

24th JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON

STATE OF LOUISIANA

NO:

DIVISION:

[REDACTED]

VERSUS

JEFFERSON PARISH SHERIFF JOSEPH LOPINTO, JEFFERSON PARISH DISTRICT ATTORNEY PAUL CONNICK, JEFFERSON PARISH, AND X,Y,Z...

FILED: _____

DEPUTY CLERK

PETITION FOR DAMAGES

Petitioner, [REDACTED] [REDACTED] Respectfully Represents:

1.

[REDACTED] names the following defendants in this proceeding:

- (a) Sheriff Joseph Lopinto
- (b) District Attorney, Paul Connick
- (c) Jefferson Parish
- (d) Jefferson Parish Sheriff's Office
- (e) Jefferson Parish Detective Bureau
- (f) Gretna Police Department
- (g) Louisiana State Police

[REDACTED]

- (i) Jon Gegenheimer, Clerk of Court
- (j) [REDACTED] former Detective JPSO, former detective GPD
- (k) [REDACTED] Louisiana State Police, and JPSO employee
- (l) [REDACTED] Jefferson Parish Courthouse, former District Attorney Paul Connick Employee

2.

On March 3, 2018, [REDACTED] reported to JPSO detectives about sexual misconduct occurring among law enforcement in Jefferson Parish.

3.

Under R.S.46:1844, this court has jurisdiction over this matter.

4.

Sheriff Lopinto and District Attorney Paul Connick improperly responded to [REDACTED]

domestic abuse claims against her ex-husband.

5.

Sheriff Joe Lopinto and District Attorney Paul Connick improperly investigated reports of sexual misconduct, sexual assaults, and sexual harassment pursuant to the Prison Rape

Elimination Act in Jefferson Parish.

5.

Sheriff Lopinto and District Attorney Paul Connick are subject to civil suits and criminal charges under certain circumstances.

6.

Sheriff Joe Lopinto and DA Paul Connick's performance or failure to perform duties imposed by state law resulted in a violation of the plaintiff's federal constitutional rights. 42 U.S. § 1983, allows a person to sue a police officer or other government official who violates the person's civil rights.

7.

Sheriff Joe Lopinto and District Attorney Paul Connick who normally would be the prosecutor's main witnesses in a domestic violence prosecution might instead find themselves charged as defendants in a separate case and have to defend against allegations of improper or even illegal conduct.

8.

Sheriff Joe Lopinto and the District Attorney Paul Connick's conduct with respect to reports of sexual misconduct was particularly questionable. Their maliciousness or other improper motive is cause for them to lose protections against lawsuits.

9.

██████████ that: Jefferson Parish Sheriff Joseph Lopinto, Jefferson Parish District Attorney Paul Connick, and X, Y, Z, did not take all necessary precautions to prevent injury to the Plaintiff, even after being made aware of a problem in their jurisdiction of sexual misconduct pursuant to the Prison Rape Elimination Act.

10.

On July 15, 2016, defendant ██████████ armed, in full uniform, arrived at ██████████ residence in Harvey, LA, and firmly demanded, "take off your clothes!" and yelled at the plaintiff to, "Fuck me bitch!" The plaintiff asserts that the defendant caused her injury by brutally raping her and that the defendant was angry and with brutal force demanded the plaintiff, "Suck your dick!! [Meaning the defendant] Do it now! Do it!" Plaintiff asserts that the defendant grabbed the plaintiff by the head and forced his penis inside her mouth. Plaintiff asserts that she was in physical pain, was choking, and could not breathe. Plaintiff discovered the defendant secretly taking pictures during the attack. The Plaintiff asserts that during the attack, the defendant demanded she tune the television to the porn channel. When the plaintiff responded that she does not subscribe to the porn channel, the defendant used the remote control to order pornography on the plaintiff's cable account without her consent. Then, the officer forced himself on top of the plaintiff and brutally raped her. The plaintiff asserts that the defendant apologized after the assault, blaming his antipsychotic medication "Adderoll" for the "brutalness" of the rape.

11.

On several occasions the defendant ██████████ sexually assaulted the plaintiff pursuant to the Prison Rape Elimination Act. On one occasion, the defendant left a meeting at the detective bureau on Maple Street in Harvey, LA, then drove to the plaintiff's residence in Harvey, LA, while the defendant was armed and in full uniform. The plaintiff asserts that the defendant

sexually assaulted her pursuant to the Prison Rape Elimination Act. The plaintiff asserts that she discovered the defendant secretly video taping her without her knowledge or consent during the sexual assault.

12.

On October 26, 2020, defendant [REDACTED] an employee of the Jefferson Parish District Attorney's Office, sexually harassed the plaintiff via text message. Without warning or provocation, the defendant transmitted unsolicited photos of his own genitalia to the plaintiff.

This hostile act by the defendant caused the plaintiff extreme emotional distress.

13.

Plaintiff suffered extreme emotional distress when she discovered the defendants secretly taking pictures and video taping the plaintiff, without her knowledge or consent.

14.

These violations pursuant to the Prison Rape Elimination Act by the defendants, and Sheriff Joe Lopinto and District Attorney Paul Connick's improperly investigating reports of sexual misconduct pursuant to the Prison Rape Elimination Act and improperly responding to the Plaintiff's domestic abuse claims against her ex-husband, and are therefore liable for the grievous loss and irreparable harm to the plaintiff.

Wherefore, [REDACTED] prays that the defendants be served with a copy of this petition for damages and that, after due proceedings, this honorable court render a Judgment in favor of [REDACTED] and against the defendants for all direct and consequential Damages the plaintiff has sustained, along with other damages which may be proven at trial together with legal interest from the date of judicial demand, all expert fees, all costs if these proceedings, and all equitable relief to which the Plaintiff may be entitled.

Respectfully Submitted by: