

ROBERT BURNS

NUMBER 602.922 DOCKET: 24

19<sup>TH</sup> JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

SANDY EDMONDS

STATE OF LOUISIANA

\*\*\*\*\*

**MEMORANDUM IN OPPOSITION TO EXCEPTION OF NO CAUSE OF ACTION AND SPECIAL MOTION TO STRIKE**

NOW UNTO COURT comes Plaintiff, Robert Edwin Burns, in proper person, who submits to this Honorable Court this Memorandum in Opposition to Defendant's Exception of No Cause of Action and Special Motion to Strike which is scheduled for hearing on Monday, November 14, 2011 at 9:30 a.m.

Defendant, through counsel, has asserted a number of prior court cases as a foundation for conveying that Defendant Edmonds is entitled to absolute immunity pursuant to CCP 971 in exercising her right of free speech where a public body is concerned. Several vexing problems exist for Defendant in posing this defense, to wit:

**Ms. Edmonds is NOT an employee of the LALB or the Interior Design Board**

Upon the resignation of Ms. Sherrie Wilks, the LALB's former Executive Director effective August 7, 2009, Ms. Edmonds, as reflected in the sworn affidavit of Ms. Wilks, which is attached hereto and made a part hereof as Exhibit P-22-a, after having told Ms. Wilks numerous times that she wouldn't have Ms. Wilks' job because "her Board," the Interior Design Board, "was so easy to work for and the LALB sounds like a bunch of crazy people," nevertheless immediately accepted Ms. Wilks' former position upon Ms. Wilks' resignation. In fact, Ms. Edmonds informed Petitioner soon after accepting the position that, the moment Ms. Wilks resigned, she went to Ms. Dow, LALB Legal Counsel (who also is Legal Counsel for the Interior Design Board), with a list of conditions under which she would "accept the job." After making her required conditions known to Ms. Dow, Ms. Edmonds then drafted a vague proposal for "employment" with the LALB dated August 3, 2009, which is attached hereto and made a part hereof as Exhibit P-18.


CERTIFICATE COPY  
 19TH JUDICIAL DISTRICT  
 EAST BATON ROUGE PARISH, LA  
 DEPUTY CLERK OF COURT  
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through his amended pleading filing to this Honorable Court on September 7, 2011 as well as the additional revelations contained within this Memorandum, particularly the submission of Freedom of Information Act Requests to assist the Louisiana Legislative Auditor's Office in its investigation of Ms. Edmonds for "blatant payroll fraud" as characterized by Mr. Patrick Lowery, the Chief of Accountability at the Louisiana Department of Civil Service.

WHEREFORE, petitioner, ROBERT EDWIN BURNS, prays that this Honorable Court deny Defendant's Special Motion to Strike and Defendant's alternative of Exception for No Cause of Action.

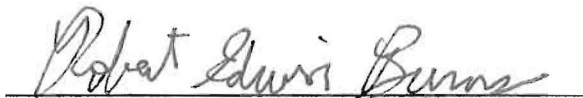
Respectfully Submitted,

Robert Edwin Burns, in proper person  
President, Auction Sells Fast, LLC  
4155 Essen Lane, Ste 228  
Baton Rouge, LA 70809-2152  
(225) 201-0390 (office) (225) 235-4346  
E-mail: [Robert@AuctionSellsFast.com](mailto:Robert@AuctionSellsFast.com)



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 2<sup>nd</sup> day of November 2011.



## Robert Burns

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**From:** Sandy Edmonds <admin@lalb.org>  
**Sent:** Monday, April 04, 2011 3:17 PM  
**To:** 'Robert Burns'  
**Subject:** RE: FIA for Office Visit for Reviewing Freddie Phillips' Documentation and Audio Files

Robert,  
I have received your request for the records indicated on the attachment to your email below.

With your approval, I would like to copy the old cassette tapes to a digital format to be provided to you by the end of next week. I think it would be in the best interest of everyone involved as there are 15 tapes included in this request. As you know, Ms. Harrison does have her regular job duties to fulfill. With your approval, the process will begin immediately.

The August 17, 2009 tape was located. Unfortunately it had been bound by rubber band to another set of tapes from a different day's meeting. It will be included with your request.

We do, as previously indicated, have all travel documents set aside for Mr. Phillips or anyone else to view. Please let me know specifically which years you would like to view as I need to be sure everything is redacted according to LA Statute. Further, although Ms. Dow did state her contention is that the Board is under no obligation to generate a report for Mr. Phillips, one was generated by myself on October 21, 2010 and forwarded to Ms. Dow to send to Mr. Phillips. However, a report only generates what is entered into the system and unfortunately there are times that travel was paid and descriptions not listed. Therefore, the report is not, in my view, a complete picture of what occurred.

Thank you,

**Sandy Edmonds**



**Louisiana Auctioneers Licensing Board**

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Phone 225-763-5568 | Fax 225-763-5598  
[Sandy@lalb.org](mailto:Sandy@lalb.org)      [www.lalb.org](http://www.lalb.org)

**From:** Robert Burns [mailto:Robert@AuctionSellsFast.com]  
**Sent:** Friday, April 01, 2011 3:43 PM  
**To:** Sandy Edmonds  
**Cc:** Freddie Phillips  
**Subject:** FIA for Office Visit for Reviewing Freddie Phillips' Documentation and Audio Files

Sandy:

I am placing the original in the mail today. As relayed in the FIA, this is likely to be an all-day office visit, so please advise as to when may be convenient for Ms. Harrison at the Attorney General's Office.

If you have any doubt whatsoever, Sandy, yes, this is an office visit which Freddie Phillips' "friend in crime" (your words) is making as a personal favor to him.

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Thanks, and I look forward to visiting with Ms. Harrison for review of the information and audio files outlined on the attached request letter.

You have an enjoyable weekend, Sandy.



**Robert Edwin Burns**

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