

STATE OF LOUISIANA PARISH OF OUACHITA FOURTH DISTRICT COURT

STANLEY R. PALOWSKY, III, Individually,  
and on behalf of ALTERNATIVE  
ENVIRONMENTAL SOLUTIONS, INC.

FILED: JUL 31 2015

VERSUS NO. 15-2179

ALLYSON CAMPBELL

*Jennifer Baud*  
DY. CLERK OF COURT

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**FIRST SUPPLEMENTAL, AMENDED, AND RESTATED  
PETITION FOR DAMAGES**

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NOW INTO COURT, through undersigned counsel, comes Plaintiff, Stanley R. Palowsky, III, who appears herein individually and as a 50-percent shareholder and director of Alternative Environmental Solutions, Inc. ("AESI"), a Louisiana corporation, and who submits his First Supplemental, Amended, and Restated Petition for Damages, without leave of Court as the originally-named defendant has not yet filed responsive pleadings, as follows:

1.

Made defendants herein are the following individuals:

- A. Allyson Campbell, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana;
- B. Chief Judge H. Stephens Winters, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana;
- C. Judge Carl V. Sharp, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana;
- D. Judge Benjamin Jones, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana;
- E. Judge J. Wilson Rambo, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana; and
- F. Judge Frederic C. Amman, an individual of the full age of majority and a resident and domiciliary of the Parish of Ouachita, State of Louisiana.

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**CASE ASSIGNED TO:  
CV. SECT. 1**

2.

Pursuant to Louisiana Code of Civil Procedure article 615, made nominal defendant herein is AESI. Palowsky states that it would be a vain and useless act for him to demand that AESI bring the present action as the other 50-percent shareholder of AESI is W. Brandon Cork, who, as discussed below, has been sued by Palowsky in a related action.

3.

At all pertinent times, Defendant Campbell was acting under color of law but outside the course and scope of her employment duties as a non-attorney law clerk for the Fourth Judicial District Court ("Fourth JDC").

4.

At all pertinent times through December 2014, Defendant Jones was employed as a duly-elected judge of the Fourth JDC sworn to uphold the laws and Constitution of this State and abide by the Code of Judicial Conduct. Since March 2015, he has been employed as the Judicial Administrator of the Fourth JDC, a position for which he receives state monies in addition to his retirement funds to perform administrative tasks and act as a "supernumerary" judge.

5.

At all pertinent times, Defendants Winters, Sharp, Rambo, and Amman were employed as duly-elected judges of the Fourth JDC sworn to uphold the laws and Constitution of this State and abide by the Code of Judicial Conduct.

6.

Defendants Winters, Sharp, Jones, Rambo, and Amman (collectively referred to as "Defendant Judges") were acting under color of law but were acting in an administrative capacity when they committed the acts and/or omissions set forth herein; therefore, they are not entitled to judicial immunity from liability arising from same.

7.

As set forth below, Defendant Campbell is liable to Palowsky for the damages he has suffered as the result of her fraud, conspiracy to commit fraud, abuse of process, destruction or concealment of public records, intentional infliction of emotional distress, and violation of his rights under the Louisiana Constitution to due process and access to courts. Defendant Judges

are liable *in solido* to Palowsky for damages he has suffered as the result of their aiding and abetting Campbell by allowing her free rein to do as she pleased and then conspiring to conceal Campbell's acts which compounded the adverse effects of her acts on Palowsky.

8.

Palowsky submits first, though, that his allegations against Defendants must be viewed in light of other actions they have taken in recent years.

**Campbell's History of Payroll Fraud and  
Defendant Judges' Complicit Cover-Up of Same**

9.

Defendant Campbell is the highest paid law clerk in the Fourth JDC even though she is the only Fourth JDC law clerk who is not a licensed attorney and even though there is at least one law clerk who has been employed there longer than she has been.

10.

Upon information and belief, Campbell has not been to a continuing legal education course since graduating from law school in Alabama 15 years ago. Instead, she apparently receives continuous on-the-job training from different judges.

11.

On March 3, 2015, *The News-Star* reported that the Louisiana Legislative Auditor had issued a report indicating that some Fourth JDC employees might have been paid for hours which were not worked. In other words, payroll fraud had probably been committed.

12.

Defendant Campbell was apparently the only subject of the Auditor's report on suspected payroll fraud.

13.

Upon information and belief, unlike all other law clerks employed by the Fourth JDC, Campbell reportedly did not electronically enter the time she spent at work until after May 2014, a month she "unexpectedly" had off without pay. Furthermore, her office reportedly went vacant for days, if not weeks, at a time.

14.

Moreover, Campbell has posted several pictures on her Facebook page which were viewable by the public<sup>1</sup> and which indicated that she not only did her job in restaurants and/or bars, but also that she drank alcohol while doing so. For example, she captioned one picture, which was obviously taken in a restaurant and which showed food and alcoholic beverages, "Seafood nachos at the office." She then posted a picture from the same restaurant of her half-eaten meal and two empty glasses and commented, "Too many house hooker drinks."

15.

Notably, Defendants Amman, Sharp, and Rambo, along with Judge B. Scott Leehy, certified Campbell's time sheets and records for state payroll.

16.

Defendant Judges all owe an administrative duty to properly audit, investigate, and report suspected payroll fraud.

17.

As Chief Judge, Defendant Winters' present administrative duties and responsibilities include the proper auditing, investigating, and reporting of any suspected payroll fraud.

18.

Nonetheless, Defendant Judges have not only allowed Campbell to commit payroll fraud, but they have also actively schemed to cover up same.

19.

As just one example, Defendant Winters filed suit number 15-0770 on March 20, 2015, against Hanna Media Inc., d/b/a/ *The Ouachita Citizen* newspaper, after it filed a criminal complaint against the Court over public records requests dealing with the Court's internal investigations of possible payroll fraud involving Campbell as well as her felonious destruction of court documents, which is discussed below.

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<sup>1</sup> Campbell has subsequently either removed the photographs from her Facebook account or changed her privacy settings so that the general public cannot view her pictures.

20.

In that suit, the Court argued that Campbell's right to privacy with regard to her employment file was stronger than the public's right to know if its tax funds were being used to pay someone who was committing, or allegedly committing, payroll fraud. Campbell intervened in that suit and, thereby, became a party to the litigation.

21.

Even though the Legislative Auditor had reported that some court employees might have been paid for hours which they did not work, and even though Campbell had posted pictures on her Facebook page which indicated that she was eating and drinking alcohol at her "office," *i.e.*, restaurants or bars, Defendant Winters, on behalf of the Court, stridently protected Campbell's privacy "rights" and deprived the public of the opportunity to learn whether they were paying her to "work" while she was out of the office eating and drinking alcohol.

22.

Additionally, in that same litigation, a draft judgment which was unsigned, undated, and unfiled in the suit record was somehow received and circulated by and between Campbell, a party litigant, and Defendant Jones more than **one week in advance** of any signed and dated judgment or reasons for judgment being made available to the public or to the defendant therein.

23.

In an interview with *The Ouachita Citizen*, Judge Jones admitted the impropriety of having an unsigned and undated draft of a judgment before same is released to all parties in the litigation, but he refused to state from whom he obtained such document and, more disturbingly, when it was obtained.

24.

Upon information, Defendant Campbell had two deputy clerks of court aiding and abetting her document destruction, removal, and/or mishandling.

25.

Palowsky avers that Defendants Jones and Campbell were clandestinely working to improperly obtain *ex parte* the judgment of the *ad hoc* judge assigned to hear Defendant Winters' lawsuit, if not to actually help influence and/or draft the judgment.

26.

Given these facts, Palowsky submits that not only were Defendant Judges complicit in Defendant Campbell's payroll fraud, but they also schemed and conspired with her to conceal the fraud from the tax-paying public.

**Campbell's History of Destruction, Mishandling, and/or Concealment of Documents and Defendant Judges' Complicit Cover-Up of Same**

27.

Defendant Judges all owe an administrative duty to properly audit, investigate, and report suspected document destruction, concealment, and/or mishandling. As Chief Judge, Defendant Winters' present administrative duties and responsibilities include the proper auditing, investigating, and reporting of any suspected document destruction, concealment, and/or mishandling.

28.

In addition to having a history of committing payroll fraud, Campbell also has a history of destroying and/or concealing court documents, and Defendant Judges have covered this up to protect Campbell.

29.

For example, in 2012, Monroe attorney Cody Rials complained to Defendant Sharp that Campbell had withheld and/or shredded his court document in a case that was pending before said judge.

30.

Upon information and belief, the investigation of Campbell's suspected felonious conduct was assigned to Defendant Sharp, who, upon information and belief, interviewed an eyewitness who confirmed that he observed Campbell bragging in a local bar that she had destroyed Rials' court document. Nevertheless, Sharp, who found the eyewitness to be credible, refused to investigate further, and he shut the investigation down.

31.

Thus, in 2012, Defendant Sharp covered up Campbell's destruction of Rials' document and remained silent as to same.

32.

In 2014, when Defendant Campbell wrote “A modern guide to handle your scandal,” one of her weekly “society” columns in *The News-Star*, Rials believed that Campbell was goading him and gloating over the fact that she had gotten away with destroying his document. As a result, he wrote to court personnel to again complain about Campbell’s actions.

33.

Upon information and belief, Rials was then ordered to reduce his complaint of such felonious conduct to writing, which he did. The Court then appointed Defendant Jones to investigate, which is a purely administrative task, Rials’ complaint of Campbell’s felonious misconduct.

34.

It is believed that during the investigation, Defendants Sharp and Jones interviewed an unbiased disinterested witness who personally saw and heard Campbell sitting in a bar boasting about shredding Rials’ document so that Sharp could not review it.

35.

Once the eyewitness, a local attorney, was interviewed and found credible, the “investigation” was closed and the cover up began yet again.

36.

No official Fourth JDC records of the investigation are believed to have survived Defendant Jones’ retirement at the end of 2014. In fact, Defendants Winters and Jones advised *The Ouachita Citizen* that there were no discipline records involving Campbell which the Court could provide in response to the newspaper’s request for public records in March 2015.

37.

Further, during the trial of the Court’s suit against *The Ouachita Citizen*, counsel for the Court argued to the *ad hoc* judge that there was no “eyewitness” testimony to Campbell’s alleged felonious destruction of court documents.

38.

Perhaps more importantly, although the Court admitted that it had Rials’ written complaint, it argued that Campbell’s destruction of court documents was a mere “personnel

matter,” and that Campbell’s privacy rights outweighed the tax-paying public’s right to know whether a Court employee was destroying documents.

39.

Additionally, upon information and belief, when the Clerk of Court could not locate 52 writ applications which had been “missing” for over a year, it was discovered that Campbell, who was clerking for Defendant Sharp at the time, had used the applications as an end table in her office. Nonetheless, it does not appear that she was ever reprimanded, much less punished, for same.

40.

Thus, Palowsky submits that not only were Defendant Judges complicit in Defendant Campbell’s felonious destruction of documents, but they also schemed and conspired with her to cover up same from the tax-paying public and from litigants and their counsel. Defendant Judges’ affirmative acts to cover up Campbell’s felonious conduct amounts to misprision of a felony.

**Defendants’ Actions in *Palowsky v. Cork***

41.

At all times pertinent to his causes of action against Defendants, Palowsky and AESI, derivatively, have been plaintiffs in the matter of *Palowsky v. Cork, et al*, Docket No. 13-2059 of the Fourth JDC.

42.

After the missing 52 writ applications were found in Campbell’s office, she was re-assigned to Defendant Amman, who is her close friend and personal confidant, and Defendant Rambo, who was presiding over Palowsky’s suit against Cork at the time.

43.

This re-assignment led to Palowsky’s becoming the most recent victim of Defendant Campbell’s malicious and intentional destruction of documents and Defendant Judges’ cover up of same.



44.

In *Palowsky v. Cork*, Plaintiff filed suit against W. Brandon Cork, the other 50-percent shareholder of AESI, for damages he suffered as a result of Cork's theft, fraud, racketeering, and breach of fiduciary duty, the latter of which Cork testified was done, at least in part, at the direction of his counsel therein.<sup>2</sup>

45.

Upon information and belief, Defendant Campbell maliciously and intentionally harmed Palowsky and willfully violated his constitutionally-protected rights to both due process<sup>3</sup> and access to courts<sup>4</sup> in *Palowsky v. Cork* when she spoliated, concealed, removed, destroyed, shredded, withheld, and/or improperly "handled" court documents such as memoranda of law, orders, pleadings, sealed court documents, and chamber copies of pleadings filed with the clerk and hand-delivered to Defendant Rambo's office.

46.

Upon information and belief, Defendant Campbell maliciously withheld and concealed documents and pleadings in the trial court as well as from the record that was sent to the Second Circuit Court of Appeal for its review of an application for supervisory writs filed by Cork. Said documents include the following:

- A. Plaintiff AESI's Opposition to W. Brandon Cork's Motion to Strike Answer filed January 13, 2014. Notably, Defendant Rambo stated at the beginning of the hearing on the motion to strike that he had this pleading, yet it has remained "missing" from the record.
- B. Plaintiff's Memorandum in Support of his Motion to Clarify Protective Order filed March 14, 2014. While the motion itself is included in the record, the supporting memorandum (with attached exhibits) was not in the record or in an envelope of sealed exhibits sent to the Second Circuit.

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<sup>2</sup> In his deposition, Cork swore under oath in the presence of his counsel, Thomas M. Hayes, III, and Brandon Creekbaum, that he was under the "direction" of said counsel when he competed with AESI without telling Palowsky.

<sup>3</sup> La. Const. Art. 1 § 2.

<sup>4</sup> La. Const. Art. 1 § 22.

- C. AESI's Reply Memorandum to Clarify Language in Protective Order to Allow Proper Reporting of Crimes, Tax Fraud, Racketeering, and Conspiracy filed June 24, 2014, with attached correspondence among counsel for the respective parties.
- D. AESI's Original Opposition to Writ Application of W. Brandon Cork filed on or about July 15, 2014. For some reason, this pleading was missing from the Second Circuit's record, which was prepared by the trial court, though Cork's application filed June 18, 2014, was included in the envelope of sealed documents filed with the appellate court.
- E. Third Amending and Supplemental Petition of Plaintiff, Stanley R. Palowsky, III, and Third Party Demand of Defendant, Alternative Environmental Solutions, Inc., with attached order requesting leave to file same filed on August 13, 2014.<sup>5</sup> Although this pleading itself was missing from the record sent to the Second Circuit, Cork's memorandum in opposition to same was not.
- F. Palowsky's and AESI's Memorandum in Support of Motion to Recuse Judge Rambo as well as exhibits attached to same. This pleading is discussed more specifically below.<sup>6</sup>

47.

Notably, such actions should constitute a violation of La. R.S. 14:132, the criminal statute which addresses the destruction or alteration of public records and sets forth the punishment for same.

48.

As set forth above, such actions by Campbell of repeatedly and maliciously withholding and concealing "missing" court documents were part of a proven pattern of misconduct outside the course and scope of her duties as a law clerk but under color of law.

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<sup>5</sup> In this pleading, Palowsky and AESI added Cork's counsel as defendants for their participation in Cork's racketeering activities. The trial court never actually granted leave to file said pleading, so Palowsky and AESI were forced to file a separate suit, docket number 14-2412, against Cork's counsel. That suit has now been consolidated with Palowsky's original suit against Cork.

<sup>6</sup> The trial court's record was reviewed again on July 22, 2015, and the pleadings listed herein are still missing from the record.

49.

Palowsky avers that Campbell undertook these acts with malice and with the intention not only to cause him loss and to injure and inconvenience him, but also to obtain unjust advantages for his opponent(s) and their counsel. At the very least, these actions constitute fraud per Louisiana Civil Code article 1953.

50.

Campbell's supervising judges at the time, Defendants Amman and Rambo, did not just sit back quietly and let Campbell commit such acts, they actively worked and schemed to cover up her actions.

51.

Additionally, Defendants Rambo, Jones, Sharp, and Winters have repeatedly denied that any documents were missing from the record of *Palowsky v. Cork*, but Palowsky has proven otherwise.

52.

Plaintiff was forced to file a motion to recuse Defendant Rambo in his suit against Cork after the following significant events involving Campbell, Defendant Rambo's law clerk at the time, occurred:

- A. Campbell published and declared in the Sunday edition of the Monroe newspaper *The News-Star* her bias, favoritism, and praise for Cork's counsel Thomas M. Hayes, III, when she wrote in her weekly "society" column that he, as well as Judge D. Milton Moore, III, of the Second Circuit Court of Appeal, had the "IT" factor, "a somewhat undefinable quality that makes you and everyone else around stand taller when they enter the room, listen a little more closely, encourage you to take fashion or life risks, make each occasion a little more fun, and generally inspire you to aim to achieve that 'IT' factor for yourself."
- B. Many of Palowsky's filings went missing from the record and/or were withheld from Judge Rambo in status conferences and hearings as noted above.
- C. Palowsky learned that Campbell had been investigated in 2012 by Defendant Sharp and again in 2014 by Defendants Sharp and Jones for destruction of Cody

Rials' court document as stated above. Even though Campbell's conduct had been corroborated by an eyewitness interviewed by Defendant Sharp who stated that Campbell boasted in a local bar that she had, indeed, shredded or withheld a court document in order to cause loss, injury, or inconvenience to attorney Rials, Defendant Judges refused to do anything to control, much less punish, Campbell. This showed Palowsky that Campbell had aptly demonstrated that she was beyond supervision, let alone discipline, and furthermore that Defendant Judges were covering up her actions.

- D. In 2014, Defendant Jones was appointed to investigate complaints that Campbell was improperly "handling" Palowsky's filings. Defendant Jones concluded that the missing documents resulted from nothing more than delays caused by a new "filing process" in the Clerk's office. Nevertheless, the Clerk of Court advised counsel for Palowsky that the new "filing process" referenced by Defendant Jones did not exist.
- E. Also in 2014, Campbell published the above-mentioned column entitled "A modern guide to handle your scandal" declaring that "half the fun is getting there, and the other half is in the fix. . . ." She went on to advise her readers as follows:

[F]or the more adventurous among us, keep the crowd guessing. Send it out – lies, half truths, gorilla dust, whatever you've got. . . . [Y]ou are on the receiving end of one of the highest forms of flattery, as we always say "you're no one until someone is out to get you." That special somebody cared enough to try and blacken your reputation and went and turned you into a household name? Bravo. You're doing something right.

53.

After having so many of his pleadings vanish, after learning that Defendants Jones and Sharp had covered up Campbell's destruction of documents in another case, and after reading in black and white that Defendant Rambo's law clerk publicly and proudly advocated lying as a way to deal with a "scandal," Palowsky realized that he could not have Campbell or Defendant Rambo, for whom she worked and who allowed her to publish such "advice," handle his case if he wanted it done fairly.

54.

Palowsky filed the motion to recuse Defendant Rambo to escape recurring abuses of process, bias, prejudice, and the problem of his pleadings frequently disappearing. In compliance with this Court's local rules, Palowsky contemporaneously filed a supporting memorandum with the Clerk of Court detailing the facts and circumstances, including Campbell's actions, which justified his recusal request. Moreover, counsel hand delivered a copy of same to Judge Rambo's chambers.

55.

Shortly after the recusal motion and memorandum were filed, Defendant Rambo held a status conference wherein he expressed his extreme displeasure to Plaintiff's counsel that Plaintiff had filed a motion to recuse **without a supporting memorandum**. Counsel for AESI and Palowsky advised Defendant Rambo that was exactly why they were asking him to recuse himself, *i.e.*, because their filings were obviously being intercepted before he could read them.

56.

Obviously Defendant Campbell had, once again, acted outside the course and scope of her employment to intentionally harm Palowsky by withholding and/or concealing court documents and wrongfully thwarting his constitutional rights to due process and access to courts.

57.

After Palowsky and AESI suffered harm which was intentionally and maliciously inflicted upon them in Defendant Rambo's court for more than two years by Campbell in her efforts to damage them and to assist their opponents and their counsel, Defendant Rambo, while denying bias, recused himself without a hearing. Palowsky's case was then assigned to Defendant Sharp.

58.

Palowsky then filed a motion to recuse the Fourth JDC judges *en banc* on the basis that Campbell and the Court had become inextricably intertwined in litigation when Defendant Winters, on behalf of all the judges, filed suit against *The Ouachita Citizen* to protect Defendant Campbell's alleged privacy rights as discussed in paragraphs 18 through 26 above.

59.

Palowsky's motion to recuse has recently been set for hearing in front of Defendant Sharp on August 20, 2015; however, he has informed all counsel in writing that he is not going to allow any testimony to be submitted during that hearing. Such refusal to hear evidentiary testimony is a clear violation of Palowsky's rights of due process and meaningful access to courts and is being done for the sole purpose of continuing the cover up.

60.

Palowsky avers that Defendant Judges' actions have been undertaken to cover up Campbell's misdeeds and felonious acts and to prevent any testimony or evidence of same from becoming part of the record in his litigation.

61.

Palowsky submits that his allegations against Campbell and Defendant Judges must be viewed in light of other actions she has taken during her employment and the judges' concealing of same all as set forth above in paragraphs 9 through 40.

62.

Palowsky also submits that his allegations must be considered in light of Defendant Campbell's personal philosophies on life which she has smugly published in her weekly "society" column during his litigation and which might lead one to believe that she is, to put it mildly, narcissistic and incapable of submitting to any authority.

63.

For example, on May 31, 2015, she wrote, "You will always be fond of me. I represent to you all the sins you have never had the courage to commit," a quote which she attributed to Oscar Wilde before he was imprisoned.

64.

On February 15, 2015, she quoted Oscar Wilde again when she said that "to love oneself is the beginning of a lifelong romance."

65.

On April 5, 2015, she told her readers as follows: “I say live life to the fullest, follow no one’s rules except your own (and law enforcement, of course) and continue to excel at your own personal spectacular talents.”

66.

On April 12, 2015, she ended her column by quoting Henry Rollins: “In winter, I plot and plan. In spring, I move.”

67.

On June 14, 2015, Campbell again cited Oscar Wilde and stated, “Consistency is the last refuge of the unimaginative.” She then described how she “concocted . . . a faux rom-com worthy ‘don’t leave me’ airport scene,” and she professed, “goodness, I love attention.” She then closed her column with W. David Johansen’s words “I am doing exactly what I want to do, and I am having fun doing it.”

68.

On June 21, 2015, Campbell wrote, “Escape the ordinary. Almost anything is possible if you have enough time and enough nerve.”

69.

On July 12, 2015, she penned, “It’s not cheating if it’s in our favor.”

70.

In another blatant display of narcissism, when Campbell’s alleged improprieties and the litigation between the Court and *The Ouachita Citizen* were reported on by *The Acadiana Advocate*, Campbell posted a comment on the paper’s online site and stated as follows: “Dear advocate [sic]: first of all my name is spelled Allyson, not Allison.” She then went on to explain the role of an *ad hoc* judge.

71.

Palowsky notes that by allowing Campbell to write her weekly “society” column in which she has published articles which clearly show her admiration for Palowsky’s opponent’s attorney Hayes, by failing to properly supervise her, and by allowing, either directly or indirectly, her to withhold court documents in order to delay proceedings and harm Palowsky,

Defendants Rambo, Amman, Winters, Jones, and Sharp have violated multiple Canons of the Code of Judicial Conduct.

72.

For example, Canon 3(A)(3) requires that a judge have his staff be “patient, dignified, and courteous” to litigants and lawyers.

73.

Canon 3(A)(4) states that a judge shall not permit his staff to “manifest bias or prejudice” through “conduct or words.”

74.

Canon 3(A)(8) prohibits a judge and his personnel from “mak[ing] any public comment that might reasonably be expected to affect [a pending proceeding’s] outcome or impair its fairness . . . .”

75.

Canon 3(B)(2) states that a “judge shall require staff, court officials and others subject to the judge’s direction and control to observe the standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in the performance of their official duties.”

76.

Palowsky notes that Article V, § 25(C) of the Louisiana Constitution provides in pertinent part as follows:

On recommendation of the judiciary commission, the supreme court may censure, suspend with or without salary, remove from office, or retire involuntarily a judge for willful misconduct relating to his official duty, willful and persistent failure to perform his duty, persistent and public conduct prejudicial to the administration of justice that brings the judicial office into disrepute, conduct while in office which would constitute a felony, or conviction of a felony.

77.

Regardless of Defendant Campbell’s writings in her society column, Palowsky states that her actions of improperly handling pleadings and filings appear to be not only habitual, but also, at the very least, to be tacitly approved by Defendant Judges as she has apparently never even been reprimanded, much less disciplined, for same by any of them.



78.

It is more likely, though, that Campbell's actions have been purposely concealed by Defendant Judges in a scheme to maliciously defraud and harm Palowsky and deprive him of his constitutional rights to due process and access to courts.

**Recusal of All Judges of This Court**

79.

Palowsky avers that all the judges of the Fourth JDC should recuse themselves from this matter since Defendants are employees of the Court.

80.

Moreover, as discussed above, this Court, through Defendant Judges, has an apparent history of protecting Campbell even though several attorneys in different cases, including *Palowsky v. Cork*, have complained about her suspected felonious destruction of documents and even though she has reportedly been investigated for public payroll fraud.

81.

Not only has this Court allowed Campbell to do as she pleases at the courthouse without recourse, but as noted above, it chose to sue a local newspaper to protect her employment records from being made public, and therein, it denied that there were any eyewitnesses to Campbell's destruction of documents even though Defendants Jones and Sharp reportedly interviewed an eyewitness who personally heard Campbell bragging about same.

82.

The above facts and circumstances require that the Fourth JDC be recused *en banc* and an *ad hoc* judge be appointed to hear and decide the instant lawsuit.

**Requests for Relief**

83.

To date, Plaintiff has endured more than two years of needless delay, court costs, attorney fees, embarrassment, mental stress, and inconvenience (as referred to in Civil Code article 1953) and has, likewise, been denied his constitutional rights to due process of law and access to courts as a result of Campbell's pattern of malicious and intentional misconduct and Defendant Judges' complicity in same.

84.

Campbell's wrongdoings have been reported time and again by different attorneys in different cases and investigated time and again by Defendant Judges but have nevertheless been allowed to continue. It is now painfully apparent that not only has Campbell been unsupervised and uncontrollable for years, but Defendant Judges have actively schemed to allow her conduct to continue unabatedly.

85.

Palowsky avers that Campbell's and Defendant Judges' actions constitute fraud, conspiracy to commit fraud, abuse of process, destruction or concealment of public records, misprision of felonies, intentional infliction of emotional distress, and violation of his rights under the Louisiana Constitution to due process and access to courts.

86.

Palowsky therefore states that he, individually and on behalf of AESI, is entitled to be compensated for any and all damages that he and AESI have suffered as the result of Defendants' fraud, conspiracy to commit fraud, abuse of process, destruction or concealment of public records, misprision of felonies, intentional infliction of emotional distress, and violation of his Louisiana constitutional rights to due process and access to courts.

87.

At this time, Plaintiff seeks no relief under any federal law.

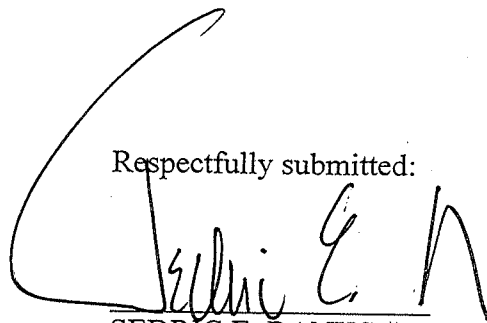
88.

Palowsky hereby requests a trial by jury on all his claims, including without limitation, his intentional tort claim.

WHEREFORE, Plaintiff, Stanley R. Palowsky, III, individually and on behalf of AESI, prays that after due proceedings are had, there be judgment rendered herein in favor of Plaintiff and against Defendants, Allyson Campbell, Judge H. Stephens Winters, Judge Carl V. Sharp, Judge Benjamin Jones, Judge J. Wilson Rambo, and Judge Frederic C. Amman, for all sums as are fair and just under the circumstances, together with reasonable attorney fees and court costs.

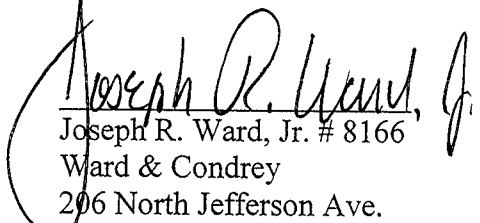
Plaintiff further prays for all orders and decrees necessary and proper under the premises and for full, general, and equitable relief.

Respectfully submitted:



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*Attorneys for Plaintiff, Stanley R.  
Palowsky, III*

**PLEASE PERSONALLY SERVE:**

**ALLYSON CAMPBELL**

300 St. John St.  
Monroe, LA 71201

**PLEASE SERVE:**

**ALTERNATIVE ENVIRONMENTAL SOLUTIONS, INC.,**

**Through its agent for service of process:**

Sedric E. Banks  
1038 North Ninth St.  
Monroe, LA 71201

**PLEASE PERSONALLY SERVE the Original Petition for Damages and the First Supplemental, Amended, and Restated Petition for Damages on**

**CHIEF JUDGE H. STEPHENS WINTERS**

300 St. John St.  
Monroe, LA 71201

**PLEASE PERSONALLY SERVE the Original Petition for Damages and the First Supplemental, Amended, and Restated Petition for Damages on**

**JUDGE CARL V. SHARP**

300 St. John St.  
Monroe, LA 71201

**PLEASE PERSONALLY SERVE the Original Petition for Damages and the First Supplemental, Amended, and Restated Petition for Damages on**

**JUDGE BENJAMIN JONES**

300 St. John St.  
Monroe, LA 71201

**PLEASE PERSONALLY SERVE the Original Petition for Damages and the First Supplemental, Amended, and Restated Petition for Damages on JUDGE J. WILSON RAMBO**

300 St. John St.  
Monroe, LA 71201

**PLEASE PERSONALLY SERVE the Original Petition for Damages and the First Supplemental, Amended, and Restated Petition for Damages on JUDGE FREDERIC C. AMMAN**

300 St. John St.  
Monroe, LA 71201

FILED

JUL 31 2015

*Jennifer Band*  
DEPUTY CLERK  
4TH JUDICIAL DISTRICT COURT  
OUACHITA PARISH, LA.

VERIFICATION

BE IT KNOWN that on this 31<sup>st</sup> day of July, 2015, personally came and appeared  
STANLEY R. PALOWSKY, III, who declared that he is the named plaintiff in the above and  
foregoing suit and that all allegations contained therein are true and correct to the best of his  
knowledge, information and belief.

*Stanley R. Palowsky III*  
STANLEY R. PALOWSKY, III

SWORN TO and subscribed before me, Notary on the day and date first written above.

*Sedric E. Banks*

NOTARY  
Sedric E. Banks, Bar No. 2730