

WILLIAM H. BROYLES, III

SUIT NUMBER:

594123-B

VERSUS

FIRST JUDICIAL DISTRICT COURT

STEPHANIE LYNCH

CADDO PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes WILLIAM H. BROYLES, III ("Broyles"), a person of full age of majority and domiciliary of Caddo Parish, Louisiana, who respectfully represents:

1.

Made defendant herein is STEPHANIE LYNCH ("Lynch"), a person of full age of majority, domiciled in Caddo Parish, Louisiana, who may be served at her residence, 5037 Waters Place, Shreveport, LA 71109.

2.

Venue is proper in Caddo Parish, Louisiana pursuant to Louisiana Code of Civil Procedure articles 42 and 74 because Lynch is domiciled in Caddo Parish, Louisiana, and the wrongful conduct and the damages sustained thereby occurred in Caddo Parish, Louisiana.

3.

In early July 2016, Lynch -- in her individual and personal capacity, and not as an employee, agent or representative of any other person or entity -- published or caused to be published false, defamatory, injurious, inflammatory, and baseless allegations against Broyles to third parties on Facebook. At no relevant time was Lynch acting in any official capacity, and Broyles asserts no claims against any governmental entity.

4.

Among other things, Lynch falsely accused Broyles of being the Caddo Parish School Board whistleblower, commonly referred to as "Bill Unsharpened," falsely accused Broyles of receiving "hush money" in connection with the Shreveport Rafter's soccer club;

300.00

7460
Eric S. Vigen

PGS	3	EXH	_____	MIN.	_____
CC	1	CP	_____	MAIL	_____
INDEX	✓	REC.	_____	FAX	_____
W/D DOC	_____	CERT MAIL	_____		
SERVICE	1	cert	_____		

FILED

JUL 18 2016

Jim Scott

JIM SCOTT
DEPUTY CLERK OF COURT
CADDO PARISH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

and falsely stated that Broyles is "a shrapnel to the Black community in Shreveport and Caddo Parish."

5.

At all relevant times, Lynch knew or should have known that her postings were false, defamatory, injurious, inflammatory and baseless.

6.

Lynch's actions and posts with respect to Broyles were made with actual and implied malice with the intent to harm Broyles' reputation and credibility as to lower his standing in the community; to deter others from associating or dealing with Broyles and/or his business ventures; to otherwise expose Broyles to contempt or ridicule; to defame, libel and/or slander Broyles; to invade Broyles' privacy; to expose Broyles to criminal investigation; to damage Broyles' present and future employment prospects; to intentionally interfere with contracts of Broyles and his businesses; and to intimidate Broyles.

7.

Upon information and belief, Lynch's efforts to discredit and harm Broyles stem from the facts that Lynch has received more taxpayer-funded contributions to her Caddo Parish Employees' Retirement System ("CPERS") account than any current or former Caddo Parish Commissioner, that Lynch has a balance of \$2,950.00 in unpaid fines to the Louisiana Ethics Administration, and that Broyles has been active in educating the public about CPERS and unpaid ethics fines, as well as advocating for the return of taxpayer-funded CPERS contributions to the citizens of Caddo Parish.

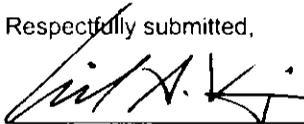
8.

As a result of Lynch's actions, Broyles has incurred general, special, and pecuniary damages as set forth above, including, but not limited to damage to reputation and good standing in the community, as well as lost economic opportunity.

WHEREFORE, WILLIAM H. BROYLES, III prays that defendant STEPHANIE LYNCH be duly served with a copy of this petition and cited to appear herein, and that after due proceedings had, there be judgment herein in favor of WILLIAM H. BROYLES,

III, against STEPHANIE LYNCH, for reasonable damages to be determined at trial, interest thereon at the legal rate until paid, costs of these proceedings, and any other legal and equitable relief as the Court deems necessary and proper.

Respectfully submitted,



Erik S. Vigen, No. 32000

333 Texas Street, Suite 2121
Shreveport, LA 71101
Telephone: (318) 227-3083
Facsimile: (318) 865-1894
Email: evigen@thebroylesgroup.com

Counsel for William H. Broyles, III

40
39
38
37
36
35
34
33
32
31
30
29
28
27
26
25
24
23
22
21
20
19
18
17
16
15
14
13
12
11
10
9
8
7
6
5
4
3
2
1

PLEASE SERVE:

STEPHANIE LYNCH
5037 Waters Place
Shreveport, LA 71109

If Ms. Lynch cannot be served at her residence, she may be served at City Council Chamber, 1st Floor of Government Plaza, 505 Texas St., Shreveport, LA 71101, at 3:00 pm on July 26, 2016