



Attorney on or about January 11, 2009, and has served as District Attorney of Evangeline Parish, Louisiana continuously for the past fourteen (14) years, located at 200 Court Street, Suite 200, Ville Platte, Louisiana 70586.

2. Plaintiff, Christina Renee Freeman Sam, is currently the Alderwoman for the City of Ville Platte, Louisiana. On November 17, 2022, Alderwoman Sam was contacted by Mr. Brignac's office to personally appear at his office to discuss a matter. Alderwoman Sam believed that Mr. Brignac wanted to discuss a complaint she made to his office two (2) days prior concerning the harassment of her political opponent's relative. However, when Alderwoman Sam arrived to Mr. Brignac's office on the afternoon of November 17, 2022, the following incredible events occurred: (1) Alderwoman Sam was falsely imprisoned by Mr. Brignac and his office investigator, Alderwoman Sam was interrogated for more than four (4) hours concerning allegations of voter fraud, Alderwoman Sam was not allowed to leave Mr. Brignac's office or make a phone call to her children and family members; Alderwoman Sam was not provided an attorney during this four (4) hour interrogation; Alderwoman Sam was forced to sign a guilty plea form, pleading guilty to voter fraud and agreeing to resign her seat from the City Council for the City of Ville Platte; Alderwoman Sam was brought before a Judge to plead guilty and at that point was provided a Public Defender Attorney, but the Judge refused to accept her guilty plea; and Alderwoman Sam was taken to jail after her guilty plea fell apart, however the jail could not book her because it had no information she committed a crime.
3. Additionally, during the four (4) hour interrogation of Alderwoman Sam, Mr. Brignac falsely imprisoned Alderwoman Sam and threatened her if she decided to leave; Mr.

Brignac followed Alderwoman Sam to the restroom during the four (4) hour investigation and sat in a chair close to Alderwoman's bathroom stall while Alderwoman Sam urinated; And rushed what he believed to be a criminal matter through the court system in five (5) hours from investigation, to failed guilty plea to arrest, all in one day on November 17, 2022.

### **BACKGROUND**

1. Christina Renee Freeman Sam is the widow of the late Alderman Donald Sam, who served as Alderman for District E on the Ville Platte City Council for nearly fifteen (15) years. Alderman Donald Sam suffered an untimely death in December 2021. His wife, Alderwoman Sam was sworn into office on January 7, 2022, to serve out her late husband's term on the Ville Platte City Council. Alderwoman Sam ran for official election to the Ville Platte City Council and received forty-six percent (46%) of the vote in the November 8, 2022 primary election. However, because she did not receive more than fifty-percent (50%) of the vote in the primary election, she entered a run-off election on December 10, 2022. Alderwoman Sam won the run-off election on December 10, 20022 with more than sixty-four percent (64%) of the vote. She continues to serve as Alderwoman of District E on the Ville Platte City Council.

### **ALDERMAN SAM'S INTERACTION WITH EVANGELINE PARISH DISTRICT ATTORNEY, TRENT BRIGNAC, NOVEMBER 15-18, 2022**

2. On or about Tuesday, November 15, 2022, Alderwoman Christina Sam went to the Evangeline Parish District Attorney's Office to report that a relative of her political opponent was harassing her and coming to her job harassing her. Alderwoman Sam met

with Mr. Brignac and expressed to him her desire to press charges against her opponent's relative because his behavior was causing problems at her job.

3. On the morning of Thursday, November 17, 2022, Mr. Brignac convened an emergency staff meeting with his Assistant District Attorneys. During this staff meeting at approximately 10:30 a.m., Mr. Brignac advised his staff that he would be charging Alderwoman Sam with voter fraud and she would be brought before the Judge late in the evening to plead guilty and resign her seat from the Ville Platte City Council. Notably, during the time of this staff meeting, Alderwoman Sam did not know of Mr. Brignac's plans to have her plead guilty to voter fraud. At that time, she did not know Mr. Brignac was investigating her.
4. On the afternoon of Thursday, November 17, 2022, Alderwoman Sam was contacted by the Evangeline Parish District Attorney's Office. Alderwoman Sam was informed that Mr. Brignac wished to meet with her. Alderwoman Sam initially believed this meeting was concerning the harassment complaint she made against her opponent's relative. However, when she arrived at the District Attorney's office at approximately 1:15 p.m. on November 17, 2022, Alderwoman Sam was sent to an office in the District Attorney's office where she was interrogated by the District Attorney Trent Brignac, and later his office investigator, Marcus Aucoin.
5. Alderwoman Sam was kept in the office with Mr. Brignac and his investigator for over four (4) hours without an attorney, without the ability to leave, and without the presence of any law enforcement officers from the Evangeline Parish Sheriff's Office or the Ville Platte Police Department. Alderwoman Sam describes her experience with District Attorney

Trent Brignac as being “tormented” by him. During the four (4) hours interrogation, Mr. Brignac allowed Alderman Sam to use the restroom two (2) times, however Mr. Brignac waited on the outside of the restroom door by sitting in a chair outside of the stalls while Alderwoman Sam used the restroom to ensure she would not leave the building.

6. During the four (4) hour interrogation of Alderwoman Sam, Mr. Brignac accused her of voter fraud by registering voters in her district that did not live in her district. Mr. Brignac claimed to have proof of this information by an alleged internet IP address connected to Alderwoman Sam. Mr. Brignac continued to accuse Alderman Sam of voter fraud and informed her that if she did not plead guilty and officially resign from the Ville Platte City Council that day, she would be sent to jail and information concerning her arrest and conviction would be in the media. Notably, Mr. Brignac did not obtain a subpoena for Alderwoman Sam’s IP address until December 2022, a month after his four (4) hour November 17, 2022 interrogation of Alderwoman Sam.
7. Mr. Brignac also called Alderwoman Sam’s place of employment, Teets Grocery Store, and asked her employer if she ever stole anything from him.
8. Alderwoman Sam initially decided to plead guilty because Mr. Brignac threatened and placed her under extreme duress throughout his four (4) hour interrogation, and told Alderwoman Sam the only way she could avoid going to jail was by pleading guilty and resigning her seat from the City Council that evening on November 17, 2022. Alderman Sam has multiple school aged children, and she is their only surviving parent. Because of Mr. Brignac’s threats, she was afraid she would be sent to jail and not be able to get home to her children. Mr. Brignac refused to allow her to call her children and family during his

four (4) interrogation of her and threatened Alderwoman Sam with an arrest if she decided to go to her car and retrieve her phone.

9. During his four (4) interrogation of Alderwoman Sam on November 17, 2022, Mr. Brignac recorded a purported confession from Alderwoman Sam. Alderwoman Sam was asked if she waived her right to an attorney during this recording. Alderwoman Sam did not know how to answer this question. She then looked at Mr. Brignac for guidance and he shook his head and mouthed the word, "NO," to Alderwoman Sam without making a sound, advising her to say no she did not need an attorney. Alderwoman Sam followed Mr. Brignac's instructions.
10. Later in the day after 5:30 p.m., on Thursday, November 17, 2022, Alderwoman Sam was brought before Judge Chuck West to accept a guilty plea to election fraud. Judge Chuck West is the District Court Judge for Division B of Evangeline Parish, Louisiana.
11. Before Alderwoman Sam was brought before Judge West to take up the guilty plea, multiple public defenders were approached by District Attorney Trent Brignac and asked by Mr. Brignac to stand in as her attorney for the guilty plea.
12. All of the public defenders refused to sign off on the guilty plea form. Public Defender Aaron Brown provided a statement that District Attorney Trent Brignac became visibly angry with him when he refused to stand in as the attorney for Alderwoman Sam for the guilty plea, and that Mr. Brignac did not tell Public Defender Aaron Brown that Alderwoman Sam is a public official who would be pleading guilty to voter fraud.
13. Public Defender Lyndon Burton agreed to stand in for Alderman Sam's guilty plea before Judge West for the sole purpose of advising her of her rights. Public Defender Lyndon

Burton refused to sign the plea form and District Attorney Trent Brignac made mention of Mr. Burton's failure to sign the plea form in Open Court during a failed plea bargain court proceeding of Alderman Sam during the evening of November 17, 2022.

14. Judge West attempted to Boykinize Alderwoman Sam before accepting her guilty plea.

However, Alderwoman Sam was so emotional and sobbing before the Court, and after there were concerns expressed by a Public Defender, Judge West elected not to accept Alderwoman Sam's guilty plea.

15. During the attempted Boykinization of Alderwoman Sam, Judge West advised Alderwoman Sam that she did not have to plead guilty. Alderwoman Sam stated that she needed more time, but that she did not want to go to jail. District Attorney Trent Brignac intervened and stated, "I said you would not be arrested." Alderman Sam then said, "That is the same thing, Mr. Trent.

16. After Judge West refused to accept Alderwoman Sam's guilty plea, Mr. Brignac begged for five (5) more minutes with Alderwoman Sam. Judge West still refused to accept Alderman Sam's guilty plea and Mr. Brignac thereafter ordered the bailiff to take Alderman Sam into custody at the Evangeline Parish jail. Mr. Brignac also blamed Judge West for allowing Alderwoman Sam to plead guilty. The jail could not book Alderwoman Sam into custody because it had no information that she committed a crime. The jail staff asked Alderwoman Sam to return the next day for booking on Friday, November 18, 2022.

17. Alderman Sam was officially booked into custody at the Evangeline Parish Jail on Friday, November 18, 2022, for voter fraud. Before Alderwoman Sam was booked into custody at the Evangeline Parish Jail, Mr. Brignac's secretary called her by telephone at

approximately 8:40 a.m., however Alderwoman Sam refused to take Mr. Brignac's phone call.

**MOTION TO RECUSE DISTRICT ATTORNEY TRENT BRIGNAC**

18. Undersigned counsel was subsequently retained by Alderwoman Sam to represent her in this matter. Undersigned counsel filed several motions in this matter, including a Motion to Recuse District Attorney Trent Brignac, pursuant to the Louisiana Code of Criminal Procedure, Article 680 (A)(1). The Motion to Recuse was filed on December 5, 2022, but was set for hearing by the trial court on February 6, 2023 at 1:00 p.m.
19. In the Motion to Recuse, undersigned counsel moved the District Court of Evangeline Parish, Louisiana to recuse District Attorney Trent Brignac because of his personal interests in this case and because he was a material witness as he personally investigated this case without the involvement of law enforcement agencies. Undersigned counsel presented to the District Court that District Attorney Trent Brignac treated Alderwoman Sam differently in the management of her case in such an extraordinary manner and without the cooperation of any outside law enforcement agencies. Therefore, both the District Attorney and his office investigator are material witnesses in this case.
20. It was also argued to the District Court of Evangeline Parish, Louisiana that Alderwoman Sam was threatened, tormented, and coerced by District Attorney Trent Brignac into an attempted guilty plea. As a result, he is a material witness as he is the only person who could testify as to why he agreed to make sure Alderman Sam would not be arrested for allegedly committing a felony offense. However, Mr. Brignac made sure Alderman Sam was in fact arrested after Judge West refused to accept her guilty plea.



21. Undersigned counsel also asserted in the Motion to Recuse that she filed a complaint against District Attorney Trent Brignac with the Louisiana Attorney Disciplinary Board, hereinafter referred to as LADB, and therefore the District Attorney also has a personal interest in this matter in light of the LADB complaint.
22. Five (5) days before the February 6, 2023, Motion to Recuse hearing, Mr. Brignac's office obtained a grand jury indictment against Alderwoman Sam on Wednesday, February 1, 2023.
23. At the February 6, 2023, Motion to Recuse Hearing, the District Court for Evangeline Parish, Louisiana denied Alderwoman Sam's Motion to Recuse Mr. Brignac from her case. On or about February 24, 2023, Alderwoman Sam filed a Writ Application with the Louisiana Third Circuit Court of Appeal, requesting the Court of Appeal reverse the District Court's decision to deny Alderwoman Sam's Motion to Recuse Mr. Brignac from her case. On March 15, 2023, the Louisiana Third Circuit Court of Appeal granted Alderwoman Sam's Writ Application and ordered Mr. Brignac and his entire office recused from Alderwoman Sam's case peremptorily, as Mr. Brignac is a material witness in the case in reference to the purported confession by Alderwoman Sam, and Mr. Brignac can't be both prosecutor and material witness.
24. After the Third Circuit Court of Appeal recused Mr. Brignac from Alderwoman Sam's case, the Louisiana Attorney General's Office was assigned to Alderwoman Sam's case. Alderwoman Sam filed a Motion to Quash (Dismiss the Prosecution) by Mr. Brignac's Office. The Louisiana Attorney General Office did not object to Alderwoman Sam's

Motion to Quash. Thereafter the District Court of Evangeline Parish, Louisiana dismissed all charges against Alderwoman Sam and relieved her of all her bond obligations.

### **DAMAGES TO ALDERWOMAN SAM**

25. As a result of Mr. Brignac's interrogation and prosecution of Alderwoman Sam, Alderwoman Sam lost a job that she held for several years at Teet's Food Store in Ville Platte, Louisiana. Mr. Brignac called the owner of Teet's Food Store during his four (4) interrogation of Alderwoman Sam. Mr. Brignac asked the owner of Teet's if Ms. Sam ever stole from him. As a result of Mr. Brignac's actions, Alderwoman Sam was terminated from her full time employment she held with Teet's Food Store for several years.
26. Prior to November 17, 2022, Alderwoman Sam never had personal experience with the criminal justice system, including prosecutors or law enforcement agencies. She never received a traffic ticket. Mr. Brignac's actions in November of 2022 towards Alderwoman Sam has caused her major depression, trauma, and sleepless nights. Alderwoman Sam had to seek psychiatric treatment and regularly sees a counselor to deal with the trauma inflicted upon her by Mr. Brignac.

### **BASIS FOR JURISDICTION**

27. Under 42 U.S.C 1983, Mr. Brignac, under the color of state law, deprived Alderwoman Sam of her following constitutional rights: The right to an Attorney during his four (4) interrogation of her in accordance with the \_\_\_ Amendment of the U.S. Constitution; and The right to due process pursuant to the Fourteenth (14<sup>th</sup>) Amendment to the U.S. Constitution. Additionally, Mr. Brignac falsely imprisoned Alderwoman Sam and threatened, coerced, and made promises to her to plead guilty to a crime.

28. This Court has jurisdiction over Plaintiff's federal claim under 28 U.S.C. 1331 and 1343.

Venue in the United States District Court for the Western District of Louisiana, Lafayette, Louisiana, is proper pursuant to 28 U.S.C. 1391.

**MR. BRIGNAC HAS NO PROSECUTORIAL/ABSOLUTE IMMUNITY**

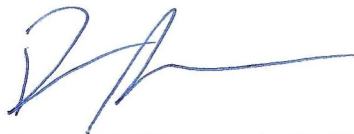
29. In this matter, Mr. Brignac was the sole investigator of charges against Alderwoman Sam and his office provided an affidavit supporting the arrest warrant of Alderwoman Sam. There was no outside law enforcement agencies involved in the investigation of Alderwoman Sam. Accordingly, Mr. Brignac has no prosecutorial immunity. *Buckley*, 509 U.S. at 269; *Kalina v. Flether*, 522 U.S. 118, 129-30 (1977); *Johnson v. Dosey*, 515 F. 3d 778, 783 (7<sup>th</sup> Cir. 2008); *Burns v. Reed*, 500 U.S. 478, 496 (1999).

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for the following relief:

- A. A money judgment for compensatory and punitive damages against Defendant, Trent Brignac individually and his capacity as District Attorney of Evangeline Parish, Louisiana, in an amount to be determined at trial, including consequential damages, lost wages, earning, mental pain and anguish, severe emotional distress, according to proof;
- B. A jury trial on all appropriate issues;
- C. An award of costs and expenses against the Defendants and any other relief this Court deems appropriate.

RESPECTFULLY SUBMITTED BY:



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ROSELL JONES: BAR NO. 27466  
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roshell.jonesesq@gmail.com  
ATTORNEY FOR: CHRISTINA RENEE FREEMAN SAM

I HEREBY CERTIFY that a copy of the above and foregoing Complaint has this day been forwarded to Defendant, Trent Stuart Brignac at his place of employment located at the Evangeline Parish District Attorney's Office, 200 Court Street, Suite 200, Ville Platte, LA 70586 via FEDEX, and via email at [trentb@13thepda.com](mailto:trentb@13thepda.com) on this 17<sup>th</sup> day of November, 2023.



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**ROSELL JONES**