22ND JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. TAMMANY

STATE OF LOUISIANA

NO. DIVISION

ST. TAMMANY PARISH MOSQUITO ABATEMENT DISTRICT

VERSUS

ST. TAMMANY PARISH GOVERNMENT BY AND THROUGH
THE ST. TAMMANY PARISH COUNCIL

FILED: _____ _____
DEPUTY CLERK

VERIFIED PETITION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND FINAL INJUNCTION

Plaintiff, St. Tammany Parish Mosquito Abatement District ("STPMAD"), through undersigned counsel and pursuant to Louisiana Code of Civil Procedure articles 3601 *et seq.*, respectfully petitions this Court for a temporary restraining order, preliminary injunction, and final permanent injunction against Defendant, St. Tammany Parish Government (sometimes referred to as "STPG") by and through the St. Tammany Parish Council (sometimes referred to as "the Council") restraining it from persisting in its unauthorized and unlawful investigation of STPMAD. Plaintiff respectfully represents:

Introduction

The STPG and the Council are facing a budgetary shortfall after the taxpayers and voters of St. Tammany Parish declined 6 tax measures at the ballot to increase funding for STPG. Despite a clear indication of voter distrust for additional funding to the STPG, the Council through its members, committees, and agents concocted a scheme to consolidate STPMAD within itself in order to take control of STPMAD's dedicated funds and redirect the funds to itself. Unlike the STPG, the voters of St. Tammany Parish directly voted for and approved the funding for STPMAD which is dedicated to mosquito abatement services for the St. Tammany Parish residents. In furtherance of this scheme, the Council conducted an illegal and unauthorized investigation into STPMAD, an independent special district and political subdivision of the state of Louisiana, and deputized STPMAD's own legal counsel, the district attorney, to investigate and disparage its

client in violation of attorney ethics rules. STPMAD petitions the Court to enjoin this illegal investigation for the reasons set forth herein.

I. The Parties

1.

Plaintiff, STPMAD, is a special district pursuant to Article 6, § 19 of the Louisiana Constitution and a political subdivision of the state of Louisiana pursuant to La. R.S. § 33:7721. STPMAD has the power to sue and be sued in its name and is domiciled in the Parish of St. Tammany.

2.

Defendant, St. Tammany Parish Government, by and through the St. Tammany Parish Council, is a local government subdivision operating under a Home Rule Charter. It is a distinct juridical entity having the power to sue and be sued.

II. Jurisdiction and Venue

3.

Jurisdiction is proper in this Court pursuant to Article 5, § 16(A) of the Louisiana Constitution.

4.

Venue is proper pursuant to La. R.S. § 13:5104(B) because this is an action against a political subdivision and is being brought in the district court of the judicial district where the political subdivision is located.

III. Facts

5.

Beginning in 2016, St. Tammany Parish officials put forth a series of five tax propositions for dedicated taxes to the parish's criminal justice system. Each proposition was voted down by the voters of St. Tammany Parish.[1]

[1] https://www.nola.com/news/northshore/tax-st-tammany-jail-mike-cooper/article_3f72978a-f478-11ef-80a0-071c9ce89515.html

6.

On March 29, 2025, the voters and taxpayers of St. Tammany Parish voted down a sales tax diversion designed to fund the courts, the district attorney's office, and the criminal justice system.

7.

At least one expert has characterized the Council's tax measure failures as clearly signaling that "the voters in St. Tammany don't trust their elected officials with taxes."[2]

8.

The above-described ballot initiatives were designed to increase taxes and funding for STPG, which includes the office of the district attorney.

9.

In contrast to STPG and the Council, STPMAD is a special taxing district and political subdivision of the state of Louisiana with the power to carry on business and adopt ordinances reasonably necessary for STPMAD's purpose and mission of the abatement, control, eradication, and study of mosquitoes and other arthropods of public health importance, and all activities incidental thereto. STPMAD also has the independent power to levy and collect special taxes to further this mission and purpose.[3]

10.

As an independent special taxing district, STPMAD is directly answerable to the voters and taxpayers of St. Tammany Parish, who directly control their approval or disapproval of millages for mosquito abatement services.

11.

In further contrast to STPG and the Council, on December 10, 2016 the St. Tammany Parish voters and taxpayers voted in favor of renewing a millage and dedicating certain tax dollars to STPMAD.

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[2] Statement of Dr. Robert Collins. https://www.fox8live.com/2025/03/31/st-tammany-officials-perplexed-after-voters-reject-tax-diversion-criminal-justice-system/

[3] La. R.S. § 33:7721 *et seq.*

12.

At the 2016 millage renewal, STPMAD asked for renewal at 4.2 mils, lowering its millage from the previously approved 5.5 mils from 2007. Since the 2016 renewal, STPMAD has continued to lower its millage even more. The millage for 2025 is 3.1 mils, and STPMAD recently approved an even lower millage of 2.27 mils for 2026.

A. The Scheme

13.

In clear response to the Council's failed attempts to win taxpayer and voter approval of additional money for services they provide, the Council with the assistance of District Attorney Collin Sims instituted an illegal and sham investigation of STPMAD under the guise of government efficiency with a clear and obvious goal of circumventing the will of the voters and taxpayers by utilizing the illegal investigation as a smear campaign with an end goal to not reduce taxes but rather pursue control of STPMAD and its voter-dedicated tax funds for itself ("the Scheme").

14.

The beginnings of the Scheme can be traced back to at least November 8, 2023 when then Assistant District Attorney Collin Sims publicly disparaged and criticized STPMAD as a "fiefdom" and "sitting on piles of cash" to the Leadership St. Tammany class of 2024, where STPMAD Executive Director, Dr. Kevin Caillouet, was a member and in attendance. This first public comment disparaging STPMAD was also the beginning of District Attorney Collin Sims's ongoing ethics violations under the Louisiana Rules of Professional Conduct for attorneys as it was the first time he took a public position adverse to his client, STPMAD.

15.

Throughout the illegal investigation, District Attorney Collin Sims "readily admit[ted] that his office and the judiciary need money."[4]

[4] https://www.nola.com/news/northshore/transparency-committee-district-attorney-role/article_cb64d97f-2c35-40d7-a7a5-4dfafd3b27a4.html

16.

Most recently, District Attorney Collin Sims candidly stated his desire for STPMAD's funds when, without any expertise, knowledge, or experience on how to run or operate mosquito abatement services, he stated he could "fund the judiciary for six years" with STPMAD's dedicated tax dollars that it spent on aerial equipment, ground equipment, and a lab to further mosquito abatement services for the citizens of St. Tammany Parish.

17.

Indeed, as a result of the illegal investigation, the Council through its committee with the assistance of District Attorney Collin Sims released a report proposing consolidation of STPMAD within STPG in an obvious attempt to take over physical and financial assets of STPMAD acquired through its dedicated taxpayer approved funds to fund STPG and the District Attorney's office—whose additional funding the voters rejected—as explained by Assistant District Attorney Elizabeth Authement and Councilman Arthur Laughlin who discussed how much money they could get by either selling or leasing STPMAD's lab upon consolidation.[5]

18.

Also in support of the Scheme, the Council and District Attorney enlisted a group of business leaders to assist in the investigation. Most recently at the October 23, 2025 Government Efficiency Committee meeting, the investigative team suggested that the voters of St. Tammany Parish were not smart enough to make decisions about dedicated taxes and that the solution was to take away the voters' direct say over tax dollars to STPMAD and other districts and to consolidate power into the Council and STPG, who the voters have shown a clear distrust and multiple times rejected awarding more tax dollars to.

19.

For example, a recent comment was made, "We believe that the overwhelming majority of our citizens do not understand that this government [the Council] has no real oversight over these special taxing districts."[6]

[5] https://www.youtube.com/watch?v=YSK25S0jX3I
[6] STPG Efficiency Committee Meeting of October 23, 2025. https://www.youtube.com/watch?v=YSK25S0jX3I

20.

Another comment was made that "A consolidation under Parish Government whereby you as elected councilmembers will have appropriate oversight and approval as to budgets and capital expenditures is absolutely necessary."[7]

21.

During the course of the illegal investigation, STPMAD was up for its 10-year millage renewal, and the Board of Commissioners ultimately decided to bring to the taxpayers and voters of St. Tammany Parish another reduced millage from the 2016 4.2 mils to 2.8 mils. The Council refused to allow the proposal to go on the ballot for the voters of St. Tammany Parish, further indicating that the Scheme is not about lowering taxes but about consolidating power.

22.

At the same time the STPMAD Board of Commissioners was discussing lowering their millage, Council Chair Joe Impastato requested a closed-door meeting to request that STPMAD leadership withhold bringing their lowered millage renewal to the ballot so that the Council could continue the illegal investigation. At the meeting, STPMAD Executive Director Dr. Kevin Caillouet asked about potential solutions including across the board spending cuts for STPG as well as other special districts, and whether the Council would allow the reduced STPMAD millage to go forward on the next election cycle. Council Chair Impastato declined to engage in such discussions, instead representing that he wanted more time to continue the Council's illegal investigation further indicating that the Scheme was not about voter autonomy or lowering taxes but about consolidating power and using money dedicated to mosquito control to fill the anticipated shortfall in the STPG's budget.

23.

The Scheme is clear. Presently, voters of St. Tammany Parish have direct control over how much of their tax dollars go to STPMAD when they vote for STPMAD's millage. Their vote for council members also influences operations of STPMAD because the Council appoints the Board of Commissioners for STPMAD. While the voters have approved tax dollars for STPMAD at the

[7] STPG Efficiency Committee Meeting of October 23, 2025. https://www.youtube.com/watch?v=YSK25S0jX3I

ballot, they have rejected additional tax dollars for STPG and the District Attorney at the ballot. Thus, STPG through the Council and with the assistance of the District Attorney have elected to conduct an illegal investigation to try to disparage the STPMAD and to support their anticipated move to consolidate STPMAD into the STPG. If STPMAD is part of STPG, the Council could then redirect funding directly approved and controlled by the taxpayers of St. Tammany Parish for mosquito abatement and redirect it to themselves.

A. The Illegal Investigation

24.

From January to October 2024 District Attorney Collin Sims, Councilman Pat Philips, Councilman Jimmy Strickland, and Councilman Jeff Corbin made various requests to meet, made requests for Aerial Operations Department information, and toured the STPMAD Facility.

25.

On February 26, 2025, the Council passed Resolution No. C-7080 forming the Transparency and Resource Accountability Committee ("TRAC") in express partnership with District Attorney Collin Sims and his office "to provide assistance for the 2026 budget process for all departments, offices and agencies receiving funding from the St. Tammany Parish Government." Resolution C-7080 expressly acknowledged that the Council only had control of funds, budgets, charges, taxes, assessments, revenue control, and regulation for "Parish government" and "service by Parish government." Furthermore, the resolution listed certain entities as part of the resolution" "the coroner's office, jail operations, library, COAST/STARC, 22nd Judicial District Court, Assessor's Office, Clerk of Court, and the District Attorney of the 22nd Judicial Court." The resolution further stated, "the Parish Council desires to have more data during the 2026 budget process, as well as an expert's insight into the 2026 budgetary requests for each department and entity receiving funding from St. Tammany Parish Government." Finally, the Council acknowledged that it was performing an investigation when it stated, "WHEREAS the District Attorney of the 22nd Judicial Court has a Forensic Accountant on staff who is an expert in accounting, auditing, and **investigations**." (Emphasis added).

26.

Notably, STPMAD is not listed at all in the resolution and is not a department, office, or agency of St. Tammany Parish Government nor is it an entity that receives funding from the St. Tammany Parish Government.

27.

In addition, STPG and the Council have no authority to investigate an independent special district like STPMAD because Article II § 2-08 of the St. Tammany Parish Home Rule Charter limits the Council's ability to investigate "into the affairs of the parish government and the related conduct of any parish official, officer, employee, department, office or agency."

28.

In fact, at the February 13, 2025 Home Rule Committee meeting, former Councilman and Parish President Kevin Davis and Gen. Carl Ernst discussed the very issue of the Council's limited power to investigate and/or look into the finances of entities outside of STPG. The discussion acknowledged that new state legislation was likely required to change the relationship between the Office of Inspector General and STPG in hopes that it would give STPG more power to look into entities beyond those controlled and/or covered by STPG and its budget. Councilman Laughlin even acknowledged during this exchange, "we don't have authority over stuff so we can't if you have a problem with the school board or if you have a problem with the fire department we can't investigate . . ." Like the school board and the fire districts, STPMAD is an independent special taxing district not part of STPG.

29.

Despite the lack of legal authority from both the Council's own resolution and the Home Rule Charter, the Council in conjunction with District Attorney Collin Sims launched an illegal and unauthorized investigation against STPMAD.

30.

On March 9, 2025, TRAC announced through the Times Picayune that District Attorney Collin Sims and Parish Council Chair Joe Impastato along with the Finance Committee and its chair, Cheryl Tanner, would spearhead and direct the investigation including the use of District

Attorney Collin Sims' forensic auditor. As recently explained by District Attorney Collin Sims, his agency used former FBI agents to assist in conducting the illegal investigation. District Attorney Collin Sims and Councilman Impastato announced that they intended to conduct the illegal investigation by stating that they hoped to look at entities with dedicated property taxes singling out Mosquito Abatement.[8]

31.

Shortly thereafter on March 26, 2025, District Attorney Collin Sims publicly and baselessly disparaged STPMAD, posting on Facebook that "The mosquito abatement district is its own fiefdom and not a line item on a budget."

32.

On April 2, 2025, the illegal investigation of STPMAD became crystal clear when Assistant District Attorney Elizabeth Authement, on information and belief, on behalf of the Council who deputized the District Attorney's office with respect to TRAC, sent records requests to STPMAD clearly as part of a forensic audit. The requests included "all records 2021 to present of funds received, spent, and/or allocated including but not limited to plane maintenance, flight hours, storage, fuel, pilot, mechanic, and maintenance costs; all interest accrued on funds under the control of the Mosquito Abatement District; specific amounts spent from District Revenue for employees; commission members and elected official salaries and benefits; all contracts for outside services; total square mileage of areas within St. Tammany Parish serviced by the District; and frequency of and total number of sprays annually".

33.

The clear intent to forensically audit STPMAD was curious and unauthorized given that STPMAD, as an independent political subdivision of the state of Louisiana, is audited by the Louisiana Legislative Auditor, who has never found any inappropriate use of public funds.

[8] https://www.nola.com/news/northshore/st-tammany-government-transparency-committee-doge/article_df3e6c4c-fa10-11ef-95cd-f3b328e016ea.html

34.

In light of District Attorney Collin Sims' and his office's public disparagement and clear investigation of STPMAD, STPMAD began to question the propriety of his acts because the District Attorney admittedly was STPMAD's legal counsel.[9]

35.

After approximately a month and a half of communications with District Attorney Collin Sims, who continued his illegal investigation of STPMAD for the Council and refused to back off the disparagement of his client, and after providing requested facility tours to Council members Impastato, Corbin, and Tanner that were clearly connected to the illegal investigation, STPMAD sent a formal letter to District Attorney Collin Sims requesting him to recuse himself and his office from the Council's illegal investigation of his client and acknowledge his ethics violations of the Rules of Professional Conduct for attorneys by performing an adversarial investigation against his client.

36.

District Attorney Collin Sims refused to recuse himself and his office from the Council's illegal investigation of his client and instead doubled down. On August 4, 2025, Assistant District Attorney Elizabeth Authement invited STPMAD leadership to a meeting to allegedly disclose Mr. Sims' "findings" from information gathered thus far from the illegal investigation of his client, STPMAD. Upon arrival, STPMAD's representatives learned that the District Attorney had no findings to share but instead sought to conduct follow-up investigation against his client under false pretenses. The investigation took the form of detailed questions to STPMAD's leadership, akin to a deposition, peppering them with questions to support or defend practices.

37.

STPMAD told District Attorney Collin Sims at this meeting as it has done numerous times in past meetings that it believed he and his office had a clear conflict of interest that prohibited their involvement in the illegal investigation of his client STPMAD, but District Attorney Collin Sims advised that there was no conflict, that he was apparently not representing STPMAD during

[9] https://www.nola.com/news/northshore/st-tammany-government-transparency-committee-doge/article_df3e6c4c-fa10-11ef-95cd-f3b328e016ea.html

that meeting, and then he proceeded to pressure STPMAD's leadership to answer his questions. Some of the questions were related to STPMAD's contracts, for which District Attorney Collin Sims' office generally provides counsel for providing legal advice and approving them.

38.

On or about August 7, 2025, the TRAC was nominally changed to the Government Efficiency Committee. However, nothing substantively changed, and District Attorney Collin Sims remained in partnership with the Council's committee continuing the illegal investigation of STPMAD in coordination with the committee members.

39.

Shortly thereafter, on August 13, 2025, STPMAD received a new and even more invasive records request from an employee of the Council, including interrogatory-style questions following up directly on topics discussed at the August 4, 2025 interrogation conducted by District Attorney Collin Sims.

40.

During this time and despite a clear conflict of interest in which an attorney was disparaging and investigating his own client, the District Attorney's office insisted it was exclusive counsel to STPMAD and refused to permit STPMAD to hire outside legal counsel.

41.

The untenable position that District Attorney Collin Sims placed STPMAD in is even more incredible when considering he candidly admitted in regard to his investigation of STPMAD "It's an awkward role I play," "I recognize that"[10] and most recently, "I 100% agree that the District Attorney's office is not the correct entity to be taking up this mantle", after acknowledging that his illegal and unethical investigation was a "single mission deal."[11]

42.

Unfortunately, District Attorney Collin Sims' refusal to recuse himself from the illegal investigation against STPMAD and stonewalling of STPMAD's efforts to retain its independent

[10] https://www.nola.com/news/northshore/st-tammany-trac-committee-reviews-mosquito-abatement/article_8167662f-503b-4248-a444-aa2385fc8b9d.html

[11] St. Tammany Parish Government Efficiency Committee : October 23, 2025. https://www.youtube.com/watch?v=YSK25S0jX3I

counsel forced STPMAD to file an ethics complaint against District Attorney Collin Sims with the Louisiana Attorney Discipline Board. Despite this, District Attorney Collin Sims in partnership with and at the direction of the Council has continued to pursue the illegal and unethical investigation in furtherance of the Scheme.

43.

Between May and June 2025, STPMAD received more requests for information from Council Chair Impastato and Councilwoman Tanner along with more requests for facility tours from the District Attorney and various councilpersons.

44.

While the voluminous and invasive information requests, combined with deposition-style interrogations, follow up requests, baseless public suggestions of STPMAD financial irresponsibility, and various tours of STPMAD facilities clearly indicated that the Council with the assistance of the District Attorney was conducting an illegal and unauthorized investigation, this was further confirmed in June and July of 2025 when it was reported that District Attorney Collin Sims and Council Chair Impastato were assembling a "report" on STPMAD for the Parish Council.[12]

45.

In furtherance of the illegal investigation, the District Attorney's office in addition to the resources it was already spending and diverting for the illegal investigation thus far, then moved beyond St. Tammany Parish and began calling and requesting information from other mosquito abatement districts in other parishes.

46.

Notably, the fact that at no point during the Council's illegal investigation has it utilized any expert or person knowledgeable in industry best practices for mosquito abatement services further highlights the illegitimacy of the already illegal investigation. Rather, the Council through the District Attorney's office appears to have spent and allocated its own resources, money, and

[12]https://www.nola.com/news/northshore/st-tammany-trac-committee-reviews-mosquito-abatement/article_8167662f-503b-4248-a444-aa2385fc8b9d.html; https://www.nola.com/news/northshore/transparency-committee-district-attorney-role/article_cb64d97f-2c35-40d7-a7a5-4dfafd3b27a4.html

manpower for almost a year to conduct the illegal investigation while complaining that it needs more money to continue its services to the citizens of St. Tammany Parish.

47.

While the original TRAC resolution's stated purpose was to look at STPG itself, to date, on information and belief, no investigation of STPG itself has occurred and the only investigation has been against STPMAD, which was illegal and unauthorized.

48.

On September 5, 2025, apparently unhappy with STPMAD's insistence that the investigation against it was illegal and unethical, District Attorney Collin Sims requested that Parish President Mike Cooper remove a STPMAD commissioner from its board of commissioners.[13]

49.

The illegal investigation of STPMAD recently culminated in an October 23, 2025 Government Efficiency Committee meeting in which the District Attorney's office presented their "thick binder" of investigation files, and instituted a prosecution of STPMAD before committee members by arguing baselessly that STPMAD had wasted taxpayer dollars. The STPG and the district attorney's office revealed their plan to take control and to use taxpayer approved dedicated funds to further mosquito abatement services for their own purposes; to try to plug the looming shortfall in the STPG 2026 budget.

50.

Notably, the funds speculatively estimated in the Council committee's report to be saved and/or diverted to STPG fall woefully short of the amount needed to plug the looming shortfall in the STPG 2026 budget. The prosecution of October 23, 2025 made clear that the Council's goal was to use the illegal investigation to make an example of STPMAD and that more unlawful and illegal investigations of other special districts are likely to follow in furtherance of the Council's mission to consolidate special districts, for whom the voters have approved dedicated taxes, into STPG.

[13] Exhibit A – Letter of Resignation.

51.

The prosecution of STPMAD was one-sided, presented information out of context, and was misleading to the public and the Council. STPMAD was never presented with the report or information beforehand nor was it given an opportunity to be heard all in violation of procedures contemplated in the spirit of Article II § 2-08 of the Home Rule Charter for investigations which, again, are not even permitted against special districts like STPMAD. The prosecution was also in direct violation of the procedures outlined in the TRAC Scope Document which among other things required, "the draft report will be shared with the organization for review and feedback" and "the finalized report will be presented at the organization's board meeting." None of this occurred prior to October 23, 2025 evincing that the investigation is not only illegal but a sham.

52.

Following the October 23, 2025 prosecution of STPMAD, Council Chair Impastato proposed a resolution calling for removal of STPMAD Board of Commissioners Chair, Dr. Vicki Traina-Dorge, in apparent retaliation for Dr. Traina-Dorge's efforts to protect the St. Tammany Parish voters and taxpayers' dedicated funds, and her insistence that the investigation of STPMAD was illegal, unauthorized, and unethical.

53.

Just one day ago on November 4, 2025, Council Chair Impastato admitted on Facebook that the "Parish Council is reviewing this district and all the others" confirming that the Council and its Government Efficiency Committee is still conducting and will continue to conduct illegal investigations. In the same Facebook post, Council Chair Impastato confirmed that the illegal investigation was conducted "[w]ith help from the District Attorney's Office" verifying that District Attorney Collin Sims acted as the Council's agent in the illegal investigation.

54.

Incredibly, Council Chair Impastato stated in the same November 4, 2025 Facebook post that "there's been a lot of misinformation about the Mosquito Abatement District review" and "we set up a structured, fact-based review process" when the review process included no subject matter experts, was one-sided, did not follow the procedures of the TRAC Scope Document, was illegal,

and ultimately culminated in the October 23, 2025 report which, itself, was out-of-context misinformation that has now irreparably damaged STPMAD.

55.

STPMAD maintains that being prosecuted publicly by its own legal representative at the direction of the Council and its Chair, Joe Impastato, through the use of an extended illegal and unauthorized investigation in furtherance of the District Attorney and the Council's Scheme to take over taxpayer dedicated funds and services is reprehensible, unethical, and immoral.

Requested Relief and Causes of Action

56.

The allegations of the foregoing paragraphs are incorporated as if pleaded herein.

57.

Under La. C.C.P. art. 3601, an injunction shall be issued in cases where irreparable injury, loss, or damage may otherwise result to the applicant, and where the applicant is entitled to relief.

58.

The Council's actions will result in irreparable injury, loss, and damage to STPMAD, and the actions taken by the Council thus far have already done so as described hereinabove. STPMAD has a statutory obligation pursuant to La. R.S. § 33:7721 *et seq.* to appropriately use its dedicated tax funds for the abatement, control, eradication, and study of mosquitoes and other arthropods of public health importance, and all activities incidental thereto. The Council's illegal investigation has and will continue to cause STPMAD to divert resources from the core mission to engage in the illegal investigation, defend its character, and defend its mission, practices and budgets to protect the residents of St. Tammany Parish, even after the Louisiana Legislative Auditor—the only appropriate financial investigator of STPMAD—has found no misuse of public funds.

59.

Even so, a showing of irreparable injury is not necessary when the conduct sought to be restrained is unconstitutional or unlawful. *Jurisich v. Jenkins*, 99-0076, p. 4 (La. 10/19/99); 749 So.2d 597, 599.

60.

The Council has no legal power to direct, suspend, or investigate the internal operations of an independent mosquito abatement district like STPMAD. The Council's power in this respect is restrained by Home Rule Charter Article II § 2-08 which provides, "The council may make investigations into the affairs of the parish government and the related conduct of any parish official, officer, employee, department, office or agency. For this purpose the council may subpoena witnesses, administer oaths, take testimony and require the production of evidence. Investigations shall be for a specified purpose submitted in writing and may be undertaken only by the affirmative vote of a majority of the authorized membership of the council. Any person who fails or refuses to obey any lawful order of the council may be cited for contempt. No councilmember shall vote on any matter under such investigation in which said councilmember has a conflict of interest."

61.

STPMAD is not the parish government or a parish official, officer, employee, department, office or agency, and thus is not an entity for which the Council may investigate.

62.

Furthermore, no specified purpose submitted in writing and approved by the majority vote of the Council was made to investigate STPMAD, even if the Council did have the power to investigate STPMAD, which it does not.

63.

The Council has no supervisory or disciplinary authority over the internal operations of the District; its actions constitute an attempt to unlawfully seize powers granted exclusively to the District's governing board under La. R.S. § 33:7721 *et seq.*

64.

The Council, in addition to causing present, ongoing, and potential irreparable injury by its actions, has also violated its own charter as explained above and unlawfully impinged on the separation of powers between it, the governing authority of a home rule jurisdiction and an independent special district.

65.

WHEREFORE, STPMAD prays that this Court issue a temporary restraining order, and, after hearing, issue a preliminary injunction restraining defendant St. Tammany Parish Government by and though the St. Tammany Parish Council, and any and all persons or entities acting on their behalf or in privity with them including but not limited to District Attorney Collin Sims and the office of the district attorney, from engaging in any continued investigation of STPMAD and any activities incidental to the illegal investigation of STPMAD. Pursuant to La. R.S. 13:4581, STPMAD, as a political subdivision, is exempt from furnishing security for a temporary restraining order under La. C.C.P. art. 3610.

Plaintiff further prays for final permanent injunction against Defendant to prevent it from engaging in any continued investigation of STPMAD and any activities incidental to the illegal investigation of STPMAD after trial on the merits and all other relief necessary or proper in the premises.

Respectfully submitted,

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Counsel for St. Tammany Parish Mosquito Abatement District

CERTIFICATE OF NOTICE PURSUANT TO LA. C.C.P. ART. 3603

Pursuant to La. C.C.P. art. 3603(A)(2), I certify that STPMAD made efforts to give notice of the requested temporary restraining order herein on October 31, 2025 via letter sent to all members of the St. Tammany Parish Council which letter is attached hereto as Exhibit B.

Please Serve St. Tammany Parish Government through:

Mike Cooper
President
21490 Koop Dr.
Mandeville, LA 70471

Joe Impastato
St. Tammany Parish Council Chair
21490 Koop Dr.
Mandeville, LA 70471

Collin Sims
St. Tammany Parish District Attorney
701 N. Columbia St.
Covington, LA 70433

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FILED: _____ _____
DEPUTY CLERK

VERIFICATION

STATE OF LOUISIANA,

PARISH OF ST. TAMMANY

BEFORE ME, the undersigned authority, a Notary Public in and for the above Parish and State aforesaid, duly commissioned, qualified and sworn, personally came and appeared KEVIN A. CAILLOUET, PH.D., M.S.P.H., who after being duly sworn did depose and say that:

He is the Executive Director for the St. Tammany Parish Mosquito Abatement District, Petitioner named in the above and foregoing Verified Petition for Temporary Restraining Order, Preliminary Injunction, and Final Injunction, and has authority to act on behalf of St. Tammany Parish Mosquito Abatement District to verify the contents of the petition filed on its behalf. He has read the petition and verified that all of the allegations of fact contained therein are true and correct to the best of his knowledge, information, and belief.

K-a Cai

KEVIN A. CAILLOUET, PH.D., M.S.P.H.

SWORN TO AND SUBSCRIBED
before me, Notary, this 5th day
of November, 2025.

Sharon A. Barrois

NOTARY PUBLIC in and for
ST. TAMMANY Parish, Louisiana

SHARON A. BARROIS
NOTARY PUBLIC
ST. TAMMANY PARISH
LOUISIANA
NOTARY ID NO. 39696

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ST. TAMMANY PARISH MOSQUITO ABATEMENT DISTRICT

VERSUS

ST. TAMMANY PARISH GOVERNMENT BY AND THROUGH
THE ST. TAMMANY PARISH COUNCIL

FILED: _____ _____
DEPUTY CLERK

ORDER

Considering the above and foregoing Petition for Tempoarary Restraining Order, Preliminary Injunction, and Final Injunction,

IT IS ORDERED BY THE COURT that defendant, St. Tammany Parish Government by and though the St. Tammany Parish Council, show cause on the ____ day of _____, 2025 at _____ o'clock a.m. why this Court should not enter an order for a preliminary injunction, and subject to the further orders of this Court, in accordance with the terms and conditions outlined in the attached petition for preliminary injunction.

IT IS FURTHER ORDERED that pending determination of Plaintiff's entitled to preliminary injunction, Defendant and all persons or entities acting on their behalf or in privity with them or in concert with them, including but not limited to District Attorney Collin Sims and the office of the district attorney, are hereby enjoined and temporarily restrained from engaging in any continued investigation of STPMAD and any activities incidental to the illegal investigation of STPMAD.

Covington, Louisiana, this _____ day of _____, 2025.

_____
DISTRICT JUDGE

[Service instructions on following page]

Please Serve St. Tammany Parish Government through:

Mike Cooper
President
21490 Koop Dr.
Mandeville, LA 70471

Joe Impastato
St. Tammany Parish Council Chair
21490 Koop Dr.
Mandeville, LA 70471

Collin Sims
St. Tammany Parish District Attorney
701 N. Columbia St.
Covington, LA 70433