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ORLEANS PARISH CIVIL DISTRICT COURT

PARISH OF ORLEANS

STATE OF LOUISIANA

NO. _____

DIV. _____

**EYE ON SURVEILLANCE, VOICE OF THE EXPERIENCED, EDITH ROMERO,
ALEX JAOUCHE, TANIA WOLF, BRUCE REILLY, and SONNI MUN**

VERSUS

**NEW ORLEANS CITY COUNCIL and FRENCH QUARTER ECONOMIC
DEVELOPMENT DISTRICT GOVERNING AUTHORITY**

FILED _____

DEPUTY CLERK

**PETITION TO ENFORCE THE LOUISIANA OPEN MEETINGS LAW, FOR
DECLARATORY JUDGMENT, INJUNCTION, AND ATTORNEYS' FEES AND COSTS**

NOW INTO COURT come Petitioners EYE ON SURVEILLANCE, VOICE OF THE EXPERIENCED, New Orleans non-profit organizations, and EDITH ROMERO, ALEX JAOUCHE, TANIA WOLF, BRUCE REILLY, and SONNI MUN, residents of New Orleans, who file this Petition against Defendants New Orleans City Council and French Quarter Economic Development District Governing Authority for violations of the Louisiana Constitution, Article XII, Section 3, and Louisiana's Open Meetings Law, La. R.S. 42:11, *et seq.* Defendants convened, participated in, and took several actions at an April 16, 2026 public meeting in violation of the law, resulting in irreparable injury to Petitioners as well as other citizens who attended the meeting, by excluding them from fully participating in the meeting, failing to make voice votes, and denying them the right to offer public opinion on a matter of extreme public importance: public safety and security of the local community from law enforcement surveillance. These actions should be voided, enjoined, and declared unlawful, and Defendants should be ordered to fully comply with the Open Meetings Law and Louisiana Constitution, going forward.

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INTRODUCTION

1. Petitioners file this summary action to protect their rights to observe, participate in, and voice their opinions in the deliberations and business of public bodies, as guaranteed by the Louisiana Constitution and the Louisiana Open Meetings law. *See* La. Const. art. XII, § 3; La. R.S. 42:14(A).
2. Pursuant to Louisiana’s Constitution and Open Meetings Law, all public bodies must allow public comment before taking action on an agenda item on which a vote is to be taken, *see* La. R.S. 42:19(D), and that “[t]he agenda [for the public body meeting] shall not be changed less than twenty-four hours, exclusive of Saturdays, Sundays, and legal holidays, prior to the scheduled time of the meeting.” *See* La. R.S. 42:19(A)(1)(b) (ii)(aa).
3. Furthermore, public bodies are required to read aloud the description of an item from an agenda, and the related upcoming vote, before addressing it at a public meeting, *see* La. R.S. 42:19(A), and all votes on a motion must be made via viva voce (verbally spoken), *see id.* 42:14(C).
4. But the New Orleans City Council, at its April 16, 2026 French Quarter Economic Development District (“FQEDD”) meeting, in its capacity as the French Quarter Economic Development District Governing Authority, complied with none of these well-established legal principles. Instead, the Council truncated public comment and cherry-picked who would speak on an action (Motion No. M-2026-01) related to a controversial law enforcement program being considered by the Council that day: the New Orleans Police Department 8th District’s drone surveillance program, which has sparked heated debate among the local community for its potential for unethical, dangerously invasive, dehumanizing, and racist uses. *See* Ed Vogel, “Battle Over Facial Recognition in New Orleans Will Shape Future of Surveillance,” *Truthout*, January 17, 2026; Sophie Kasakove, “Controversial Drone Program in French Quarter Moves Forward,” *NOLA.com*, May 9, 2026.
5. The City Council, in its capacity as the French Quarter Economic Development District Governing Authority, also voted on Motion No. M-2026-01 without announcing what item was being considered, without a verbal second, and without a voice vote.

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6. Each of these actions by the French Quarter Economic Development District Governing Authority violates, suppresses, and undermines the core principles of transparency, accountability, and public voice that undergird Louisiana's Constitution and the Louisiana Open Meetings Law. Absent Defendants' compliance with these laws, the City Council, in its capacity as the French Quarter Economic Development District Governing Authority, has failed to ensure its commitment, as a public body, to meaningfully publicly engage with communities in a democratic, transparent manner.
7. Petitioners therefore file this lawsuit to enforce the Louisiana Constitution and Open Meetings Law. Specifically, Petitioners request: (A) a judgment declaring that Defendants violated the Louisiana Constitution and Open Meetings Law at the April 16, 2026 FQ EDD meeting; (B) a judgment that the vote on the motion at same meeting is void; (C) an injunction mandating Defendants' compliance with the Louisiana Constitution and Open Meetings Law; and (D) costs and attorneys' fees.

PARTIES

8. Petitioner EYE ON SURVEILLANCE ("EOS") is a coalition of New Orleans organizations and community members working to fight the expansion of surveillance. EOS is rooted in the understanding that surveillance has historically been used to criminalize and target communities of color. EOS advocates for community safety alternatives while organizing community power against dangerous surveillance tech such as facial recognition or police drones. Members of EOS attended French Quarter Management District and French Quarter Economic Development District meetings about the proposed drone program, including the April 16, 2026 French Quarter Economic Development District meeting and signed up for public comment but were not given the opportunity to speak.
9. Petitioner VOICE OF THE EXPERIENCED ("VOTE") is a grassroots organization founded and run by formerly incarcerated people (FIP), our families and our allies. VOTE is dedicated to restoring the full human and civil rights of those most impacted by the criminal legal system using collective experience, expertise and power to improve public safety in Louisiana and beyond without relying on mass incarceration. VOTE serves the

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city and state as a model of civic engagement, providing public comment in hundreds of meetings and educating the public through the media and their own materials. Members of VOTE attended the April 16, 2026 French Quarter Economic Development District meeting and signed up for public comment but were not given the opportunity to speak.

10. Petitioner EDITH ROMERO is a person of the age of majority domiciled in District B of New Orleans who attended the April 16, 2026 FQ EDD meeting. Ms. Romero is a member of EOS and signed up for public comment on agenda Item Three to express her concern about the implementation of the “Drones as First Responder” program of the Department of Homeland Security to increase surveillance technology in the most surveilled part of New Orleans, especially in the middle of a budget deficit and the need to fund youth programs, education, and food and housing access. Edith submitted a comment card, but she was not allowed to participate in public comment.

11. Petitioner ALEX JAOUICHE is a person of the age of majority domiciled in District D of New Orleans who attended the April 16, 2026 FQ EDD meeting. Alex is a member of EOS and submitted a public comment card to express their concerns about using public safety monies on additional police spending when the French Quarter has a separate budget for police spending, and especially in light of instances of false identifications of New Orleans residents based on surveillance technologies. Alex submitted a comment card, but they were not allowed to participate in public comment.

12. Petitioner TANIA WOLF is a person of the age of majority domiciled in District B of New Orleans who attended the April 16, 2026 FQ EDD meeting. Tania is a member of Southeast Dignity Not Detention Coalition which signed on to the letter urging the City Council to voluntarily address the Open Meetings Violations that took place at the April 16 meeting. Tania submitted a comment card, but she was not allowed to participate in public comment.

13. Petitioner BRUCE REILLY is a person of the age of majority domiciled in District C of New Orleans who attended the April 16, 2026 FQ EDD meeting. Bruce is a staff member of VOTE and submitted a comment card to express his concerns about the drone proposal, particularly informing the Council on a residents’ perspective on surveilling his neighborhood along with how the City could otherwise be resourcing the NOPD’s

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documented issue of their most frequent calls for service: “subjects moved.” Bruce provided public comment at one of the French Quarter Management District meetings preceding this Council hearing, and he submitted a written comment, that was not read, at a second FQMD meeting. Bruce submitted a comment card on April 16, but he was not allowed to participate in public comment.

14. Petitioner SONNI MUN is a person of the age of majority who grew up in New Orleans and is currently domiciled in District B who attended the April 16, 2026 FQ EDD meeting. Sonni is a member of EOS and signed up for public comment to express her concerns about the use of drones to respond to 911 calls about individuals experiencing a mental health emergency and how the drone program might delay the arrival of appropriate human resources. Sonni submitted a comment card on April 16, but she was not allowed to participate in public comment.

15. Defendant NEW ORLEANS CITY COUNCIL is the governing authority for the City of New Orleans and the French Quarter Economic Development District. The New Orleans City Council is a public body subject to the Open Meetings Law.

16. Defendant FRENCH QUARTER ECONOMIC DEVELOPMENT DISTRICT GOVERNING AUTHORITY (“FQ EDD Governing Authority”) is the governing authority of the French Quarter Economic Development District pursuant to La. R.S. 9038:32(D) and a public body subject to the Open Meetings Law. It has seven District Members, who are the seven members of the New Orleans City Council. The City Council, in its capacity as the French Quarter Economic Development District Governing Authority, holds quarterly meetings to review quarterly budget and expenditure reports of the FQ EDD Trust Fund and to hear a presentation about those reports from the Executive Director of the French Quarter Management District and a representative from the French Quarter Management District’s Board of Commissioners. Pursuant to La. R.S. 25:799, which established the French Quarter Management District, the Management District must adopt a budget in compliance with La. R.S. 39:1305. This process requires approval by motion from the FQ EDD Governing Authority. On December 4, 2025, the FQ EDD Governing Authority approved a motion to approve FQ EDD’s budget for the year 2026, as approved

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by the French Quarter Management District on Monday, November 17, 2025. Consideration of an amendment to that budget was the subject of the public meeting that is challenged in this petition.

JURISDICTION and VENUE

17. This Court maintains subject matter jurisdiction over this dispute based on the object of the demand and the provisions of La. R.S. 42:25(C).
18. Venue is proper in Orleans Civil District Court because:
 - a. Pursuant to La. R.S. 42:25, "Enforcement proceedings shall be instituted in the district court for the parish in which the meeting took place or will take place."
 - b. Pursuant to La. Code Civ. Proc. arts. 73-74, and 78, the acts and/or failures of Defendant occurred in Orleans Parish; and
 - c. Pursuant to La. Code Civ. Proc. art. 42, Petitioners and Defendants are domiciled in Orleans Parish.

UNDERLYING FACTS

19. On April 16, 2026, the City Council's French Quarter Economic Development District ("FQ EDD") held a meeting to discuss and vote on a budget amendment to fund drone surveillance in the French Quarter.
20. The drone surveillance program, known as the Drone as First Responder, would launch drones equipped with high-definition cameras, thermal sensors, and live video streams to respond to 911 calls throughout the French Quarter. The program would cost over \$740,000, of which the New Orleans Police Department ("NOPD") has stated \$500,000 would be covered by a "private investor." The identity of the private investor has not been made public, and the French Quarter Management District ("FQMD") has refused to disclose that information despite questions from New Orleans residents, including Petitioner Alex Jaouiche, who asked during a FQMD meeting, and Petitioner Edith Romero who asked a FQMD Commissioner directly.
21. The April 16 meeting was first noticed with an agenda that included only two items: the quarterly budget and expenditure reports for the FQ EDD Trust Fund ("Item One") and a

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presentation from the FQMD and New Orleans Police Department (“NOPD”) about the budget request for the new drone program (“Item Two”).

22. Twenty-four hours before the meeting, a third item was added to the agenda: a motion to vote to approve the budget amendment (“Item Three” or “FQ EDD Motion No. 1”).
23. The meeting began shortly after 12:00pm CT on April 16, 2026, and lasted roughly 50 minutes. District Member King was the presiding officer. Five minutes were spent on agenda Item One, and less than one minute on agenda Item Three. Thirty three minutes were spent on Item Two – the FQMD and NOPD presentation—and Q&A with Council Members.
24. At no point during the thirty-three minutes of the discussion on Item Two was there any discussion of the potential security and privacy concerns with high-resolution video recording that begins the moment the drone is launched, even though New Orleans residents, including Petitioners Edith Romero and Alex Jaouiche by email to the Council and FQMD Commissioners, have asked questions about both of these concerns.

The FQ EDD Governing Authority Truncated and Cherry-Picked Public Comment for Agenda Item Two.

25. In the thirty-fifth minute, the presiding officer, District Member King, announced that public comment on Agenda Item Two would be limited to ten minutes, because another meeting was scheduled in the same room at 1:00pm CT and because he wanted to allow a District Member who had to leave early to be present for the vote. As he said this, District Member King held a stack of comment cards in his hands. It was clear that ten minutes was not likely to be enough time for everyone who submitted a comment card to speak. Even as District Member King held the stack of cards, he continued to hold the floor for seven to eight more minutes to make his own comments and ask questions of the presenters, before moving to public comment on agenda Item Two.
26. As presiding officer, District Member King then turned to what would be a limited and truncated public comment. King called people one at a time to have the floor, and handpicked the comment cards and who would speak. The comment cards were not called in timestamped order, but instead were called based on the presiding officer’s preferences.

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27. Petitioner Sonni Hui believed she had been one of the first people to turn in a comment card, so she walked over to an aide in the room to ask why her name had not been called. She was told not to worry because they were going in order just rotating between those in support of and those opposed to the program. Petitioner Sonni's comment card was timestamped at 12:09pm, however she was never called to give public comment. Those who were called up to speak in opposition to the program turned in comment cards that were timestamped at 12:17pm, 12:33pm, and 12:39pm.
28. Three people were called to speak in favor of the program, including an FQMD commissioner who indicated on his comment card that he was speaking on behalf of FQMD, and a lobbyist who identified himself as such on his comment card and verbally when he made public comment.
29. Three people were called to speak against the program. Public comment rotated between a person in favor and a person opposed to the program. Before the sixth person was called to the podium, there were two minutes remaining of the ten-minute public comment period. However, rather than calling the sixth person and determining after that if there was additional time for further public comment, the presiding officer said the sixth person would be the last to speak. This gave the impression of an unannounced and predetermined plan to have an equal number of people speak for and against the program.
30. Eighteen people who signed up to speak in opposition to the program were not allowed to make public comment at all, including many whose comment cards were timestamped before the cards of some of the people who did make public comment. Included among them are Petitioners Tania Wolf and Sonni Hui who submitted comment cards that were timestamped, but who were not allowed to speak, and Petitioners Edith Romero, Alex Jaouiche, and Bruce Reilly – whom District Member King was already aware had a deep understanding of the issue and who represent organizations with many members in the community – who timely submitted comment cards that, for reasons unknown, do not have a timestamp.
31. Because the FQMD and NOPD presentation (Item Two) was listed as a separate agenda item from the motion to approve the budget amendment to fund the program (Item Three),

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before the meeting began, attendees, including members of EOS, VOTE, and the individual Petitioners, had expected two, separate opportunities for public comment, one for each item. Twelve of the eighteen people who were not permitted to make public comment had submitted comment cards for agenda Item Three, the vote to approve the drone program, and checked the box for “oppose.” None of those twelve were allowed to give public comment, including Petitioners Edith Romero, Alex Jaouiche, Tania Wolf, Bruce Reilly, and members of EOS and VOTE. The only person who submitted a comment card for agenda Item Three who was allowed to speak was the one person whose comment card indicated support of the program. That person was called to speak during public comment on agenda Item Two.

32. In total, twenty-one people submitted comment cards opposing the drone program. Eighteen were not permitted to make public comment. Three people submitted comment cards in support of the drone program. All three were permitted to make public comment.

The FQ EDD Governing Authority Mishandled Agenda Item Three By Failing to Allow for Public Comment and a Voice Vote.

33. Immediately following the truncated public comment on Item Two and comments from District Members Green and Morrell, who had reserved their time until after public comment, the FQ EDD Governing Authority moved to Item Three, the motion to approve the budget amendment. At minute 57:52 of the meeting, District Member King said “I make a motion.” Notably, this was all he said; he did not say he was moving to the next agenda item, did not explain what motion he was making, and did not read the description of the item or reference it in any way. Nor did the presiding officer state that the motion was seconded. The next words from the presiding officer after “I make a motion” were: “Can I get a second?” at 57:55, “No second?” at 57:59, and then “vote your machines please” at 58:09. Then at 58:17, the District Member King said “4 Yeas, No Nays.” However, there had, in fact, been 3 Nay votes.

34. Furthermore, there was no voice vote or reading of the votes by name. Voting was conducted in less than thirty seconds, and by electronic system. The only statement about

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the results of the vote made during the meeting was the presiding officer's incorrect statement that there had been "4 Yeas, No Nays."

35. Despite having just voted on agenda Item Three, King then asked the clerk to call agenda Item Three. The clerk responded that Item Three was the motion on which the FQ EDD Governing Authority had just voted. In response, at minute 58:50 – less than sixty seconds after he had said "I make a motion," – District Member King called for a motion to adjourn the meeting, which was seconded, and then the District Members still present voted unanimously to adjourn.

Members of Petitioners EOS and VOTE and Individual Petitioners Were Unable to Voice Their Significant Civil and Human Rights Concerns Related to the Drone Program or Have Them Addressed at the April 16th Meeting.

36. Petitioners and other New Orleans residents, including members of EOS and VOTE, have expressed their concerns and opposition to the Drone as First Responders program. Over 6,500 people signed a petition demanding a withdrawal of the program due to several concerns including: the potential for fourth amendment violations since the drones begin recording at takeoff, with high-definition cameras, thermal sensors, and live video streams, and would fly over a dense area with private courtyards; concerns about NOPD running data and still images from flight recordings through facial recognition systems; concerns about information sharing with other agencies, including federal agencies, through Louisiana's Fusion Center; lack of clarity about the app NOPD is developing for the drone program including who is creating the app and how information will stored; the community's expressed desires for resources to be spent on foot patrols; and concerns about the proliferation of surveillance technology in the French Quarter.
37. Petitioners and other residents, including members of EOS and VOTE, have concerns about the budget implications of the drone program, but were unable to raise those concerns at the April 16th meeting or have the concerns addressed. The City of New Orleans currently has a budget deficit, which has resulted in cuts to youth and family programs, and entire agencies and offices being shuttered. But members of EOS and VOTE and individual

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Petitioners could not raise these concerns about the cost of long-term aerial surveillance systems at the April 16, 2026 meeting.

38. Petitioners and other residents, including members of EOS and VOTE, have privacy, safety, and civil and human rights concerns about the drone program, but were also unable to raise those concerns at the April 16th meeting or have them addressed. Many surveillance drones, including the ones at issue in Item Two and the Motion under Item Three, are often equipped with high-definition cameras, thermal sensors and live video streams. Petitioners and members of EOS and VOTE were not able to state their questions about the specific features and capabilities of the drones, or about data storage, privacy protections, how warrants would be obtained, and other safeguards. Their concerns about violations of privacy and civil rights – heightened by the NOPD representative’s lack of knowledge about whether NOPD is in compliance with reporting requirements for the current drone program – were not adequately addressed at the April 16 meeting.
39. Petitioners also have concerns about whether and which government agencies can access the data collected by the drones, but were not able to raise those concerns at the April 16th meeting or otherwise have those concerns addressed. Petitioners were not able to state their questions about whether federal agencies such as Immigration and Customs Enforcement (“ICE”), Department of Homeland Security (“DHS”), Customs and Border Patrol (“CBP”), or the Federal Bureau of Investigations (“FBI”), or state agencies, will have access to the data collected or under what circumstances, including through fusion centers, like the Louisiana Fusion Center, that compile data for sharing across these agencies and to which NOPD sends its data.
40. The NOPD has stated that it hopes to expand the drone program city-wide. Yet Petitioners were not able to ask questions about these plans or the timeline for any expansion or raise concerns about the proposed extended city-wide surveillance.

Members of Petitioners EOS and VOTE and Individual Petitioners Urged Defendants to Address Open Meetings Violations Without Success.

41. On June 9, 2026, Counsel for Petitioners, Attorney William P. Quigley and the Center for Constitutional Rights, sent a letter on behalf of Petitioners, to Ashley J. Becnel, Executive

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Counsel to the New Orleans City Council, to document the Open Meetings Law violations at the April 16, 2026 meeting, and to request that the City Council, in its capacity as the FQ EDD Governing Authority, repudiate, recall, or reconsider actions taken at the April 16 meeting. They also requested the Council hold a new FQ EDD meeting about the drone program that is compliant with Louisiana's Open Meeting Laws. Several organizations and residents signed on in support of the letter: Petitioner EOS, Petitioner VOTE, Indivisible New Orleans, Southeast Dignity Not Detention (SEDND) Coalition, the American Civil Liberties Union of Louisiana (ACLU-LA), and Petitioners Tania Franco, Alex Jaouiche, Sonni Mun, Bruce Reilly, and Edith Romero.

42. The letter requested an acknowledgment of receipt, and a response by 12 PM CT on June 11, 2026.
43. On June 10, 2026, Ms. Becnel confirmed receipt of the letter. To date, no other response has been received.
44. FQ EDD Motion No. 1 has not been rescinded, and remains in effect.

VIOLATIONS OF THE LOUISIANA CONSTITUTION AND LOUISIANA'S OPEN MEETINGS LAW

45. The Louisiana Constitution guarantees the right of all persons "to observe the deliberations of public bodies and examine public documents, except in cases established by law." La. Const. art. XII, § 3.
46. In furtherance of that constitutional guarantee, the legislature enacted the Open Meetings Law ("OML"), La. R.S. 42:11 *et seq.* See *Wagner v. Beauregard Par. Police Jury*, 525 So. 2d 166, 168. (La. App. 3 Cir. 1988). The "primary purpose" of Article XII, Section 3 of the Louisiana Constitution and the OML "is to protect citizens from secret decisions made without any opportunity for public input" and enforce the public's "right to know." *Id.* at 169; *see also* La. R.S. 42:12 ("It is essential to the maintenance of a democratic society that public business be performed in an open and public manner and that the citizens be advised of and aware of the performance of public officials and the deliberations and decisions that go into the making of public policy.").
47. "Toward this end, the provisions of [the OML] shall be liberally construed." La. R.S. 42:12.

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48. Section 42:14(D) of the OML requires that “each public body conducting a meeting which is subject to the notice requirements of R.S. 42:19(A) shall allow a public comment period at any point in the meeting prior to action on an agenda item upon which a vote is to be taken.” La. R.S. 42:14(D).
49. Section 42:14(C) requires that all “votes made by members of a public body shall be viva voce and shall be recorded in the minutes, journal, or other official, written proceedings of the body, which shall be a public document.” *Id.* § 42:12(C).
50. Section 42:19 requires that all public bodies “give written public notice of any regular, special, or rescheduled meeting no later than twenty-four hours, exclusive of Saturdays, Sundays, and legal holidays, before the meeting.” La. R.S. 42:19(A)(1)(b)(1). The notice must contain an agenda on which each item is “listed separately and described with reasonable specificity.” *Id.* § 42:19(A)(1)(b)(ii)(bb). “Before the public body may take any action on an item, the presiding officer or his designee shall read aloud the description of the item except as otherwise provided in Subitem (dd) of this Item.” *Id.*
51. The New Orleans City Council is unquestionably a public body subject to the OML. *Deep S. Ctr. for Env't Just. v. Council of City of New Orleans*, 2019-0774, p. 8 (La. App. 4 Cir. 2/12/20), 292 So. 3d 973, 980 (“[I]t is undisputed that the Council, as a governing authority of the City of New Orleans, is a ‘public body’ subject to Open Meetings Law.”). The Council in its capacity as the French Quarter Economic Development District Governing Authority is likewise subject to the OML. *See id.*; La. R.S. 42:13(A)(3).
52. The New Orleans City Council, in its capacity as the French Quarter Economic Development District Governing Authority, violated Article XII, Section 3 of the Louisiana Constitution and the Open Meetings Law with respect to its April 16, 2026 FQ EDD meeting by:
- a. Imposing excessive and unreasonable limitations on public comment regarding the proposed expansion of drone surveillance in the French Quarter in violation of La. R.S. 42:14(D), thus depriving meeting participants, including members of Petitioners EOS and VOTE and individual Petitioners, and the public at large of

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their right to “voice their opinions in the decision-making process.” *Deep S. Ctr. for Env’t. Just.*, 292 So. 3d at 982.

- b. Failing to read aloud the description of agenda Item Three, as well as the motion to approve that item, as required by La. R.S. 42:19(A).
 - c. Voting on agenda Item Three via an electronic voting system that did not require District Members to orally voice their vote, in violation of La. R.S. 42:14(C) (requiring “viva voce” vote that is recorded in the governing body’s official written record of proceedings); *see Greemon v. City of Bossier City*, 2010-2828 (La. 07/01/11), 65 So.3d 1263, 1269 n.4 (La. 2011) (defining “viva voce” as “[w]ith the living voice; by word of mouth.” (quoting Black’s Law Dictionary 1573 (6th ed. 1990))).
53. These were not “mere technical violations” of the OML. *See Gilley v. Bd. of Supervisors of Louisiana State Univ. & Agric. & Mech. Coll.*, 2024-1298, p. 24, (La. App. 1 Cir. 3/19/26). As a result of the violations, members of EOS and VOTE, individual Petitioners and other members of the public were deprived of their constitutionally and statutorily-guaranteed right to observe and meaningfully participate in the deliberations of a public body making decisions on their behalf on a matter of acute public concern and direct personal import to Petitioners.
54. Accordingly, Petitioners are entitled to declaratory and injunctive relief, and attorney’s fees and costs to remedy the FQ EDD Governing Authority’s violation of the OML.
55. Petitioners respectfully request an expedited hearing be scheduled to decide this matter, pursuant to La. Code of Civ. Proc. Art. 3782, and La. Rev. Stat. § 42:26, which requires that this summary action be tried by preference and in a summary manner.

PRAYER FOR RELIEF

56. WHEREFORE, based on the foregoing allegations, Petitioners request that judgment be entered in favor of Petitioners and against Defendants and that the Court grant the following relief:
- a. Issue a **declaratory judgment**, pursuant to La. R.S. 42:26(3), that Defendants convened, participated, and took actions at the April 16, 2026 French Quarter

Economic Development District public meeting that violated requirements under the Louisiana Constitution and the Open Meetings Law to allow for a reasonable public comment period at, and to adhere to the noticed agenda for, said meeting, and to read aloud all pending motions and issue viva voce at said meeting;

- b. Issue a **declaratory judgment**, pursuant to La. R.S. 42:26(3), that Defendant's April 16, 2026 vote on Agenda Item Three is void and without legal effect, pursuant to La. R.S. 42:24, based on Defendants' unreasonable restrictions on public comment, failure to read each agenda item before taking action on it, voting on a motion that was not read aloud in full, and voting by electronic means rather than viva voce;
- c. Enter an **injunction**, pursuant to La. R.S. 42:26(2), that requires Defendants to adhere to the Open Meetings Law in noticing, reconvening, and administering a French Quarter Economic Development District meeting to reconsider and recall its April 16, 2026 vote on the drone program;
- d. Order Defendants to pay Petitioners all costs and attorney's fees related to the commencement and prosecution of this action; and
- e. Order such other and further relief, at law or in equity, to which Petitioners may be justly entitled.

57. WHEREFORE, Petitioners pray that Defendants appear and show cause on a day and time convenient to the Court, as to why this Court should not render judgment in favor of Petitioners as prayed for and why this Court should not:

- a. Issue a declaratory judgment that Defendants convened, participated, and took actions at the April 16, 2026 French Quarter Economic Development District public meeting that violated requirements under the Louisiana Constitution and the Open Meetings Law to allow for a reasonable public comment period at, and to adhere to the noticed agenda for, said meeting, and to read aloud all pending motions and issue viva voce at said meeting;
- b. Issue a declaratory judgment that Defendant's April 16, 2026 vote on Agenda Item Three is void and without legal effect, pursuant to La. R.S. 42:24, based on

Defendants' unreasonable restrictions on public comment, failure to read each agenda item before taking action on it, voting on a motion that was not read aloud in full, and voting by electronic means rather than viva voce;

- c. Enter an injunction, pursuant to La. R.S. 42:26(2), that requires Defendants to adhere to the Open Meetings Law in noticing, reconvening, and administering a French Quarter Economic Development District meeting to reconsider and recall its April 16, 2026 vote on the drone program; and
- d. Order Defendants to pay Petitioners all costs and attorney's fees related to the commencement and prosecution of this action.

Respectfully submitted,

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**Applications for pro hac vice
admission forthcoming*

Counsel for Petitioners

Sheriff Please Serve:

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