

The Honorable Jeff M. Landry  
Attorney General  
State of Louisiana  
1885 N. 3<sup>rd</sup> St.  
Baton Rouge, LA 70802  
[Executive@ag.louisiana.gov](mailto:Executive@ag.louisiana.gov)

Friday, September 30, 2016

To Whom It May Concern:

Under the Louisiana Public Records Act § 44:1 et seq., I respectfully request copies of the following records from the Office of Attorney General Jeff Landry during his tenure in office:

- All correspondence between Attorney General Jeff Landry (or any members of the Attorney General's office during Attorney General Landry's tenure in office including Shane Guidry, Elizabeth Murrill, and Bill Stiles, and any representatives of companies (and/or trade associations representing such companies) involved in the exploration for and production of hydrocarbons, including the following and any of their members:
  - Louisiana Oil and Gas Association and any of its representatives, including Don Briggs;
  - Louisiana Mid-Continent Oil and Gas Association and any of its representatives, including Chris John;
  - Louisiana Association of Business Interests and any of its representatives including Brian Landry;
  - Kyle Ruckert of Bold Strategies and;
  - Chester Cedars.
- All correspondence between Attorney General Jeff Landry (or any members of the Attorney General's office during Attorney General Landry's tenure in office) and Louisiana Lawsuit Abuse Watch or any of its representatives, including its Executive Director, Melissa Landry.

I narrow this request to cover correspondence including letter and email to the Attorney General himself and to Executive Assistant Sarah Romero Mule'.

Section 44:32(D) of the Louisiana Public Records Act requires a response within three business days. If access to the records I am requesting will take longer than that time period, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Sincerely,

Scarlett A. Martin  
934 East Bradbury Ave.  
Indianapolis, IN 46203

CLERK OF COURT  
FILE COPY

CASE ID: \_\_\_\_\_  
FILING DATE: \_\_\_\_\_  
ATTORNEY: \_\_\_\_\_  
NO. PAGES: 20

EXHIBIT ATTACHMENT TO:

- ☐ MOTION SUMMARY JUDGMENT  
☐ PETITION  
☐ MEMORANDUM  
☐ OTHER \_\_\_\_\_

DEPUTY CLERK OF COURT

EBR4058374



NINETEENTH JUDICIAL DISTRICT COURT  
PARISH OF EAST BATON ROUGE, STATE OF LOUISIANA

NUMBER 656513

SECTION 23

SCARLETT A. MARTIN

VERSUS

JEFF LANDRY, IN HIS OFFICIAL CAPACITY  
AS ATTORNEY GENERAL OF THE STATE OF  
LOUISIANA

\*\*\*\*\*

**EXCEPTION OF NO RIGHT OF ACTION  
ON BEHALF OF THE ATTORNEY GENERAL**

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NOW COMES, Jeff Landry, in his official capacity as the Attorney General of the State of Louisiana ("Attorney General"), who respectfully excepts to the plaintiff's right to bring this action against him on the following grounds:

1.

Plaintiff filed this public records action claiming entitlement to the disclosure of certain records maintained and/or in the custody of the Louisiana Department of Justice, Office of Attorney General.

2.

Upon information and belief, the plaintiff in the case is not a resident or citizen of Louisiana but rather alleges that she is a domiciliary and citizen of the State of Indiana.

3.

The public records laws of Louisiana that the plaintiff sues upon are rooted in the Louisiana Constitution's Declaration of Rights, particularly La. Const. art. XII, § 3, granting Louisiana citizens the right of direct participation in their state government.

4.

The right of Louisiana citizens to participate in their government is not extended to non-citizens of the State so that the plaintiff as an Indiana resident and citizen does not belong to the class of persons to whom the law grants the cause of action asserted in the petition.

5.

Non-citizens of the State do not enjoy the right to direct participation in Louisiana's government and cannot assert a right they do not have in a civil action.



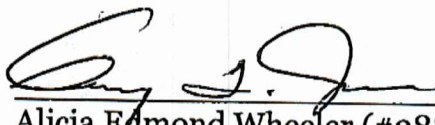
6.

The plaintiff's petition should be dismissed pursuant to La. Code Civ. P. art. 927(A)(5) that requires a plaintiff to be a member of the class of persons to whom the law grants the cause of action asserted in the suit.

ACCORDINGLY, the Attorney General prays that this exception be set for hearing prior to the trial of the merits of the case and that the exception be granted and the plaintiff's claims dismissed with prejudice.

**JEFF LANDRY  
ATTORNEY GENERAL  
STATE OF LOUISIANA**

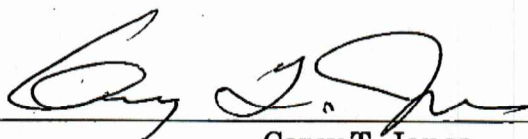
BY:



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Baton Rouge, LA 70802  
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Facsimile: (225) 326-6098

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Exception of No Right of Action* *Behalf of the Attorney General* has been served upon counsel for all represented parties to this proceeding by fax and/or electronic mail on this 26th day of December, 2018.



Carey T. Jones