

**19th JUDICIAL DISTRICT COURT  
FOR THE PARISH OF EAST BATON ROUGE  
STATE OF LOUISIANA**

THOMAS M. MANUEL

Plaintiff,

v.

LOUISIANA DEPARTMENT OF  
WILDLIFE AND FISHERIES; MADISON  
D. SHEAHAN, in her official capacity as  
Secretary of the Department; RACHEL  
ZECHENELLY, in her official capacity as  
Colonel of the Department's Enforcement  
Division; and WILL ROBERTS, in his official  
capacity as a Regional Captain with the  
Department,

Defendants.

SUIT NO.

SECTION “ ”

DIVISION “CIVIL”

**PETITION FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

NOW INTO COURT, through undersigned counsel, comes Plaintiff Thomas M. Manuel (“Tom”), who files this Petition for Declaratory and Injunctive Relief against Defendants Louisiana Department of Wildlife and Fisheries (“LDWF” or the “Department”), Madison D. Sheahan (in her official capacity as Secretary of the Department), Rachel Zechenelly (in her official capacity as Colonel of the Department’s Enforcement Division), and Will Roberts (in his official capacity as a Regional Captain with the Department).

**INTRODUCTION**

1. The Louisiana Constitution guarantees Tom Manuel the right to be “secure in his . . . property” against “unreasonable searches, seizures, or invasions of privacy.” La. Const. art. I, § 5. Land is property. Despite this, the Louisiana Department of Wildlife and Fisheries has repeatedly entered Tom’s land without his consent, a warrant, probable cause, or reasonable suspicion of criminal activity. That’s unconstitutional. This suit seeks to vindicate Tom’s right to be free from unreasonable searches and invasions of privacy on his property.

2. Tom owns about 240 acres of timberland in Ethel, Louisiana. Tom’s property is accessible only through private gates and is well marked against intrusion. It is not open to the

public. Yet twice in December 2023, LDWF wildlife enforcement agents entered Tom’s property—without his consent, a warrant, probable cause, or reasonable suspicion—to search for evidence of potential violations of state wildlife laws.

3. The wildlife enforcement agents who entered Tom’s property did so under an official LDWF policy and practice of entering private land without a warrant to look for evidence of potential violations of wildlife laws. LDWF bases that policy and practice on a state statute that empowers agents to “see” whether people are violating wildlife laws “in the territory assigned to” them—including on private land. La. Stat. Ann. § 56:54. The statute does not require agents to have consent, a warrant, probable cause, or reasonable suspicion before entering private land.

4. LDWF’s warrantless intrusions onto Tom’s land violated Article I, Section 5 of the Louisiana Constitution. Section 5’s protections against unreasonable searches and invasions of privacy apply to all “property,” including land. And warrantless entries onto constitutionally protected property are presumptively unreasonable. Therefore, LDWF’s intrusions—and the statute and LDWF policy and practice that enabled them—violate the Louisiana Constitution.

5. These violations must stop. To ensure Tom’s security and privacy on his land, the Court should declare that LDWF’s warrantless entries onto his land, and the LDWF policy and practice and statute (La. Stat. Ann. § 56:54) that authorized those entries, violate Article I, Section 5, and permanently enjoin LDWF from conducting any warrantless (or otherwise unreasonable) entries in the future.

### **PARTIES**

6. Plaintiff Tom Manuel lives in Ethel, Louisiana. Tom is a professional forester and wildlife biologist who owns a 240-acre plot of land in Ethel with his wife, Phyllis Manuel. Tom uses the 240-acre plot for growing timber, wildlife conservation, recreation, and hunting, and the land is fenced and posted to exclude intruders. Yet twice in December 2023, the Louisiana Department of Wildlife and Fisheries, through three of its wildlife enforcement agents, entered Tom’s land without his consent, a warrant, probable cause, or reasonable suspicion. Tom wants the warrantless entries to stop.

7. Defendant Louisiana Department of Wildlife and Fisheries is the state department charged with enforcing wildlife laws and is domiciled in Baton Rouge, East Baton Rouge Parish, Louisiana. *See* La. Stat. Ann. § 36:602. LDWF’s headquarters and principal office is located at 2000 Quail Drive in Baton Rouge.

8. Defendant Madison D. Sheahan is the Secretary of LDWF. She took office in January 2024, replacing Robert Shadoin who was Secretary of LDWF from April 2023 to January 2024. Defendant Sheahan is sued in her official capacity, as she is responsible for supervising all LDWF employees and has “responsibility for [LDWF] policies” as well as for the “administration, control, and operation” of LDWF’s “functions, programs, and affairs.” La. Stat. Ann. § 36:604. On information and belief, Defendant Sheahan’s office is at LDWF’s headquarters in Baton Rouge.

9. Defendant Rachel Zechenelly is the Colonel in charge of LDWF’s Enforcement Division and has held that position since June 2023. Defendant Zechenelly is sued in her official capacity, as she oversees LDWF’s wildlife law enforcement operations and agents. On information and belief, Defendant Zechenelly’s office is at LDWF headquarters in Baton Rouge.

10. Defendant Will Roberts is a Regional Captain with LDWF. Defendant Roberts is sued in his official capacity, as he oversees LDWF wildlife enforcement agents in Region 7, which includes Plaintiff’s property in Ethel (plus LDWF headquarters). When LDWF agents entered Plaintiff’s property in December 2023, Defendant Roberts was responsible for supervising those agents (and remains so today). On information and belief, Defendant Roberts’s office is at LDWF headquarters in Baton Rouge.

11. The Attorney General will be served with a copy of this petition pursuant to La. Code. Civ. Proc. art. 1880.

### **JURISDICTION AND VENUE**

12. This Court has jurisdiction under Article V, Section 16(A) of the Louisiana Constitution because Plaintiff brings a civil suit to vindicate his rights under Article I, Section 5 of the Louisiana Constitution.

13. This Court also has jurisdiction because Plaintiff seeks declaratory and injunctive relief and nominal damages under La. Code Civ. Proc. art. 1871, 3601, and under the right-of-action provided in Article I, Section 5.

14. Venue is proper in this Court under La. Stat. Ann. § 36:602(A).

### **FACTS**

#### *Plaintiff Tom Manuel*

15. Tom Manuel lives in Ethel, Louisiana, with his wife, Phyllis. Together, they own a roughly 240-acre plot of rural timberland in Ethel, about ten minutes from their house.

16. Tom is a professional forester and wildlife biologist who manages land for his clients in Louisiana and Mississippi. In fact, Tom has been hired by LDWF multiple times and as recently as 2023 to help manage wildlife habitats on state land, including conducting controlled burns.

17. Tom bought the 240-acre plot in 2003 from one of his land-management clients.<sup>1</sup>

18. Tom uses the property—which he calls End of the Road Tree Farm—for growing and harvesting timber, wildlife conservation, family recreation, and hunting.

19. Tom primarily uses the land as a commercial tree farm. Tom planted and cultivates timber on the property, which is mostly pine, for income and as a long-term investment.

20. Tom's forestry operations are conspicuous. He has several stands of timber neatly planted in rows, feeders and food plots to manage wildlife, traps and cameras to reduce invasive species, and a network of well-maintained gravel and dirt roads that crisscross the property. He also conducts controlled burns to promote both timber growth and wildlife habitats.

21. For years Tom and his family have also used the property for recreation. When his children were young, his family spent time on the property learning about tree farming, hunting, and camping. When they got a little older, Tom's kids would drive four wheelers around the property with their friends. And now that their children have grown up and moved out, Tom and Phyllis frequently visit the property to take quiet walks in the woods and watch birds.

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<sup>1</sup> Throughout this petition, references to "Tom's property," "Tom's land," "the property," or "the land" refer to Tom's 240-acre property unless otherwise indicated.

22. Tom's hunting activities are recreational. He has a hunting license (and has for decades), and hunts game alone or with friends and family on the land.

23. Tom has also given his brother permission to hunt on his property. Both Tom and his brother have placed hunting stands and trail cameras around the property.

24. Tom has never been cited for violating any wildlife laws on his property. Neither has anybody else since he bought the property in 2003.

25. The only time Tom has been cited for violating wildlife laws *anywhere* was in 2019, when he was cited for hunting on a friend's field that—unknown to Tom—had allegedly been baited. Tom was never prosecuted for this citation.

26. Tom enjoys hunting largely because he enjoys being alone in the woods.

27. Safe hunting requires knowing where other people are around you, particularly in the zone of fire. Unlike hunters, wildlife enforcement agents are not required to wear hunter orange in the field, even on land with active hunters. Agents wandering Tom's land without his knowledge and without wearing high-visibility clothing is dangerous and increases the risk of an accident.

28. Tom values his privacy and does not want intruders on his land.

29. Louisiana law does not require Tom to mark his land to exclude trespassers. Rather, the law provides that “[n]o person shall enter upon immovable property owned by another without express, legal, or implied authorization.” La. Stat. Ann. § 14:63(B)(1).

30. Even so, Tom has marked the boundaries of his land to prevent trespassing. The entire perimeter of Tom's land is marked by either blue paint, blue paint and fencing, or Black Creek, which forms a natural boundary. The only part of Tom's land that borders public property fronts onto Parish Road 1-114, also known as Dobrowoiski Lane. That boundary is clearly marked with metal fencing and gates.

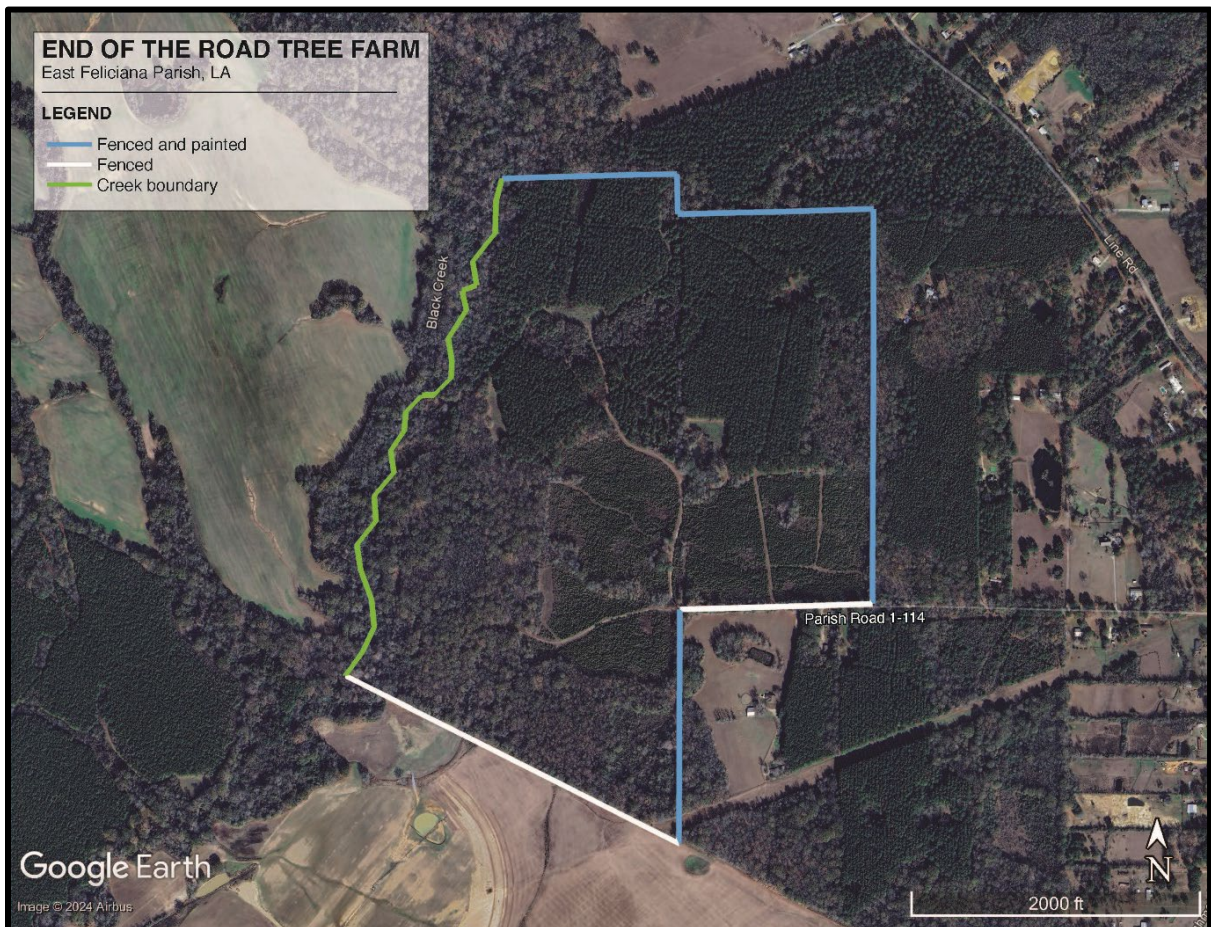
31. Tom does not allow public access to his property.

32. To enter Tom's property from public roads, a person must access Tom's private roads through one of two metal gates in the fence along Dobrowoiski Lane.

33. Tom keeps both gates locked unless he, his family, or a guest is on the property.

34. Tom mainly uses one gate at the end of Dobrowoiski Lane, where a “no trespassing” sign is clearly visible from the gate.

35. This map and the key in the top-left corner accurately depict how Tom’s property lines were marked in December 2023:



36. Because Tom’s property is private land on which he hunts, spends time with family, and grows timber, Tom desires and expects privacy there. Indeed, privacy from unwanted visitors or intrusions is crucial to Tom’s enjoyment of his property and to safe hunting practices.

*LDWF Searches Private Land Without Warrants*

37. To hunt game in Louisiana, a person must obtain a license from LDWF and follow all relevant wildlife laws and regulations. La. Stat. Ann. §§ 56:103(A), 56:301.

38. LDWF enforces the state’s wildlife laws and regulations. La. Stat. Ann. § 36:602(B).

39. LDWF’s wildlife enforcement agents have a duty to “see that” hunters are licensed and following “the laws, rules, and regulations under the jurisdiction of the department.” La. Stat. Ann. § 56:54.

40. By statute, each wildlife enforcement agent has authority to enforce wildlife laws throughout all the “territory assigned to him.” La. Stat. Ann. § 56:54.

41. By statute, wildlife enforcement agents are “vested with the same authority and powers conferred by law upon other law enforcement officers of this state,” “in addition to the authority” that the law confers on wildlife enforcement agents specifically. La. Stat. Ann. § 56:55.2.

42. Louisiana statutes do not require wildlife enforcement agents to obtain consent or a warrant before entering private land to search for evidence of potential violations of state wildlife laws.

43. Louisiana statutes do not require wildlife enforcement agents to establish probable cause or reasonable suspicion that a violation is being committed before entering private land to search for evidence of potential violations of state wildlife laws.

44. LDWF has a policy and practice of entering private land without consent, a warrant, probable cause, or reasonable suspicion that a violation is being committed to search for evidence of potential violations of state wildlife laws.

45. Acting under La. Stat. Ann. § 56:54 and LDWF’s policy and practice of warrantless entries, LDWF’s wildlife enforcement agents frequently enter private land—without consent, a warrant, probable cause, or reasonable suspicion—to search for evidence of potential violations of state wildlife laws.

46. As an official LDWF job description puts it, wildlife enforcement agents “are responsible for the patrol of public and private land and water.” *Louisiana Wildlife Enforcement Cadet*, <http://tinyurl.com/3esduhdv> (accessed February 22, 2024).

47. During these warrantless patrols of private land, LDWF wildlife enforcement agents go wherever they please, whenever they please, for however long they please—regardless of how the land is used or marked—looking for evidence of potential violations of state wildlife laws.

48. In other words, neither Louisiana statute nor LDWF policy places any meaningful constraints on the timing, frequency, duration, or scope of wildlife enforcement agents’ discretion to patrol private land for evidence of potential violations of state wildlife laws.

49. LDWF's warrantless entries and patrols of private land are standard procedure statewide, have been for decades, and continue today.

50. As a professional forester and wildlife biologist, Tom supports wildlife laws but knows that warrantless searches are not necessary to enforce those laws.

51. In neighboring Mississippi, where Tom also owns land and has forestry clients, wildlife enforcement officers are prohibited from conducting warrantless entries. Yet Mississippi has nonetheless been able to effectively manage its wildlife populations without a policy and practice like LDWF's warrantless entries.

52. In fact, several states across the country enforce wildlife laws and maintain healthy wildlife populations without resorting to warrantless entries onto private land.

*December 6, 2023 Warrantless Entry onto Tom's Property*

53. Tom has had a hunting license for decades and has hunted on his property for as long as he's owned it. He has never been cited for or committed any legal offense on his land.

54. On December 6, 2023, Tom was hunting on his 240-acre property in Ethel.

55. As was his normal practice, he left the gate unlocked while he was on his property.

56. Tom didn't shoot anything that day, so he walked back to his truck, which was parked over an eighth of a mile into his property in a spot not visible from the public road.

57. When Tom arrived back at his truck, Nicholas Firmin, a wildlife enforcement agent with LDWF, was waiting for him.

58. Parked nearby on Tom's land was an LDWF vehicle that the agent had driven through Tom's gate and onto Tom's private roads.

59. When Tom approached his truck, the agent asked if Tom's rifle was loaded. Tom told the agent it was loaded but that he would unload it, place it in his nearby truck, then talk to the agent. When the agent asked Tom to hand him the loaded rifle so that he could unload it himself, Tom refused because he felt it was unsafe. The agent allowed Tom to unload the rifle and place it back in Tom's truck.



60. When Tom returned to speak with him, the agent inspected Tom to see if Tom had his hunting license and was wearing hunter orange (he was).

61. Agent Firmin was not dressed in hunter orange.

62. The agent then asked to see Tom's deer tags. Tom explained that Louisiana had just transitioned to a "text to tag" electronic tag system, so the agent asked for proof that Tom was registered for the electronic tagging system.

63. Tom called the electronic tag hotline, which confirmed he was part of the program.

64. The agent next went to his LDWF vehicle to run a warrant check on Tom.

65. While the agent ran the warrant check, Tom called a friend who is also a LDWF wildlife enforcement agent to confirm that he was following the rules for the electronic tagging system. When the agent returned, Tom handed his phone to him and the agent talked to Tom's friend.

66. Tom asked the agent if his enforcement check was complete. The agent told Tom it was. Tom then politely but firmly told the agent he was unhappy with the agent's conduct, particularly his entry onto Tom's land without permission. The agent left.

67. Agent Firmin did not have a warrant for his December 6, 2023 search of Tom's property.

68. Agent Firmin did not issue Tom a citation for any violation of state wildlife laws (or any other laws).

*December 30, 2023 Warrantless Entry onto Tom's Property*

69. A few weeks later, LDWF entered Tom's 240-acre property a second time, again without consent, a warrant, probable cause, or reasonable suspicion of illegal activity.

70. On December 30, 2023, Tom went hunting in the morning and shot a buck on his property. He immediately sent in his electronic tag to report the kill to the state. Because he had reached his daily limit, Tom stopped hunting for the day.

71. Later that day, Tom's brother was hunting on the property with Tom's permission. Like Tom, his brother left the gate unlocked and parked well inside the property out of sight of the

public road. Yet when Tom's brother returned to his truck, he found LDWF wildlife enforcement agents waiting for him by his truck on Tom's land. Tom's brother immediately texted Tom and Tom began driving towards his property.

72. The LDWF agents who entered Tom's property on December 30, 2023, were Josh Cooper and Dale Wheat. They checked Tom's brother and found no violations.

73. Just after the agents exited through Tom's gate and onto Dobrowoiski Lane (the public road) in their LDWF vehicle, Tom arrived. Because Dobrowoiski Lane is a narrow, one-lane dirt road, both the agents and Tom pulled off to the side, creating space for Tom's brother to pass.

74. Tom exited his truck and calmly approached the agents in their LDWF vehicle. Tom introduced himself and informed the agents he was using his phone to record the interaction. The agents told him, "That's fine."

75. Tom expressed concern that it was *his* land the agents had just exited and that it was the second time LDWF agents had been on the property recently. The agents confirmed they had gone to where Tom's brother parked and checked him.

76. Tom asked the agents why they had entered his land. One of the agents responded: "It is known hunting property and the gate was open."

77. Tom asked: "How? What makes it known hunting property?" One of the agents responded that "during the hunting season there's regular in and out traffic" and that it is simply "known for hunting." The other agent added, "It's a wooded area."

78. Tom explained that there's regular traffic in and out during the entire year and that he didn't "think an open gate gives [agents] any probable cause for coming on somebody's land."

79. One of the agents responded that Tom could take it up with "Captain Will Roberts, region 7 captain," to which Tom responded that he would. Tom asked the agents if Defendant Roberts sent them to Tom's property, which they both denied.

80. Tom asked the agents whether "anytime y'all see an open gate you feel like you have the right to go on someone's land and look for them." The agents replied, "Absolutely."

81. Tom asked the agents if that's how they were "trained in the academy and everything," to which one of the agents replied, "Yes sir."

82. When Tom again asked the agents whether they were trained to enter private land without consent or a warrant, one of the agents confirmed they were trained to do so.

83. The same agent added that it was "just like dove season 2019," apparently referencing the time Tom was cited for hunting on a friend's field that had allegedly been baited without Tom's knowledge.

84. Neither agent explained what connection, if any, the 2019 incident had to their presence on Tom's land that day. Tom calmly ended the encounter and left.

85. Agents Cooper and Wheat did not have a warrant for their December 30, 2023 search of Tom's property.

86. Agents Cooper and Wheat did not issue Tom or his brother citations for any violation of state wildlife laws (or any other laws).

87. Neither Tom nor anyone else has ever been cited for a violation of state wildlife laws (or any other laws) on a property Tom owns.

### **INJURY TO PLAINTIFF**

88. Defendants' warrantless entries and searches of Plaintiff's land have invaded his property and privacy rights and have hindered his ability to use and enjoy his land in peace.

89. Defendants' warrantless entries and searches of Plaintiff's property have caused him to feel a constant sense of anxiety that LDWF may be watching him, wandering in his zone of fire, or prying into his private life.

90. Defendants' policy and practice of entering and searching Plaintiff's land without warning or permission when people are hunting is dangerous. This is especially so when LDWF agents enter without wearing hunter orange or other high-visibility clothing. Plaintiff does not want to accidentally shoot an LDWF agent while hunting simply because he is unaware of the agent's presence.

91. Because of Defendants' warrantless entries and searches, Plaintiff has spent time and money taking steps to deter such intrusions in the future beyond those already in place in December 2023. Since then, Plaintiff has posted additional "no trespassing" signs and blue paint along his property lines, made special trips to his property to check for intruders, and placed a camera to watch the main entrance gate.

92. Defendants' warrantless entries and searches of Plaintiff's property have made him less willing to invite guests and family onto his property for fear they will experience unwarranted intrusions, questioning, and surveillance. He is also concerned that others hunting on his property run a higher risk of a hunting accident when wildlife enforcement agents could be on his property without hunter-orange high-visibility clothing.

93. In short, Defendants' warrantless entries and searches have reduced Plaintiff's ability to use and enjoy his property in peace.

94. Moreover, Plaintiff will continue to suffer a reduced ability to use and enjoy his property in peace for as long as LDWF's policy and practice of warrantless searches, and La. Stat. Ann. § 56:54 (to the extent it authorizes such searches), remain in place.

95. But for Defendant's warrantless entries and searches of Plaintiff's property, LDWF's policy and practice of warrantless entries and searches, and La. Stat. Ann. § 56:54 (to the extent it authorizes such intrusions), Plaintiff would have suffered none of these harms before and would suffer none of them in the future.

### CAUSE OF ACTION

#### **Violation of Article I, Section 5 of the Louisiana Constitution**

96. Article I, Section 5, of the Louisiana Constitution provides:

Every person shall be secure in his person, property, communications, houses, papers, and effects against unreasonable searches, seizures, or invasions of privacy. No warrant shall issue without probable cause supported by oath or affirmation, and particularly describing the place to be searched, the persons or things to be seized, and the lawful purpose or reason for the search. Any person adversely affected by a search or seizure conducted in violation of this Section shall have standing to raise its illegality in the appropriate court.

97. The word "property" in Article I, Section 5 encompasses all private land, including (but not limited to) hunting grounds, timber farms, recreational land, roads, and woods.

98. Plaintiff's land is "property" under Article I, Section 5.

99. Defendants "searched" Plaintiff's property under Article I, Section 5 by entering without permission to look for evidence of potential violations of state wildlife laws.

100. Defendants also "inva[ded]" Plaintiff's "privacy" under Article I, Section 5 by entering property he owns, regularly uses for private purposes, and has conspicuously marked as private.

101. All of Defendants' searches of Plaintiff's property and invasions of his privacy were conducted without consent or a warrant.

102. All of Defendants' searches of Plaintiff's property and invasions of his privacy were conducted without probable cause or reasonable suspicion that a crime was being committed.

103. All of Defendants' searches of Plaintiff's property and invasions of his privacy were thus unreasonable and violated Article I, Section 5 of the Louisiana Constitution.

104. Accordingly, Plaintiff asks the Court to enter judgment declaring that Defendants' past searches of his property and invasions of his privacy violated Article I, Section 5 of the Louisiana Constitution.

105. All of Defendants' searches of Tom's property and invasions of his privacy were conducted under LDWF's policy and practice of warrantless entries and searches and under La. Stat. Ann. § 56:54 (to the extent it authorizes such searches).

106. LDWF's policy and practice of warrantless entries and searches of private land and La. Stat. Ann. § 56:54 (to the extent it authorizes such searches) thus violate Article I, Section 5 of the Louisiana Constitution.

107. Accordingly, Plaintiff asks the Court to enter judgment declaring that LDWF's policy and practice of warrantless entries and searches of private land and La. Stat. Ann. § 56:54 (to the extent it authorizes such searches) violate Article I, Section 5 of the Louisiana Constitution.

108. On information and belief, LDWF maintains an ongoing policy and practice of warrantless entries and searches of private land.

109. Unless Defendants are enjoined from entering and searching Plaintiff's property without a warrant, from enforcing LDWF's policy and practice of warrantless entries and searches, and from enforcing La. Stat. Ann. § 56:54 (to the extent it authorizes such entries and searches), Plaintiff will suffer continuing and irreparable harm.

**PRAYER FOR RELIEF REQUESTED**

WHEREFORE, Plaintiff prays for relief as follows:

- A. A judgment declaring that Defendants' warrantless searches of Plaintiff's property violated Article I, Section 5 of the Louisiana Constitution;
- B. A judgment declaring that LDWF's policy and practice of warrantless searches of private property violates Article I, Section 5 of the Louisiana Constitution;
- C. A permanent injunction barring Defendants from conducting warrantless (or otherwise unreasonable) searches of Plaintiff's property;
- D. A judgment declaring that La. Stat. Ann. § 56:54—to the extent it authorizes warrantless searches of private property—violates Article I, Section 5 of the Louisiana Constitution, both on its face and as applied to Plaintiff;
- E. A permanent injunction barring Defendants from relying on La. Stat. Ann. § 56:54 to conduct warrantless searches of private property or otherwise enforcing LDWF's policy and practice of warrantless searches of private property;
- F. An award of \$1 in nominal damages for violations of the Louisiana Constitution;
- G. An award of attorneys' fees and court costs; and
- H. All other legal and equitable relief to which Plaintiff may be entitled.

WHEREFORE, Plaintiff prays that the Defendants be served with a copy of this Petition and duly cited to appear and answer this Petition and that, after all legal delays and due proceedings had, there be judgment in favor of Plaintiff.

Respectfully submitted,

**KOCH & SCHMIDT, L.L.C.**

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