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BILLY JOE HARRINGTON, IN HIS
OFFICIAL CAPACITY AS
DISTRICT ATTORNEY FOR THE
10TH JUDICIAL COURT, NATCHITOCHES,
LOUISIANA

RECEIVED AND FILED
DAVID STAMMETT
CLERK OF COURT

99856-A

2019 JAN 22 P 4: 16

BY: _____ DY. CLERK
NATCHITOCHES PARISH, LA

VERSUS

* 10TH JUDICIAL DISTRICT COURT

MOZELLA JEANETTER BELL

* NATCHITOCHES, LOUISIANA

**PETITION TO DECLARE THE OFFICE OF MAYOR OF CAMPTI
CURRENTLY HELD BY MOZELLA JEANETTER BELL
VACANT IN ACCORDANCE WITH LA. R.S. 18:671-675**

**TO THE HONORABLE, 10TH JUDICIAL DISTRICT COURT OF THE STATE
OF LOUISIANA, IN AND FOR THE PARISH OF NATCHITOCHES;**

NOW COMES, Billy Joe Harrington, in his official capacity has District Attorney for the
10th Judicial District, Natchitoches Parish, Louisiana, through Assistant District Attorney,
STEVEN P. MANSOUR, and in accordance with his duties pursuant to LA. R.S. 18:671-675, so
does declare and state that:

1.

Made defendant herein is:

MOZELLA JEANETTER BELL, a resident and domiciliary of Red River Parish,
Louisiana who may be served at her resident located at 201 Ruby Street, Coushatta,
Louisiana 71019.

2.

On or about November 6, 2018, defendant was elected as Mayor of the Town of Campti,
Natchitoches Parish, Louisiana, sworn to uphold the duties of that office and whose term was to
expire on December 31, 2022.

3.

On January 2, 2019, the Natchitoches Parish District Attorney's office did receive a
written complaint from Tarlisha Hudson, a lawfully registered voter in the Town of Campti as is
evidence by Exhibit 1, attached hereto and made a part hereof, which alleged, among other things
that the defendant does not currently live in the town limits of Campti, Louisiana.

4.

Thereafter, the Natchitoches Parish District Attorney's office received a written
complaint from Cynita Nash, a registered voter in the Town of Campti as is evidence by Exhibit
2. In her complaint, Cynita Nash stated that it is her belief that Mozella Bell currently does not
live within the Town of Campti and lives and is domiciled in Red River Parish, Louisiana.

5.

The Town of Campti, Louisiana is a Lawrason Act jurisdiction and is therefore governed by the Lawrason Act. LA. R.S. 33:321, et seq.

6.

LSA-R.S. 18:672, provides:

“When any voter lawfully registered in the district or geographical area from which an officeholder has been elected, or from which an officeholder has been appointed or otherwise selected to hold an office, has reason to believe that the officeholder no longer meets the residence or domicile requirements of that office, the voter may make a written complaint of that fact to the proper official.”

7.

LSA-R.S. 18:581(3) provides, in part:

“‘Vacancy’ occurs in an elective office... when the person elected to or holding the office no longer meets the residence or domicile requirements of that office...”

8.

LSA-R.S. 33:384, requires that the Mayor shall be an elector of the municipality, and this is a continuing requirement in order to remain Mayor of a municipality.

9.

LSA.-R.S. 18:671, *et seq* requires that the District Attorney of an office holder’s domicile investigate a written complaint such as the complaints of Tarlisha Hudson and Cynita Nash and provide a written opinion, with reasons within twenty (20) days of receipt, as to whether the office holder meets the residence or domicile requirements of the office held, to which the official holder was elected; and the opinion is to be published in the official journal of the parish.

10.

The Natchitoches Parish District Attorney did undertake an investigation as required by the State into the defendant’s domicile and residence and her compliance or non-compliance with the requirements of the office of Mayor of Campti, Louisiana. On January 9, 2019 the District Attorney did provide a written opinion with reasons, copy of which is attached hereto and made a part hereof as Exhibit 3. The District Attorney also provided the opinion to the complainants and the City Council of the Town of Campti under separate covers, copies of which are attached hereto and made a part hereof as Exhibit 4. Further, as required by the statute, the District Attorney did publish the opinion in the Natchitoches Times on January 17, 2019, the official

parish journal, as shown in Exhibit 5, attached hereto and made a part hereof.

11.

Petitioner shows that the investigation described herein did reveal that defendant's domicile and residence is not located within the Town of Campti, Louisiana. Defendant lists as her domicile and place of residence, on the Notice of Candidacy Qualifying Form, and as her mailing address, 3365 Hwy 480, Campti, Louisiana. A official copy of the city limits of the Town of Campti, Louisiana is attached hereto and made a part hereof, as Exhibit 6.

12.

Petitioner shows that the above stated address is located approximately 400 feet outside of the city limits of the Town of Campti, Louisiana.

13.

Further, petitioner will show that defendant lists another address as her residence, which address is located in Red River Parish, Louisiana.

14.

As a result, petitioner shows that defendant does not reside, nor is domiciled in the city limits of the Town of Campti, Louisiana, as is required by the Louisiana Election Code and Louisiana Law.

15.

Petitioner alleges that its investigation concludes that defendant does not meet the qualification and continuing requirements of Mayor of the Town of Campti, and therefore, defendant should be disqualified from holding said office and this Court declare a vacancy of the office of Mayor of the Town of Campti, Louisiana.

16.

Petitioner shows that it is necessary that the office of Mayor, currently held by defendant, MOZELLA JEANETTER BELL, should be declared vacant and should be filled in the accordance with the Lawrason Act and all statutes of the State of Louisiana.

17.



Petitioner seeks an order of the Court setting a hearing, to be held in accordance with Louisiana Revised Statute 18:674, not more than twenty (20) days after the service upon the defendant, MOZELLA JEANETTER BELL.

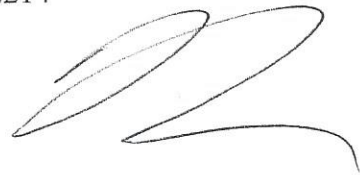
WHEREFORE, petitioner prays that the defendant, MOZELLA JEANETTER BELL, be duly cited and served with a copy of this petition; and that:

1. A hearing be held not more than twenty (20) days from the service on the defendant herein;
2. That after due proceedings be had there be Judgment herein declaring defendant, MOZELLA JEANETTER BELL, disqualified from holding the office of Mayor of the Town of Campti;
3. That the Office of Mayor of the Town of Campti, which is currently held by the defendant, MOZELLA JEANETTER BELL, be declared vacant;
4. There be judgment herein ordering that the vacancy be filled in accordance with provisions of Louisiana Revised Statute and the Lawrason Act;
5. That there be judgment assessing all cost and fees associated with these proceedings against the defendant, MOZELLA JEANETTER BELL; and,
6. That defendant be ordered to answer the attached Interrogatories and Request for Production within a shorten period of time to be fixed for the Court.

RESPECTFULLY SUBMITTED:

STATE OF LOUISIANA
BILLY JOE HARRINGTON
DISTRICT ATTORNEY

BY: 
STEVEN P. MANSOUR
Assistant District Attorney 
POST OFFICE BOX 838
NATCHITOCHEs, LA 71458-0838
(318) 357-2214



PLEASE SERVE:

**PETITION, ORDER,
MOTION, INTERROGATORIES
AND REQUEST FOR PRODUCTION on:**

MOZELLA JEANETTER BELL
201 Ruby Street
Coushatta, Louisiana 71019

BILLY JOE HARRINGTON, IN HIS
OFFICIAL CAPACITY AS
DISTRICT ATTORNEY FOR THE
10TH JUDICIAL COURT, NATCHITOCHE,
LOUISIANA

* DOCKET NUMBER:

VERSUS

* 10TH JUDICIAL DISTRICT COURT

MOZELLA JEANETTER BELL

* NATCHITOCHE, LOUISIANA

ORDER

Considering the above and foregoing,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that a hearing on the above
petition shall be held on the 15th day of February, 2019 at 9:00 a.m.

Natchitoches, Louisiana this 24th day of January, 2019.


DISTRICT JUDGE

BILLY JOE HARRINGTON, IN HIS
OFFICIAL CAPACITY AS
DISTRICT ATTORNEY FOR THE
10TH JUDICIAL COURT, NATCHITOCHE,
LOUISIANA

* DOCKET NUMBER: 90697-A

VERSUS

* 10TH JUDICIAL DISTRICT COURT

MOZELLA JEANETTER BELL

* NATCHITOCHE, LOUISIANA

**MOTION AND ORDER TO SHORTEN TIME DELAYS FOR ANSWERS TO
INTERROGATORIES AND REQUEST FOR PRODUCTION**

Petitioner, District Attorney Billy Joe Harrington, through Assistant District Attorney,
STEVEN P. MANSOUR, does declare and state that LSA-R.S. 18:674(B) requires that a hearing
on the petition be held not more than twenty (20) days after service upon defendant;

Therefore, petitioner herein does hereby move this Honorable Court to shorten the legal
time delays to ten (10) days for defendant to answer the attached Interrogatories and respond to
Request for Production. Considering the above Motion;

IT IS ORDERED that defendant, MOZELLA JEANETTER BELL, answers the attached
Interrogatories and responds to the attached Request for Production, within ten (10) days of service
of the petition and attached discovery.

Natchitoches, Louisiana this 24th day of January, 2019.

Desnee Dubois Dye
DISTRICT JUDGE

RECEIVED AND FILED
DAVID STAMEY
CLERK OF COURT
2019 JAN 22 P 4: 16
BY: NATCHITOCHE PARISH, LA
CLERK

BILLY JOE HARRINGTON, IN HIS
OFFICIAL CAPACITY AS
DISTRICT ATTORNEY FOR THE
10TH JUDICIAL COURT, NATCHITOCHE,
LOUISIANA

VERSUS

MOZELLA JEANETTER BELL

* DOCKET NUMBER:
* 10TH JUDICIAL DISTRICT COURT
* NATCHITOCHE, LOUISIANA

RECEIVED AND FILED
DAVID STAMEY
CLERK OF COURT
2019 JAN 22 P 16
BY: NATCHITOCHE, MISSISSIPPI

**PETITIONER'S FIRST SET OF INTERROGATORIES PROPOUNDED TO
DEFENDANT, WITH REQUEST FOR PRODUCTION**

TO: Mozella Jeanetter Bell
201 Ruby Street
Coushatta, Louisiana 71019

NOW INTO COURT, comes petitioner, Billy Joe Harrington, who propounds to defendant, the following numbered interrogatories pursuant to Louisiana Code of Civil Procedure Article 1457 et seq., to be answered fully, in writing and under oath. In accordance with Article 1428 of the Louisiana Code of Civil Procedure, these interrogatories are being continuing and should be supplemented, when supplemental information is obtained. Production request is also made pursuant to Louisiana Law. Petitioner requests that production of documents be made on the same date as answers to Interrogatories are due and shall be made to petitioner at 200 Church Street, Natchitoches, Louisiana.

INTERROGATORY NUMBER 1:

Please identify yourself as the person answering these interrogatories by giving;

1. Full legal name.
2. Physical Residence Address.
3. Mailing Address.
4. Your home telephone number.
5. Your cellular telephone number.
6. Date of Birth.
7. Your social security number.
8. Your driver's license number and state of issuance.
9. Your place of employment.
10. Your work address.

REQUEST FOR PRODUCTION NUMBER 1:

By way of Request for Production of Documents please furnish a copy of your motor vehicle driver's license.

INTERROGATORY NUMBER 2:

For each and every person with whom you consulted with regards to preparing your answers to these interrogatories, please indicate and list:

1. The person's name.
2. Work address.
3. Work telephone number.
4. Home address (if someone other than your attorney)
5. Relationship to you.
6. What information was provided by each person.
7. Which interrogatory that person assisted you with.

NOTE: You do not have to disclose the content of any discussion you have had with your Attorney, but you must disclose on which interrogatory, if any, your attorney supplied the information to you.

INTERROGATORY NUMBER 3:

Do you have a policy of homeowners' insurance that insures the structure and premises located at 3386 Hwy 480, Campti, Louisiana 71411?

REQUEST FOR PRODUCTION NUMBER 2:

By way of Request for Production of Documents please furnish a copy of any such policy if the answer to Interrogatory number 3 is yes.

INTERROGATORY NUMBER 4:

Do you have a policy of insurance that covers the 201 Ruby Street, Coushatta, Louisiana 71019?

REQUEST FOR PRODUCTION NUMBER 3:

By way of Request for Production of Documents please furnish a copy of any such policy if the answer to Interrogatory number 4 is yes.

REQUEST FOR PRODUCTION NUMBER 4:

By way of Request for Production of Documents please provide a copy your voter registration card.

INTERROGATORY NUMBER 5:

Where are you registered to vote?

INTERROGATORY NUMBER 6:

Do you own or have an interest in any property in Natchitoches Parish or Red River Parish, Louisiana?

INTERROGATORY NUMBER 7:

List all motor vehicles, tractors, farmers' machinery or equipment owned by you, either separately, in part or in community, by:

1. Make
2. Color
3. Model
4. VIN number
5. Tag number

REQUEST FOR PRODUCTION NUMBER 5:

By way of Request for Production of Documents please provide a copy of the registration and automobile insurance policy and identification cards with information for each of the vehicles listed.

INTERROGATORY NUMBER 8:

Do you have any interest in any financial accounts, including checking or savings account? If so, with regards to each account state the following:

1. Name of the financial institution.

2. Date the account was open.
3. The percentage of ownership interest.
4. The address that the financial institution sends the account statements and/or notices.

INTERROGATORY NUMBER 9:

Do you receive any federal or state benefits including, but not limited to, Medicaid benefits, SNAP benefits, disability benefits, and/or retirement benefits? If so, with regards to each benefit please state the following:

1. Payor of benefit
2. Type of benefit
3. The date benefit began
4. The address at which the benefit is mailed and received.

INTERROGATORY NUMBER 10:

Name each person that resides at 3386 Hwy 480, Campti, Louisiana. With regards to each, list full name, date of birth, telephone number, length of time they have lived there.

INTERROGATORY NUMBER 11:

Name each person that resides at 201 Ruby Street, Coushatta, Louisiana. With regards to each, list full name, date of birth, telephone number, length of time they have lived there.

INTERROGATORY NUMBER 12:

Do you pay rent or a mortgage payment to anyone?

REQUEST FOR PRODUCTION NUMBER 5:

By way of Request for Production of Documents please provide a copy of your last five canceled checks reflecting rental or mortgage payments.

REQUEST FOR PRODUCTION NUMBER 6:

By way of Request for Production of Documents please provide copies of your last five water and electric bills for the home where you are domiciled.

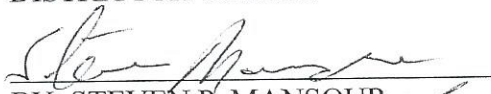

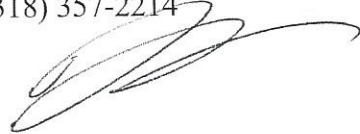
INTERROGATORY NUMBER 13:

For each person you intend to call as a witness at the trial of this case please state the following:

1. Their name and address.
2. Their relationship to you.
3. A summary of their anticipated testimony.

RESPECTFULLY SUBMITTED:

STATE OF LOUISIANA
BILLY JOE HARRINGTON
DISTRICT ATTORNEY


BY: STEVEN P. MANSOUR 
Assistant District Attorney
POST OFFICE BOX 838
NATCHITOCHEs, LA 71458-0838
(318) 357-2214


Louisiana Secretary of State
Voter Information Report

For Parish NATCHITOCHES - 35 for Voter Registration Number 3875519

Parish: **NATCHITOCHES - 35** Wd/Pct: **02/08** Status: **Active** Registration Date: **08/27/1997**
 Voter Name: **HUDSON, TARLISHA JOY** Registration Number: **3875519**

Race: **Black** Sex: **Female** Age: **39** Party: **No Party**

Residence Address: **128 FRONT ST
 CAMPTI, LA 71411-4723**

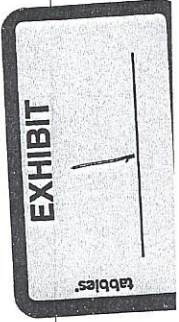
Mailing Address: **128 FRONT ST
 CAMPTI, LA 71411-4723**

Daytime Phone: **318-554-9374**

Home Phone: **318-476-2268**

CONG	SEN	REP	PJ	SCHBD	JP	CD	TXWD	SCT	ACT	DCT	PSC	BESE
04	31	023	01	08	02	CA	//	02	31	10	05	04
CCT	FIR	RSCC	SCH	ST	WAT							
//	09	31C	S7	S1	//							

Deborah Tebbets
 Deborah S. Waskom
 Registrar of Voters
 P.O. Box 677
 Natchitoches, LA 71457
Shanda Turner



Louisiana Secretary of State
Voter Information Report

For Parish NATCHITOCHES - 35 for Voter Registration Number 3881757

Parish: **NATCHITOCHES - 35** Wd/Pct: **02/08** Status: **Active** Registration Date: **05/15/2001**
 Voter Name: **NASH, CYNITA ANN** Registration Number: **3881757**

Race: **Black** Sex: **Female** Age: **65** Party: **No Party**

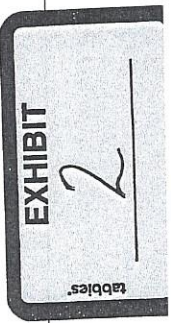
Residence Address: **120 RAPHIEL ST
 CAMPTI, LA 71411-4717**

Mailing Address: **120 RAPHIEL ST
 CAMPTI, LA 71411-4717**

Daytime Phone: Home Phone: **318-476-2853**

CONG	SEN	REP	PJ	SCHBD	JP	CD	TXWD	SCT	ACT	DCT	PSC	BESE
04	31	023	01	08	02	CA	//	02	31	10	05	04
CCT	FIR	RSCC	SCH	ST	WAT							
//	09	31C	S7	S1	//							

Tebbetts
 Deborah S. Waskoff
 Registrar of Voters
 P.O. Box 677
 Natchitoches, LA 71457
 Shanelca Turner



OFFICE OF THE DISTRICT ATTORNEY



BILLY JOE HARRINGTON
DISTRICT ATTORNEY
TENTH JUDICIAL DISTRICT
NATCHITOCHE PARISH

COURTHOUSE BUILDING
P.O. BOX 838
NATCHITOCHE, LOUISIANA 71458-0838
318-357-2214
318-357-0006 FAX

CLOYD BENJAMIN, JR.
1ST ASSISTANT DISTRICT ATTORNEY

JIMMY D. LONG, JR.
ASSISTANT DISTRICT ATTORNEY

CHARLES W. SEAMAN
ASSISTANT DISTRICT ATTORNEY

AMANDA M. McCLUNG
ASSISTANT DISTRICT ATTORNEY

J. CHRIS GUILLET
ASSISTANT DISTRICT ATTORNEY

CIVIL
SHANTEL WEMPREN
ASSISTANT DISTRICT ATTORNEY

January 9, 2019

**DISTRICT ATTORNEY'S WRITTEN OPINION, WITH REASONS IN
ACCORDANCE WITH LOUISIANA REVISED STATUE 18:673**

On January 2, 2019, my office did receive a written complaint from Tarlisha Hudson, a registered voter in the Town of Campti alleging that Mozella Jeanetter Bell was elected Mayor of the Town of Campti on November 6, 2018 and that it is her belief that Mozella Bell did not live in the Town of Campti for one year prior to the election and currently does not live within the Town of Campti and lives in Red River Parish, Louisiana.

Thereafter, my office received a complaint from CyNitea Nash, a registered voter in the Town of Campti. In her complaint, CyNitea Nash stated that it is her belief that Mozella Bell currently does not live within the Town of Campti and lives and is domiciled in Red River Parish, Louisiana.

La. R.S. 18:672 states "when any voter lawfully registered in the district or geographical area from which an office holder has been elected, or from which an officer holder has been appointed, or otherwise selected to hold office, has reason to believe that the office holder no longer meets the residence or domicile requirements of that office, the voter may make a written complaint of that fact to the proper official." La. R.S. 18:671 states, in pertinent part, that "proper official means the District Attorney of the office holder's designated domicile." La. R.S. 18:673 states that "within 20 days of the receipt of such written complaint the proper official shall investigate and provide a written opinion, with reasons, as to whether the office holder meets the residence or domicile requirements of the office he holds to the complainant and to the legislative or executive agency, board, commission, governing authority, or other body or entity of the state or of any political subdivision, to which the office holder has been elected or appointed. The opinion shall also be published in the official journal of the parish of the office holder's designated domicile."



Louisiana Civil Code Art. 38 defines "domicile" as follows: "The domicile of a natural person is the place of his habitual residence." C.C. Art. 39 states that a person "may reside in several places but may not have more than one domicile." C.C. Art. 44 states that "Domicile is maintained until acquisition of a new domicile. A natural person changes his domicile when he moves his residence to another location with the intent to make that location his habitual residence." Louisiana courts have determined that intent is based on the actual state of facts and not what one declares them to be. Taken into account to determine a person's intent are things such as where a person sleeps, takes his meals, has established his household, and surrounds himself with the comforts of domestic life. Other factors include where the person is registered to vote, where his motor vehicles are registered, where he maintains bank accounts and receives mail, where he transacts business affairs, and where he leases or owns property. See *McClendon v. Bel*, (La. App. 1 Cir 9/7/00), 797 So. 2d 700.

The complaint that Mozella Bell did not live in the Town of Campti for one year prior to the election will be pretermitted, an objection to candidacy based on these facts was not received by this office within the allotted time period established by statute.

The other issue raised by both complaints as to whether Mozella Bell is currently domiciled in and actually residing within the City limits of Campti, will be addressed herein in accordance with the Election Code of Louisiana.

As previously noted, state statute requires that the Mayor continue to be legally domiciled within the Town of Campti and shall continue to actually reside within the Town of Campti.

After an investigation I have determined that Mozella Bell, on her Notice of Candidacy Qualifying Form, listed her domicile address as 3365 Hwy 480, Campti, Louisiana 71411 as well as that being her mailing address. That address is not located within the town limits of Campti, Louisiana, but approximately 400 feet west of the town limits of Campti.

Moreover, it is important to note that my investigation has determined that the residence located at that address appears to be abandoned with windows covered by sheets of plywood and, further, appears uninhabited and incapable of habitation.

It is further important to note that Mozella Bell is registered to vote in Clarence, Louisiana and voted in Clarence, Louisiana in the November 6, 2018 election and not in Campti, Louisiana.

A controlling factor of my investigation is that the address of 3365 Hwy 480 wherein Mozella Bell claims to reside and be domiciled is not located within the town limits of Campti, Louisiana.

Using the factors of *McClendon v. Bel* cited previously herein, Mozella Bell is not registered to vote in Town of Campti, voted in the November 6, 2018 election in Clarence, Louisiana, does not receive mail in the town of Campti,, Louisiana and does not have a residence or established household surrounding herself with the comfort of domestic life as result of the nature of the abandoned residence at 3365 Highway 480, Campti, Louisiana. Additionally, Mozella Bell currently lists two different residential addresses. One is located at 201 Ruby Street, Coushatta, Louisiana 71019. The other address she lists is 3365 Highway 480, Campti, Louisiana. The 3365 Highway 480, Campti, Louisiana is the address that Mozella Bell has listed on her vehicle registration. Neither of the above two addresses are located within the town limits of Campti, Louisiana

Moreover, Mozella Bell admitted that she did not live in the Town of Campti in the presence of 1st Assistant District Attorney, Cloyd Benjamin, Jr., by stating that she did not live in the town limits of Campti, Louisiana but lived "20 feet outside of the town limits."

CONCLUSION

Louisiana Revised Statue 18:672 establishes a continuing obligation on the Mayor to maintain domicile, in and actually reside in, the Town of Campti. It is clear that Mozella Bell does not meet and has not met the continuing dual obligation to be domiciled and actually reside within the Town of Campti and is in violation of La. R.S. 18:672.

Therefore, it is my opinion that Mozella Jeanetter Bell does not qualify to hold office of Mayor of the Town of Campti. It is my duty in accordance with Louisiana Revised Statue 18:674, to file suit in the 10th Judicial District Court within ten (10) days of this report to declare the Office of Mayor in the Town of Campti vacant.

Sincerely,



BILLY JOE HARRINGTON

BJH/pw

OFFICE OF THE DISTRICT ATTORNEY



CLOYD BENJAMIN, JR.
1ST ASSISTANT DISTRICT ATTORNEY

JIMMY D. LONG, JR.
ASSISTANT DISTRICT ATTORNEY

CHARLES W. SEAMAN
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TENTH JUDICIAL DISTRICT
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COURTHOUSE BUILDING
P.O. BOX 838
NATCHITOCHES, LOUISIANA 71458-0838
318-357-2214
318-357-0006 FAX

January 15, 2019

Tarlisha Hudson
128 Front Street
Campti, Louisiana 71411

RE: District Attorney's Written Opinion

Dear Ms. Hudson:

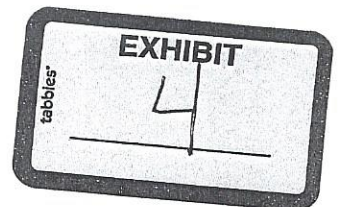
Attached please find a copy of the *District Attorney's Written Opinion*, with reasons in accordance with Louisiana Revised Statute 18:673.

If you have any questions or concerns, please do not hesitate to contact my office.

Sincerely,


BILLY JOE HARRINGTON

BJH/pw



OFFICE OF THE  DISTRICT ATTORNEY

CLOYD BENJAMIN, JR.
1ST ASSISTANT DISTRICT ATTORNEY

JIMMY D. LONG, JR.
ASSISTANT DISTRICT ATTORNEY

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318-357-2214
318-357-0006 FAX

January 15, 2019

Campti Town Hall
3060 US-71
Campti, LA 71411

RE: District Attorney's Written Opinion

Dear Campti Town Council:

Attached please find a copy of the *District Attorney's Written Opinion*, with reasons in accordance with Louisiana Revised Statute 18:673.

If you have any questions or concerns, please do not hesitate to contact my office.

Sincerely,


BILLY JOE HARRINGTON

BJH/pw

OFFICE OF THE DISTRICT ATTORNEY



CLOYD BENJAMIN, JR.
1ST ASSISTANT DISTRICT ATTORNEY

JIMMY D. LONG, JR.
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318-357-2214
318-357-0006 FAX

January 15, 2019

Cynitea Nash
120 Raphiel Street
Campti, Louisiana 71411

RE: District Attorney's Written Opinion

Dear Ms. Nash:

Attached please find a copy of the *District Attorney's Written Opinion, with reasons in accordance with Louisiana Revised Statute 18:673.*

If you have any questions or concerns, please do not hesitate to contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Harrington", written over a horizontal line.

BILLY JOE HARRINGTON

BJH/pw

AFFIDAVIT OF PUBLICATION

STATE OF LOUISIANA
Parish of Natchitoches

Before me, a Notary Public, personally came and appeared Vickie Feazell who, being duly sworn, did depose and say that she/he is Bookkeeper of

The Natchitoches Times, a newspaper of general circulation published within the Parish of Natchitoches, And that January 9, 2019 DISTRICT ATTORNEY'S WRITTEN OPINION, WITH REASONS IN ACCORDANCE WITH LOUISIANA REVISED STATUTE 18:673 #50-19

as per copy attached hereto, was published in said newspaper in the issues of 1/17/19

(s) Vickie Feazell

January 9, 2019
DISTRICT ATTORNEY'S
WRITTEN OPINION,
WITH REASONS IN
ACCORDANCE WITH
LOUISIANA REVISED
STATUTE 18:673

On January 2, 2019, my office did receive a written complaint from Tarrisha Hudson, a registered voter in the Town of Campit alleging that Mozella Jeanette Bell was elected Mayor of the Town of Campit on November 6, 2018 and that it is her belief that Mozella Bell did not live in the Town of Campit for one year prior to the election and currently does not live in the Town of Campit and lives in Red River Parish, Louisiana.

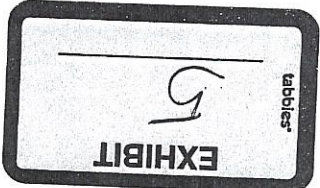
Thereafter, my office received a complaint from CyNitea Nash, a registered voter in the Town of Campit. In her complaint, CyNitea Nash stated that it is her belief that Mozella Bell currently does not live within the Town of Campit and lives and is domiciled in Red River Parish, Louisiana.

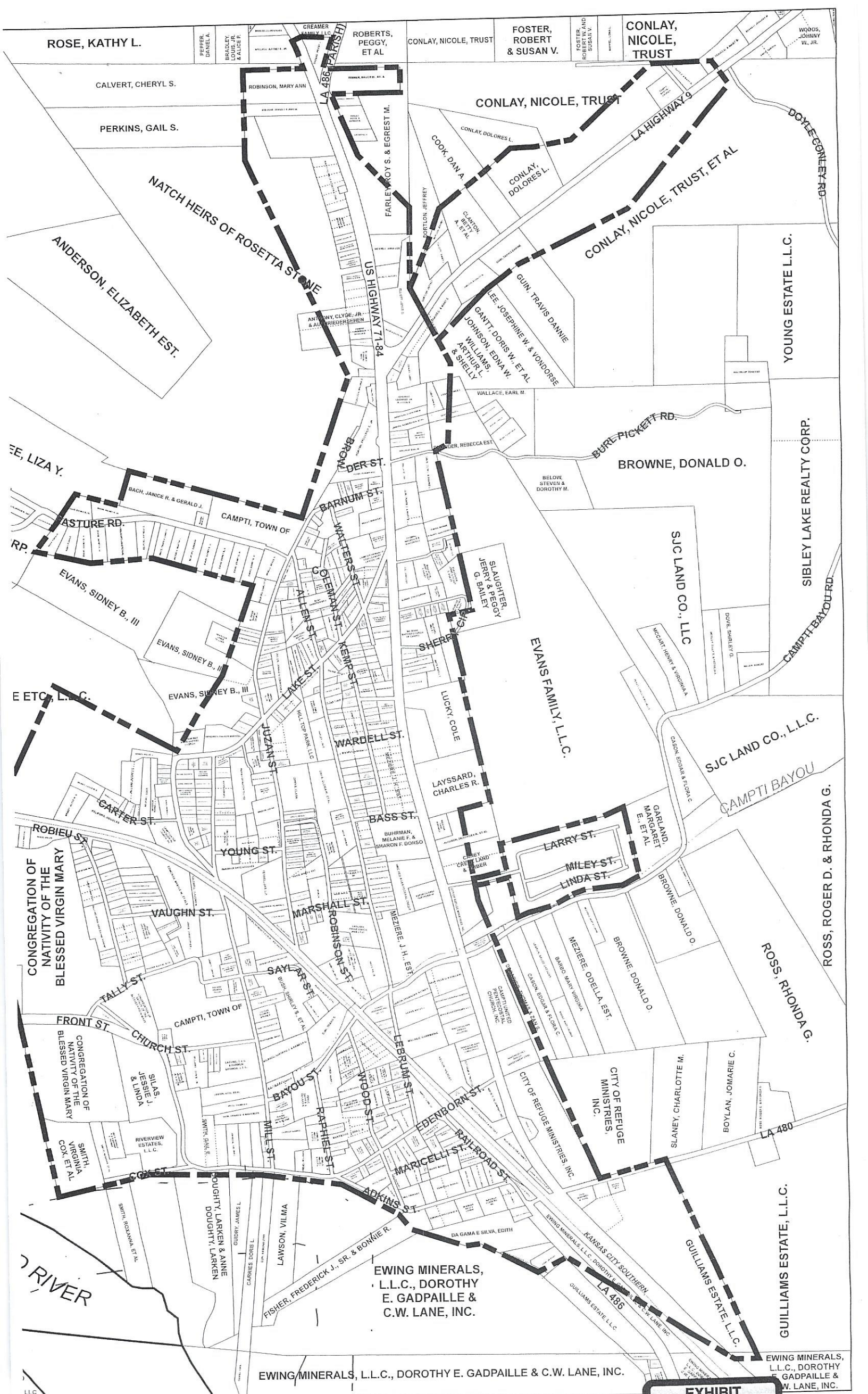
La. R.S. 18:672 states "when any voter lawfully registered in the district or geographical area from which an office holder has been elected, or from which an appoint-officer holder has been appointed, or otherwise selected to hold office, has reason to believe that the office holder no longer meets the residence or domicile requirements of that office, the voter may make a written complaint of that fact to the proper official." La. R.S. 18:671 states, in pertinent part, that "proper official means the District Attorney of the office holder's designated domicile." La. R.S. 18:673 states that "within 20 days of the receipt of such written complaint the proper official shall investigate and provide a written opinion with reasons, as to whether the office holder meets the residence or domicile requirements of the office he holds to the complainant and to the legisla-

to before me this 17th day of January, 2019.

Tammy E. Raynes
Notary Public

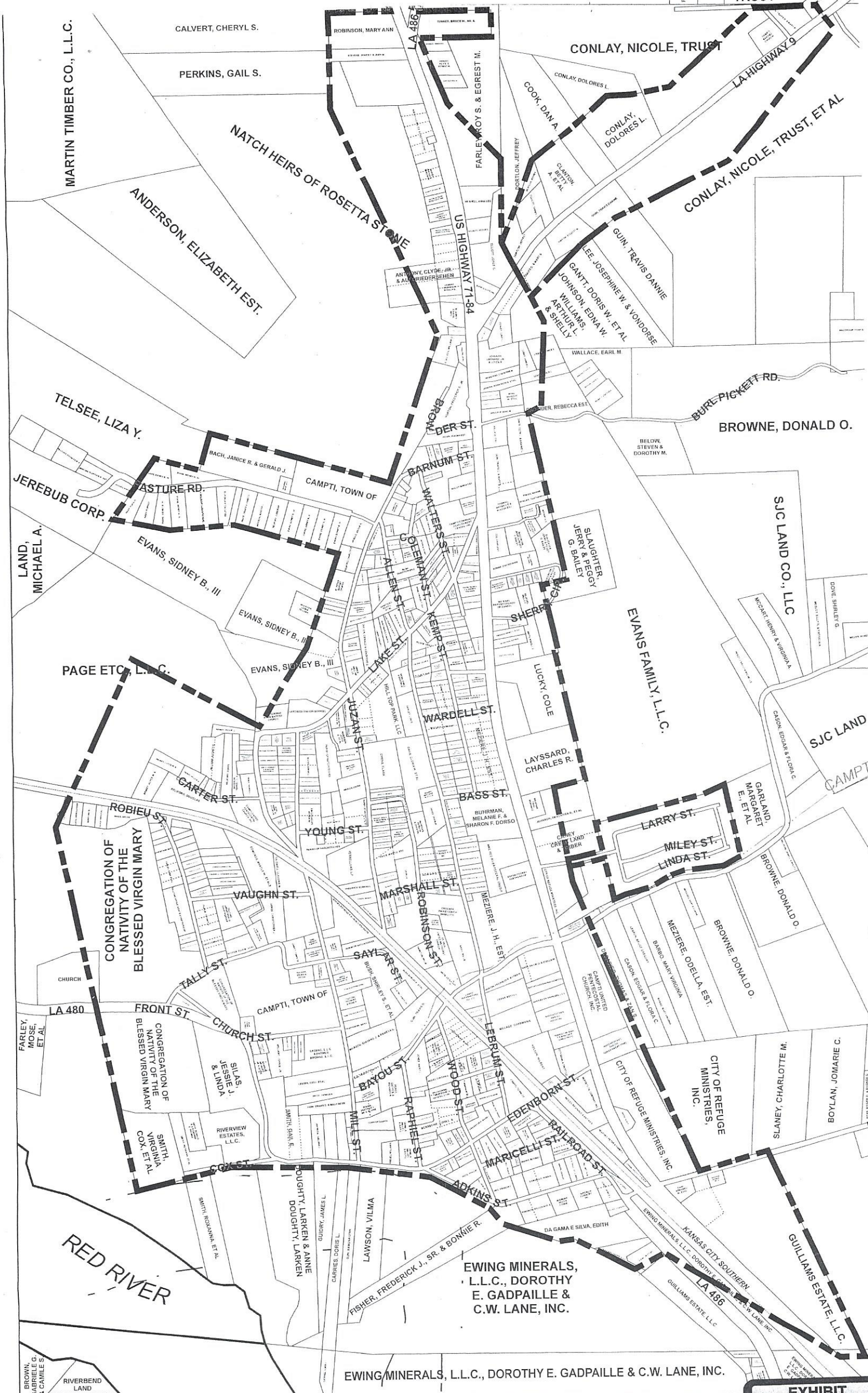
Tammy E. Raynes
#035617





EWING MINERALS, L.L.C., DOROTHY E. GADPAILLE & C.W. LANE, INC.

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The Natchitoches Parish Assessor's Office has made every viable attempt to produce and publish accurate mapping information as possible. However, no warranties are expressed or implied in the use or interpretation of the data provided. Maps are provided for informational purposes only and are not to be interpreted as a legal survey or legal document. Errors, omissions or the incorrect positional placement of the data may occasionally occur.

FROM THE OFFICE OF
DOLLIE C. MAHONEY
 ASSESSOR
 NATCHITOCHE PARISH

EXHIBIT

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