

No. 25-7001

In the Supreme Court of the United States

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ERNEST MILLS, JR.,
Petitioner,

v.

STATE OF LOUISIANA,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
LOUISIANA SUPREME COURT

BRIEF IN OPPOSITION

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QUESTION PRESENTED

Whether the Court should resurrect Petitioner's successive and untimely state post-conviction application, which the Louisiana Supreme Court dismissed as (a) barred by state law and (b) resting on a non-viable *Brady* claim.

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INTRODUCTION

Petitioner Ernest Mills, Jr., raped his girlfriend's 11-year-old niece K.O. in May 2007. Three times, Petitioner "forced her to rub his penis" and performed "unprotected sexual acts" on her, causing the 11-year-old to contract chlamydia. App.085–86. His own post-arrest, positive chlamydia test pinned him as the obvious culprit. A Louisiana grand jury indicted Petitioner for sexual battery and aggravated rape—which carried a death sentence at the time.

Rather than face trial, Petitioner pleaded guilty to a lesser charge of forcible rape and received a 30-year prison sentence. He did so on the sound advice of his trial counsel: That "both parties tested positive for the STI chlamydia ... would be taken" by a jury "as conclusive proof" that "Mills had had intercourse with"—that is, raped—the 11-year-old girl. App.054. More, Louisiana's rape-shield laws would have prohibited cross-examining her "about any prior sexual history that could otherwise explain her contraction of chlamydia." *Id.* And if he forewent trial, he might "be eligible for parole in two years." App.031. So Petitioner took the plea. Louisiana courts then roundly rejected his follow-on requests for post-conviction relief based on his counsel's effectiveness, the voluntariness of his plea, and a supposed violation of *Brady v. Maryland*, 373 U.S. 83 (1963).

Years later, Mills tried to reopen that conviction based on two letters from the District Attorney's Office to the child's family. App.094–95. Those letters did not say the child recanted. They did not say she fabricated her allegations. They did not say she would refuse to testify. They did not identify another suspect, undermine the medical evidence, or negate guilt. They showed only that the prosecutor's office was

trying to contact the child’s family and warned that, without testimony and cooperation, the case “*may* be dismissed.” App.094–95.

The Louisiana Supreme Court properly dismissed Petitioner’s second post-conviction application. Pet.App.14a–15a. It adopted a state appellate judge’s reasoning, which gave multiple independent reasons for dismissal. Pet.App.10a–13a. First, his application was barred by state law because it was untimely, repetitive, and procedurally barred under Louisiana’s post-conviction rules. Pet.App.10a. Second, his guilty plea foreclosed his attempt to relitigate a pre-plea discovery dispute. Pet.App.11a–12a. Third, the *Brady* claim failed on its own terms because the letters were, “at most, impeachment evidence,” not material exculpatory evidence. Pet.App.12a.

Petitioner now asks this Court to treat that state-law dismissal of a successive and untimely collateral attack as a vehicle for deciding a broad constitutional question about *Brady* and guilty pleas. The Court should decline to do so. The judgment below plainly rests on adequate and independent state procedural grounds—and that alone forecloses review here. Even setting that aside, Petitioner’s alleged circuit split is not implicated because this case does not involve genuinely exculpatory evidence. And the merits are not close: *United States v. Ruiz*, 536 U.S. 622 (2002), forecloses any pre-plea *Brady* claim based on impeachment evidence, the letters did not undermine the medical evidence, and Petitioner cannot show that disclosure would have changed his decision to accept a favorable plea rather than face trial.

This petition is not about suppressed evidence of innocence. It is about a convicted child rapist's attempt to turn routine witness-coordination letters into a constitutional defect years after he pleaded guilty. Certiorari should be denied.

STATEMENT OF THE CASE

A. Factual Background

1. Over the course of three nights in May 2007, Petitioner Ernest “E.J.” Mills, Jr., repeatedly raped 11-year-old K.O. At the time, Mills was dating K.O.’s aunt, who lived with K.O. in their family’s apartment in Algiers, Louisiana. App.085–86.

The nightmarish three days began May 24, 2007—just four days removed from K.O.’s eleventh birthday. While her “mother and stepfather were gone to work,” “sister and brother were asleep,” and aunt “was gone to the store,” K.O. stayed at home and answered a call on the house phone. App.086. Someone was looking for “E.J.,” so she “brought the telephone” to Mills, “who was laying on the bed.” *Id.* He told K.O. to wait until his call ended and then asked her, “Do you want to see something?” *Id.* When K.O. resisted, Mills “removed his penis from within his pants and put her hands on it.” *Id.* K.O. “fled the room.” *Id.*

The next evening, another call for Mills prompted K.O. to bring him the phone “in the bedroom.” *Id.* That night, Mills appeared drunk. *Id.* He told K.O. to “come here” before “grabb[ing] her and plac[ing] her on the bed with her hands behind her back.” *Id.* “He got on top of her and penned her legs with his legs” and then “pulled down her clothes and pulled down her pants.” *Id.* Mills “inserted his penis into her vagina.” *Id.* K.O. “asked him to ‘Please stop’” but Mills “responded by ‘going harder.’” *Id.* When she “again forcefully asked him to stop,” Mills finally got “off of her.” *Id.*

A night later, while they were “home alone,” Mills “grabbed [K.O.] by the mouth and brought her into the bed room.” *Id.* Mills held the 11-year-old upright while he “removed her pants and underwear” before making her “insert[] his penis into her vagina.” *Id.* K.O. escaped by “kicking” Mills and “forcing him to stop.” *Id.*

It was not until a friend’s slumber party months later on July 18 that the friend’s mother overheard K.O. confiding to her friends about Mills’s horrendous acts. App.085–86. The same day, K.O.’s mother reported the rape to the New Orleans Police Department, who confirmed the allegations in an interview and referred K.O. to Children’s Hospital. App.085. When she arrived, K.O. again confirmed the allegations in another interview—“that her aunt’s boyfriend [Mills] ‘forced her to have sex with him’ and ‘made her touch his penis.’” App.085. The hospital tested the 11-year-old for “various sexually transmitted diseases.” App.086.

Two days later, K.O. “participated in” a videotaped “forensic interview” at the Louisiana Department of Children & Family Services’ Child Advocacy Center. App.086. Once again, K.O. recounted the disturbing details. *Id.*¹ NOPD applied for and obtained an arrest warrant for Mills charging one count of sexual battery and two counts of aggravated rape. App.086–87.

The hospital soon shared more horrifying news: K.O. “tested positive for Chlamydia via a urine test”—“results” that “were definitive for previous sexual contact.” App.087. K.O.’s family told NOPD that her aunt “informed [them] that she

¹ Two days later, K.O. again disclosed the abuse to medical professionals at Children’s Hospital, reporting that Mills forced sexual contact and intercourse despite her resistance. App.087.

also had Chlamydia from sexual contact with” Mills. App.087. The next day, NOPD arrested Mills, App.093, and placed him in custody, App.087–88.

NOPD investigators interviewed K.O.’s friends. They, too, confirmed that K.O. confided in them “that she was having sex with Ernest Mills Jr.” App.087–88. On their telling, “three times” when K.O. “brought the telephone” to Mills, he “grabbed her and made her have sex with him” and “made her touch his ‘thing.’” App.087. One also said that K.O. had told “her sister ... and asked her not to tell anyone.” *Id.* The younger sister shared that “Mills made [K.O.] touch his penis and raped her.” App.088. NOPD investigators also applied for and obtained a warrant to swab Mills for chlamydia. *Id.* At the University Hospital, though Mills refused to give a statement relative to the investigation, his chlamydia swab tested positive. App.089, 049.

2. In September 2007, a grand jury indicted Mills for two counts of aggravated rape and one count of sexual battery—both of a child under the age of 13 years. App.019–22. At the time, aggravated rape carried mandatory life without parole and, for a victim under 13, exposed Petitioner to a possible capital prosecution. La. R.S. 14:42(D)(1)–(2) (2006); *Kennedy v. Louisiana*, 554 U.S. 407 (2008) (rendering that option unconstitutional).

Mills avoided trial. On the morning trial was set to begin, he pleaded guilty to the lesser charge of forcible rape and waived his trial rights. App.067, 096, 123. The court sentenced him to thirty years at hard labor. App.123. Any finality that plea offered K.O. was short-lived. Days later, her best friend and brother were murdered

in her new home. *See State v. Davis*, 12-512 (La. App. 5 Cir. 4/24/13), 115 So. 3d 68, 72, *writ denied*, 2013-1205 (La. 11/22/13), 126 So. 3d 479 (“K.O. crawled to her brother’s bedroom where she found F.O. and R.C. lying in pools of their own blood.”).

B. Petitioner’s Post-Conviction Proceedings

A year later, Mills filed his first state post-conviction application. App.023–35; *see* App.068–80 (same). He raised ineffective assistance, an involuntary plea, and *Brady*. App.025–33. Relevant here, he faulted counsel for failing to verify K.O.’s availability “for testimony at the time [he] entered his plea,” citing “some problems early in the case with obtaining the presence of the complaining witness in open court.” App.029. He also alleged that he pleaded guilty because counsel advised that he “w[ould] be eligible for parole in two years.” App.031. The State argued that the claims were procedurally defaulted and that the *Brady* claim lacked a factual basis. App.036–37. The trial court denied relief, App.035; the Louisiana Fourth Circuit denied writs, *State v. Mills*, 2014-K-0937 (La. App. 4 Cir. Oct. 23, 2014); and the Louisiana Supreme Court denied Mills’s writ application as untimely, *State ex rel. Mills v. State*, 2015-KH-0423 (La. Dec. 7, 2015).

Six years later, in November 2021, Louisiana’s Attorney General assumed representation for the State. App.125. Six days later, Petitioner’s counsel enrolled. App.083; *see* App.125. Petitioner then waited another fifteen months before filing a second post-conviction application. App.039–043; *see* App.125.

That second application asserted one claim: *Brady*. App.051–54. It rested on two 2007 letters from the District Attorney’s Office to K.O.’s family—more than a

year before Mills’s trial date. App.050, 094–95. The letters reflected efforts to contact K.O.’s family and warned that, without testimony and cooperation, the case “*may* be dismissed.” App.094–95. They did not say that K.O. had recanted, that she had fabricated her allegations, or that she would refuse to testify.

Petitioner nevertheless construed the letters as proof that K.O. “very well could have” been “having second thoughts about the veracity of her statements and desired to recant her statements entirely.” App.053. He also relied on trial counsel’s affidavit stating that, had counsel known K.O. was “not compliant with the prosecution,” he “would not have advised [Petitioner] at the time to take a plea deal.” Pet.App.74a. But counsel also acknowledged the evidence that drove the plea advice: Both K.O. and Mills tested positive for chlamydia, which a jury would likely view as “conclusive proof” that Mills “had intercourse with” K.O. and that “there was no way for him to prove that he had not given it to her.” App.054.

The State objected. App.099–104. The trial court overruled the State’s objections and ordered an evidentiary hearing, Pet.App.4a, and a divided Louisiana Fourth Circuit panel denied the State’s writ in a one-paragraph order, Pet.App.9a.

Judge Lobrano dissented. Pet.App.10a–13a. She would have dismissed the application outright for three independent reasons. First, it was “untimely, repetitive, and procedurally barred under La. C.Cr.P. arts. 930.8 and 930.4.” Pet.App.10a. Second, Petitioner’s guilty plea foreclosed his pre-plea *Brady* theory because “the Constitution does not require disclosure of impeachment evidence prior to a guilty plea,” Pet.App.11a, and a guilty plea waives “all non-jurisdictional defects, including

the right to contest pretrial discovery violations,” Pet.App.12a. Third, the claim failed on its own terms because the letters were, “at most, impeachment evidence,” Pet.App.12a, and Petitioner had not shown that they rendered his plea “involuntary, unreliable, or otherwise invalid,” Pet.App.13a.

Judge Lobrano also recognized the cost of allowing the claim to proceed: An evidentiary hearing would let Petitioner subpoena “the now-adult victim” to testify about “her past fears and uncertainties about testifying,” undermining finality and risking “unnecessary retraumatization.” Pet.App.10a–11a.

The Louisiana Supreme Court then granted the State’s writ, reversed the order granting an evidentiary hearing, and dismissed Petitioner’s application “for the reasons assigned by Judge Lobrano.” Pet.App.14a–15a.

REASONS FOR DENYING THE PETITION

I. THE JUDGMENT BELOW RESTS ON INDEPENDENT AND ADEQUATE STATE-LAW GROUNDS.

The petition fails at the threshold because the Louisiana Supreme Court’s judgment rests on adequate and independent state-law grounds. Petitioner asks this Court to review a federal *Brady* question. But the Louisiana Supreme Court dismissed his application “for the reasons assigned by Judge Lobrano,” Pet.App.15a, and Judge Lobrano’s first holding was grounded in state law: Petitioner’s second post-conviction application was “untimely, repetitive, and procedurally barred under La. C.Cr.P. arts. 930.8 and 930.4.” Pet.App.10a; *contra* Pet.6 (erroneously asserting the judgment did not rest on an independent and adequate state ground).

That is a jurisdictional problem. This Court “will not review a question of federal law” when the state-court judgment “rests on a state law ground that is independent of the federal question and adequate to support the judgment.” *Coleman v. Thompson*, 501 U.S. 722, 729 (1991). The rule applies to procedural state-law grounds too. *Id.* Because this Court “has no power to review a state law determination that is sufficient to support the judgment,” review of any federal question would be advisory. *Id.*; *see also Herb v. Pitcairn*, 324 U.S. 117, 125–26 (1945).

That rule resolves this case. Louisiana permits “a second or successive application only under the narrow circumstances provided in La.C.Cr.P. art. 930.4 and within the limitations period as set out in La.C.Cr.P. art. 930.8.” *State v. Campbell*, 2024-00885 (La. 4/15/25), 406 So. 3d 413, 413–14. As Judge Lobrano and the Louisiana Supreme Court recognized, Petitioner satisfied neither state-law requirement.

His application was repetitive and successive. Pet.App.13a. Petitioner’s second application asserted a *Brady* claim, App.051–54—just as his first application had, App.031–33. The factual theory was also the same. And both rested on the same witness-availability theory. In his first application, Petitioner faulted counsel for failing to verify K.O.’s availability “for testimony at the time [he] entered his plea” and alleged “some problems early in the case with obtaining the presence of the complaining witness in open court.” App.029. In his second, he claimed K.O. had stopped being a willing participant in the prosecution. App.052. The second

application thus repackaged the same theory around two letters dated more than a year before trial. Article 930.4 bars that kind of repetitive collateral litigation.

The application was untimely, too. Pet.App.13a. Petitioner pleaded guilty in April 2009, App.123, but filed this second application years after his conviction became final and long after Article 930.8's limitations period expired. The letters do not avoid that bar. By 2011, Petitioner already knew of the supposed witness-availability issue on which his current claim rests. App.029. Later-acquired documents do not create a new factual predicate for a theory he already had, especially where Petitioner showed no diligence in pursuing that theory for years.

Those state-law grounds were not incidental. They were Judge Lobrano's threshold basis for dismissal, Pet.App.10a, 13a, and they became the Louisiana Supreme Court's judgment when that Court adopted her reasons, Pet.App.15a. Petitioner tries to recast the decision below as a broad ruling about *Brady*, exculpatory evidence, and guilty pleas. It was not—and that characterization ignores the principal, state-law procedural grounds cited by Judge Lobrano and the Louisiana Supreme Court. That Court dismissed a successive and untimely state post-conviction application under state procedural rules that fully support the judgment. So the petition should be denied out of hand.

II. THIS CASE DOES NOT SATISFY ANY CERTIORARI CRITERIA.

Even apart from the state-law bar, this case does not warrant review. Petitioner tries to convert a successive, untimely, fact-bound post-conviction dispute into a vehicle for resolving a broad constitutional question about *Brady*, exculpatory

evidence, and guilty pleas. But his only certiorari hook—an alleged split over pre-plea disclosure of exculpatory evidence—is not even implicated here.

Start with the mismatch between the petition and the decision below. Petitioner frames the question presented as whether due process requires disclosure of material exculpatory evidence before a guilty plea. Pet.2. But the Louisiana Supreme Court did not decide that question. It dismissed Petitioner’s application for the reasons assigned by Judge Lobrano, Pet.App.15a, and Judge Lobrano concluded that “the letters are, at most, impeachment evidence,” Pet.App.12a. Whatever disagreement Petitioner says exists about pre-plea exculpatory evidence, this case does not present it.

That mismatch defeats Petitioner’s claimed split. His cited authorities concern whether and when *Brady* may require disclosure of material exculpatory evidence before a guilty plea. Pet.13. But the decision below involved impeachment evidence at most. Pet.App.12a. And on that issue, there is no relevant split: *Ruiz* holds that “the Constitution does not require the Government to disclose material impeachment evidence prior to entering a plea agreement with a criminal defendant.” *Ruiz*, 536 U.S. at 633. So Petitioner’s alleged circuit split exists, if at all, only at a level of abstraction this case does not reach.

Nor can Petitioner manufacture certworthiness by relabeling the letters as exculpatory. *See infra* Section III; *contra* Pet.14. To reach his proposed question, this Court would first have to reject the Louisiana Supreme Court’s characterization of the evidence and decide that two case-specific witness-coordination letters were

exculpatory. That is not a clean vehicle for resolving a recurring constitutional question. It is fact-bound error correction dressed up as a circuit split.

The petition identifies no clean federal question, no implicated split, and no recurring issue warranting this Court's intervention. It should be denied.

III. PETITIONER'S *BRADY* CLAIM FAILS ON THE MERITS.

Petitioner's merits argument fails for essentially the same reasons. His *Brady* theory depends on treating routine witness-coordination letters as exculpatory evidence. But speculation about a child victim's willingness to participate in the prosecution is not evidence of innocence. The Louisiana Supreme Court correctly adopted Judge Lobrano's conclusion that the letters were, "at most, impeachment evidence," Pet.App.12a, 15a, and that the claim was legally meritless, Pet.App.10a, 15a.

That conclusion avoids the broader question Petitioner tries to present. This Court need not decide whether *Brady* ever requires pre-plea disclosure of genuinely exculpatory evidence because this case involves *no such evidence*. *Contra* Pet.14 (faulting the Louisiana Supreme Court for "collaps[ing] the distinction between impeachment evidence and evidence negating guilt") The letters did not say K.O. recanted. They did not say she fabricated her allegations. They did not say she would refuse to testify. They did not identify another suspect, undermine the medical evidence, or negate guilt. They showed only that the prosecutor's office was trying to contact K.O.'s family and warned that, without testimony and cooperation, the case "*may be dismissed.*" App.094–95. That is not exculpatory evidence. A child victim's

hesitation about participating in a prosecution against her repeated abuser does not suggest the abuse did not occur.

If anything, the letters were impeachment evidence.² They could have been used only to question K.O.’s or her family’s willingness to participate in the prosecution. Petitioner said as much below, describing the letters as evidence that “could [have] be[en] used to impeach a prosecution witness.” App.052. Judge Lobrano likewise concluded that “the letters are, at most, impeachment evidence.” Pet.App.12a. And for impeachment evidence, *Ruiz* supplies the governing rule: “the Constitution does not require the Government to disclose material impeachment evidence prior to entering a plea agreement with a criminal defendant.” 536 U.S. at 633. Petitioner pleaded guilty. His *Brady* claim based on pre-plea impeachment evidence therefore fails as a matter of law.

Regardless of how the letters are characterized, Petitioner cannot establish prejudice. He speculates the State’s case would have collapsed without K.O.’s testimony because, in his telling, the State had only “one piece of physical evidence.” App.053. But that “single piece of physical evidence” was devastating: Both 11-year-old K.O. and Petitioner tested positive for chlamydia. App.054. As Petitioner’s own trial counsel acknowledged, a jury would likely view that evidence as “conclusive

² Perhaps recognizing that the letters are not exculpatory, Petitioner invokes *Smith v. Cain*, 565 U.S. 73, 75–76 (2012). Pet.12. That case only highlights the difference. In *Smith*, the suppressed evidence was the eyewitness’s own statement that he could not identify the perpetrators, and that eyewitness supplied the only evidence of guilt. 565 U.S. at 75–76. Here, the letters were not statements from K.O. at all; they were letters to K.O.’s family from the District Attorney’s Office.

proof” that Petitioner “had intercourse with” K.O. and that “there was no way for him to prove that he had not given it to her.” App.054. Nor could Petitioner have explained away K.O.’s infection by cross-examining the child about supposed prior sexual history—Louisiana’s rape-shield protections barred that route. So Petitioner’s musings that, “had [K.O.] not taken the stand to testify,” the State would have “dismiss[ed] the charge against” him, App.54, are not just speculative; they are belied by the record.

The letters did nothing to change that calculus. They did not undermine the chlamydia evidence. They did not affect Petitioner’s sentencing exposure. And they had nothing to do with Petitioner’s own prior assertion that he pleaded guilty because counsel advised that he “w[ould] be eligible for parole in two years” if he did so. App.031. That record refutes Petitioner’s contrary assertion that “the withheld evidence complained of would have led to a different outcome had it been disclosed.” Pet.14. On Petitioner’s own account, then, the letters had no bearing on the reason he accepted the plea.

Petitioner’s prejudice theory thus depends on speculation stacked on speculation: that missed communications meant K.O. would not testify; that the State would dismiss or lose the case; that Petitioner would reject a favorable plea; and that trial would produce a better result despite the medical evidence, rape-shield protections, and far greater sentencing exposure. *Brady* requires more.

Finally, Judge Lobrano recognized an important practical consequence of allowing this claim to proceed. An evidentiary hearing would give Petitioner “the

opportunity to present evidence and subpoena witnesses, including the now-adult victim, to testify about her past fears and uncertainties about testifying.” Pet.App.10a–11a. That proceeding would “undermine[] the finality of convictions” and risk “subjecting the survivor to unnecessary retraumatization.” Pet.App.11a. The Louisiana Supreme Court properly prevented that result by dismissing a successive, untimely, and meritless collateral attack.

CONCLUSION

The Court should deny the petition.

Respectfully submitted,

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