

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS  
STATE OF LOUISIANA

NO.: 2023-1381

EILEEN CARTER AND BELDEN BATISTE

DIVISION: CIVIL DISTRICT COURT

2023 FEB 16 AM 9:27

FILED

VERSUS

SANDRA WILSON, IN HER OFFICIAL CAPACITY AS  
REGISTRAR OF VOTERS FOR THE PARISH OF ORLEANS, AND  
R. KYLE ARDOIN, IN HIS CAPACITY AS SECRETARY OF STATE

FILED: \_\_\_\_\_

DEPUTY CLERK

PETITION FOR WRIT OF MANDAMUS

NOW INTO COURT, through undersigned counsel, come Eileen Carter and Belden Batiste, who pursuant to La C.C. art. 3863, request that this Court issue a Writ of Mandamus directing Sandra Wilson, in her official capacity as Orleans Parish Registrar of Voters, and R. Kyle Ardoin, in his official capacity as Secretary of State for the State of Louisiana, to perform the duties required of them pursuant to La. R.S. 18:192, *et seq.* and La. R.S. 18:300.2, *et seq.* Petitioners request an expedited hearing within ten days of the filing of this Petition, as required by La.C.C.P. Art. 3782.<sup>1</sup>

In support of this Petition, Petitioners state the following:

1.

Petitioners are EILEEN CARTER AND BELDEN BATISTE, both natural persons over the age of eighteen, domiciled in the Parish of Orleans, State of Louisiana. Both Petitioners are qualified electors of the Parish of Orleans and have signed the recall petition to be measured against a correct number of qualified electors.

2.

Made Defendant is SANDRA WILSON, a person of the full age and majority, domiciled in the Parish of Orleans. She is the registrar of voters for the Parish of Orleans.

3.

Made Defendant is R. KYLE ARDOIN, a person of the full age and majority, who is the Secretary of State for the State of Louisiana.

<sup>1</sup>A mandamus against a registrar "shall be heard and determined by preference, in term time or in vacation." La.R.S. 18:66(A).

4.

Venue is proper under La. C.C.P. art. 73, which subjects joint obligors to any venue which is proper as to any one defendant.

5.

On August 26, 2022, a recall petition for Orleans Parish Mayor LaToya Cantrell was filed with the Louisiana Secretary of State. According to La. R.S. 18:1300.2(2), the petition shall be signed by a percentage of the total number of electors of the voting area wherein and for which a recall election is petitioned as provided in Paragraph (3). As it pertains to Orleans Parish, the petition shall be signed by at least twenty percent of the qualified electors.

6.

Once a recall petition is filed, legal requirements for the Secretary of State are triggered. Defendant R. Kyle Ardoin is the Secretary of State for Louisiana. La. R.S. 18:1300.2 sets forth the legal requirements for Mr. Ardoin during the pendency of a petition for a recall election. The statute states in La. R.S. 18:1300.2(C)(1);

Upon receipt of the recall petition, the secretary of state *shall* produce a report of the number of qualified electors in the voting area wherein the recall election is sought effective on the date of receipt of the recall petition and shall notify the registrar of voters in each parish in the voting area of the number of qualified electors of the voting area in the parish for issuance of the certification.

The Secretary of State was required to provide the organizers of the recall with the accurate number of qualified electors in Orleans Parish. Despite the clear obligation of the Secretary of State to produce an accurate report, it never occurred. The organizers of the recall were forced to rely on the data produced by the Secretary of State's website.

7.

As of August 1, 2022, the website for the Secretary of State indicated that Orleans Parish had 266,714 registered voters. On September 1, 2022 the same Secretary of State website indicated that Orleans Parish had 267,004 registered voters. This is the data that the organizers of the recall were forced to rely upon since no official report of the number of qualified electors was ever produced by the Secretary of State. The organizers of the recall expected that they could rely upon this data. They were wrong.

8.

After extensive work canvassing and mailing out material for the recall campaign, it became clear that the number of active registered voters in Orleans Parish, as appearing on the

Secretary of State's website, was inaccurate. Given the continuous discrepancies in the numbers, the recall campaign engaged Gulf Coast Resources, LLC, an entity specializing in the analysis of voter data, to determine the accuracy of the voter rolls in Orleans Parish.

9.

It was learned that the data which the Secretary of State relies upon to produce these numbers is input into a centralized database by Mrs. Sandra Wilson, the Registrar of Voters for the Parish of Orleans. To maintain accurate records of qualified electors for the Parish of Orleans, the law sets forth what Mrs. Wilson is required to do. La. R.S. 18:192 sets forth the requirement that a registrar of voters conduct an annual canvass of the names of the registrants in all precincts in the parish. The requirement of La. R.S. 18:192 states in relevant part:

A.(1)(a) No later than June thirtieth in each parish, the registrar of voters *shall* annually canvass the names of the registrants in all precincts in the parish. Failure of the registrar to conduct an annual canvass as provided in this Paragraph *shall* constitute willful misconduct relating to his official duty for the purposes of R.S. 18:53. The Department of State shall use the United States Postal Service or its licensee to verify the names and addresses of the registrants in all precincts in the state. A verification by the United States Postal Service or its licensee shall constitute a valid canvass of the registered voter.

(b) In conducting the verification, if the United States Postal Service or its licensee provides a corrected address, the Department of State shall furnish the corrected address to the appropriate registrar of voters. Upon receiving a corrected address inside the parish, the Department of State may make the change on the statewide registration system and the registrar of voters may make the change on his records. If a change is made, the registrar shall mail a new voter identification card to the voter using the corrected address provided and an address confirmation card as provided in R.S. 18:193. In the event the new voter identification card using the corrected address is returned to the registrar and the voter has failed to return the address confirmation card, the registrar shall consider the address not corrected. His records should be changed to reflect the prior address on file for that voter. If the corrected address is outside the parish, the registrar of voters shall not make the change on his records and shall send an address confirmation card as provided in R.S. 18:193.

(2) For a registrant whose address was not verified or whose corrected address is outside the parish, the registrar shall send an address confirmation card as set forth in R.S. 18:193.

Ms. Wilson is therefore legally required to use the United States Postal Service (hereafter "USPS") or its licensee to verify the names and addresses of registrants in all precincts in the parish.

10.

Further, R.S. 18:193 states that if it is believed that a person no longer lives in Orleans Parish, there are specific steps that must be taken to remove that person from the list of active registered voters. The Registrar of Voters is required to document and maintain the evidence to show that these requirements are being met. The law specifically states:

- A. **When the registrar has reason to believe that a registrant no longer is qualified to be registered, or that a registrant has changed his residence, he shall immediately notify the person by sending the address confirmation card to the registrant and place the voter on the inactive list of voters.** However, a person shall not be placed on the inactive list of voters if there is address information available to the registrar from the United States Postal Service or its licensee which indicates the voter has moved to another address within the parish.
- B. For the purposes of this Section, "address confirmation card" shall mean a postage prepaid and pre-addressed return card, sent by forwardable mail. The Department of State shall be responsible for developing the address confirmation card and for informing the registrant about his voting rights under the address confirmation process and the address confirmation card shall be submitted by the Department of State to the House and Governmental Affairs Committee of the House of Representatives and the Senate and Governmental Affairs Committee of the Senate for review.
- C. If the registrant responds to the address confirmation card and has not moved or has moved within the parish, the registrar shall remove the person's name from the inactive list of voters if it is on the inactive list and correct the voter's address if necessary.
- D. (1) **If the voter responds to the address confirmation card and has permanently moved to a different parish, the registrar shall transfer the voter's registration information to the new parish of residence.**  
 (2) **If the voter responds to the address confirmation card and has permanently moved outside the state, the registrar shall cancel the voter's registration.**
- E. **A voter on the inactive list of voters who fails to respond to the address confirmation card shall remain on the inactive list of voters until his address is confirmed** in accordance with the procedures set forth in R.S. 18:196 or not later than a period of two regularly scheduled federal general elections, at which time the registrar shall cancel the voter's registration.
- F. A list of names and addresses to whom address confirmation notices are sent and whether or not each person responded to the confirmation notice shall be maintained for a period of two years and shall be open to inspection and copying as provided in R.S. 18:154. Ninety days prior to a regularly scheduled federal primary election, the names and addresses of those persons on the inactive list shall be published for one day in the official journal of the parish governing authority or in a newspaper calculated to provide maximum notice in the parish.

Therefore, if the Registrar has reason to believe, through the USPS data base or otherwise, that a person has moved outside of Orleans Parish, the registrar **must** send a confirmation card to the residence and place the person on the list of inactive voters.

11.

The law also requires the registrar of voters to remove voters from the active list when they are deceased. R.S. 18:173 sets forth this law as follows:

- A. Within thirty days after receipt of a certified copy of a death certificate, the registrar of voters shall remove from the voter registration rolls the name of the deceased.
- B. By the tenth day of each month the parish health officer shall send notice to the registrar of voters of the death of each person in the parish during the preceding month and shall include the deceased person's parish of residence.
- C.(1) By the tenth day of each month, the secretary of the Louisiana Department of Health shall send to the Department of State a report, certified as correct over his signature or the signature of his authorized representative, containing the name, address, date of birth, sex,

social security number, place of birth, mother's maiden name, and alias name, as such information exists in the database of the Louisiana Department of Health, of any person sixteen years of age or older who died in each parish of the state within the preceding calendar month.

(2) Within thirty days after receipt of the report described in Paragraph (1) of this Subsection, the Department of State shall cancel the registration of any deceased person when the information provided by the Louisiana Department of Health corresponds exactly to the criteria for cancellation of voter registration as established by the secretary of state. The Department of State shall promptly notify the registrar of the parish in which the voter was registered of such cancellation.

(3) The information received from the Louisiana Department of Health regarding deceased persons whose registrations were not canceled pursuant to Paragraph (2) of this Subsection shall be sent monthly to the registrar of voters for each parish by the Department of State. Within thirty days after receipt of the report from the Department of State, the registrar of voters shall review the information received from the Louisiana Department of Health to determine if the matches of information are sufficient to cancel or challenge the registration of deceased persons.

**D. The registrar of voters shall search obituaries for deceased persons** whose registrations were not canceled. The registrar of voters shall use information from an obituary notice to cancel a deceased voter's registration if the notice provides sufficient information to properly identify the voter and the registrar has confirmed the voter's death with the office of vital records.

The registrar receives information from the Louisiana Department of Health to maintain accurate records of voters who are deceased. Further, the registrar is required to search obituaries in the parish to identify deceased voters and remove them from the list of active voters.

12.

The lack of accuracy of voters who are active versus inactive plays a detrimental role to the recall effort. Most importantly, “the names of registrants on the inactive list of voters *shall not be counted* in computing the number of ballots required for an election, the number of voters required to divide or constitute a precinct, *the number of signatures required on any petition . . .*” La. R.S. 18:196. As such, inactive voters should not be considered in the total number of qualified electors. Therefore, compliance with the requirements of Louisiana law by both Defendants to maintain the inactive voter list is critical. These are also indisputably ministerial in nature. *See Ventre v. Ryder*, 176 F. Supp. 90 (W.D. La. 1959); *see also Smith v. Flournoy*, 117 So. 2d 320 (La. Ct. App. 1959).

13.

In order to determine if Ms. Wilson was meeting her legal requirement to maintain the accuracy of active versus inactive voters, Gulf Coast Resources utilized the National Change of Address database (hereinafter “NCOALink”), a product of the United States Postal Service. This database consists of a secure dataset of approximately 160 million permanent change-of-address

(“COA”) records consisting of the names and addresses of individuals, families and businesses who have filed a change-of-address with the USPS. The change of address requests were compared with the roll of Orleans Parish voters issued by the Secretary of State. The comparison revealed that thousands of people who had moved out of Orleans Parish or died were never purged by Ms. Wilson and still remain active voters in Orleans Parish. This is evidence of Ms. Wilson’s failure to perform her duties to canvass under the law and Mr. Ardoin’s failure to supervise her.

14.

Specifically, the data revealed that approximately 546 deceased persons are identified as active voters as of the date of this filing. Those 546 individuals are all members of the pool of individuals from which the recall effort is responsible for gathering signatures. The inclusion of those 546 individuals on the active voter list illegally increases the count of signatures required by the recall effort.

15.

Next it was determined that 21,436 people who are listed as active voters in Orleans Parish have moved out of the state of Louisiana. An additional 9,084 people that are currently listed as active voters in Orleans Parish have moved out of Orleans Parish but into a different parish within the state of Louisiana. The illegal inclusion of these people on the active voter list increases the count of signatures required by the recall effort.

16.

In addition to people who have moved or died, it was then determined that 1,601 people listed as active voters have an address that has been labeled by the USPS as “undeliverable” and no change of address was provided by the resident. An additional 121 people listed as active voters have an address that was labeled by USPS as “undeliverable” but did provide a change of address yet still remain active voters at the original address. Many of these addresses are vacant lots. La. R.S. 18:101(B) provides that “[f]or purposes of the laws governing voter registration and voting, “resident” means a citizen who resides in this state and in the parish, municipality, if any, and precinct in which he offers to register and vote, with an intention to reside there indefinitely.” There are no residents of vacant lots, yet many of these vacant lots are considered active voters in Orleans Parish. Again, inclusion of these persons who have moved or of vacant lots on the active voter list illegally increases the count of signatures required by the recall effort.

17.

Ultimately, thousands of inconsistencies were identified. While the time constraints of the recall deadline prevented a review of each one, below are several examples with supporting data of individuals who are listed as active voters in Orleans Parish, but clearly are not.

18.

Dr. Rishi Anand changed his address with the USPS in 2010, approximately 13 years ago, and provided a new address in Florida. He last voted in Orleans Parish in 2008, 15 years ago. Nonetheless, as of the date of this filing, Dr. Anand is identified as an active voter in Orleans Parish by the Secretary of State.

HOME	VOTER REGISTRATION	ELECTION CALENDAR	BALLOT INFORMATION	VOTING INFORMATION	CHANGE SEARCH
Name: Rishi Gujral Anand Party: No Party Parish: Orleans Ward/Precinct: 01/02 Status: Active					

Interestingly, despite being an active Orleans Parish voter, Dr. Anand is also an active voter in the state of Florida and has been for over a decade.

Full Name:	RISHI GUJRAL ANAND
Street Address:	[REDACTED]
City:	[REDACTED]
Zip Code:	[REDACTED]
County Name:	BROWARD
Voter Identification Number:	120280825
Date Of Registration:	9/28/2012
Party:	Republican Party of Florida
Voter Status:	Active*

\* An active voter means the person is registered to vote. The deadline to register to be eligible to vote in an upcoming election is 29 days before that election.

This individual, who has not lived in Orleans Parish in 13 years and who has been registered to vote in Florida for over 10 years, is one of the individuals comprising the pool of qualified electors against which the recall effort is being judged. Furthermore, the fact that both his address changed with the postal service and that he failed to vote in two consecutive federal elections in Orleans Parish, should have necessarily been detected, and his Orleans Parish voter registration canceled if Ms. Wilson was performing her duties to canvass under the law.

19.

Another example is the registration of Ms. Kim Kinkella, who is identified by the Secretary of State as an active voter in Orleans Parish as of the date of this filing.

HOME	VOTER REGISTRATION	ELECTION CALENDAR	BALLOT INFORMATION	VOTING INFORMATION	CHANGE SEARCH
Name: Kim M Kinkella Party: Democratic Parish: Orleans Ward/Precinct: 17/07 Status: Active					

Ms. Kinkella completed a change of address form with the USPS in May of 1997, identifying a move to California. Ms. Kinkella last voted in Orleans Parish in May of 1985, nearly 38 years ago.

As she is an “active voter” according to the Secretary of State, this individual who has not lived or voted in Orleans Parish for decades is a member of the pool of qualified electors which the recall effort must obtain a signature from. These are two mere examples of thousands of individuals who have left the State of Louisiana but whom remain active voters in the parish of Orleans. This is further evidence of Ms. Wilson’s neglect and willful indifference to her duties to canvass under the law, and Mr. Ardoin’s failure to supervise her.

20.

Citizens who have left the state are not the only issue with the voter rolls in Orleans Parish. Thousands of citizens have left New Orleans for surrounding parishes yet remain registered as “active voters” in Orleans Parish. The law provides a very brief time period in which a citizen who has relocated to another parish can still vote in his or her original parish. “The removal from one parish to another parish does not deprive any registrant of the right to remain a legal registrant in the parish from which he has removed, as to all issues upon which he was entitled to vote prior to his change of residence, *until he registers and has the right to vote in the parish to which he has moved or until three months after he moved, whichever is sooner.*” La. R.S. 18:110(C)(emphasis added). Failure to remove names of individuals who have left Orleans Parish and to allow them to remain as Orleans Parish active voters artificially and illegally inflates the number of qualified electors in Orleans Parish.

21.

Andrea H. Mora completed a change of address in January of 1997 advising the USPS, and thus the Secretary of State and Ms. Wilson who must access the NCOALink as part of their duties, that she had moved to Port Sulphur, LA. Port Sulphur is not located in the parish of Orleans. Ms. Mora last voted in Orleans Parish in 1991, over 30 years ago. Despite that fact, she remains an “active voter” in Orleans Parish.

HOME	VOTER REGISTRATION	ELECTION CALENDAR	BALLOT INFORMATION	VOTING INFORMATION	CHANGE SEARCH
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Name: Andrea H Mora Party: Democratic Parish: Orleans Ward/Precinct: 08/06 Status: Active

Again, this is Ms. Wilson’s failure to perform her duty to canvass under the law and to cancel registrations of non-residents, and Mr. Ardoin’s failure to supervise her.

22.

The chaotic state of the voter rolls does not end there. Ms. Geraldine Perrier is an active voter in Orleans Parish as of the date of this filing.

<a href="#">HOME</a>	<a href="#">VOTER REGISTRATION</a>	<a href="#">ELECTION CALENDAR</a>	<a href="#">BALLOT INFORMATION</a>	<a href="#">VOTING INFORMATION</a>	<a href="#">CHANGE SEARCH</a>
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**Name:** Geraldine Marie Perrier **Party:** Republican **Parish:** Orleans **Ward/Precinct:** 14/10 **Status:** Active

Ms. Perrier has not voted in an election since 2001. Ms. Perrier passed away in 2012, over a decade ago, and remains an active voter in Orleans Parish and a member of the pool from which the recall effort is responsible for gathering signatures. She is being counted as a qualified elector in Orleans Parish. This demonstrates Ms. Wilson’s failure to perform her duty to canvass under the law and to cancel registrations of people who are deceased, and Mr. Ardoin’s failure to supervise her.

23.

Mrs. Wilbur Babin is also an active voter in Orleans Parish as of the date of this filing.

<a href="#">HOME</a>	<a href="#">VOTER REGISTRATION</a>	<a href="#">ELECTION CALENDAR</a>	<a href="#">BALLOT INFORMATION</a>	<a href="#">VOTING INFORMATION</a>	<a href="#">CHANGE SEARCH</a>
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**Name:** Mrs Wilbur J Babin **Party:** Republican **Parish:** Orleans **Ward/Precinct:** 04/22 **Status:** Active

Mrs. Babin last voted in 2006 according to the Secretary of State. Mrs. Babin passed away in 2012. Mrs. Babin was born in 1916 and would thus be 107 years old if she were alive today. Neither her obituary, apparent age, or the length of time since her last vote, were cause of concern for Ms. Wilson, who never cancelled Ms. Babin’s voter registration. As such, Mrs. Babin is also a member of the pool from which the recall effort is responsible for gathering signatures and is being counted as a qualified elector in Orleans Parish.

24.

Likewise, Mrs. Vita Tortorich is an active voter in Orleans Parish as of the date of this filing.

<a href="#">HOME</a>	<a href="#">VOTER REGISTRATION</a>	<a href="#">ELECTION CALENDAR</a>	<a href="#">BALLOT INFORMATION</a>	<a href="#">VOTING INFORMATION</a>	<a href="#">CHANGE SEARCH</a>
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**Name:** Vita M Tortorich **Party:** Democratic **Parish:** Orleans **Ward/Precinct:** 05/15 **Status:** Active

Mrs. Tortorich last voted in 2006. She passed away in 2010. Ms. Tortorich would be 101 years old if alive today. Like Mrs. Babin, neither Ms. Tortorich’s obituary, apparent age, or the length of time since her last vote, were a cause of concern for Ms. Wilson, who never cancelled Ms. Tortorich’s voter registration. This is yet another individual who comprises the pool from which the recall effort is responsible for gathering signatures and is being counted as a qualified elector in Orleans Parish.

25.

This Court has jurisdiction to issue a writ of mandamus ordering the Defendants to perform their ministerial duties under the law. *See* La. R.S. 18:66. *See also* La.C.C.P. Art. 3782. The recall effort has been handicapped by the incompetence of the Orleans Parish registrar of voters and the Secretary of State alike. Petitioners are entitled by law to an accurate count of Orleans Parish active registered voters. Their failure to maintain even remotely accurate voter rolls have made it impossible to determine the number of signatures needed for the recall to be successful. It should not require a legal pleading to force a state official to do the job they are being paid to do, yet apparently it does. The data presented in this pleading should be alarming and embarrassing to the citizens of Orleans Parish and to the State of Louisiana.

26.

This mandamus to compel a registrar to perform her duties should be tried by preference. *See* La.R.S. 18:66(A).

27.

Defendant Sandra Wilson has willfully and persistently failed to perform her duty and is thus subject to removal by the State Board of Election Supervisors pursuant to La. R.S. 18:53.

**WHEREFORE**, Petitioners EILEEN CARTER AND BELDEN BATISTE., pray that the Defendants be duly cited and served with a copy of the foregoing Petition, and that after legal delays have expired, there be judgment in their favor against the Defendants, Sandra Wilson and R. Kyle Ardoin, granting Petitioner's Writ of Mandamus, ordering the Defendants to perform their duties set forth under La. R.S. 18:192, *et. seq.* and La. R.S. 18:1300.2, *et. seq.* Furthermore, Petitioners prays that Defendants be ordered to pay all attorney's fees, court costs, and any damages proven by the Petitioners for the Defendants' arbitrary and/or capricious failure to perform these duties required of them under the law.

The Petitioners further pray that this case be tried by preference and in a summary manner.

Respectfully submitted,

RODRIGUE & ARCURI, LLP

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**PLEASE SERVE:**

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CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS  
STATE OF LOUISIANA

NO.:

EILEEN CARTER AND BELDEN BATISTE

2023 FEB 16 AM 9:37

DIVISION:

VERSUS  
CIVIL DISTRICT COURT

SANDRA WILSON, IN HER OFFICIAL CAPACITY AS  
REGISTRAR OF VOTERS FOR THE PARISH OF ORLEANS, AND  
R. KYLE ARDOIN, IN HIS CAPACITY AS SECRETARY OF STATE

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

ORDER

Considering the foregoing Petition for Writ of Mandamus:

**IT IS ORDERED** that SANDRA WILSON and R. KYLE ARDOIN be made to appear and show cause before this Honorable Court on the \_\_\_\_\_ day of \_\_\_\_\_, 2023 at \_\_\_\_\_ o'clock \_\_\_\_M. why Petitioners' Writ of Mandamus should not be granted.

NEW ORLEANS, LOUISIANA, this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
JUDGE

PLEASE SERVE:  
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