

ROBERT BURNS

NUMBER 602922 DOCKET: 25

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

SANDY EDMONDS

STATE OF LOUISIANA

AMENDMENT TO PLEADINGS

NOW UNTO COURT comes Plaintiff, Robert Edwin Burns, in proper person, who asserts to this Honorable Court that, pursuant to this Court’s ruling at a hearing held on Monday, November 14, 2011 granting Petitioner 30 days in which to file amended pleadings to substantiate a Cause of Action against Defendant, he wishes to amend his pleadings to change the title of his Petition and add paragraphs to his Petition as follows:

PETITION FOR DAMAGES FOR MALICIOUS PROSECUTION, DEFAMATION OF CHARACTER, AND TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIP

34.

As previously relayed, Petitioner invested a significant amount of time, effort, and money in cultivating an auction joint venture partnership with Mr. Beau Box of Beau Box Commercial Real Estate (Exhibits P-36 through P-43).

35.

Defendant engaged in an act of tortious interference with a business relationship between Petitioner and Beau Box. That relationship was severed through Defendant’s actions of making complaint(s) to Mr. Box on or about the same day as the Terrorism Unit of State Police was dispatched to Petitioner’s residence. Those complaint(s) to Mr. Box on the part of Defendant were false, scurrilous, and defamatory.

36.

Defendant defamed Petitioner’s character and portrayed him as an individual having mental issues and deficiencies who would be dangerous to Mr. Box, his clients, and the public at large.

37.

Specifically, Ms. Edmonds is listed as the sole complainant in a Police Report (Exhibit P-5) wherein Corporal Steven Hayward quoted the complainant and victims as stating that Petitioner was “faking a Board Meeting.” Any reasonable man,

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including Mr. Box, upon hearing such a portrayal of any person, would certainly justifiably infer that anyone showing up at a facility and, in isolation, filming a “fake board meeting” is mentally deficient and exhibiting characteristics of lunacy.

38.

Further, given the significant action of Defendant of altering the Terrorism Unit of State Police to be dispatched out to Petitioner’s home, anyone would be justified in inferring that Defendant believed Petitioner to be a serious danger to society. Before obtaining a “comfort level” with Petitioner in which he clearly perceived no threat to be in any way present, State Police Trooper Bart Morris asked Petitioner questions such as, “Are you willing to assure me right now that you have no intention of doing harm to any State Employee or doing damage to any State-leased facility?” Defendant Edmonds had absolutely nothing upon which to assert Petitioner posed any such security threat (nor did Ms. Kennedy, Ms. Messenger, or Ms. Dow), and the act of contacting the State Police Terrorism Unit and requesting that they be dispatched out to Petitioner’s home with no foundation or investigation whatsoever prior to doing so is an act of Defamation in itself, and upon information and belief, Petitioner asserts this fact was relayed to Mr. Box, thus causing his near instantaneous email severing all business (and other) ties with Petitioner.

39.

Almost simultaneous to Ms. Edmonds’ call to the Terrorism Unit of State Police to request that the Unit be called out to Petitioner’s home (less than two hours from the Unit’s arrival, in fact), Mr. Box relayed to Petitioner via email that he’d received “numerous complaints” from clients regarding Petitioner (Exhibit P-6). The timing and authoritative communication from Mr. Box to Petitioner and the close proximity of that communication to the time that the Terrorism Unit of State Police was dispatched to Petitioner’s home by Defendant are not coincidences. The two events are interrelated and will be explored in depth through discovery entailing the parties involved.

40.

In contacting Mr. Box and portraying Petitioner to be an individual who is mentally disturbed, and upon the credibility Mr. Box clearly justifiably gave to those assertions on the part of Defendant, Defendant significantly damaged the personal and

business character and reputation of Petitioner. Furthermore, this portrayal of Petitioner was conscious, intentional, calculated, and malicious.

41.

The assertions made to Mr. Box were false, scurrilous, and intentional on the part of Defendant; furthermore, they were made on the part of Defendant for the purpose of disparaging Petitioner and causing direct financial harm to Petitioner in the way of loss of business income.

42.

As a direct result of these actions of Defendant, Petitioner has in fact suffered the lost revenue which would have otherwise resulted from Petitioner's extensive efforts to cultivate commercial real estate auction business with Mr. Box.

43.

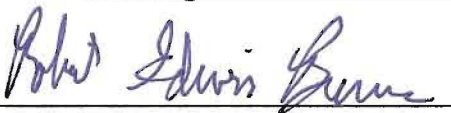
Defendant further, in one single episode of making these complaints to Mr. Box, destroyed the months-long efforts of Petitioner to cultivate that joint venture relationship and caused Petitioner's significant financial outlays pertaining to that joint venture to have been in vain.

44.

Petitioner therefore files this cause of action to seek compensatory damages for the lost business revenue and the financial outlays by Petitioner which were negated by a single act of Defendant in portraying Petitioner as a person having mental deficiencies which would cause any reasonable man to sever ties with an individual so portrayed.

Respectfully Submitted,

Robert Edwin Burns, in proper person
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Service Information on Next Page.

Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 9th day of December, 2011.

Robert Edwin Burns