

JENNIFER WOERNER, D.M.D., M.D.

SUIT NO.

VERSUS

FIRST JUDICIAL DISTRICT COURT

The BOARD OF SUPERVISORS OF
LOUISIANA STATE UNIVERSITY
AGRICULTURAL AND MECHANICAL
COLLEGE and EDWARD F. JONES,
in his official capacity as
Assistant Vice-Chancellor for
Administration and Organizational Integrity
Louisiana State University Health
Science Center-Shreveport

CADDO PARISH, LOUISIANA

SECTION: _____

**PETITION FOR DECLARATORY JUDGMENT
AND PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF**

NOW INTO COURT comes, JENNIFER WOERNER, M.D., plaintiff herein who respectfully shows:

I.

PARTIES

1.

This is a civil action for declaratory judgment, a preliminary injunction and permanent injunctive relief.

2.

Plaintiff is Jennifer Woerner, M.D. (“Dr. Woerner”) a person of the age of majority domiciled in Caddo Parish, Louisiana.

3.

Defendants are:

- A. THE BOARD OF SUPERVISORS OF THE LOUISIANA STATE UNIVERSITY AGRICULTURAL AND MECHANICAL COLLEGE (“BOARD OF SUPERVISORS”), the supervisory body of Louisiana State University Health Sciences Center-Shreveport (“LSUHSC-S”), a public medical school and medical facility doing business at 1501 Kings Highway, Shreveport, Louisiana, and funded by the State of Louisiana, can be served through Mary L. Werner, Chair of LSU Board of Supervisors, at 3810 West Lakeshore Drive, Baton Rouge, Louisiana, 70808; and
- B. EDWARD F. JONES, Assistant Vice-Chancellor for Administration and Organizational Integrity, Louisiana State University Health Science Center-Shreveport. (“Jones”). Jones, sued in his official capacity only, can be served at 1501 Kings Highway, Shreveport, Louisiana, 71103.

II.
STATEMENT OF FACTS

4.

Plaintiff Woerner is a Doctor of Dental Medicine with a Doctorate in Medicine, and employee of the Board of Supervisors System and a tenured member of the faculty at LSUHSC-S.

5.

Dr. Woerner was tenured July 1, 2019. She currently serves in the position of Associate Professor, Associate Dean of Academic Affairs, Fellowship Director of Craniofacial and Cleft Surgery, and holds the Tilakram and Bhagwanti Devi Distinguished Professorship in Cleft Lip & Palate Surgery and Training.

6.

In 2021, Dr. Woerner assisted female students, residents, and fellows in asserting complaints of sex discrimination and harassment that were occurring at LSUHSC-S in violation of Title IX of the Education Amendments of 1972, a law protecting students from discrimination based on sex in education programs or activities. On April 5, 2021, Dr. Woerner sent a lengthy email to LSU Title IX lead investigators Jeffrey Scott and Stephanie Rhodes reporting that female students, residents, and fellows at LSUHSC-S were being bullied, harassed, publicly humiliated and their gender complaints ignored. Specifically, Dr. Woerner reported the complainants' concerns that Chancellor G.E. Ghali ("Ghali") was aware of Title IX complaints and not taking appropriate action and that as to campus Title IX Coordinator, Ed Jones, "there is an overwhelming amount of conflict-of-interest present." Dr. Woerner also complained of the gender discrimination she was likewise experiencing and of the retaliation she was experiencing due to her participation in the protected activity of opposing the discrimination she was reporting.

7.

On April 13, 2021, Dr. Woerner filed a complaint of gender discrimination and retaliation with the Equal Employment Opportunity Commission ("EEOC") and the Louisiana Commission on Human Rights ("LCHR"). The filing of these complaints was made public through various news agencies, including, but not limited to, the Advocate, a statewide newspaper. Following the

complaint of Dr. Woerner against him and Mr. Jones, Chancellor Ghali consented to being temporarily removed from his duties as Chancellor only and voluntarily accepted leave with pay. Mr. Jones continued his duties as Assistant Vice-Chancellor for Administration and Organizational Integrity.

8.

On May 12, 2021, Dr. Woerner attended a meeting conducted by Mr. Jones and attended by Dr. Charles Fox, III, Vice Chancellor for Clinical Affairs. During this meeting Mr. Jones informed Dr. Woerner that he was initiating an investigation into alleged complaints by residents against her and placing her on administrative leave pending the investigation. Jones handed Dr. Woerner a letter stating that she was on administrative leave and was not to return to the campus. Jones' letter did not state the nature of the alleged complaints nor why it would be necessary to force Dr. Woerner to cease teaching and/or patient care pending investigation. Dr. Charles Fox stated that this was the protocol decided upon between him and Mr. Jones. Dr. Woerner was involuntarily removed from her duties as tenured faculty immediately following that meeting on May 12, 2021.

9.

Thereafter, all faculty members, including Dr. Ghali, and staff were sent an email that read as follows:

As of yesterday afternoon, Dr. Jennifer Woerner has been placed on administrative leave. The conditions involve her to not be on our campus and to prohibit her from all clinical activities at any location. She is not to interact with any member of the Department of Oral and Maxillofacial Surgery for any reason except for urgent patient care related issues. Please report to me regarding any contact with Dr. Woerner during this period. Thank you. D. David Kim, Chair.¹

This email was then followed by an in-person meeting, on May 13, 2021, with all the residents conducted by Dr. David Kim (Chair), Leisa Oglesby (Designated Institutional Officer), and Mr. Jones where the residents were verbally instructed that they were not allowed to communicate with Dr. Woerner for any reason, and they should report her if she reached out to them. Dr. Ghali then returned to work as a faculty member performing clinical patient care and began to perform Dr. Woerner's duties and/or participated in the reassignment of her cases to

¹ Plaintiff's Exhibit 1, screen shot of email to Department.

faculty members who supported his return as Chancellor. Dr. Woerner's duties were re-assigned and absorbed, in part, by Dr Ghali, the subject of her Title IX complaint, and Dr. Patel, a Dr. Ghali supporter.

10.

Dr. Woerner, through counsel, objected to being placed on administrative leave and asked to be returned to her duties.² To date she has not been returned to her duties.

11.

Following her objection through counsel, Dr. Woerner, in good faith, directly emailed Dr. Charles Fox and Dr. David Lewis, requesting to return to clinical duties. Her email request read as follows:

I wanted to reach out to you because I have not heard anything, nor has my counsel, related to my administrative leave. It has been over 2 weeks, and despite contacting general counsel at BR, there has been no response related to receiving these complaints in writing, my due process, the investigation, or any possible timeline for return. My patients are anxiously awaiting, and my department has begun "redistributing" my direct referrals and current patients to two of the individuals I actually have filed complaints against. I'm not sure either of you are aware, but I just underwent a full audit by the LSBME and internally at every hospital I work at in late 2019, over 3-5 years of my records. This review found no CMS violations, no professional complaints of any kind, and no other compliance related concerns on my part. All of my outcomes metrics were found to be excellent as well. I understand the sensitivity of this situation, but I do not require the assistance of residents to run my clinical service and would like to request that I can return to clinical practice and continue training my fellow, Dr. Rachel Bishop as this is negatively impacting her training. I hope you look favorably upon my request.

This email request was then followed by an email response by Ed Jones, on June 3, 2021, denying her request to return to work. Ed Jones' email response read as follows:

You were placed on administrative leave with pay effective May 12, 2021 pending resolution of complaints filed against you by GME residents, and directed to refrain from any clinical duties. Your request, via May 30, 2021 email to Dr. Lewis and Dr. Fox, to return to clinical practice while on administrative leave was forwarded to me for response. After review and consultation with the LSU General Counsel's office, your request to return to clinical practice while on administrative leave will not be granted. The investigation into these complaints is expected to conclude shortly. Until the matter is resolved, please continue to refrain from engaging in clinical activities.....

² Plaintiff's Exhibit 2, copy of the letter from Allison A. Jones dated May 19, 2021 to counsel for the Board of Supervisors.

12.

Placing Dr. Woerner on administrative leave was an unlawful act. Mr. Jones does not have lawful authority to place a tenured faculty member on administrative leave.

**JONES DOES NOT HAVE APPOINTING
AUTHORITY OVER TENURED FACULTY**

13.

The Board of Supervisors is a corporate body created by Art. VIII, §7 of the Louisiana Constitution and vested with the powers to supervise, and manage the institutions and programs administered through its systems. The Board of Supervisors is the employer of personnel for the board and all managed universities. La. R.S. 17:3351A(10). The Board of Supervisors, not the state university it manages, has the right to sue and be sued. La. R.S. 17:3351A(1).

14.

The Board is authorized by La. R.S. 17:3351A(12) to adopt, amend, or repeal rules and regulations necessary or proper for the government of the universities it manages. *See also* La. Const. Art. VIII, § 7; La. R.S. 17:3218 and 17:3351B. In accordance with its constitutional and statutory authority, the Board of Supervisors of LSU adopted Bylaws to govern its operations and the operations of the universities it manages (the “Bylaws”).³ The Board of Supervisors has also enacted Rules and Regulations, which set forth its policies and procedures.⁴ The Bylaw and the Rules and Regulations of the Board of Supervisors apply to all of the universities and colleges within the system.

15.

In addition to the Bylaws and the Rules and Regulations of the Board of Supervisors (which are issued by the Board) are Permanent Memoranda (“PM”) issued by the President of the Board of Supervisors pursuant to authority delegated to him by the Board of Supervisors. The Bylaws, Rules and Regulations and Permanent Memoranda are all binding upon all institutions in the university system and have the effect of law.

³ Plaintiff’s Exhibit 3, excerpts of Bylaws of the Board of Supervisors of Louisiana State University Agricultural and Mechanical College, attached hereto.

⁴ Plaintiff’s Exhibit 4, excerpts of Rules and Regulations of the Board of Supervisors of Louisiana State University Agricultural and Mechanical College, attached hereto.

16.

LSUHSC-S is one of the universities managed by the Board of Supervisors. The Board of Supervisors' Bylaws, Rules and Regulations and Permanent Memoranda are binding upon LSUHSC-S.

17.

In Article VII, §1 (K)(5) of the Bylaws, the Board of Supervisors has delegated the management of personnel to the President of the Board.

18.

Pursuant to Article II, §2 of the Rules and Regulations, the President has established a Personnel Action Approval Policy. Article II, §4, §5(A)(4) and §5(B) and (C)(1-2) provide that all personnel actions related to all faculty must be initiated pursuant to and in accordance with the President's Personnel Action Approval Policy.

19.

The President's Personnel Action Approval Policy is contained in Permanent Memorandum 69 ("PM 69"). In PM 69, the President delegated certain personnel authority to the Chancellors or Equivalents of each campus within the system. Section IV. of PM 69 states in relevant part:

Delegation of Authority to Chancellors or Equivalents

Authority to make all other personnel actions which are not reserved to the Board or the President are hereby delegated by the President to the Chancellors or equivalents. The President may also delegate authority to the Provost of the LSU A&M campus since the President also serves as the Chancellor of that campus. This delegation may be revoked or amended by the Board or the President at any time. Delegation includes the following items **which may not be further delegated.**

* * *

E. Appointment and termination of tenured faculty. [Bold added for emphasis.]

20.

Through "Permanent Memorandum 69, Delegation of Authority to Execute Personnel Actions," ("PM 69")⁵ the President has delegated eleven (11) specific personnel action powers to the Chancellors of the various campuses.

⁵ Plaintiff's Exhibit 5, PM 69.

21.

The powers delegated by the President to the Chancellors of the various campuses is specified in PM 69, Section IV, as items A through K. PM 69 states specifically that the “items” delegated therein “**may not be further delegated except as noted.**” [Bold added.]

22.

As shown above, one of the powers bestowed upon the President by the Board of Supervisors, and delegated by the President to the chancellors, is the power to appoint tenured faculty and to terminate the appointment of tenured faculty (Item E).

23.

There is no provision in PM 69 permitting a chancellor to delegate the power to appoint and terminate tenured faculty (Item E). It is one of the personnel action matters that cannot be further delegated. Thus, the President’s authority to appoint and terminate tenured faculty can be exercised by the chancellors, but not by anyone subordinate to a chancellor.

24.

The power to appoint and to terminate tenured faculty is known as “appointing authority.” The power to appoint tenured faculty and to terminate that appointment necessarily includes all matters in between that would affect the terms and conditions of the appointment, including temporarily relieving the tenured faculty member of normal job responsibilities without the faculty member’s consent.

25.

Thomas Galligan is President of the LSU System and at all times relevant herein was Interim President or President.

26.

Dr. G.E. Ghali is the Chancellor of LSUHSC-S and held that office at all times relevant herein. Dr. Ghali voluntarily took an approved leave following Dr. Woerner’s complaint against him, but transferred all clinical work to another hospital when Dr. Woerner was involuntarily relieved of duties.

27.

Dr. Ghali has delegated most of his Chancellor/administrative duties to Interim Chancellor David Lewis, while Dr. Ghali performs many of the clinical duties previously provided by Dr. Woerner.

28.

Dr. Ghali was the subject of Dr. Woerner's Title IX complaint and had a motive to retaliate against her. Though Dr. Ghali did not directly exercise appointing authority to prohibit Dr. Woerner from performing her duties as tenured faculty, that authority was exercised by unlawful delegation directly for Dr. Ghali's personal benefit.

29.

Dr. Ghali directly benefited from Dr. Woerner being removed from her duties as tenured faculty and placed on administrative leave. Once she was involuntarily relieved of her duties, he took over many of her duties and assigned others to his supporters.

30.

Though Dr. G.E. Ghali has resumed clinical practice at and still holds the title of Chancellor at LSUHSC-S, most of his duties of Chancellor were delegated to Interim Chancellor David Lewis, M.D.

31.

Because PM 69 prohibits a chancellor from delegating appointing authority of tenured faculty, Dr. Ghali could not delegate to Interim Chancellor Lewis the power of personnel action over tenured faculty. Interim Chancellor Lewis has never taken any action affecting Dr. Woerner's rights to perform the duties of her tenured faculty appointment.

32.

LSU President Thomas Galligan, to whom the LSU Board of Supervisors delegated their appointing authority, is the only person with lawful authority to alter the terms and conditions, even temporarily, of Dr. Woerner's tenured faculty appointment at LSUHSC-S.

33.

LSU President Thomas Galligan has never taken any action of any kind restricting Dr. Woerner's appointment as tenured faculty.

34.

Dr. Woerner did not consent to being placed on administrative leave. Dr. Woerner sent written objection immediately when she received the May 12, 2021, letter from assistant Vice-Chancellor Jones informing her that he was placing her on administrative leave and warning her to stay away from the campus and her other duty posts upon threat of enforcement action.

35.

Dr. Woerner is being prohibited from performing her duties as tenured faculty by Vice-Chancellor Charles F. Fox, III, Assistant Vice-Chancellor Edward F. Jones, and LSU's General Counsel, not one of whom is authorized by law to exercise any appointing authority over Dr. Woerner.

36.

The action of these Defendants against Dr. Woerner is an absolute nullity because it was undertaken without lawful authority.

37.

Further, placing Dr. Woerner on administrative leave was punitive and retaliatory.

38.

In her Title IX complaint and complaints to the EEOC/LCHR, Dr. Woerner reported that it was widely perceived that Dr. Ghali's conduct was discriminatory and retaliatory and that Mr. Jones had a conflict of interest that adversely affected his ability to conduct investigations of matters brought to him and this deterred complainants from coming forward with their concerns.

39.

Mr. Jones placed Dr. Woerner on administrative leave within 30 days of receiving notice that he was one of the subjects of her Title IX complaint letter.

40.

Placing Dr. Woerner on administrative leave was not only an unauthorized act with no lawful effect, it was also punitive and retaliatory.

41.

Article III of the Rules and Regulations of the Board of Supervisors specifies the types of leave that may be granted to excuse an employee from the performance of duties. There is no

provision for administrative leave as a type of leave that may be requested or imposed upon an academic employee or tenured faculty.

42.

Article III, §4 of the Rules and Regulations provides that time off without loss of pay, without loss of annual leave, and without loss of sick leave may be provided pursuant to policy memoranda of the President. However, the leave policies promulgated by the President address only leaves of absences that have been requested by the employee and approved by the appropriate authority. The President has never promulgated any personnel leave policy that defines “administrative leave.” There is nothing in the Bylaws, Rules and Regulations or PMs that defines “administrative leave.”

43.

The only reference to “administrative leave” within the Rules and Regulations and policies of the LSU system is in PM 73⁶, in which “administrative leave” is listed as a “possible corrective action.” PM 73 addresses Title IX investigations, such as those conducted by Mr. Jones’ office. In a Title IX investigation, “administrative leave” is “**corrective action.**” [Bold added]. Imposing this type of ‘corrective action’ upon Dr. Woerner would be in violation of state law prohibiting retaliation against one who has engaged in protected activity. Dr. Woerner engaged in activity protected by Louisiana law when she opposed sex discrimination and harassment in the workplace and reported the complaints of others to the appropriate investigative office within the LSU System.

44.

Mr. Jones retaliated against Dr. Woerner by placing her on administrative leave, without lawful authority. This was “corrective action” and an adverse employment action that is illegal.

⁶ Plaintiff’s Exhibit 6, excerpts of PM 73.

III.

REQUEST FOR DECLARATORY JUDGMENT

45.

Louisiana Code of Civil Procedure 1871 authorizes “Courts of record within their respective jurisdictions may declare rights, status, and other legal relations whether or not further relief is or could be claimed.”

46.

Dr. Woerner seeks a declaration that her status as an Associate Professor of Oral and Maxillofacial Surgery at LSUHSC-S, with tenure, cannot be restricted, and that she cannot be involuntarily removed from the appointment, even temporarily, by anyone except the Chancellor (or, in the event the Chancellor has a conflict of interest or other impediment to the exercise of that authority, the President of the LSU System) and that the current involuntary leave imposed upon her by assistant vice-chancellor Jones’ is unauthorized, unlawful and an absolute nullity.

IV.

REQUEST FOR PRELIMINARY RESTRAINING ORDER AND PERMANENT INJUNCTION

47.

Pursuant to Louisiana Code of Civil Procedure article 3604, Dr. Woerner seeks a preliminary injunction pending resolution of her request for declaratory judgment ordering her reinstated to her duties as tenured faculty, immediately, and prohibiting assistant vice-chancellor Jones, or any other administrator from restricting her duties or impeding her in the performance of her duties until a ruling can entered on the request for declaratory relief.

48.

As shown by the facts in this verified petition, the restriction imposed upon Dr. Woerner’s tenured faculty appointment by assistant Vice-Chancellor Mr. Jones is unlawful because (a) the action was not initiated or approved by the lawful appointing authority and (b) the action is based upon an unlawful and retaliatory cause.

49.

The conduct which Dr. Woerner seeks to restrain is unlawful conduct. Consequently, she is not required to show that she would suffer irreparable harm upon *prima facie* showing that the conduct sought to be restrained is unlawful conduct. See *Jurisch v. Jenkins*, 99-0076, p. 4 (La. 10/19/99), 749 So. 2d 597, 599:

“A petitioner is entitled to injunctive relief without the requisite showing of irreparable injury when the conduct sought to be restrained is unconstitutional or unlawful, i.e. when the conduct sought to be restrained constitutes a direct violation of a prohibitory law and / or a violation of a constitutional right.”
Therefore, the injunction should issue without bond.

V.

DAMAGES FOR RETALIATION

50.

Dr. Woerner further seeks all legal and equitable relief necessary to have her restored to her duties as tenured faculty, and the expungement of all records of the unlawful administrative leave.

51.

Dr. Woerner further shows that placing her on administrative leave was retaliatory action taken against her because she had engaged in the protected conduct of reporting an employment practice declared prohibited by the Louisiana Employment Discrimination Laws, La.R.S. 23:301, *et seq.* and the prohibition against sex discrimination in employment, La. R.S. 23:332. Though she sent her complaint to Title IX investigators, these investigators are also state employees and obligated by law to conduct an investigation of violations of state laws or forward the information to the appropriate state investigative office. Dr. Woerner also engaged in protected activity by providing information about discriminatory and unlawful workplace activities to the Louisiana Commission on Human Rights. Mr. Jones and Mr. Fox and LSU's General Counsel were aware that Dr. Woerner had filed a complaint with the LCHR because Dr. Woerner's counsel provided them a copy simultaneously with the submission to the LCHR.

52.

Dr. Woerner has suffered and will continue to suffer serious injury to her professional reputation if this Court does not intervene to lift the restriction and order her returned to work forthwith.

VI.

NO FEDERAL CLAIMS ARE ASSERTED

53.

No federal claims are asserted in this lawsuit. Any federal laws referenced are for purposes of stating facts, not as an element of any claim and not as a basis for relief. All claims for relief are asserted under state laws only.

VII.

PRAYER FOR RELIEF

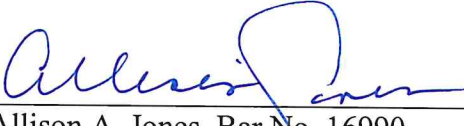
WHEREFORE, PLAINTIFF REQUESTS that a hearing be set at which time the Defendants be ordered to appear and show cause why a preliminary injunction should not be issued restraining Edward Jones, in his official capacity and any other administrator of LSUHSC-S from preventing the Plaintiff from performing her duties as tenured faculty pending a ruling on Plaintiff's request for declaratory judgment.

PLAINTIFF FURTHER REQUESTS that upon the conclusion of due proceedings a judgment be entered declaring (a) that vice chancellor Jones does not have authority to prohibit Plaintiff from performing her duties by placing her on administrative leave; (b) that the administrative leave is an absolute nullity; (c) that the administrative leave is adverse employment action; (d) that the administrative leave is retaliatory; (e) restoring Plaintiff to her duties as tenured faculty with the expungement of all adverse actions from her personnel file; (f) awarding Plaintiff compensatory damages for injury to her professional reputation; and (g) awarding Plaintiff reimbursement of her costs and attorneys' fees.

PLAINTIFF FURTHER REQUESTS all legal and equitable relief to which she may be entitled, plus pre-judgement interest on all monetary awards.

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By: _____


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ATTORNEYS FOR PLAINTIFF

JENNIFER WOERNER, D.M.D., M.D.

SUIT NO.

VERSUS

FIRST JUDICIAL DISTRICT COURT

The BOARD OF SUPERVISORS OF
LOUISIANA STATE UNIVERSITY
AGRICULTURAL AND MECHANICAL
COLLEGE and EDWARD F. JONES,
in his official capacity as
Assistant Vice-Chancellor for
Administration and Organizational Integrity
Louisiana State University Health
Science Center-Shreveport

CADDO PARISH, LOUISIANA

SECTION: _____

ORDER

CONSIDERING the foregoing verified Petition for Declaratory Judgment and Preliminary and Permanent Injunctive Relief (“Petition”)

IT IS HEREBY ORDERED that a Rule to Show Cause issue herein directed to the Defendants, the Board of Supervisors of Louisiana State University Agricultural and Mechanical College and Edward F. Jones, in his official capacity as Assistant Vice-Chancellor for Administration and Organizational Integrity Louisiana State University Health Science Center-Shreveport, ordering them to show cause, if any they can, on _____, 2021, at _____ o’clock ____ M. why a preliminary injunction should not be issued in favor of Plaintiff, Jennifer Woerner, D.M.D., M.D. and against for defendants, without bond or other security, (1) restraining Edward Jones, in his official capacity and any other administrator of LSUHSC-S from preventing the Plaintiff from performing her duties as tenured faculty pending a ruling on Plaintiff’s request for declaratory judgment; and (2) that upon the conclusion of due proceedings a judgment be entered declaring (a) that vice chancellor Jones does not have authority to prohibit Plaintiff from performing her duties by placing her on administrative leave; (b) that the administrative leave is an absolute nullity; (c) that the administrative leave is adverse employment action; (d) that the administrative leave is retaliatory; (e) restoring Plaintiff to her duties as tenured faculty with the expungement of all adverse actions from her personnel file; (f) awarding Plaintiff compensatory damages for injury to her professional reputation; and (g) awarding Plaintiff reimbursement of her costs and attorneys’ fees.

IT IS FURTHER ORDERED that Defendants, the Board of Supervisors of Louisiana State University Agricultural and Mechanical College and Edward F. Jones, in his official capacity as Assistant Vice-Chancellor for Administration and Organizational Integrity Louisiana State University Health Science Center-Shreveport, respond to the Request for Admissions filed with the Petition on or before two business days before the date set for the hearing on the Rule to Show Cause described above.

THUS DONE AND SIGNED in chamber, at Shreveport, Caddo Parish, Louisiana on this _____ day of _____, 2021.

DISTRICT JUDGE

PLEASE SERVE:

THE BOARD OF SUPERVISORS OF THE
LOUISIANA STATE UNIVERSITY
AGRICULTURAL AND MECHANICAL COLLEGE
can be served through
Ms. Mary L. Werner
Chair of LSU Board of Supervisors
3810 West Lakeshore Drive
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MR. EDWARD F. JONES
Assistant Vice-Chancellor for Administration
and Organizational Integrity, Louisiana State
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can be served at
1501 Kings Highway
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