central Hudson Gas & Elec. v. Public Svc. Comm’n*, 447 U.S. 557, 561 (1980) (citations omitted).

20.

It is well settled that commercial speech is subject to intermediate scrutiny. *Craig v. Boren*, 429 U.S. 190 (1976).

21.

Pursuant to U.S. Const. *amend.* I, an ordinance restricting commercial speech is constitutional when 1) government has a “substantial interest” in it, 2) it “advances these interests in a direct and material way,” (*i.e.*, the “direct advancement test”), and 3) “the extent of the restriction on protected speech is in reasonable proportion to the interests served.” *Edenfield v. Fane*, 507 U.S. 761, 767 (1993) (citations omitted).

22.

Ordinance 7530 was enacted with the governmental interest of preventing sex offenders from committing “crimes against victims who are minors.” (*See* Exhibit “B”).

23.

However Ordinance 7530 is not “reasonably proportioned” and does not pass the “direct advancement test”, resulting in Ordinance 7530 being fatally under inclusive, because its statutory reach **does extend** to the Plaintiffs, as landlords who rent to persons convicted of **sexual** “crimes against victims who are minors”, but Ordinance 7530 **does not extend** to landlords who rent to persons convicted of **non-sexual** “crimes against victims who are minors.”

**ORDINANCE 7530 VIOLATES PLAINTIFFS’ CONSTITUTIONAL
RIGHTS AGAINST INVASIONS OF PRIVACY**

24.

U.S. Const. *amend.* IV states that “The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated . . .”

25.

It is axiomatic that property owners, such as the Plaintiffs, have a reasonable expectation of privacy, concerning their property being searched, and thus a warrantless search is “*per se* unreasonable under the Fourth Amendment.” *Arizona v. Gant*, 556 U.S. 332, 338 (2009) (citations omitted)

26.

La. Const. *art.* I § 5 guarantee a person’s right to be secure in their home “against unreasonable searches, seizures, or invasions of privacy” and also ensure that a warrant shall not be issued without probable cause.

27.

The Supreme Court has held that “[t]he right to exclude is one of the most treasured rights of property ownership.” *Cedar Point Nursery v. Hassid*, 141 S. Ct. 2063, 2072 (2021).

28.

Pursuant to U.S. Const. *amend.* XIV, U.S. Const. *amend.* IV is applicable to the states and municipalities. *Mapp v. Ohio*, 367 U.S. 643, 655 (1961).

29.

Ordinance 7530 states that “(e) The transitional facility shall be available at all times for inspection of the premises.” (*See* Exhibit “B”).

30.

Ordinance 7530 further states that “(i) Each transitional facility shall have a . . . (‘supervisor’), who shall be on the premises twenty-four (24) hours, seven (7) days per week.” (*See* Exhibit “B”).

31.

Thus Ordinance 7530 intends for said “supervisor” to be permanently present on Plaintiffs’ property without a warrant or Plaintiffs’ permission.

32.

Ordinance 7530 violates the constitutional rights of property owners, such as the Plaintiffs, by allowing the Defendants to conduct, without probable cause, warrantless and non-permissioned inspections, (*i.e.* searches), upon the Plaintiffs’ said properties, as well as allowing the Defendants to permanently place a “supervisor” on the Plaintiffs’ said properties without a warrant or the Plaintiffs’ permission, in violation of U.S. Const. *amend* IV.

**ORDINANCE 7530 VIOLATES PLAINTIFFS’
CONSTITUTIONAL RIGHTS TO DUE PROCESS**

33.

U.S. Const. *amend V* states that no person shall be “deprived of life, liberty, or property, without due process of law.”

34.

U.S. Const. Amend XIV states that “No State shall . . . deprive any person of life, liberty, or property, without due process of law.”

35.

Thus the Due Process Clause of U.S. Const. Amend V applies to the States through U.S. Const. Amend XIV.

36.

Additionally, La. Const. *art. I*, § II says that “No person shall be deprived of life, liberty, or property, except by due process of law.”

37.

The Due Process Clause requires notice and an opportunity to be heard before an unbiased magistrate.

38.

Ordinance 7530 states that “(m) **Failure to follow any requirement herein is grounds for immediate revocation of the permit to operate such facility or denial of a permit for said facility.**” (Emphasis Added) (*See* Exhibit “B”)

39.

Ordinance 7530 does not provide due process procedures for the Plaintiffs, prior to governmental prosecution for Plaintiffs' continuing refusal to obtain Permit or completing the steps required to qualify for a Permit.

40.

Thus Ordinance 7530, as it pertains to the Plaintiffs, is clearly unconstitutional because of its absence of procedural due process requirements, in violation of the Due Process Clause.

ORDINANCE 7530 VIOLATES THE TAKINGS CLAUSE

41.

The Takings Clause of U.S. Const. *amend* V, applicable to the states through U.S. Const. *amend* XIV, provides that “nor shall private property be taken for public use, without just compensation.”

42.

The virtually unconstrained power of the government to nonconsensually take a citizen's private property is balanced only by the constitutional guarantee that the government must compensate said property owners.

43.

Furthermore, “if regulation goes too far, it will be recognized as a taking for which compensation must be paid.” *Pennsylvania Coal v. Mahon*, 260 U.S. 393 (1922)

44.

STPG has enacted a regulation, (i.e., Ordinance 7530), which unconstitutionally attempts to regulate the ability of property owners, such as the Plaintiffs, to continue renting their property to sex offenders, when the “resident population” is not equal to nor does it “exceed fifteen percent (15%) of registered sex offenders” without first complying with the pre-Permit and Permit requirements of Ordinance 7530. Said governmental violations constitute a taking which entitles the Plaintiffs to just compensation.

45.

Furthermore Ordinance 7530 violates the constitutional rights of property owners, such as the Plaintiffs, by allowing the Defendants to conduct, without probable cause, warrantless and non-permissioned inspections, (*i.e.* searches), upon the Plaintiffs’ said properties, as well as allowing the Defendants to permanently place a “supervisor” on the Plaintiffs’ said properties without a warrant or the Plaintiffs’ permission. Said governmental violations constitute a taking which entitles the Plaintiffs to just compensation.

46.

The Supreme Court has held that “[t]he clearest sort of taking occurs when the government encroaches upon or occupies private land for its own proposed use [E]ven a minimal ‘permanent physical occupation of real property’ requires compensation under the Clause.” *Palazzolo v. Rhode Island*, 533 U.S. 606, 617 (2001) (citations omitted).

47.

Ordinance 7530 does not provide just compensation to the Plaintiffs for the Defendants' violations of the Takings Clause and prior to governmental prosecution of the Plaintiffs their continuing refusal to obtain a Permit or completing the steps required to qualify for a Permit.

ORDINANCE 7530 IS A VIOLATION OF THE STATE'S POLICE POWERS

48.

It is axiomatic that U.S. Const. *amend* X reserves powers not delegated to the federal government to the states or the people.

49.

La. Const. *art.* IV § IX states that “(A) . . . [n]o local government subdivision shall . . . (2) except as provided by law, enact an ordinance governing private or civil relationships. (B) . . . the police power of the state shall never be abridged.”

50.

Thus any local governmental ordinance that violates the rights provided to the Plaintiffs by the Constitutions of the United States and/or Louisiana is unconstitutional and invalid.

51.

La. R. S. 15:540, *et seq.* governs the registration requirements for sex offenders in the State of Louisiana.

52.

A junior sovereign, (i.e., STPG), cannot enact an ordinance which conflicts with the law of a senior sovereign, (i.e., State of Louisiana), as occurs with Ordinance 7530 being more restrictive than the State of Louisiana rental laws for landlords, such as the Plaintiffs, renting their private property to sex offenders.

53.

In the same way that STPG cannot enact an ordinance concerning State of Louisiana licensing practices for attorneys or doctors, it was *ultra vires* for STPG to enact Ordinance 7530.

PLAINTIFFS HAVE ARTICLE III STANDING

54.

A plaintiff, to have standing, must have a “personal stake in the dispute.” *Food & Drug Admin. v. All. for Hippocratic Med.*, 602 U.S. 367, 379 (2024) (quotations omitted)

55.

Thereafter, “a plaintiff must show (i) that he suffered an injury in fact that is concrete, particularized, and actual or imminent; (ii) that the injury was likely caused by the defendant; and (iii) that the injury would likely be redressed by judicial relief.” *TransUnion LLC v. Ramirez*, 594 U.S. 413, 423(2021).

56.

To establish injury in fact, a plaintiff must show “an invasion of a legally protected interest” that is both “concrete and particularized” and “actual or imminent, not conjectural or hypothetical.” *Spokeo, Inc. v. Robins*, 578 U.S. 330, 339 (2016) (citation omitted).

57.

Concerning standing to seek prospective relief, the Plaintiffs must show an “imminent future injury.” *Summers v. Earth Island Institute*, 555 U.S. 488, 495 (2009).

58.

“An allegation of future injury may suffice if the threatened injury is ‘certainly impending,’ or there is a ‘substantial risk’ that the harm will occur.” *Susan B. Anthony List* at 158 (2014) (citations omitted).

59.

Furthermore, “even a small probability of injury is sufficient to create a case or controversy—to take a suit out of the category of the hypothetical—provided of course that the relief sought would, if granted, reduce the probability.” *Massachusetts v. EPA*, supra, 549 U.S. 497, 525 n. 23 (2007).

60.

To argue otherwise means that Article III standing, for a prospective injury, is nonexistent.

61.

There is nothing speculative or conjectural about Ross P. Liner, on behalf of STPG, writing a letter to Plaintiff Abraham Williams which stated that if Plaintiff Abraham Williams’ “[f]ailure to obtain a valid permit by January 1, 2024 will result in enforcement proceedings by St. Tammany Parish Government.” (See Exhibit “A”)

62.

Said letter to Plaintiff Abraham Williams evidences that a “allegation of future injury [to the Plaintiffs by STPG] may suffice if the threatened injury is ‘certainly impending,’ or there is a ‘substantial risk’ that the harm will occur.” *Susan B. Anthony List* at 158 (2014) (citations omitted).

63.

The above described imminent threat of government prosecution by STPG, against the Plaintiffs, has resulted in the Plaintiffs now having a fear of being forced against their will to comply with the unconstitutional requirements of Ordinance 7530, provides the Plaintiffs with Article III standing.

64.

However the Plaintiffs, out of an abundance of caution, again hereby acknowledge that their above stated continuing intent to not comply with Ordinance 7530 is proscribed by law and the Plaintiffs realize, pursuant to said letter from Ross P. Liner, that the threat of government prosecution, for the Plaintiffs non-compliance with Ordinance 7530, is substantial. See *Susan B. Anthony List* at 149 (2014).

65.

In a suit for the violation of a private right, courts have “historically presumed that the plaintiff suffered a de facto injury [if] his personal, legal rights [were] invaded.” *Spokeo* at 343 (2016) (Thomas, J., concurring).

66.

Furthermore, the unconstitutionality of Ordinance 7530, and said letter from Ross P. Liner to Plaintiff Abraham Williams, as previously explained, result in the Plaintiffs having Article III standing since *de facto* finality has occurred, as explained below.

PLAINTIFFS’ CLAIMS ARE RIPE FOR ADJUDICATION

67.

Pursuant to Ordinance 7530, the Plaintiffs constitutional claims, as explained above, are ripe for adjudication because the Plaintiffs have plead sufficient facts to allow this Honorable Court to find that there is *de facto* finality since *de facto* finality occurs when government enacts a regulation, such as the enactment of Ordinance 7530 by STPG. See *Pakdel v. City & Cty. of S.F.*, 594 U.S. 474, 141 S. Ct. 2226 (2021).

68.

The Defendants may argue that de facto finality is irrelevant because they have yet to enforce Ordinance 7530 against the Plaintiffs. However such gamesmanship by the Defendants, of playing “hide-and-seek” with their enforcement of Ordinance 7530, is untenable.

THIS HONORABLE COURT HAS SUBJECT-MATTER JURISDICTION

69.

Pursuant to *Knick v. Township of Scott, Pennsylvania*, 588 U.S. 180 (2019), this Honorable Court has subject-matter jurisdiction to adjudicate the Plaintiffs’ claims against the Defendants concerning the unconstitutionality of Ordinance 7530, as it directly and personally relates to the Plaintiffs for the reasons explained above.

DEFENDANT STPG IS LIABLE

70.

In order to hold a municipality liable, the alleged unconstitutional acts must constitute an “official” policy of the city. *Monell v. New York City Dept. Of Social Services*, 436 U.S. 658 (1978).

71.

Furthermore a municipality may be held liable under 42 USC § 1983 for said municipality’s official acts when said acts are pursuant to a city ordinance. *Id.* at 690-91, 694 (1978).

72.

Thus, “when execution of a government's policy or custom . . . inflicts the injury [then] the government, as an entity, is responsible under [42 USC] § 1983.” *Id.* at 694 (1978).

73.

Ordinance 7530, as it personally relates to the Plaintiffs, evidences STPG’s liability due to: 1) a constitutional violation, 2) caused by an official policy or custom, 3) final policymakers knew of or acquiesced in.

74.

Said letter from Ross P. Liner evidences the liability of STPG to the Plaintiffs.

DEFENDANT COOPER IS LIABLE

75.

Concerning Ordinance 7530 as it relates to the Plaintiffs, Defendant Cooper, as Parish President of STPG, is liable for this “unlawful decision[] represent[ing] the official policy” of STPG. See *ODonnell v. Harris Cnty.*, 892 F.3d 147, 155 (5th Cir. 2018).

76.

The Parish President’s duties are listed in the Code of Ordinances, Article III. Executive Branch, Sec. 3-09 - “Powers and Duties of the President”, (Exhibit “D”), as follows:

* * *

(1) See that all laws, provisions of this Charter and acts of the council, subject to the president's direction and supervision, are faithfully executed.

* * *

(3) Direct and supervise the administration of all departments . . . except as otherwise provided by this Charter.

* * *

(8) . . . shall attend all meetings of the council and keep the council fully advised as to the . . . future needs of the parish government and make such recommendations to the council concerning the affairs of the parish government as deemed desirable.

* * *

77.

The Parish President is not a “rubber stamp” for the St. Tammany Parish Council and thus Defendant Cooper had a duty to: 1) Inform said Council and STPG that Ordinance 7530 is unconstitutional, 2) “Direct and supervise the administration of all departments, offices and agencies of” STPG to not enforce Ordinance 7530 due to its unconstitutionality, and 3) Make recommendations to said Council and STPG to repeal Ordinance 7530 due to its unconstitutionality.

78.

Clearly Defendant Cooper was derelict in these duties and therefore is liable.

DECLARATORY RELIEF

79.

The Defendants have violated the Plaintiffs’ constitutional and civil rights, pursuant to Ordinance 7530, and thus there exists a justiciable controversy as to whether Ordinance 7530 prima facially violates said constitutional rights of the Plaintiffs and a declaratory judgment, by this Honorable Court, will clarify the legal and constitutional rights relationship between Plaintiffs and Defendants and give the Plaintiffs relief from the threat of imminent and particularized concrete harm, by the Defendants, pursuant to Ordinance 7530, giving rise to this controversy.

80.

Thus the Plaintiffs’ constitutional claims are ripe for immediate resolution in federal court.

INJUNCTIVE RELIEF

81.

The requirement of ongoing or imminent harm supports the forward-facing nature of injunctions. 11A Charles Alan Wright, et al, *Federal Practice & Procedure* § 2942, at 47 (3d ed. 2013) (“[I]njunctive relief looks to the future and is designed to deter . . .”).

82.

42 U.S.C. § 1983 grants the Plaintiffs the right to seek injunctive relief, damages and attorney fees for the Defendants' violations of the Plaintiffs constitutional rights, through the Defendants' enactment and enforcement of Ordinance 7530.

83.

Plaintiffs have no other adequate remedy at law to address the deprivation of their constitutional rights by Ordinance 7530 and there is substantial likelihood that Plaintiffs will succeed on the merits of their claims.

84.

Plaintiffs will suffer irreparable harm and injury absent injunctive relief to enjoin the Defendants from enforcing Ordinance 7530 and thus said imminent, particularized and concrete injuries to the Plaintiffs outweigh any harm said injunction might cause the Defendants.

85.

When seeking preliminary injunctive relief it is mandatory that a plaintiff prove "that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).

86.

"When an alleged constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary." 11A Charles Alan Wright, et al, *Federal Practice & Procedure* § 2948.1 (2d ed. 1995).

87.

Ordinance 7530 in conjunction with said letter from Ross P. Liner evidence that Ordinance 7530 violates the Plaintiffs' constitutional rights and that injunctive relief is required.

PRAYER FOR RELIEF

For all the foregoing reasons Plaintiffs respectfully pray and request that, after due proceedings, this Honorable Court find for the Plaintiffs and against the Defendants, at Defendants' costs, and that this Honorable Court further finds and issues the following:

1. A preliminary injunction which enjoins Defendants from enforcing Ordinance 7530 against the Plaintiffs, and
2. A declaratory judgment which declares that Ordinance 7530 is unconstitutional; and
3. Damages for any injuries suffered by Plaintiffs, at Defendants' costs, including punitive damages, and
4. Plaintiffs' reasonable attorney fees, at Defendants' costs, under 42 U.S.C. §1988 and;
5. Plaintiffs' other expenses and costs, at Defendants' costs and such other equitable and additional relief to the Plaintiffs as the interests of justice may require and that this Honorable Court deems proper.

RESPECTFULLY SUBMITTED:

s/ Jim Holt

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Attorney for Plaintiffs



ST. TAMMANY PARISH

MICHAEL B. COOPER
PARISH PRESIDENT

November 26, 2024

Mr. Abraham Williams

[REDACTED]
Lacombe, LA 70445

RE: 60207 Hwy 434, Lacombe, LA 70445
61028 Shady Pine Rd, Lacombe, LA 70445
60440 Hwy 434, Lacombe, LA 70445
61111 Lohman Rd, Lacombe, LA 70445

Dear Mr. Williams:

Please be advised beginning January 1, 2025, the facility at the addresses listed above will be required to have a Transitional Facility Permit. Attached is the ordinance and the requirements to apply for and obtain the Transitional Facility Permit. Failure to obtain a valid permit by January 1, 2025 will result in enforcement proceedings by St. Tammany Parish Government. The permit application can be found at stpgov.org/pdf/Transitional_Facility_Application.pdf or by calling the St. Tammany Parish Government Department of Planning & Development at (985) 898-2529.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross P. Liner".

Ross P. Liner
Director, Planning & Development

Attachment(s) Ordinance Number 24-5406 – Transitional Facility
St. Tammany Parish Transitional Facility Application



ST. TAMMANY PARISH COUNCIL

ORDINANCE

ORDINANCE CALENDAR NO. 7530

ORDINANCE COUNCIL SERIES NO. 24-

COUNCIL SPONSOR: IMPASTATO

PROVIDED BY: CIVIL DA

INTRODUCED BY: MR. IMPASTATO

SECONDED BY: MR. SMITH

ON THE 7TH DAY OF MARCH, 2024

ORDINANCE TO AMEND THE CODE OF ORDINANCES OF ST. TAMMANY PARISH, LOUISIANA, PART I, CHAPTER 28 – OFFENSES AND MISCELLANEOUS PROCEDURES, BY ADDING ARTICLE XVII. TRANSITIONAL FACILITY, SECTIONS 28-497; DEFINITIONS, SEC. 28-498; APPLICATION REQUIREMENTS AND PERMIT APPROVAL, AND SEC. 28-499; PERMIT DENIAL TO ESTABLISH A COMPREHENSIVE ORDINANCE REGARDING TRANSITIONAL FACILITIES.

WHEREAS, it is in the best interests of the parish and its citizens to amend and add the above referenced article and sections to the St. Tammany Parish Code of Ordinances in order to promote the safety, morals and general welfare of the public and to provide the public with a comprehensive ordinance regarding transitional facilities; and

WHEREAS, Louisiana Revised Statutes 15:540 and the St. Tammany Parish Code of Ordinances, Part I, Chapter 28 – Offenses and Miscellaneous Provisions, Article XV. Registration of Sex Offenders, Section 28-475. Findings; purpose, provide, “The legislature has found that sex offenders, sexually violent predators and child predators often pose a high risk of engaging in sex offenses, and crimes against victims who are minors even after being released from incarceration or commitment and that protection of the public from sex offenders, sexually violent predators and child predators is of paramount governmental interest. The legislature has also found that local law enforcement officers efforts to protect their communities, conduct investigations, and quickly apprehend offenders who commit sex offenses and crimes against victims who are minors, are impaired by the lack of information available to law enforcement agencies about convicted sex offenders, sexually violent predators, and child predators who live within the agency’s jurisdiction, and the penal and mental health components of our justice system are largely hidden from public view and that lack of information from either may result in failure of both systems to meet this paramount concern of public safety. Restrictive confidentiality and liability laws governing the release of information about sex offenders, sexually violent predators, and child predators have reduced willingness to release information that could be appropriately released under the public disclosure laws, and have increased risks to public safety. Persons found to have committed a sex offense or a crime against a victim who is a minor have a reduced expectation of privacy because of the public’s interest in public safety and in the effective operation of government”; and

WHEREAS, there is a concentration of sex offenders, sexually violent predators, and child predators residing within St. Tammany Parish, the following parish wide regulations pertaining to transitional housing will further the governmental interests of public safety.

THE PARISH OF ST. TAMMANY HEREBY ORDAINS that, the Code of Ordinances of St. Tammany Parish, Louisiana, Part I, Chapter 28 – Offenses and Miscellaneous Provisions, is hereby amended by adding a new article and sections to be numbered as follows:



ARTICLE XVII: Transitional Facility

Sec. 28-497. Definitions.

As used in this article, the following words, terms and phrases shall have the meaning ascribed to them in this article, except when the context clearly indicates a different meaning.

Transitional Facility is a facility used to house registered (a) sex offenders, (b) sexually violent predators or (c) child predators, pursuant to La. R.S. 15:540 ("registered sex offender") and which may provide transitional support to registered sex offenders reentering society or providing housing for registered sex offenders in a group setting. Any residential or commercial use, apartment building, apartment hotel, dwelling, or residence, as defined by Sec. 130-5, with such registered sex offenders as residents is hereby considered a "transitional facility" when its resident population is equal to or exceeds fifteen percent (15%) of registered sex offenders. A transitional facility is subject to all of the requirements of Article XVII, the St. Tammany Parish Code of Ordinances, and other applicable state, local and federal laws.

Operator means the owner, operator, agent, representative, and/or approved applicant who owns or operates a transitional facility and must comply with the requirements of this article.

Sec. 28-498. Application Requirements and Permit Approval

- (a) In order to operate a transitional facility, an operator of such facility shall make an immediate application for a permit to operate the facility. It is unlawful to operate a transitional facility without a transitional facility permit. Failure to renew a transitional facility permit prior to its expiration date renders the expired permit immediately invalid.
- (b) More than one transitional facility may be located on the same property, in which case more than one transitional facility permit will be required (one permit for each transitional facility is required).
- (c) A site and floor plan that depicts a scaled diagram of the transitional facility shall be submitted with the transitional facility permit application that includes the number of occupants therein.
- (d) Thirty days prior to applying for a transitional facility permit, the operator shall (1) publish at least three times, in a paper of local circulation in St. Tammany Parish, notice that the operator will apply for a transitional facility permit and (2) place a sign in the front yard, readable from street view, alerting the public that a permit for a transitional facility will be sought.
- (e) The transitional facility shall be available at all times for inspection of the premises by the Department of Planning and Development and the Department of Permits and Inspections. The Department of Planning and Development shall conduct an inspection of the proposed transitional facility prior to the issuance or renewal of any permit for a transitional facility.
- (f) The owner shall retain and maintain general liability insurance in the amount of \$1,000,000, issued by an insurer duly licensed, and furnish a current insurance certificate as proof of insurance to the Department of Planning and Development as a part of the permit application.

- (g) The required permit fee shall be \$5000 annually beginning on or before the 15th day of May 2024 for each transitional facility for the purposes of monitoring and enforcing the provisions of this article. The annual permit fee for each transitional facility shall be included with the transitional facility permit application submission and due to the Parish of St. Tammany on May 1 of each year. An additional penalty of five percent per month shall accrue for each month the renewal permit fee is late, not to exceed 25 percent of the permit fee. In the event an attorney is employed to collect the annual permit fee and/or enforce any provisions of this article, the applicant shall pay a 25 percent attorney fee on the total amount of the permit fee, interest, penalty, and other fines determined to be due.
- (h) Transitional facilities now in existence and/or established in the future shall be surrounded by a privacy fence of no less than six feet (6').
- (i) Each transitional facility shall have a person supervising the facility ("supervisor"), who is not a registered sex offender, who shall be on the premises twenty-four (24) hours, seven (7) days per week, to make face-to-face contact with each resident on a daily basis. The permit application shall contain the name and contact information of the designated supervisor, including phone number with area code and email address. The operator shall provide (1) a sworn affidavit certifying that the proposed supervisor has read and understood all of the minimum standards for transitional facilities as set forth in this article and that the supervisor shall through the duration of the permitting term be in compliance therewith and (2) a notarized copy of a criminal background investigation for the proposed supervisor which is to be conducted by the St. Tammany Parish Sheriff's Office. Operator shall notify the Department of Planning and Development with any changes regarding the supervisor.
- (i) The operator of a transitional facility shall immediately report to the St. Tammany Parish Sheriff's Office any suspected criminal acts perpetrated by any of the occupants of the transitional facility, including, but not limited to, any and all parole or probation violations. Failure to report such criminal acts immediately is grounds for immediate revocation of the permit to operate such facility.
- (k) Any transitional facility in existence at the time of the effective date of this article shall apply for a permit by January 1, 2025.
- (l) Any transitional facility seeking a permit to operate as required herein and above shall be limited to a maximum of one occupant per one thousand square feet, per permit, and per transitional facility.
- (m) Failure to follow any requirement herein is grounds for immediate revocation of the permit to operate such facility or denial of a permit for said facility.

Sec. 28-499. Permit Denial

- (a) The Department of Planning and Development may deny the issuance of a transitional facility permit if it finds any of the following:
 - (1.) The applicant fails to meet the application requirements imposed in this article.
 - (2.) The applicant has made a false, misleading, or fraudulent statement of fact in the permit application, or in any other document required herein.

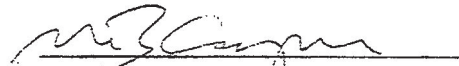
ORDINANCE CALENDAR NO. 7530
ORDINANCE COUNCIL SERIES NO. 24-5406
PAGE 5 OF 5

THIS ORDINANCE WAS DECLARED DULY ADOPTED AT A REGULAR MEETING OF THE PARISH COUNCIL ON THE 4TH DAY OF APRIL, 2024; AND BECOMES ORDINANCE COUNCIL SERIES NO. 24-5406.


ARTHUR LAUGHLIN, COUNCIL CHAIR

ATTEST:


KATRINA L. BUCKLEY, COUNCIL CLERK


MICHAEL B. COOPER, PARISH PRESIDENT
04/12/2024 @ 8:30 am

Published Introduction: FEBRUARY 28, 2024

Published Adoption: April 24, 2024

Delivered to Parish President: April 09, 2024 at 2:00pm

Returned to Council Clerk: April 12, 2024 at 9:25am

(3.) The proposed transitional facility will be conducted in a manner not meeting the health or safety standards established by the ordinances of the parish or laws of the state.

(4.) The applicant has previously had a transitional permit that was suspended or terminated in the last year from the date of the application for a transitional housing permit.

(5.) The proposed transitional housing has an outstanding notice of violation of the St. Tammany Parish Code of Ordinances, in excess of thirty days.

(6.) The applicant has been convicted of any felony or misdemeanor sexual offense in a court of competent jurisdiction within the last ten years.

(7.) The applicant has operated a transitional facility with a suspended, revoked or expired transitional facility permit.

(b) Where the transitional facility permit application is denied, the Department of Planning and Development will issue the applicant, at the address provided in the application, a notice stating the reasons for denial, as well as a refund for the amount received in the transitional permit application, less \$250.00 as non-refundable application fee.

(c) An applicant who is denied the issuance of a transitional facility permit may appeal the decision to the Board of Adjustment within sixty days from the date in which the notice of denial was delivered.

REPEAL: All Ordinances or parts of Ordinances in conflict herewith are hereby repealed.

SEVERABILITY: If any provision of this Ordinance shall be held to be invalid, such invalidity shall not affect other provisions herein which can be given effect without the invalid provision and to this end the provisions of this Ordinance are hereby declared to be severable.

EFFECTIVE DATE: This Ordinance shall become effective fifteen (15) days after adoption.

MOVED FOR ADOPTION BY: MR. IMPASTATO

SECONDED BY: MR. BURKE

WHEREUPON THIS ORDINANCE WAS SUBMITTED TO A VOTE AND RESULTED IN THE FOLLOWING:

YEAS: SMITH, ROLLING, CAZAUBON, SEIDEN, PHILLIPS, TANNER, IMPASTATO, BURKE, COUGLE, O'BRIEN, LAUGHLIN, BINDER, CORBIN, STRICKLAND (14)

NAYS: (0)

ABSTAIN: (0)

ABSENT: (0)



ST. TAMMANY PARISH
MICHAEL B. COOPER
PARISH PRESIDENT

St. Tammany Parish Application for Transitional Facility
Department of Planning and Development

Type of Application: New _____ Renewal _____ (License must be renewed annually) Date: _____

Property Information

Location of Transitional Facility (General Description) and/or municipal address:

Assessor No. (s): _____

Present Zoning Classification: _____ Subdivision: _____

Ward: _____ District: _____ Section: _____ Township: _____ Range: _____

Owner Information:

Type of Ownership: Individual: _____ Corporation _____ Partnership _____ Other (please specify) _____

Owner of Establishment: _____

Cell Phone Number: _____ Email Address: _____

Mailing Address of Transitional Facility Owner: _____

Designated Supervisor:

Full Legal Name: _____ Cell Phone Number: _____

Mailing Address: _____ Email Address: _____

* Each transitional facility shall have a person supervising the facility ("supervisor"), who is not a registered sex offender, who shall be on the premises twenty-four (24) hours, seven (7) days per week, to make face-to-face contact with each resident on a daily basis.



TRANSITIONAL FACILITY PERMIT APPLICATION REQUIREMENTS

1. A recorded Act of Sale or Deed that establishes the proposed operator as the owner of the property in which the transitional facility is located
 - If the Transitional Facility is owned by a corporation, partnership, sole proprietorship or other entity, the proposed operator shall provide: a sworn affidavit executed by the respective entity authorizing the operator to apply for the transitional permit in the name of the establishment as required by Sec. 22-591(b)(1), as well as the name, date, and state under which laws such entity was organized, and if a foreign (out of state) entity, whether such is authorized to do business in the State of Louisiana, the name under which the entity may be doing business, and the name of the principal officer (s) or whoever controls the entity, registered agent and local representative or partners, and their business address.
2. The permit application shall contain the name and contact information of the designated supervisor, including phone number with area code and email address. The operator shall provide:
 - a sworn affidavit certifying that the proposed supervisor has read and understood all of the minimum standards for transitional facilities as set forth in this article and that the supervisor shall through the duration of the permitting term be in compliance therewith and
 - a notarized copy of a criminal background investigation for the proposed supervisor which is to be conducted by the St. Tammany Parish Sheriff's Office. Operator shall notify the Department of Planning and Development with any changes regarding the supervisor.
3. More than one transitional facility may be located on the same property, in which case more than one transitional facility permit will be required (one permit for each transitional facility is required).
4. A site and floor plan that depicts a scaled diagram of the transitional facility shall be submitted with the transitional facility permit application that includes the number of occupants therein.
5. Survey of property.
6. A plot plan shall be submitted with the application. The plot plan must be drawn to scale include the following:
 - The location of all proposed and existing structures on the property and set back lines.
 - The exact placement of the required privacy fence (Must include existing fence or proposed fence height)
7. Thirty days prior to applying for a transitional facility permit, the operator shall (1) publish at least three times, in a paper of local circulation in St. Tammany Parish, notice that the operator will apply for a transitional facility permit and (2) place a sign in the front yard, readable from street view, alerting the public that a permit for a transitional facility will be sought.
8. The Departments of Planning & Development and/or Permits & Inspections shall conduct an inspection of the proposed transitional facility prior to the issuance or renewal of any permit for a transitional facility.
9. Any transitional facility in existence at the time of the effective date of this article shall apply for a permit by January 1, 2025.

Transitional Facility Information:

Number of Rooms: _____ **Proposed maximum number of occupants permitted:** ____

Date of proposed commencement of operation: _____

*When the transitional facility permit application is approved, the Department of Planning & Development will issue to the operator at the address provided in the application a permit approval notice that includes a transitional facility permit number, an expiration date for the transitional facility permit, and the maximum number of occupants allowed in the transitional facility, as determined by the Fire Marshal and the Department of Planning & Development. This approval notice must be displayed within the transitional facility in a conspicuous location at all times so as to be easily accessible.

FEE SCHEDULE FOR TRANSITIONAL FACILITY APPLICATIONS

As per St. Tammany Parish Code of Ordinances per Sec. 28-498(g)

Annual Transitional Facility Permit Fee: Five thousand dollars (\$5,000.00)

TRANSITIONAL FACILITY REQUIREMENTS

1. Any transitional facility seeking a permit to operate as required herein and above shall be limited to a maximum of one (1) occupant per one thousand square feet, per permit, and per transitional facility.
2. The transitional facility shall be available at all times for inspection of the premises by the Department of Planning & Development and the Department of Permits & Inspections.
3. The owner shall retain and maintain general liability insurance in the amount of \$1,000,000, issued by an insurer duly licensed, and furnish a current insurance certificate as proof of insurance to the Department of Planning & Development as a part of the permit application.
4. Transitional facilities now in existence and/or established in the future shall be surrounded by a privacy fence of no less than six feet (6').
5. The Transitional Facility shall provide sewage and water service that has been approved and permitted by the Louisiana Department of Environmental Quality (LDEQ) and Louisiana Department of Health (LDH) where necessary and appropriate.
 - If the Transitional Facility is serviced by community sewage and/or water, applicant shall provide Parish with the LDEQ and/or LDH permit numbers for the systems providing service.
 - If the Transitional Facility has its own sewage treatment system, applicant shall provide Parish with a copy of the Louisiana Pollutant Discharge Elimination System (LPDES) permit issued by LDEQ or certification from LDEQ that a permit is not required.
 - If the Transitional Facility has its own water well and provides water to at least 25 individuals at least 60 days out of the year, applicant shall provide the Parish with the Public Water Supply (PWS) identification number issued by the LDH.

TRANSITIONAL FACILITY VIOLATIONS

1. In order to operate a transitional facility, an operator of such facility shall make an immediate application for a permit to operate the facility. It is unlawful to operate a transitional facility without a transitional facility permit. Failure to renew a transitional facility permit prior to its expiration date renders the expired permit immediately invalid.
2. An annual permit fee in the amount of five thousand dollars (\$5,000.00) shall be due beginning on or before the 15th day of May 2024 for each transitional facility for the purposes of monitoring and enforcing the provisions of this article. The annual permit fee for each transitional facility shall be included with the transitional facility permit application submission and due to the Parish of St. Tammany on May 1 of each year. An additional penalty of five percent per month shall accrue for each month the renewal permit fee is late, not to exceed 25 percent of the permit fee. In the event an attorney is employed to collect the annual permit fee and/or enforce any provisions of this article, the applicant shall pay a 25 percent attorney fee on the total amount of the permit fee, interest, penalty, and other fines determined to be due.
3. Failure to follow any requirement herein is grounds for immediate revocation of the permit to operate such facility or denial of a permit for said facility.
4. The operator of a transitional facility shall immediately report to the St. Tammany Parish Sheriff's Office any suspected criminal acts perpetrated by any of the occupants of the transitional facility, including, but not limited to, any and all parole or probation violations. Failure to report such criminal acts immediately is grounds for immediate revocation of the permit to operate such facility.

NOTE: THIS DOCUMENT MUST BE SIGNED IN THE PRESENCE OF A NOTARY PUBLIC.

By my signature below, I certify that all information submitted to the Department of Planning and Development is TRUE and CORRECT and understand that failure to submit TRUE and CORRECT information can result in delay or denial of this application. I further certify that I have read and understand the above important noted relative to the submission of this application and the operation of short-term rentals.

Operator	Date: _____	Designated Supervisor	Date: _____
Name: _____		Name: _____	
Address: _____		Address: _____	
_____		_____	
Cell Phone Number: _____		Cell Phone Number: _____	
Email: _____		Email: _____	
Signature: _____		Signature: _____	

BEFORE ME, the undersigned authority, personally appeared the persons whose signatures are affixed above, all of full age and majority, who declared me, Notary, that they are the owners or duly authorized representatives of all that certain lot, piece, or parcel of land located in this application, that their signatures were executed freely and voluntarily and that they are duly qualified to sign.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20_____

Notary Public

STATE OF LOUISIANA

PARISH OF ST. TAMMANY

AFFIDAVIT

BEFORE ME, the undersigned Notary Public, duly authorized in this Parish and State, personally came and appeared: _____

who after being duly sworn, did depose and state:

- 1) That this affidavit is being made in accordance with St. Tammany Parish Code of Ordinances Sec. 28-498 and Sec. 28-499.
- 2) I am the proposed operator of the Transitional Facility located at _____.
- 3) The designated supervisor for Transitional Facility is:
 Name: _____
 Address: _____
 Telephone Number: _____
 Email Address: _____
- 4) The designated supervisor identified above shall be on the premises twenty-four (24) hours, seven (7) days per week, to make face-to-face contact with each resident on a daily basis.
- 5) I have read and understood all of the minimum standards for transitional facilities as set forth in St. Tammany Parish Code of Ordinances Sec. 28-498 and Sec.28-499.
- 6) I am in compliance with all minimum standards established in St. Tammany Parish Code of Ordinances Sec. 28-498 and Sec.28-499, and shall continue to be in compliance through the duration of the permitting term.

SIGNATURE

PRINTED NAME

THUS SWORN TO AND SUBSCRIBED BEFORE ME, NOTARY PUBLIC, THIS

____ DAY OF _____, 202____, AT _____, LOUISIANA.

NOTARY PUBLIC

Bar or Notary ID No: _____

- A. The president as chief executive officer of the parish government shall have the following powers and duties:
- (1) See that all laws, provisions of this Charter and acts of the council, subject to the president's direction and supervision, are faithfully executed.
 - (2) Appoint and suspend or remove for just cause all parish government employees and appointive administrative officers provided for by or under this Charter, except as otherwise provided by this Charter or other personnel rules adopted pursuant to this Charter. The president may authorize any administrative officer who is subject to the president's direction and supervision to exercise these powers with respect to subordinates in the officer's department, office or agency.
 - (3) Direct and supervise the administration of all departments, offices and agencies of the parish government, except as otherwise provided by this Charter.
 - (4) Prepare and submit the annual operating budget and five year capital improvement budget to the council.
 - (5) Sign contracts for projects, equipment, professional services and materials and supplies specifically identified in the approved operating and capital improvement budgets or as specifically identified by ordinance. Contracts for projects, equipment, professional services or materials and supplies not so identified shall be submitted to the council for approval.
 - (6) Submit to the council and make available to the public, within 90 days after the end of the fiscal year, a complete report on the finances and administrative activities of the parish government as of the end of the fiscal year.
 - (7) Make such other reports as the council may reasonably request to enable the council to conduct its functions.
 - (8) The president shall attend all meetings of the council and keep the council fully advised as to the financial condition and future needs of the parish government and make such recommendations to the council concerning the affairs of the parish government as deemed desirable.
 - (9) Perform such other duties as are specified in this Charter or may be required by the council, not inconsistent with this Charter.



**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

Abraham Williams, et al

Plaintiff

v.

2:24-cv-02877

Civil Action No.

St. Tammany Parish, et al

Defendant

CERTIFICATE OF INTERESTED PERSONS

Pursuant to Local Civil Rule 7.1,

Abraham Williams, Lorraine Williams

provides the following information:

A complete list of all persons, associations of persons, firms, partnerships, corporations, guarantors, insurers, affiliates, parent or subsidiary corporations, or other legal entities that are financially interested in the outcome of the case:

****Please separate names with a comma and do not add address information. Only text visible within box will print.***

Abraham Williams, Lorraine Williams, St. Tammany Parish, Mike Cooper, St. Tammany Parish President

James S. Holt LBR#08416

Attorney Name and Bar Number