

**40th JUDICIAL DISTRICT COURT
PARISH OF ST. JOHN THE BAPTIST
STATE OF LOUISIANA**

NO. _____

DIV. _____

**RURAL ROOTS LOUISIANA, HARRY JOSEPH SR.,
and LOUISIANA BUCKET BRIGADE,**

Plaintiffs,

VERSUS

THE PORT OF SOUTH LOUISIANA, through its Board Chair, P. Joey Murray, III,

Defendant.

St. John The Baptist Filed Apr 02, 2026 8:32 AM Deputy Clerk of Court E-File Received Apr 02, 2026 7:33 AM	C-85336 A
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PETITION FOR DECLARATORY AND INJUNCTIVE RELIEF

NOW INTO COURT, through undersigned counsel, come Rural Roots Louisiana, Harry Joseph Sr., and the Louisiana Bucket Brigade (collectively, “Plaintiffs”), who bring this action pursuant to La. Code of Civ. Proc. Art. 1871 for declaratory and injunctive relief to obtain a judicial determination as to whether the Port of South Louisiana (“Defendant” or “the Port”) must publish public notice in the official journal of the State, pursuant to Article VII, Section 8(C) of the Louisiana Constitution, of its decision to preliminarily authorize the issuance of up to \$400 million in revenue bonds and \$40 million in bond anticipation notes.

If the Court determines that the Port must publish notice of the decision to issue bonds in the official journal of the State, Plaintiffs request an order from this Court restraining the Port from proceeding with the bond issuance until such time as notice has been properly published.

BACKGROUND

1. The Port of South Louisiana plans to issue \$400 million in bonds for the construction of a major dock and ancillary facilities. As confirmed in records obtained from the Port in response to a public records request, the Port did not publish public notice of its decision to do so in the official journal of the State as required by Article VII, Section 8(C) of the Louisiana Constitution. Proper legal notice is important, as a general matter, and even more so in this instance because the publication of the notice starts a 30-day clock which is the only time during which the validity of bond issuances may be questioned, pursuant to La. Const. art. VII, § 8(C).

2. Through media reporting and public records requests, it has been revealed that the \$400 million in bonds is intended for construction of a major dock project and ancillary facilities to serve heavy industrial projects planned for the west bank of Ascension Parish in Modeste. These projects have been shrouded in secrecy through non-disclosure agreements among state, local, and Port officials¹ as well as confidentiality exemptions pursuant to controversial amendments in 2024 to the Public Records Law allowing for records pertaining to negotiations of economic development projects to be withheld from the public.²

3. This case is brought in the 40th Judicial District because the Port does not have jurisdictional authority over Ascension Parish, while it does have jurisdictional authority in St. John the Baptist Parish and its offices are located in Reserve.

JURISDICTION AND VENUE

1. This court has jurisdiction over this matter pursuant to La. Const. art. VII, § 8, governing the issuance of bonds, and La. Code of Civ. Proc. art. 1871, governing declaratory judgments.

2. Venue is proper in this Court for actions against state agencies, pursuant to La. R.S. § 13:5104, as this Court presides in the judicial district in which the Port has jurisdictional authority, pursuant to La. R.S. § 34:2471(A), and in which its offices are located, i.e. at 1720 La. Hwy. 44, Reserve, Louisiana, 70084.

PARTIES

3. Plaintiff Rural Roots Louisiana (“Rural Roots”) was founded in 2023, in Donaldsonville, Louisiana. Its mission is to introduce kids to social justice and care of the earth, provide literacy programs, promote community stewardship, and help make communities aware and educate kids on social justice by teaching art and gardening. Rural Roots’ members live in Ascension Parish and in the area targeted for dock construction for heavy industrial projects at

¹ Drew Hawkins, *'A muzzle on elected officials': NDAs 'cloak' Louisiana's biggest business developments*, Mississippi Public Broadcasting (Mar. 27, 2026), <https://www.mpbonline.org/blogs/news/a-muzzle-on-elected-officials-ndas-cloak-louisianas-biggest-business-developments/>.

² Shawn Wilson, *Behind Closed Doors: Louisiana's Dangerous New Transparency Law*, The Bayou Insider (Apr. 26, 2025), <https://thebayouinsider.substack.com/p/behind-closed-doors-louisianas-dangerous>.

issue in this matter. Rural Roots purchases goods within and pays sales taxes to the State of Louisiana and Parish of Ascension.

4. Harry Joseph Sr. is a pastor and a resident of Ascension Parish. He owns property, purchases goods, and pays sales taxes in the State and Ascension Parish, and resides in an area that would be affected by the Port's construction project and heavy industrial expansion.

5. Louisiana Bucket Brigade ("Bucket Brigade"), is a Louisiana nonprofit organization, based in New Orleans, that works for environmental health and justice with communities in Louisiana located near heavy industry. The organization works to achieve a healthy, prosperous, pollution-free and just state where people, their health and environment are valued and prioritized over profit. The Bucket Brigade has staff who do work in Ascension Parish in the area targeted for the Port's construction project to be funded by the bond issuance. The Bucket Brigade purchases goods within the state and pays sales taxes to the State of Louisiana as do its members and staff.

6. Defendant Port of South Louisiana is a political subdivision of the State of Louisiana, pursuant to La. R.S. § 34:2471(A). P. Joey Murray, III, is the Chair of the Board of Commissioners.

FACTS

7. On August 5, 2025, the Board of Commissioners of the Port of South Louisiana adopted a resolution giving preliminary approval to the issuance of up to \$400 million in revenue bonds and up to \$40 million in bond anticipation notes.

8. Article VII, Section 8(C) of the Louisiana Constitution requires that a state agency, or political subdivision, that decides to issue bonds "shall publish once in the official journal of the state, as provided by law, a notice of intention to issue the bonds."

9. The Port is a political subdivision of the State pursuant to the statute creating it, La. R.S. § 34:2471(A).

10. Article VII, Section 8(C) further requires that the notice "shall include a description of the bonds and the security therefor."

11. *The Advocate* newspaper based in Baton Rouge has long served as the official journal of the State.³

³ See La. R.S. § 43:81 and Legislative Glossary, available at <https://www.legis.la.gov/legis/Glossary.aspx>.

12. In addition, the Louisiana Register is a monthly publication published by the Louisiana Division of Administration to provide access to legal notices issued by the executive branch of the state government.⁴

13. Plaintiffs' counsel have undertaken a search of both of these journals and found no public notices of the Port's decision on August 5, 2025, to preliminarily authorize the bond issuance.

14. On March 16, 2026, Plaintiffs, through their counsel, inquired of the Port whether it had published a public notice of the August 5, 2025, resolution, and asked for a copy of any published notice.

15. The Port responded on March 18, 2026, with an affidavit showing that the minutes of the special meeting of the Board of Commissioners where the resolution was adopted were published in the *L'Observateur* on October 22, 2025. Affidavit of publication, annexed hereto as Exhibit A.

16. The *L'Observateur*⁵ is a local newspaper distributed through the parishes of St. John the Baptist, St. Charles and St. James, and is not the official journal of the state of Louisiana.

17. The notice published by the Port did not comply with the constitutional requirement in Article VII, section 8(C) that it be published "in the official journal of the state."

18. The notice of the meeting minutes also did not comply with the constitutional requirement that the notice of a bond issuance "include a description of the bonds and the security therefor."

19. The notice as published did not mention what the \$400 million in bonds and \$40 million in bond anticipation notes would be spent on, nor where.

20. Rather, as shown below, the notice simply described the resolution as "giving preliminary approval to the issuance of not exceeding (i) four hundred million dollars (\$400,000,000) of revenue bonds and (ii) forty million dollars (\$40,000,000) of bond anticipation notes of the Port of South Louisiana and providing for other matters in connection therewith."

⁴ Available at <https://www.doa.la.gov/dao/osr/louisiana-register/>.

⁵ Available at <https://lobservateur.com/services/about-us/>.

ITEM 5B. CONSIDER RESOLUTION GIVING PRELIMINARY APPROVAL TO THE ISSUANCE OF NOT EXCEEDING (I) FOUR HUNDRED MILLION DOLLARS (\$400,000,000) OF REVENUE BONDS AND (II) FORTY MILLION DOLLARS (\$40,000,000) OF BOND ANTICIPATION NOTES OF THE PORT OF SOUTH LOUISIANA AND PROVIDING FOR OTHER MATTERS IN CONNECTION THEREWITH.

A Motion was offered by Commissioner Bazile and seconded by Commissioner Dumas to adopt that Resolution, which is attached as Exhibit 5B. After discussion, the Motion was called for a vote, which was as follows:

YEAS Mr. Scontrino, Ms. Dumas, Mrs. Hebert, Mr. Murray, Mr. Burks, Mr. Bazile, Mr. LeBlanc, Mr. Duhe*, Mr. Joseph

NAYS None

ABSTAIN None

ABSENT None

21. In response to a public records request, the Port provided the resolution adopted at the special meeting of the Port Board.

22. While the resolution provides at least a bit more information to the effect that the bonds would be used to fund the construction of a dock and ancillary facilities, the resolution did not indicate where the construction would take place nor any other information about the project. Resolution Giving Preliminary Authorization for the Issuances of Bonds, annexed hereto as Exhibit B.

23. The resolution itself was not published in any journal, neither the *L'Observateur* nor *The Advocate*.

24. It is only through public reporting and other records received in response to public records requests that it became clear that this bond issuance is connected to the heavy industrial development in Modeste, Louisiana, in Ascension Parish.⁶

25. Given the lack of transparency around these developments, the amount of debt being incurred through bond issuances, and the strict requirements for testing the validity of bond issuances, clarity as to the requirements of public notice is not a mere formality. It takes on heightened importance in such circumstances.

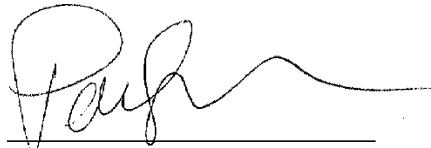
⁶ Anthony McAuley, *Jeff Landry's trade plan aims to keep peace between Louisiana ports. It just got an early win.*, nola.com (Aug. 24, 2026), https://www.nola.com/news/business/jeff-landrys-trade-plan-aims-to-keep-peace-between-louisiana-ports-it-just-got-an/article_689d3cb5-820c-421c-a4bf-88fc9bf6e0dc.html.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that, after due proceedings had, this Court:

- (i) Render a declaratory judgment determining whether the Port of South Louisiana must a) publish notice of resolutions authorizing the issuances of bonds in the official journal of the state, and b) include a description of the bonds and security therefor, pursuant to Article VII, Section 8(C) of the Louisiana Constitution; and,
- (ii) If the answer is affirmative, issue an order restraining the Port from proceeding with the bond issuance before publishing notice as required by Article VII, Section 8(C) of the Louisiana Constitution.

Respectfully submitted,



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Counsel for Plaintiffs

**pro hac vice application forthcoming*

PLEASE SERVE:

Port of South Louisiana
Through its Chair of the Board
of Commissioners
P. Joey Murray, III

and

Through its Executive Director
Julia Fisher-Cormier
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P.O. Box AE
Reserve, Louisiana 70084