

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

DOCKET #:

95334-B

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VERSUS

NICHOLAS CHRISTOPHER DOUGLAS,
ET AL

10TH JUDICIAL DISTRICT COURT
NATCHITOCHE PARISH, LOUISIANA

RECEIVED AND FILED
DAVID STAMEY
CLERK OF COURT
2015 FEB 11 P 1:16
10TH JUDICIAL DISTRICT COURT
NATCHITOCHE PARISH, LA

PETITION FOR OBJECTION TO CANDIDACY

NOW INTO COURT, comes and appears the State of Louisiana, through the undersigned District Attorney for the Tenth Judicial District, Parish of Natchitoches, State of Louisiana, respectfully represents and shows:

Made Defendants herein are:

NICHOLAS CHRISTOPHER DOUGLAS, hereinafter referred to as
“Defendant” **HONORABLE NANCY LANDRY**, Secretary of State for the State
of Louisiana

LOUISIANA BOARD OF ETHICS

DAVID STAMEY, Clerk of Court for Natchitoches Parish, Louisiana.

1.

A registered voter in the Village of Powhatan, Louisiana has made a complaint to the Office of Natchitoches Parish District Attorney alleging that Nicholas Christopher Douglas, a candidate for Chief of Police for the Village of Powhatan, illegally qualified for said office and has not resided in Natchitoches Parish for at least the immediate preceding year pursuant to the Louisiana Revised Statute 33:385.1.

2. ✓

The undersigned District Attorney brings this action pursuant to the Louisiana Revised Statute 14:491, et seq. and 18:401, et seq.

3.

Made Defendant herein is Nicholas Christopher Douglas, on information and belief, he is not a resident of the Parish of Natchitoches despite the fact that he has declared as candidate for Chief of Police for the Village of Powhatan, Louisiana.

4.

Pursuant to Louisiana Revised Statute 18:492, et seq. and 18:405, et seq., this court has jurisdiction over actions objecting to candidacies for elections in this jurisdiction.

5.

Venue is proper in this court as objection to the candidate involved in office filing by Natchitoches Parish election pursuant to Louisiana Revised Statute 18:1404.

6.

This action challenges the candidacy of the Defendant for the position of the Chief of Police of the Village of Powhatan, Louisiana and seeks to disqualify him from election for that office, scheduled to be held on March 29, 2025. This petition is filed timely pursuant to Louisiana Revised Statute 14:493 and Louisiana Revised Statute 14:1405A.

7.

Based on information and belief Defendant is neither a resident of nor domiciled in Natchitoches Parish, and has not been domiciled or resided in any portion of Natchitoches Parish in the one year immediately preceding his declaring as a candidate for the Chief of Police for the Village of Powhatan.

8.

Petitioner shows that Defendant submitted, by mail from Ohio, a Louisiana Voters Registration application to the Natchitoches Parish Registrar Voters on November 6, 2024. In said application, Defendant listed his address as 233 Melissa Place, Natchitoches, Louisiana 71457. After an investigation, petitioner shows that Defendant has never lived at that address. Moreover, the Natchitoches Parish Registrar Voters mailed a confirmation of registration to said address that was returned by the United States Postal Service.

9.

Further, petitioner shows that Defendant mailed his notice of candidacy for Chief of Police for the Village of Powhatan to the Natchitoches Parish Clerk of Court Office by United Parcel Service Express Mail on January 28, 2025. The return address of the

Defendant on said document is listed as 2920 Gunckel Blvd. Toledo, Ohio 43606. In said application filed with the Natchitoches Parish Clerk of Court on January 31, 2025, Defendant listed his address 129 Sycamore Court, Natchitoches, Louisiana 71457. After an investigation, petitioner has discovered the Defendant has never lived at that address.

10.

Upon information and belief, petitioner shows that Defendant has never lived in Natchitoches Parish and has lived in the State of Ohio for the year preceding his filing for candidacy.

11.

Further, upon information and belief, petitioner shows that Defendant current driver's license was issued by the State of Ohio.

12.

Further, upon information and belief, petitioner alleges that Defendant has active voters' registration in Selma, Alabama; Toledo, Ohio; Temberance, Michigan.

13.

As result of the falsified Louisiana Voter Registration application and falsified State of Louisiana – Notice of Candidacy Qualifying Form, Petitioner shows that Defendant has a repeated behavior and has a pattern of falsifying information on legal documents in the Parish of Natchitoches, in reference to his candidacy and voter registration.

14.

Petitioner shows that the certification listed on the Defendants notice of candidacy filed on January 31, 2025 is false, as a result of the Defendants intentional fraudulent listing of his address, at which he has never resided.

15.

On these bases, therefore, plaintiff seeks a judgment from this court disqualifying the Defendant as a candidate in the March 29, 2025 election for the Chief of Police for the Village of Powhatan, Louisiana.

16.

Plaintiff reserves the right to supplement this petition with any other information obtained prior to the hearing.

17.

Plaintiff moves this court that the Defendant be compelled to produce at the hearing on the Rule to Show Cause the following documentary evidence:

1. Documentation that shows that Defendant has lived in the Parish of Natchitoches for at least one year preceding his filing of the Notice of Candidacy, including but not limited to, leases, homestead exemption, rental agreements.
2. Copies of all bills, invoices, statements and receipts attributable to or incurred in connection with his residence, if any, in the Parish of Natchitoches between January 1, 2024 to January 31, 2025, including but limited to, copies of utility bill, electricity, gas, cable, water sewage, telephone, insurance policies.
3. Copies of any Federal or State income tax returns and any request for extensions or amendments or modifications filed by the Defendant for the tax years 2022 and 2023.
4. A copy of any homestead exemptions filled by or on behalf of Nicholas Christopher Douglas with the Assessor for the Parish of Natchitoches declaring an exemption for tax years beginning on and after January 1, 2022, for the dwelling situated at 233 Melissa Place, Natchitoches, Louisiana.
5. Copies of all bills, invoices, statements and receipts attributable to or incurred in connection with the dwelling situated at 233 Melissa Place, Natchitoches, Louisiana 71457, 129 Sycamore Court, Natchitoches, Louisiana, or any other place of residence in Natchitoches Parish, between January 1, 2023, and the date of the hearing herein, including

but not limited to utilities, electricity, gas, cable services, water, sewerage, telephone, insurance policies, mortgage, ad valorem taxes.

6. Copies of any Federal and State income tax returns any request for extensions, amendments or modifications filed by Nicholas Christopher Douglas for the tax year 2022, 2023 and 2024.

18.

Plaintiff further moves that this Honorable Court to order the Natchitoches Parish Clerk of Court be compelled to produce the following documentary evidence at the Rule to Show Cause:

- A: original order of candidacy submitted by Defendant.
- B: worksheet for the original notice of candidacy completed by the Defendant.

19.

Pursuant to Louisiana Revised Statue 18:1406 (A), upon filing, a copy of this petition is being posted at a conspicuous place at the entrance of the Office of the Clerk of Court of Natchitoches Parish.

20.

Pursuant to Louisiana Revised Statue 18:1406 (C) and 18:1409 (A) (1), this action challenging the candidacy of the Defendant must be tried summarily in open court without a jury.

21.

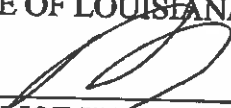
By operation of law, in filing the Notice of Candidacy, plaintiff shall issue service on Defendant's appointed agent for service of process in this action challenging his candidacy in accordance with Louisiana Revised Statue 18:1407, said agent being the Natchitoches Parish Clerk of Court. Out of abundance of caution, plaintiff is also undertaking a diligent effort to effect personal service on the Defendant at the domiciliary address shown on his Notice of Candidacy.

WHEREFORE, the State request a hearing to held, and thereafter that

Defendant's candidacy for Chief of Police for the Village of Powhatan be disqualified for the March 29, 2025 election.

RESPECTFULLY SUBMITTED:

STATE OF LOUISIANA



BILLY JOE HARRINGTON
DISTRICT ATTORNEY
10TH JUDICIAL DISTRICT
POST OFFICE BOX 838
NATCHITOCHES, LA 71458-0838
(318) 357-2214

CERTIFICATE OF SERVICE

It is hereby certified that a copy of this Petition for Objection to Candidacy has been served upon the Natchitoches Parish Clerk of Court on this the 7th day of February, 2025.



Billy Joe Harrington,
District Attorney

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

* DOCKET #:

95334-B

VERSUS

* 10TH JUDICIAL DISTRICT COURT

NICHOLAS CHRISTOPHER DOUGLAS,
ET AL

* NATCHITOCHE PARISH, LOUISIANA

ORDER

After considering the above and foregoing motion:

IT IS ORDERED that a hearing be held on the 10th day of February,
2025 at 2 a.m. (p.m.)

DONE AND SIGNED on the 7th day of February, 2025.

Lala B. Aghuel
DISTRICT JUDGE

RECEIVED AND FILED
DAVID STAMLEY
CLERK OF COURT
2025 FEB -21 P 1:46
DPA/EL
NATCHITOCHE PARISH, LA

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

VERSUS

NICHOLAS CHRISTOPHER DOUGLAS,
ET AL

DOCKET #:

95334-B

10TH JUDICIAL DISTRICT COURT

NATCHITOCHE PARISH, LOUISIANA

RECEIVED AND FILED
DAVID STAMEY
CLERK OF COURT
2025 FEB - 17 P 1:11 PM
NATCHITOCHE PARISH, LOUISIANA

RULE TO SHOW CAUSE

Considering the petition, the law, and the facts herein alleged, IT IS ORDERED THAT, Nicholas Christopher Douglas appear and show cause on 10th day of February, 2025 at 2:00 a.m./(p.m.) why he should not be declared an ineligible as a candidate for the Village of Powhatan, Natchitoches Parish, Louisiana and, after due proceedings, why this Honorable Court should not Order him to pay all cost of these proceedings, including but not limited to court costs, reasonable attorney's fees and curator fees.

IT IS FURTHER ORDERED that any motion and or the delays for production of documentary evidence, discovery, and/or subpoenas be and is hereby WAIVED, and that Defendant shall produce at the hearing on the Rule to Show Cause the following documentary evidence:

1. Copies of all bills, invoices, statements and receipts attributable to or incurred in connection with the dwelling situated at 233 Melissa Place, Natchitoches, Louisiana 71457, 129 Sycamore Court, Natchitoches, Louisiana, or any other residence in Natchitoches Parsh, between January 1, 2023, and the date of the hearing herein, including but not limited to utilities, electricity, gas, cable services, water, sewerage, telephone, insurance policies, mortgage, ad valorem taxes.
2. Copies of any Federal and State income tax returns any request for extensions, amendments or modifications filed by Nicholas Christopher Douglas for the tax year 2022, 2023 and 2024.

IT IS FURTHER ORDERED that Clerk of Court David Stamey, Secretary of

State Nancy Landry, and Defendant, Nicholas Christopher Douglas shall produce the following documentary evidence at the hearing on the Rule to Show Cause:

- A: original order of candidacy submitted by Defendant.
- B: worksheet for the original notice of candidacy completed by the Defendant.

Signed in Natchitoches, Natchitoches Parish, Louisiana, on this 7th day of February, 2025.

Lala B. Agrest
DISTRICT JUDGE

Please Serve: Personal
Nicholas Christopher Douglas:
129 Sycamore Court
Natchitoches, LA 71457
And
Nicholas Christopher Douglas:
233 Melissa Place
Natchitoches, LA 71457
And
David O. Stamey
Clerk of Court for Natchitoches Parish
200 Church Street
Natchitoches, LA 71457



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Natchitoches	C-95334
Filed Feb 10, 2025 9:13 AM	B
Danielle Queen	
Deputy Clerk of Court	
E-File Received Feb 10, 2025 9:09 AM	

E-File

BILLY "BILLY JOE" HARRINGTON

DOCKET NO: C-95334; DIV. B

VERSUS

10th JUDICIAL DISTRICT COURT

NICHOLAS CHRISTOPHER DOUGLAS,
ET AL.

PARISH OF NATCHITOCHES

STATE OF LOUISIANA

**LOUISIANA SECRETARY OF STATE'S MEMORANDUM IN RESPONSE TO
PETITION OBJECTING TO CANDIDACY OF CHRISTOPHER DOUGLAS**

MAY IT PLEASE THE COURT:

La. R.S. 18:1402 provides for the proper parties against whom actions objecting to candidacy shall be instituted. While the statute provides that the person whose candidacy is objected to and the clerk of court, in his official capacity, if the candidate qualified with the clerk of court, are the proper parties in an objection to candidacy suit such as the one before this Honorable Court, the Secretary of State is a permitted party defendant and would have standing to intervene in an action objecting to the candidacy in which the Secretary of State was not the qualifying official under La. R.S. 18:1402(C). Having been made a party in plaintiff's petition now before this Honorable Court, intervention is of course unnecessary and Counsel for the State wishes to provide this Honorable Court with information that may be pertinent in its decision and information related to the election process for unopposed candidates running in a special election.

The office of Chief of Police, Village of Powhatan, Parish of Natchitoches

The office of Chief of Police, Village of Powhatan is an elected office, and has been vacant since June 30, 2024, when the four year term of office for the last elected candidate expired. The regular election for a new, full four-year term was scheduled to be held on the election dates in the spring of 2024; however, no one qualified to run for the office. If someone had qualified, they would have served in the elected chief of police position from July 1, 2024 through June 30, 2028. Due to the office remaining vacant, in accordance with the vacancy laws of the State, a special election was therefore called for the fall of 2024. Again, no one qualified in the fall election, and in accordance with the vacancy laws of the State, another special election was called for the 2025 spring election dates, which is the current election cycle we are in, and which are scheduled for

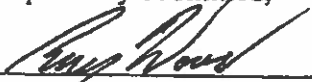
March 29, 2025 (primary), May 2, 2025 (general), with qualifying for the said election cycle having occurred last week between January 29 through January 31, 2025.

The defendant-candidate in this matter, Mr. Christopher Douglas, was the sole individual to qualify for the office of Chief of Police, Village of Powhatan, Parish of Natchitoches, during the qualifying period on January 31, 2025. For unopposed candidates running in a special election, the State's process is to verify with the respective Clerk of Court's office whether an objection to candidacy has been filed within the deadlines provided by law. La. R.S. 18:1405(A) provides that "[a]n action objecting to candidacy shall be instituted not later than 4:30 p.m. of the seventh day after the close of qualifications for candidates in the primary election." In the present matter, the District Attorney has of course timely filed an action within the time period prescribed by law. It should be noted that if an action had not been timely filed, either by the District Attorney or by a qualified elector with standing to bring said suit, then after the expiration of the timeframe, the procedure of the Secretary of State's office is to issue a commission to the unopposed candidate who has qualified to run for the unexpired term as soon as possible. This is typically the first business day after the objection to candidacy timeframe has expired, so in this instance it would be Monday, February 10, 2025 after verification with the respective Clerk of Court's office.

Conclusion

WHEREFORE, these issues considered, the State prays the information provided to this Honorable Court regarding the office of Chief of Police, Village of Powhatan, Parish of Natchitoches, the qualification process, and the Department of State's responsibilities therein prove beneficial in the decision on this matter. The State further prays that should this Honorable Court find in the Petitioners' favor, that any judgment rendered herein take into account the electoral timeframes in Title 18 of the Louisiana Revised Statutes.

Respectfully Submitted,


Ray Wood, Bar No. 34828
Natalie Vignes, Bar No. 33733
Counsel for Nancy Landry, Secretary of State
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P.O. Box 94125
Baton Rouge, LA 70809
Telephone: 225-922-0547
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