SHANNON TAYLOR, INDIVIDUALLY AND ON BEHALF OF A CURE NWLA, A NOT-FOR-PROFIT ORGANIZATION

NUMBER 592,749

PLACED IN MINUTES

VERSUS

FIRST JUDICIAL DISTRICT COURT

GEORGE ERIC HATFIELD, JR., INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS CONSTABLE, WARD 8, CADDO PARISH

ROUTE TO MINUTE CLERK

CADDO PARISH, LOUISIANA

PERMANENT ASSIGNMENT: JUDGE B C A

PETITION FOR DAMAGES AND INJUNCTIVE RELIEF

NOW INTO COURT comes SHANNON TAYLOR, through undersigned counsel, who respectfully represents:

1.

Plaintiff SHANNON TAYLOR is a person of the full age of majority, domiciled in Caddo Parish, Louisiana.

2.

Plaintiff A CURE NWLA is a Louisiana not-for-profit organization operating as an exempt organization under Internal Revenue Service regulations.

3.

Made Defendant herein is GEORGE ERIC HATFIELD, JR., a person of full age of majority, domiciled in Caddo Parish, Louisiana, residing at 10040 Loveland Court, Shreveport, Louisiana 71106-8538.

4.

Made Defendant herein is GEORGE ERIC HATFIELD, JR., the duly-elected Constable of Ward 8, Caddo Parish, Louisiana.

5.

Plaintiff SHANNON TAYLOR was a campaign volunteer in the unsuccessful campaign of Defendant GEORGE ERIC HATFIELD, JR. for Sheriff.

6.

Plaintiff A CURE NWLA was a tenant in property owned or managed by Defendant GEORGE ERIC HATFIELD, JR., which vacated the demised

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SHARON NEWTON
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premises in the 8500 block of Hatfield-Gorman Road, Shreveport, Caddo Parish, Louisiana, a few weeks after the hapless campaign drew to a close.

7.

On the night of February 29, 2016, Plaintiff SHANNON TAYLOR contacted Sharon McCullough concerning lies and defamatory matter she posted on social media. Within hours that same evening, Defendant GEORGE ERIC HATFIELD, JR. transmitted an email under his signature as Constable of Ward 8, Caddo Parish, acting under color of law, using an email account identified as caddoconstable@yahoo.com, addressed to the Sheriff of Caddo Parish and to the publisher of The Inquisitor, a weekly publication widely distributed in Northwest Louisiana.

8.

In the email at issue, Defendant GEORGE ERIC HATFIELD, JR., accused Plaintiff individually, and in her capacity with Plaintiff A CURE NWLA, *inter alia*, of operating a "non-profit scam" receiving item donations and monetary contributions that allegedly were not "dispersed" [sic] to anyone other than Plaintiff SHANNON TAYLOR.

9.

Defendants GEORGE ERIC HATFIELD, JR. conspired with SHARON MCCULLOUGH to damage Plaintiffs SHANNON TAYLOR and A CURE NWLA, as well as deprive SHANNON TAYLOR of her civil rights, and through wanton disregard for the truth, negligently injured SHANNON TAYLOR and A CURE NWLA.

10.

Although the email suggests that Defendant GEORGE ERIC HATFIELD, JR., was not the appropriate authority as Ward 8 Constable, lacking jurisdiction over any alleged criminal activity, which, although patently untrue, would have occurred, at least in part, from the offices provided by Hatfield Development Corporation to A CURE NWLA, when it benefitted Defendant GEORGE ERIC HATFEILD, JR.

11.

In further attempts to discredit and damage Plaintiff SHANNON TAYLOR and A CURE NWLA, Defendant GEORGE ERIC HATFIELD, JR. alleged wrongfully that SHANNON TAYLOR was the mastermind and source of many of the campaign hijinks, attributing "false information" about buried things in dirt mounds on Hatfield's property, falsely blaming Plaintiff SHANNON TAYLOR for posting pictures of the Sheriff on social media, during Hatfield's losing campaign for Sheriff.

12.

Defendant GEORGE ERIC HATFIELD, JR., accused Plaintiff SHANNON TAYLOR of "blackmail," alleging that she was a source of conspiracy theories for the now-defunct INFORMER "newspaper", which was a sham publication directed by GEORGE ERIC HATFIELD, JR. and funded in great part by one of his supporters, who operates a furniture store near Blanchard, from whom GEORGE ERIC HATFIELD, JR. also accused Plaintiff SHANNON TAYLOR of theft.

13.

The allegations are serious and unsubstantiated claims intended to injure SHANNON TAYLOR and A CURE NWLA. They are based, in part, on alleged statements taken by Defendant GEORGE ERIC HATFIELD, JR. from SHARON McCULLOUGH, whose child Markie was a beneficiary of the work of A CURE NWLA and SHANNON TAYLOR.

14.

In the email, GEORGE ERIC HATFIELD, JR. appeared to be investigating allegations over which he has no authority and allegedly reporting same to Sheriff Steve Prator, rather than through normal investigative channels. He and SHARON McCULLOUGH were conspiring to smear A CURE NWLA and SHANNON TAYLOR, after McCULLOUGH was no longer as active a participant in the non-profit. The McCULLOUGH child, Markie, was not the only beneficiary of A CURE NWLA.

15.

Making serious and baseless allegations is the modus operandi of Defendant GEORGE ERIC HATFIELD, JR. on other occasions, but in this matter, the Defendant is acting under color of law, with his real or imagined crime-fighting record.

16.

The February 29, 2016 email by GEORGE ERIC HATFIELD, JR. at 11:39:50 pm purported to be an intelligence report by GEORGE ERIC HATFIELD, JR., duly elected Constable for Ward 8, Caddo Parish, to identify the "suspect" SHANNON TAYLOR, who was well known to him, having been an active campaign participant, tenant and friend of him and his paramour, AMY SENN.

17.

The email was cloaked in a conciliatory tone to bury the hatchet with Sheriff Steve Prator, while attempting to blame all of his November 21, 2015 primary campaign strategy on misinformation from Plaintiff SHANNON TAYLOR, claiming he, GEORGE ERIC HATFIELD, JR., was duped and an innocent victim.

18.

Defendant GEORGE ERIC HATFIELD, JR. previously told Plaintiff SHANNON TAYLOR that he conducted criminal history and warrant inquiries into Plaintiff and others who worked in the campaign and for its media outlet, The Informer "newspaper".

19.

These actions are designed, intended and executed to cause damage to SHANNON TAYLOR and A CURE NWLA, in the following non-exclusive ways:

a. Limit the charitable undertakings of A CURE NWLA, including violating the free speech and assembly rights of SHANNON TAYLOR;

b. Interfere with the legitimate non-profit and professional interests of SHANNON TAYLOR and A CURE NWLA;

c. Intentionally inflict emotional distress and mental anguish upon SHANNON TAYLOR and her family;

d. Defame, libel or slander SHANNON TAYLOR;

e. Invade the privacy of SHANNON TAYLOR;

f. Threaten to expose SHANNON TAYLOR to criminal prosecution or public ridicule for pecuniary gain;

g. Damage the present and future prospects of A CURE NWLA and SHANNON TAYLOR;

h. Intentionally interfere with contracts of A CURE NWLA and SHANNON TAYLOR;

i. Abuse legal process, and

j. Any further acts or omissions causing damage as may be shown more fully at trial.

20.

SHANNON TAYLOR and A CURE NWLA has incurred the general, special and punitive damages as set forth above, including but not limited to:

a. Lost economic opportunity;

b. Mental anguish;

c. Damage to reputation and good standing in the community;

d. Physical damage to her health;

e. Any and all damages that may be more fully shown at trial.

21.

All of the above and foregoing damages were solely due to the negligence or intentional acts of the Defendants GEORGE ERIC HATFIELD, JR. who is liable, *in solido,* with other defendants not yet named.

22.

In addition to his claim for damages, SHANNON TAYLOR and A CURE NWLA is suffering from irreparable harm by the acts or omissions of Defendant, and therefore desires and is entitled to a temporary restraining order, and ultimately permanent injunctive relief against Defendants GEORGE ERIC HATFIELD, JR. and in favor of SHANNON TAYLOR and A CURE NWLA, prohibiting, restraining and enjoining him from falsely alleging any criminal acts,

characterizing and casting SHANNON TAYLOR and A CURE NWLA in a bad light, or falsely accusing her of any inappropriate or unlawful behavior.

23.

A *Rule Nisi* should issue, ordering and commanding Defendants GEORGE ERIC HATFIELD, JR. to show cause, if any he has, why the relief set forth above should not issue in the form of permanent injunctive relief, in the form of the temporary restraining order issued herein.

WHEREFORE, SHANNON TAYLOR and A CURE NWLA pray for judgment in this matter for general, special and punitive damages, including but not limited to:

a. Lost economic opportunity;

b. Mental anguish;

c. Damage to reputation and good standing in the community;

d. Physical damage to her health;

e. Any and all damages that may be more fully shown at trial, and,

f. for any and all just and equitable relief appropriate in the premises.

FURTHER, SHANNON TAYLOR and A CURE NWLA pray that a temporary restraining order issue against Defendants GEORGE ERIC HATFIELD, JR. and in favor of SHANNON TAYLOR, prohibiting, restraining and enjoining him from falsely alleging any criminal acts, characterizing and casting SHANNON TAYLOR and A CURE NWLA in a bad light, or falsely accusing her of any inappropriate or unlawful behavior.

Respectfully submitted,

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Please serve:

GEORGE ERIC HATFIELD, JR.
10040 Loveland Court
Shreveport, LA 71106-8538

Constable G. E. Hatfield, Ward 8
10040 Loveland Court
Shreveport, LA 71106-8538

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CADDO PARISH, LOUISIANA

PERMANENT ASSIGNMENT: JUDGE _____

ORDER

CONSIDERING THE FOREGOING, It is ordered that a Temporary Restraining Order issue herein, to Defendants GEORGE ERIC HATFIELD, JR. and in favor of SHANNON TAYLOR and A CURE NWLA, prohibiting, restraining and enjoining him from falsely alleging any criminal acts, characterizing and casting SHANNON TAYLOR and A CURE NWLA in a bad light, or falsely accusing her of any inappropriate or unlawful behavior.

IT IS FURTHER ORDERED that a *Rule Nisi* issue to Defendants GEORGE ERIC HATFIELD, JR., to show cause, if any they can, on the 15th day of June, 2016, why a permanent injunction in the form and content of the Temporary Restraining Order should not issue.

SHREVEPORT, LOUISIANA, this 19th day of May, 2016.

Judge, First Judicial District

Prepared by:

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CASH DEPOSIT SLIP

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JRobin

Suit Number 592,749-B

Deposit By D. Keele

Amount $400.00 = (286-75-15-24)

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