

ATTORNEY'S NAME: Roberts, La Koshia 26715  
AND ADDRESS:

NEW ORLEANS LA 70122

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS  
STATE OF LOUISIANA

NO: 2015 -- 08343 1 DIVISION: " A " SECTION: 15

STATE OF LOUISIANA ET AL VERSUS DAVIS, SONYA LAUGAND

CITATION

TO: DAVIS, SONYA LAUGAND  
THROUGH:  
5324 ST. ANTHONY AVENUE  
  
NEW ORLEANS LA 70122

YOU HAVE BEEN SUED:

You must either comply with the demand contained in the petition  
FOR DECLARATORY JUDGMENT AND FOR JUDGMENT TO RECOVER HAZARD MITIGATION GRANT PROGRAM FUNDS

a certified copy of which accompanies this citation, or file an answer or other legal pleading in the office of the Clerk of this Court, Room 402, Civil Courts Building, 421 Loyola Avenue, New Orleans, LA, within fifteen (15) days after the service hereof under penalty of default

ADDITIONAL INFORMATION

Legal assistance is advisable. If you want a lawyer and can't find one, you may call the New Orleans Lawyer Referral Service at 504-561- 8828. This Referral Service operates in conjunction with the New Orleans Bar Association. If you qualify, you may be entitled to free legal assistance through the New Orleans Legal Assistance Corp. You may call them at 800-624-4771 or 504-525-4431.

\*\*\*\*\*COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE\*\*\*\*\*

IN WITNESS HEREOF, I have hereunto set my hand and affix the seal of the Civil District Court for the Parish of Orleans, State of LA September 1, 2015

Clerk's Office, Room 402, Civil Courts  
421 Loyola Avenue  
New Orleans, LA

DALE N. ATKINS, Clerk of  
The Civil District Court  
for the Parish of Orleans  
State of LA

by \_\_\_\_\_  
Deputy Clerk

SHERIFF'S RETURN

(for use of process servers only)

PERSONAL SERVICE

DOMICILIARY SERVICE

On this \_\_\_\_\_ day of \_\_\_\_\_  
\_\_\_\_\_ served a copy of the w/i petition  
FOR DECLARATORY JUDGMENT AND FOR JUDGMENT TO  
RECOVER HAZARD MITIGATION GRANT PROGRAM FUNDS

\* On this \_\_\_\_\_ day of \_\_\_\_\_  
\* \_\_\_\_\_ served a copy of the w/i petition  
\* FOR DECLARATORY JUDGMENT AND FOR JUDGMENT TO  
\* RECOVER HAZARD MITIGATION GRANT PROGRAM FUNDS  
\*

On  
DAVIS, SONYA LAUGAND

\* On  
\* DAVIS, SONYA LAUGAND  
\*

THROUGH:

\* THROUGH:  
\*

\_\_\_\_\_  
Returned same day  
No.

\* by leaving same at the dwelling house, or usual place of  
\* abode, in the hands of \_\_\_\_\_  
\* a person of suitable age and discretion residing therein as  
\* a member of the domiciliary establishment, whose name  
\* and other facts connected with this service I learned by  
\* interrogating HIM / HER the said \_\_\_\_\_  
\* DAVIS, SONYA LAUGAND  
\*

Deputy Sheriff of \_\_\_\_\_  
Mileage: \$ \_\_\_\_\_

\* being absent from the domicile at time of said service.  
\* Returned same day  
\* No.

\_\_\_\_\_  
PAPER / ENTERED / RETURN  
SERIAL NO. DEPUTY PARISH

Deputy Sheriff of \_\_\_\_\_

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO: 2015-8343

DIVISION: A/15

STATE OF LOUISIANA-DIVISION OF ADMINISTRATION,  
OFFICE OF COMMUNITY DEVELOPMENT,  
DISASTER RECOVERY UNIT -  
HAZARD MITIGATION GRANT PROGRAM

VS.

SONYA LAUGAND DAVIS

FILED  
2015 AUG 31 P 4:35  
CIVIL DISTRICT COURT

PETITION FOR DECLARATORY JUDGMENT AND FOR  
JUDGMENT TO RECOVER HAZARD MITIGATION  
GRANT PROGRAM FUNDS

NOW INTO COURT, through undersigned counsel, comes Petitioner, the State of Louisiana, Office of Community Development, Disaster Recovery Unit - Hazard Mitigation Grant Program (hereinafter "HMGP"), which respectfully files this Petition for Declaratory Judgment and for Judgment to Recover Hazard Mitigation Grant Program Funds. In support, HMGP respectfully represents:

1.

The Defendant in this case is Sonya Laugand Davis, a major domiciliary of Orleans Parish, who voluntarily participated in HMGP to mitigate her home after Hurricane Katrina.

2.

HMGP is a mitigation program funded by FEMA and is administered by the State of Louisiana, the grantee. HMGP assists homeowners whose homes were damaged as a result of Hurricanes Katrina and Rita. It also helps homeowners in coastal Louisiana protect their homes from damage, which may occur in future natural disasters, by elevating their homes, reconstructing safer structures, or installing individual mitigation measures. The State of Louisiana serves as the funding vehicle by which FEMA funds are awarded to eligible homeowners.

3.

Defendant submitted a Voluntary Participation Agreement (hereinafter "VPA") on February 19, 2010 to participate in HMGP and to receive an HMGP grant. Defendant also

agreed to comply with all HMGP guidelines, which includes using HMGP funds for their intended purpose.

4.

FEMA grant funds in the amount of \$22,725.00 (hereinafter "FEMA grant funds") were paid to Defendant by HMGP on or about September 10, 2010 for the specific purpose of Elevation Measures (hereinafter "Elevation") at her home located at 5324 St. Anthony Avenue, New Orleans, Louisiana, 70122.

5.

Photographs dated April 23, 2015 show that although the FEMA grant funds were received, Defendant's home was not mitigated.

6.

Collection letters were mailed to Defendant.

7.

Defendant has failed to respond to the letters and has failed to return the funds to the State.

8.

Defendant's failure to return the FEMA grant funds has resulted in Defendant owing to HMGP the FEMA grant funds, which must be recovered by HMGP, the State program charged with distributing FEMA funds for mitigation projects.

9.

HMGP must account to FEMA for all funds issued to homeowners. Failure of HMGP to recover the FEMA grant funds from Defendant will result in reimbursement to FEMA by the State of Louisiana.

10.

HMGP requests that the debt of \$22,725.00, owed by Sonya Laugand Davis to HMGP, be recognized and that judgment in favor of HMGP be granted, directing Defendant to return and pay the FEMA grant funds to the State, in full.

**ALL PREMISES CONSIDERED, WHEREFORE, HMGP PRAYS:**

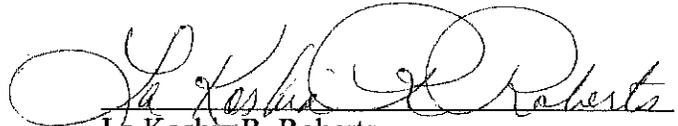
- a. That this Honorable Court declare that Defendant, Sonya Laugand Davis, is non-compliant with the Voluntary Participation Agreement submitted by her;
- b. That this Honorable Court declare that Defendant, Sonya Laugand Davis, is indebted to HMGP in the amount of \$22,725.00 because of her failure to mitigate her home

according to her agreement to abide by HMGP guidelines, including using HMGP funds for their intended purpose;

- c. That Defendant, Sonya Laugand Davis, be ordered to return the \$22,725.00 HMGP grant to HMGP, in full;
- d. That there be judgment rendered herein in favor of HMGP and against Defendant, Sonya Laugand Davis, in the full sum of \$22,725.00;
- e. That Defendant, Sonya Laugand Davis, be assessed all costs and fees associated with this matter; and
- f. That the Court grant such other relief as is just and proper.

Respectfully submitted:

**FOR HMGP:**



La Koshia R. Roberts

Bar Roll No. 26715

State of Louisiana, through

its Division of Administration

2021 Lakeshore Drive, Suite 100

New Orleans, Louisiana 70122

Telephone: 504-284-4022

Facsimile: 504-284-4091

LaKoshia.Roberts@la.gov

**PUBLIC ENTITY/FEE EXEMPT  
(La.R.S. 13:4521 and 13:5112)**

T. Randolph Richardson (Special Counsel)

Bar Roll No. 11245

Law Office of T. Randolph Richardson

1010 Common Street, Suite 3000

New Orleans, Louisiana 70112

Telephone: 504-212-4163

Facsimile: 504-581-7083

trichar994@aol.com

**PLEASE SERVE:**

**SONYA LAUGAND DAVIS  
5324 ST. ANTHONY AVENUE  
NEW ORLEANS, LOUISIANA 70122**

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO: \_\_\_\_\_

DIVISION: \_\_\_\_\_

STATE OF LOUISIANA-DIVISION OF ADMINISTRATION,  
OFFICE OF COMMUNITY DEVELOPMENT,  
DISASTER RECOVERY UNIT -  
HAZARD MITIGATION GRANT PROGRAM

VS.

SONYA LAUGAND DAVIS

FILED  
2015 AUG 31 P 4:35  
CIVIL DISTRICT COURT

VERIFICATION

CONSIDERING THE FOREGOING PETITION FOR RECOVERY OF HAZARD  
MITIGATION GRANT PROGRAM FUNDS:

I, CRAIG P. TAFFARO, JR., Director of the State of Louisiana's Hazard Mitigation  
Grant Program, declare under penalty of perjury that the representations made in the foregoing  
Petition are true and correct to the best of my knowledge, belief and understanding.

THUS DONE ON THIS 25<sup>th</sup> DAY OF August 2015 IN NEW ORLEANS,  
LOUISIANA.

  
\_\_\_\_\_  
Craig P. Taffaro, Jr.

  
\_\_\_\_\_  
La Koshia Reconda Roberts

Notary Public  
Bar Roll No. 26715  
My Commission expires at death.