

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ROBERT J. O'NEILL, and ROBERT J.  
O'NEILL LLC,**

**Plaintiffs,**

**v.**

**FRISCO SILVER STAR HOTEL  
CORPORATION d/b/a OMNI FRISCO  
SILVER HOTEL, and OMNI HOTELS  
MANAGEMENT CORPORATION, and  
JOHNNY LEE LOOMIS,**

**Defendants.**

**Case No. \_\_\_\_\_**

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**COMPLAINT**

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Plaintiffs Robert J. O'Neill ("O'Neill") and Robert J. O'Neill LLC ("RJO") (collectively, "Plaintiffs"), hereby file their Complaint against Defendants Frisco Silver Star Hotel Corporation d/b/a Omni Frisco Silver Hotel ("Silver Star"), Omni Hotels Management Corporation ("Omni Management Corp.") (collectively, "Hotel Defendants"), and Johnny Lee Loomis ("Loomis") (collectively, "Defendants") and in support show:

**INTRODUCTION**

1. O'Neill is a former Navy SEAL and member of SEAL Team Six. O'Neill is most famous for his service in Operation Neptune's Spear. He is credited with firing the shots that killed Osama bin Laden on May 2, 2011. O'Neill also served with distinction in the Navy's heroic effort to save Captain Richard Phillips and his crew from the Somalian hijackers of the *Maersk Alabama*, as well as the effort to save lone survivor Marcus Luttrell

from Taliban fighters during Operation Red Wings.

2. Hotel Defendants are the owners and operators of the “Omni Frisco Hotel at The Star,” located at the Dallas Cowboys’ “World Headquarters” in Frisco, Texas (the “Hotel”). The Hotel is a joint business venture between Jerry Jones, the owner of the Dallas Cowboys, and the Rowling family, who operates the Omni Management Corp.’s parent corporation, TRT Holdings, Inc.

3. This is a negligence action brought by O’Neill against Hotel Defendants arising from their hiring, screening, retention, and supervision of their employee and “security guard,” Loomis. This action also asserts claims for defamation, false imprisonment, and assault against Loomis. This action seeks recovery of damages for reputational injury that Plaintiffs suffered as a direct and proximate result of Hotel Defendants’ negligence and Loomis’ false statements and intentional acts. This action also seeks damages for foreseeable mental anguish resulting from defamation, false imprisonment, and assault, duties arising out of a special relationship, and particularly shocking and disturbing events as alleged. Finally, in addition to the foregoing noneconomic damages, this action seeks economic damages including, but not limited to, lost income and revenue, and diminished future earning capacity.

4. O’Neill’s claims against Defendants arise from events that occurred at the Hotel on or about August 22, 2023 (the “August 2023 Incident”), Loomis’ publication of false claims about the August 2023 Incident, and from the foreseeable events that followed.

5. Hotel Defendants knowingly, recklessly, and negligently hired and retained Loomis as a security guard, despite Loomis’ publicly available history as a pedophile and child sex purveyor. Hotel Defendants also knowingly, recklessly, and negligently hired and retained Loomis as a security guard despite his known history of violence and of making false

accusations of violence and misconduct against Hotel guests.

6. In 2012, Loomis was employed as a deputy sheriff in the Caddo Parish Sheriff's Department in Shreveport, Louisiana. On or about November 13, 2012, a workplace investigation revealed that Loomis had repeatedly engaged in disturbing and sexually explicit online messages using a computer belonging to the Caddo Parish Sheriff's Department. Shortly thereafter, Detective Jared Marshall ("Detective Marshall") of the Caddo Parish Sheriff's Department investigated Loomis.

7. Detective Marshall discovered that Loomis routinely sent and received sexually explicit messages involving children on his work computer. Loomis sent the messages using fake internet accounts he created. Some of the fake accounts Loomis titled "twistedsubmom," "granny1937luvsmomsgirlsboys," "cajun\_dad2008," and "penneypalmer."

8. Loomis' messages contained visceral descriptions of the sexual abuse of children. Some of his conversations fantasized about the rape of children as young as newborns. Loomis, under the "twistedsubmom" account, engaged in chat conversations posing as a female and talked about sexually abusing four children when they were newborns. In some messages where Loomis was posing as a female, Loomis discussed choking a newborn inside of his vagina to the point where the baby stopped breathing and needed to be revived by CPR.

9. Detective Marshall executed a search warrant on Loomis' home and seized Loomis' personal computers. Upon a search of those computers, Detective Marshall discovered several videos containing child pornography that were flagged as "notable" by the National Center for Missing & Exploited Children ("NCEMC"). According to Detective Marshall's investigation, one of the videos showed what appeared to be a white pubescent

male giving oral sex to an adult white female on a bed. Another video, which Loomis had attempted to delete from his computer, was titled, “8yo gets molested by clown (pthc).”<sup>1</sup>

10. On another one of Loomis’ personal computers, Detective Marshall discovered fourteen images of children, ranging from 6 to 12 years of age. The children in the images were bound using various items such as tape, rope, and handcuffs. Some of the pictures appeared to be staged or in a studio set up. The other images appeared to show children in actual distress. Some pictures were under review in law enforcement investigations involving missing and exploited children.

11. A police report documenting and confirming these allegations about Loomis is attached to this Complaint as *Exhibit 1* and is hereby incorporated by reference.

12. Loomis resigned from his position on or about November 13, 2012, the day after Detective Marshall opened his investigation. Shockingly, Loomis was never criminally charged. One of the prevailing explanations is that the then-Sheriff did not want the matter discussed publicly because he was up for re-election that year. One witness stated that the then-Sheriff authored a letter to the District Attorney instructing him to refrain from prosecuting Loomis.

13. Despite the then-Sheriff’s intentions to keep the matter private, the matter did not stay private. On or about October 26, 2015, an individual named John Hampson published a story titled, “Corruption in Caddo Parish: The Truth Revealed.”<sup>2</sup> In its first paragraphs, the

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<sup>1</sup> “pthc” is a keyword search on the internet for child sexual assault material, formerly referred to as child pornography.

<sup>2</sup> This article remains available online: <https://medium.com/@imrealHampson/corruption-in-caddo-parish-the-truth-revealed-363c5dff26cf> (last visited May 13, 2024).

article described the events leading to Loomis' exit from the Caddo Parish Sheriff's Department, including terming Loomis a "pedophile." The article included a photograph of Loomis in the opening paragraphs. A basic Google search yields the Hampson article as one of the top hits resulting from a search of the words, "Johnny Loomis." This article was available to the entire world beginning on October 26, 2015.

14. After Loomis' resignation from the police, and after the publicity about his pedophilic practices became public, Hotel Defendants in 2017 hired Loomis to work as a "loss prevention supervisor" for their new hotel at the Dallas Cowboys' "World Headquarters." Hotel Defendants also sometimes call Loomis a "security guard."

15. By giving Loomis this supervisory role, Hotel Defendants afforded Loomis unfettered access to security cameras, Hotel rooms, and Hotel guests throughout the Hotel and the Dallas Cowboys' facility and "World Headquarters."

16. Upon information and belief, Loomis is still employed by Hotel Defendants and is working at the Hotel as of the date of this filing.

17. Before the events of August 22, 2023, Loomis had been involved in several other physical altercations with guests at the Hotel.

18. One such guest was physically assaulted by Loomis and another Hotel employee while the guest was using a men's restroom stall. This guest is a respected businessman from Frisco, Texas. After starting the violent altercation, Loomis published false statements and instigated that guest's arrest, claiming the guest had started the altercation. In fact, the guest believed Loomis entered the bathroom stall to sexually assault him. This prior incident involving the guest is outlined in greater detail later in this Complaint.

19. On at least one occasion before August 22, 2023, law enforcement personnel specifically warned Hotel Defendants about Loomis and his background. Yet, Hotel Defendants retained Loomis in his supervisory role, giving him continued, unsupervised access to Hotel premises and guests of all ages. Hotel Defendants also took no remedial or disciplinary action against Loomis.

20. This lawsuit seeks substantial compensatory and punitive damages against Hotel Defendants for negligent hiring, screening, retention, and supervision arising from Hotel Defendants' employment of Loomis, for Loomis' false statements, and for events that occurred at the Hotel on or about August 22, 2023.

#### **PARTIES, JURISDICTION & VENUE**

21. This Court has subject matter jurisdiction under 28 U.S.C. § 1332(a)(1) because the parties' citizenship is completely diverse. Plaintiffs are citizens of New York. Hotel Defendants are citizens of the States of Texas and Delaware. Loomis is a citizen of Texas.

22. Plaintiff O'Neill is a natural person residing and domiciled in Westchester County, New York. O'Neill is a citizen of New York.

23. Plaintiff RJO is a limited liability company organized under Delaware law and is headquartered in New York. O'Neill is RJO's sole member. Because O'Neill is a citizen of New York, RJO is also a citizen of New York for purposes of this diversity action.

24. Defendant Frisco Silver Star Hotel Corporation d/b/a Omni Frisco Silver Hotel ("Silver Star") is a for-profit corporation organized under Delaware law with its principal place of business in the Dallas, Texas. Under 28 U.S.C. § 1332(c)(1), Silver Star is a citizen of the States of Texas and Delaware and may be served with process through its registered

agent, Corporation Service Company d/b/a CSC - Lawyers Incorporating Service Company, at 211 E. 7th Street, Suite 620, Austin, TX 78701-3218.

25. Defendant Omni Hotels Management Corporation (“Omni Management Corp.”) is a for-profit corporation organized under Delaware law with its principal place of business in Dallas, Texas. Under 28 U.S.C. § 1332(c)(1), Omni Management Corp. is a citizen of the States of Texas and Delaware and may be served with process through its registered agent, Corporation Service Company d/b/a CSC - Lawyers Incorporating Service Company, at 211 E. 7th Street, Suite 620, Austin, TX 78701-3218.

26. Defendant Loomis is a natural person residing and domiciled in the State of Texas. Loomis is a citizen of the State of Texas and may be served with process at 880 S. Coit Rd., Apt. 2306, Prosper, Texas 75078-3016, or wherever he may be found.

27. The amount in controversy greatly exceeds \$75,000.00, exclusive of interest, costs, and attorneys’ fees. The noneconomic and economic damages Plaintiffs have suffered as a result of Defendants’ actions dwarf the jurisdictional threshold.

28. Personal jurisdiction exists over Defendants because Hotel Defendants are corporations that regularly transact business in the State of Texas to give rise to general personal jurisdiction over them, and specific personal jurisdiction over them as this suit arises out of their contacts with the State of Texas in that this underlying incident occurred in Texas. Personal jurisdiction exists over Loomis because Loomis resides in and is a citizen of Texas.

29. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1) because Hotel Defendants are headquartered in this District.

## FACTUAL BACKGROUND

### A. THE HOTEL

30. The Hotel is located at 11 Cowboys Way, Frisco, Texas 75034. It opened for business in 2017. The Hotel, and the land on which it sits, is owned by Silver Star. Upon information and belief, one of Silver Star's shareholders is Blue Star Frisco, L.P. ("Blue Star"), which is owned by Jerry Jones, the owner of the Dallas Cowboys. Jerry Jones has been referred to as an "Inn Keeper" because of his co-ownership of the Hotel.<sup>3</sup>

31. The Hotel's website states it is the official hotel of the Dallas Cowboys and claims it "serves as the cornerstone of The Star, a 91-acre entertainment district anchored by the Dallas Cowboys World Headquarters and their 12,000-seat practice facility, Ford Center." The Dallas Cowboys' logo, a blue star, is affixed to the side of the Hotel.

32. When the Hotel opened, a public ribbon cutting ceremony took place during which Jones called the Hotel, "a triumph." Jeff Smith, then hotel manager at the time, told the crowd that Jones' son, Stephen Jones, brokered the deal to create the Hotel with Bob and Blake Rowling of Omni Management Corp.

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<sup>3</sup> See, e.g., DallasNews.com, Jerry Jones Becomes Inn Keeper as Omni Frisco Opens at Cowboys New Headquarters, (July 24, 2017), <https://www.dallasnews.com/business/local-companies/2017/07/24/jerry-jones-becomes-innkeeper-as-omni-frisco-opens-at-cowboys-new-headquarters/>; PaperCityMag.com, Jerry Jones Shows Off His Hall of Fame Hotel: The Dallas Cowboys' World Takeover Continues, (Aug. 30, 2017); <https://www.papercitymag.com/culture/omni-frisco-jerry-jones-hotel-star-frisco-hall-fame-lodging/> ("Cowboys owner Jerry Jones and Robert Rowling, owner and chairman of TRT Holdings, spoke at the event to commemorate the union of the Cowboys and Omni brands."); SportsBusinessJournal.com, Jerry Jones-Backed Omni Hotel Opens at Cowboys HQ In Frisco, (July 25, 2017), <https://www.sportsbusinessjournal.com/Daily/Morning-Buzz/2017/07/25/Jerry-Jones.aspx> ("The hotel is 'jointly owned' with Omni Hotels Owner Bob Rowling and 'includes a Charlotte Jones boutique,' named for Jones' daughter").



33. As part of the Hotel's development, Silver Star recorded a Declaration of Condominium, essentially dividing the property into two parts: the "Hotel Unit" and the "Conference Center Unit." The Declaration defines the "Hotel Unit Owner" as Silver Star and states its "address for notice is c/o Omni Hotels Management Corporation, 4001 Maple Avenue, Suite 600, Dallas, Texas 75219 (attn: Michael G. Smith)."

34. Upon information and belief, Silver Star contracts with Omni Management Corp. to manage the Hotel. Hotel Defendants are both responsible for hiring and management decisions made at the Hotel including Loomis' employment and retention.

## **B. LOOMIS**

35. Loomis has been employed by Hotel Defendants since the Hotel opened.

36. In 2012, Loomis' former employer, the Caddo Parish Sheriff's Department, determined that Loomis was in possession of child pornography on his work and personal computers; that Loomis misused and misappropriated his employer's property for illegal and misleading purposes; that Loomis lied about his identity using his work computer; and that Loomis fantasized about the sexual abuse and rape of children as young as newborns.

37. At all relevant times, these facts about Loomis were publicly available. Hotel Defendants would have located these facts had they conducted a simple Google search or reasonable background check on their employee, Loomis. Before the August 2023 Incident, Loomis also had a history of violence, engaging in physical altercations with male guests of the Hotel, and then lying about who had instigated the fight.

**C. O'NEILL**

38. O'Neill was born and raised in Butte, Montana. He enlisted in the United States Navy in 1996.

39. Between 1996 and 2001, O'Neill was a member of SEAL Team Two. Between 2001 and 2004, O'Neill was a member of SEAL Team Four. Between 2004 and 2012, O'Neill was a member of the legendary SEAL Team Six.

40. O'Neill's direct and valiant contributions to the national security of the United States of America are immense. He has taken part in more than 400 military combat missions. He served in Operation Neptune's Spear, which resulted in the death of Osama bin Laden; the *Maersk Alabama* hijacking mission, which resulted in the rescue of Captain Richard Phillips and his crew; and Operation Red Wings, which resulted in the extraction and rescue of Navy SEAL Marcus Luttrell in Afghanistan. All three operations have been the subjects of major motion pictures.

41. O'Neill has been decorated 53 times with honors including two Silver Stars for gallantry in action against the enemy, four Bronze Stars with Valor to denote heroism against the enemy, a Joint Service Commendation Medal with Valor, a Navy and Marine Corps Commendation Medal with Valor, three Presidential Unit Commendations, and three Combat Action ribbons.

42. After his honorable discharge from the Navy, O'Neill continued promoting the defense of our nation, working as a motivational speaker, public commentator, and author. He has tirelessly raised awareness about veterans' issues and supported veterans through his extensive philanthropy. His website speaks of "Standing on the Shoulders of Giants" and is

dedicated to raising funds for veterans of special forces and their families. One of the books O'Neill has authored is titled, "THE OPERATOR: Firing the Shots that Killed Osama bin Laden and My Years as a SEAL Team Warrior."

43. Prior to the August 2023 Incident, O'Neill has been interviewed on CNN, CBS, Fox News, Newsmax, and other sites, and was invited to be a guest on countless podcasts. O'Neill also participated in frequent paid speaking engagements and public appearances. However, after the August 2023 Incident and the Defendants' actions, O'Neill's speaking engagements dissipated, book sales slowed, revenue was lost, and his business, RJO, has been destroyed.

#### **D. THE AUGUST 2023 INCIDENT**

44. In August 2023, O'Neill was invited to be a guest on a podcast in Frisco, Texas. O'Neill reserved a room for himself at the Hotel. O'Neill planned to stay in the room after the podcast before leaving Frisco the following day.

45. O'Neill checked in to his room on August 22, 2023, then left the Hotel for the podcast studio. After recording the podcast, O'Neill returned to the Hotel. By this time, it was late but prior to midnight on August 22, 2023.

46. Before retiring to his room, O'Neill visited the Hotel bar, located in the lobby of the Hotel. O'Neill ordered a single drink and at some point, exhausted from a long day of traveling and work, drifted to sleep alone at the bar.

47. This is when Loomis approached O'Neill.

48. After a brief exchange, Loomis walked with O'Neill to his room located on the fifth floor of the Hotel. When they reached the hallway outside of O'Neill's hotel room.

O'Neill struggled to find his keycard to open his room door.

49. It was in this moment that Loomis decided to lie to his co-employees and, later, to the police. He chose to manufacture an utterly false narrative of the events that occurred in the hallway outside of O'Neill's room. Loomis' mendacious account falsely casts aspersions on O'Neill's character and behavior and instigated his arrest.

50. Loomis falsely claims that after O'Neill first tried to open the door, O'Neill turned to Loomis, lifted his fists in the air, and struck Loomis in the chest with his right palm, "palm striking" Loomis. Loomis also falsely claims that O'Neill called Loomis a "fucking n\*gger" when he struck him.<sup>4</sup>

51. These accusations are false, baseless, and highly inflammatory.

52. At some point while O'Neill was attempting to access his hotel room, Loomis called another employee of the Hotel, Cesar Almonte ("Almonte") asking that he call the police and claiming that O'Neill had assaulted him and called him the N-word.

53. When the police arrived in the early morning hours of August 23, 2023, Loomis claimed to need medical attention "due to getting hit in the chest and having heart problems." Because of Loomis' request, medics arrived and examined Loomis, determining that Loomis was "clear" and did not need transportation to a hospital.

54. Loomis also told the officers that the Hotel did not have security cameras on the fifth floor. Upon information and belief, this is yet another lie fabricated by Loomis to further his narrative because he knew the security footage would disprove his story.

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<sup>4</sup> Loomis is a white male.

55. O'Neill was initially arrested and taken to the Frisco County jail for being intoxicated in a public place. However, it didn't end there. When the Frisco police finally shared Loomis' story, O'Neill immediately and unequivocally denied it. But it didn't matter.

56. Law enforcement, acting solely on Loomis' false and disputed statements, sought and obtained a warrant for O'Neill's arrest for a meritless assault charge. Law enforcement then served O'Neill with the warrant and transported him to Collin County Detention Center where he was detained again.

57. O'Neill was never prosecuted for any charge arising from the August 2023 Incident.

58. Having served and fought side-by-side with men and women of every race, creed, and background, O'Neill abhors racial slurs. He does not use them, and he never will. Further, as a Navy SEAL, O'Neill received the most intense combat training mankind has ever devised. O'Neill would not "palm strike," another individual. O'Neill does not know what such a blow is, nor does or had he ever used force unnecessarily, disproportionately, or at inappropriate times. As a trained combat warrior, O'Neill is well-aware of his capacity in a fight, and assiduously practices utmost restraint.

**E. LOOMIS' PRIOR PHYSICAL VIOLENCE AT THE HOTEL**

59. The August 2023 Incident was not the first time Loomis accused a Hotel guest of assaulting him. Loomis reported himself to the police as a "victim" and claimed to have been assaulted by male guests of the Hotel on at least two other occasions.

60. On October 22, 2017, Loomis claimed to be the victim in an incident involving Ryan Webb ("Webb") at the Neighborhood Services Restaurant in the Hotel. Loomis claimed

Webb struck his “right cheek with his left fist.” While Loomis did not tell police that he was injured or needed medical attention, he did tell police that “due to past law enforcement training, [Loomis] took [Webb] to the ground and restrained him until police arrived.” Loomis was acting as the Hotel’s Loss Prevention Supervisor at the time of the incident.

61. On June 6, 2021, Loomis claimed another Hotel guest committed an act of violence against him. On that date, Loomis was again on duty as the Loss Prevention Supervisor at the Hotel. That evening, Dallas businessman Kirk Porter (“Porter”), was using a restroom on the second floor of the Hotel near the conference rooms. Porter was in a bathroom stall when Loomis and a Hotel janitor, Kenneth Baker (“Baker”), burst into the restroom shouting, “Who’s in here?”

62. Porter told them his name and that he was a guest of the Hotel.

63. Loomis and Baker then unlocked the bathroom stall door where Porter was sitting on the toilet and began punching Porter in the face while accusing him of not being a guest at the Hotel.

64. Porter begged Loomis and Baker to stop.

65. Porter believed that Loomis’ and Baker’s conduct indicated their intent to rape and otherwise take advantage of him sexually against his will. Porter fought back in self-defense to get out of the toilet stall. He was able to pin Loomis on the ground to the side of the toilet.

66. Loomis then bit Porter in his chest and bit a chunk out of Porter’s finger.

67. Porter was eventually able to escape the bathroom and promptly left the Hotel, fearing for his life.

68. Despite Loomis' outrageous conduct, Hotel Defendants continue to retain Loomis in a supervisory position, and took no remedial or punitive action against him.

**F. LOOMIS LACKED REQUISITE SECURITY REGISTRATIONS**

69. Loomis does not hold a security guard registration with the Texas Department of Public Safety ("TDPS"). Texas law requires both on-staff and contracted security guards to hold a valid security guard registration with the TDPS.

70. An individual acts as a security officer if the individual is: (1) employed by a security services contractor or the security department of a private business; and (2) employed to perform the duties of an alarm systems response runner who responds to the first signal of entry, a security guard, security watchman, security patrolman, armored car guard, or courier guard.<sup>5</sup>

71. Loomis is a "Security Officer" because he worked for the Hotel's security department and was employed to perform the duties of an alarm systems response runner or security guard. However, Loomis lacked the registrations necessary to lawfully carry out his job. Hotel Defendants knew this but hired and retained Loomis anyway.

**G. LAW ENFORCEMENT WARNED HOTEL DEFENDANTS ABOUT LOOMIS PRIOR TO THE AUGUST 2023 INCIDENT**

72. In March 2022, over a year before the August 2023 Incident, George Eric Hatfield ("Hatfield"), a Chief Deputy Constable of Caddo Parish, Louisiana, called a representative of Hotel Defendants to warn them about Loomis.

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<sup>5</sup> Tex. Occ. Code Ann. § 1702.222.

73. Hatfield had been previously contacted by Porter about Loomis' attack in a bathroom of the Hotel and relayed this information to the Hotel Defendants.

74. Hatfield also informed the Hotel Defendants about an investigative report "packet" containing information on Loomis by the Caddo Parish District Attorney's Office including information related to evidence that led to Loomis' departure from the Caddo Parish Sheriff's Department. Specifically, the packet contained evidence of Loomis' possession of child pornography and use of fake internet accounts using the Sheriff Department's property.

75. Despite this information, the Hotel Defendants took no remedial action against Loomis and continued to grant him unfettered access to guests of the Hotel.<sup>6</sup>

76. In addition, on or about October 26, 2015, author John Hampson published an article titled, "Corruption in Caddo Parish: The Truth Revealed." In this article, Loomis was named and his picture prominently displayed. The Hampson article stated that child porn and "incriminating chat messages" were found on Loomis' work-computer and that a search warrant was issued for his home computer. The Hampson article stated that "[c]oincidentally, the alleged pedophile, Johnny Loomis, resigned from his position the next day, and the 'investigation' to this day remains open, as it has been, since the incident occurred in 2012. This individual is a threat to our community's children, and he is now walking among us, free from consequence." The Hampson article also cited the investigative report concerning Loomis.<sup>7</sup>

77. At the time Hotel Defendants opened the Hotel in 2017, the Hampson article and the facts about Loomis were available via a basic Google search. The Hampson article would have

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<sup>6</sup> Hatfield's declaration in support is attached as *Exhibit 2*.

<sup>7</sup> This article is attached to this Complaint as *Exhibit 3*.



been discovered had the Hotel Defendants conducted a reasonable background check on Loomis.

#### **H. O'NEILL SUFFERS FORESEEABLE DAMAGES**

78. As a proximate result of the Hotel Defendants' negligence and Loomis' actions, Plaintiffs suffered compensable injury, including, but not limited to, injury to Plaintiffs' reputation, physical pain and mental anguish, loss of companionship and society, lost business opportunity, loss of speaking engagements, personal physical injury and sickness, and emotional distress, among other things to be proven at trial.

##### **i. Noneconomic Damages: Reputational Injury**

79. As a proximate and foreseeable result of Hotel Defendants' negligence and Loomis' false report about O'Neill, Plaintiffs suffered reputational injury.

80. Loomis published a false report about O'Neill, including false statements that O'Neill physically attacked Loomis and called him the N-word. As a result of Hotel Defendants' negligence and Loomis' resulting false report, O'Neill was taken to jail. Loomis' foreseeable and explosive allegations caused O'Neill's mugshot and Loomis' false report to be widely published in the media. Because of Defendants' acts and omissions, Plaintiffs suffered irreparable and perpetual damage.

81. The false accusation that O'Neill called Loomis (a white man) the N-word is particularly vile and abhorrent. The false accusation that O'Neill physically assaulted Loomis is an accusation of criminal conduct. Such accusations have and will diminish O'Neill's standing in the community. Members of the community have shunned Plaintiffs since the August 2023 Incident, citing Loomis' false report and the "N-word" accusation in particular. Moreover, anytime a person researches 9/11 or Osama bin Laden, O'Neill's name will show

up along with the false assault and “N-word” accusations.

82. On August 28, 2023, the New York Post, through its reporter Mary Ann Martinez, published an article with the headline, “Former Navy SEAL Robert O’Neill, who killed Bin Laden, called security guard N-word during arrest: sources.”<sup>8</sup> This article was a direct and foreseeable consequence of Loomis’ false accusations and Hotel Defendants’ negligence in hiring, screening, retaining, and supervising Loomis.

83. The New York Post followed up on its initial reporting with at least one additional article about the incident.<sup>9</sup> This article was a direct and foreseeable consequence of Hotel Defendants’ negligence in hiring, screening, retaining, and supervising Loomis.

84. Several other news outlets published articles with similar headlines.<sup>10</sup> These articles were a direct and foreseeable consequence of Hotel Defendants’ negligence in hiring, screening, retaining, and supervising Loomis.

85. Defendants knew or should have known of Loomis’ tendency to create false narratives and lie to the police. Thus, it was foreseeable that Loomis would make a false report because he had engaged in similar behavior on several other occasions prior to the August 2023 Incident. In particular, he engaged in criminal activity associated with child

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<sup>8</sup> <https://nypost.com/2023/08/28/former-navy-seal-robert-oneill-who-claims-he-killed-bin-laden-beat-up-security-guard-called-him-n-word-cops/>.

<sup>9</sup> See NewYorkPost.com, *Security guard who claimed ex-Navy SEAL Robert O’Neill called him N-word revealed to be a white man*, (Aug. 30, 2023), <https://nypost.com/2023/08/30/white-security-guard-claims-ex-navy-seal-assaulted-him-called-him-n-word/>.

<sup>10</sup> See HindustanTimes.com, *Texas security guard who accused Osama ‘killer’ Robert O’Neill of using racial slur is a white man*, (Aug. 31, 2023), <https://www.hindustantimes.com/world-news/texas-security-guard-who-accused-osama-killer-robert-o-neill-of-calling-him-the-n-word-is-a-white-man-101693447293927.html>.

pornography. As well, Loomis engaged in deceptive conduct both to hide his true self in pedophile chatrooms and to the police and others on behalf of Hotel Defendants. The Hotel Defendants' continued retention of Loomis enabled and authorized Loomis to continue his deceitful and damaging path.

86. Moreover, reporting on the behavior of patrons is conduct that security personnel routinely undertake. If security personnel are not properly trained, licensed, or qualified, it would be foreseeable that security personnel employed by Hotel Defendants could cause immense reputational harm by making fabricated reports and instigating false detainments and imprisonments. The Hotel Defendants knew that Loomis lacked the requisite security guard registration but hired and retained him anyway.

**ii. Noneconomic Damages: Mental Anguish**

87. As a proximate and foreseeable result of Defendants' negligence and Loomis' resulting false report, O'Neill suffered and will continue to suffer mental anguish, emotional distress, and personal physical injury and sickness.

88. O'Neill may recover mental anguish damages in this case because, here, the mental anguish damages were the foreseeable result of duties arising out of special relationships: the relationship between a security guard (Loomis) and a patron (O'Neill); and the relationship between a hotel (Defendants) and its guest (O'Neill). In addition, O'Neill may recover mental anguish damages in this case because this case involves particularly shocking and disturbing events where mental anguish is a highly foreseeable result.

89. Because of the false statements Loomis made about him, O'Neill suffered intense mental anguish and physical sickness. Knowing that his entire legacy and service to this country has been clouded and undermined by Loomis' false report – enabled by the Defendants – caused O'Neill immense mental suffering including, but not limited to, lost sleep, intense anxiety, and depression.

90. It was foreseeable that a guest could suffer mental anguish if the Defendants, as proprietors of the Hotel, did not take care to ensure the qualifications and safety of their staff and security personnel. If security personnel are not properly trained, licensed, or qualified, it would be foreseeable that security personnel employed by Defendants could cause immense mental suffering by making a fabricated report.

91. O'Neill's wife was pregnant during the August 2023 Incident, after suffering multiple prior miscarriages. Because of the reputational injury and mental anguish negligently inflicted upon O'Neill by Defendants, O'Neill and his wife suffered mental anguish and emotional distress reasonably worrying that the publicity given to the August 2023 Incident would leave her vulnerable to another miscarriage.

**iii. Economic Damages**

92. As a proximate and foreseeable result of the Defendants' negligence and Loomis' resulting false report about O'Neill, Plaintiffs' income has been substantially diminished. O'Neill's speaking engagements, once overflowing, are now very few, and command much lower compensation; his charitable endeavors, in which he takes great personal pride, have been substantially reduced due to his suffering these false allegations.

93. O’Neill’s company, RJO, of which he is the sole member, is the pass-through entity that facilitates and obtains revenue from O’Neill’s speaking engagements. O’Neill is the sole member of RJO. O’Neill and RJO have suffered substantial losses in revenue, income, and opportunity as a proximate and foreseeable result of the Defendants’ negligence.

94. Prior to the August 2023 Incident, O’Neill and RJO had specific speaking engagements scheduled. But following the incident and the false claim that O’Neill had assaulted Loomis and called him the N-word, those specific speaking engagements were cancelled, and O’Neill and RJO lost income.

95. O’Neill and RJO will suffer lost future profits, revenue, income, and earnings because of this incident and Loomis’ foreseeable false report.

96. The legacies of O’Neill and RJO have been utterly ravaged by the Defendants’ negligence. Any search of O’Neill on the internet, including without limitation searches of Osama bin Laden and 9/11, will yield Loomis’ false report, a proximate consequence of the Defendants’ negligence.

97. The damages that O’Neill and RJO have suffered exceed the jurisdictional minimums of this Court.

## **CAUSES OF ACTION**

### **COUNT 1—Negligence (Alleged Against Hotel Defendants)**

98. The preceding paragraphs are hereby incorporated by reference as if fully realleged herein.

99. Texas law applies under Texas choice of law rules, which results in application of Texas law to this matter.

100. Loomis is an employee of the Hotel Defendants. At all times relevant, Loomis acted in the course and scope of his employment with the Hotel. While in the course and scope of his employment, Loomis defamed, instigated a false imprisonment, and assaulted O'Neill.

101. Hotel Defendants were under a duty to exercise ordinary and reasonable care with respect to the hiring, retention, and supervision of its employees, including Loomis.

102. Hotel Defendants breached their duty by failing to properly hire, retain, and supervise its security guard, Loomis. Hotel Defendants had a responsibility but failed to:

- a. Properly supervise their employees;
- b. Refrain from leaving incompetent employees without supervision;
- c. thoroughly investigate Loomis' background;
- d. monitor for potentially unfit or incompetent employees; and
- e. ensure that its security personnel comply with Texas law, including obtaining and maintaining requisite registrations.

103. Hotel Defendants breached their duty of care to O'Neill by failing to conduct any background check—even failing to conduct a basic Google search—into Loomis that would have revealed that Loomis is a sexual predator and has repeatedly invented allegations of violence and victimhood. Loomis had lied about his identity on sexually explicit chatroom messages on a computer belonging to the Caddo Parish Sheriff's Department; had been caught in possession of child pornography on a Sheriff-owned computer; had fantasized about the sexual abuse of children during work hours with employer property, including choking newborns; and lacked the necessary TDPS security registrations to be employed in the security department of the Hotel. Loomis had also, on at least two prior occasions, been

involved in violent encounters with Hotel guests, and in at least one such occasion, had invented a wholly false depiction of the event that cast Loomis as the innocent victim instead of the violent perpetrator. Loomis clearly demonstrated an appetite for violence.

104. Hotel Defendants breached their duty of care to O'Neill by failing to terminate Loomis after Hatfield specifically informed Hotel Defendants about Loomis' background in the wake of his physical altercation with Porter at the Hotel.

105. Hotel Defendants breached their duty of care to O'Neill by failing to terminate supervisor Loomis after he had claimed to be the victim in physical altercations with guests at the Hotel.

106. Hotel Defendants at the very least should have made certain that Loomis could not be alone with any guest of the Hotel; that he did not have access to security cameras throughout the Hotel; and that he could not speak on behalf of the Hotel to police officers.

107. Hotel Defendants' negligence in hiring and retaining Loomis, and giving him supervisory authority, was the cause-in-fact of O'Neill's injuries.

108. Hotel Defendants' failure to conduct a reasonable background check, require Loomis to obtain the necessary TDPS security registrations, or terminate Loomis was a substantial factor in bringing about O'Neill's injury.

109. It was foreseeable that Hotel Defendants' failure to conduct a reasonable background check, require Loomis to obtain the necessary TDPS security registrations, or terminate Loomis created an unreasonable risk of harm to O'Neill and other guests.

110. At all relevant times, there was publicly available evidence that Loomis: (1) lied about his identity and created fake accounts in online, sexually deviant chat rooms; (2) lied about his identity and created fake accounts to discuss the rape and abuse of children on his employer's computer; (3) concealed his possession of child pornography on his work computer; and (4) concealed the possession of child pornography on his personal computers, even at times attempting to delete the material.

111. Hotel Defendants possessed actual knowledge of the above from Hatfield over a year in advance of the August 2023 Incident.

112. Hotel Defendants should have been aware of Loomis' false and/or embellished claims to law enforcement regarding guests of the Hotel because he had done so on at least one other occasion with respect to the Porter altercation.

113. It was foreseeable that if Hotel Defendants failed to take remedial action against Loomis that he could, and indeed would, once again make false and/or embellished incident reports to law enforcement officers damaging the reputations of guests of the Hotel. Loomis has committed underlying torts, including, but not limited to, the torts of defamation and instigation of a false imprisonment.

114. Hotel Defendants had actual notice of Loomis' violent and dishonest tendencies yet retained Loomis in a role of authority at the Hotel.

115. The above-referenced acts and omissions, constitute negligent hiring, retention, and supervision, and as a direct and proximate result, O'Neill suffered substantial noneconomic and economic damages proximately and foreseeably resulting from Hotel Defendants' negligence.



**COUNT 2—Defamation  
(Alleged Against Loomis)**

116. The preceding paragraphs are hereby incorporated by reference as if fully realleged herein.

117. In Texas, the elements of action for defamation are: (1) the publication of a false statement of fact to a third party; (2) that was defamatory concerning the plaintiff; (3) with the requisite degree of fault; and (4) damages, in some cases. If the statements are defamatory *per se*, then the plaintiff need not plead and prove the fourth element of damages.

118. Loomis published false statements of fact to third parties: Almonte and law enforcement officers.

119. The false statements of fact Loomis published are that O’Neill “palm struck” Loomis and called him a “fucking n\*gger.” These statements of fact are utterly false and are sometimes referred to herein as the “False Statements.”

120. The False Statements are defamatory *per se* because they accuse O’Neill of a crime (e.g., assault) and adversely reflect on O’Neill’s fitness to conduct his business and trade as a motivational public speaker. The False Statements are likewise capable of a defamatory meaning as a matter of law.

121. The False Statements are of and concerning O’Neill because Loomis specifically referred to O’Neill in making the statements.

122. No qualified or absolute privilege applies to the False Statements. Regardless, Loomis published his statements in bad faith and with common law malice. Loomis recognized O’Neill and wanted to cause him great harm and embarrassment out of ill will and spite, as he had done with prior guests of the Hotel. As he had when he worked for the Caddo

Parish Sheriff's Department, Loomis lied to law enforcement personnel.

123. Loomis published his statements negligently, with common law malice, and with actual malice. Loomis knew his statements were false or published them with reckless disregard of their truth.

124. During the August 2023 Incident, Loomis intentionally lied to law enforcement personnel, just as he had when he worked for the Caddo Parish Sheriff's Department.

125. Plaintiffs suffered noneconomic and economic damages, including, but not limited to, reputational injury and mental anguish, as a result of Loomis' False Statements.

**COUNT 3—False Imprisonment  
(Alleged Against Loomis)**

126. The preceding paragraphs are hereby incorporated by reference as if fully realleged herein.

127. The elements of false imprisonment are: (1) willful detention, (2) without consent, and (3) without authority of law.

128. The Texas Supreme Court has recognized a cause of action against one who instigates a false imprisonment. *Wal-Mart Stores, Inc. v. Rodriguez*, 92 S.W.3d 502, 507 (Tex. 2002) (“But in Texas, as both parties concede, liability for false imprisonment extends beyond those who willfully participate in detaining the complaining party to those who request or direct the detention.”).

129. Instigation satisfies the first element set forth above if the defendant's conduct was intended to cause the detention and in fact caused the detention, even if the defendant did not participate directly in the detention.

130. O'Neill was detained, without his consent, by law enforcement as a direct result of Loomis' false accusation that O'Neill physically assaulted Loomis. Loomis instructed that the police be contacted and directed or requested that O'Neill be arrested because of this false allegation of physical assault. At Loomis' request, or alternatively relying on Loomis' false allegation, law enforcement obtained a warrant falsely charging O'Neill with assault and had O'Neill imprisoned in Collin County Detention Center.

131. The arrest was without legal authority or justification. Rather, it was based on Loomis' false accusation of physical assault.

**COUNT 4—Assault by Offensive Physical Contact  
(Alleged Against Loomis)**

132. The preceding paragraphs are hereby incorporated by reference as if fully realleged herein.

133. Loomis intentionally made contact with O'Neill's person by reaching for and grabbing O'Neill's hotel key and/or wallet as O'Neill attempted to access his Hotel room.

134. Loomis knew or should have known that any contact of this nature with O'Neill's person, as a former Navy SEAL, would be regarded as offensive or provocative.

135. Loomis' offensive and provocative contact caused O'Neill damages.

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

Plaintiffs pray:

- (a) That the Court enter an award of and judgment for substantial compensatory damages against Defendants in amounts to be proven at trial;
- (b) That the Court enter an award of and judgment for substantial punitive damages against Defendants in an amount to be proven at trial;
- (c) That Plaintiffs recover their litigation expenses, costs, and reasonable attorneys' fees and expenses from Defendants;
- (d) That Plaintiffs recover pre- and post-judgment interest from Defendants;
- (e) That all costs of this action be taxed to Defendants;
- (f) That the Court grant any other relief that the Court deems just and proper.

Respectfully submitted,

**/s/ William S. Richmond**

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and

TODD V. MCMURTRY  
(*pro hac vice* motion forthcoming)  
J. WILL HUBER  
(*pro hac vice* motion forthcoming)

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# **EXHIBIT 1**

# **EXHIBIT 1**

# Caddo Parish Sheriffs Office

## INCIDENT REPORT

ENTERED LDP  
BRI LA 0090000

Incident Number  
201200036175

2012 36175

Day No. 3	Date 11/14/12	Time Disp. 1030	Time Arr 1030	Time Clr 1700	Area 3	Sec. D	Deputy Jared Marshall	Comm. # 1619			
Reported By	Name: Last First Middle Caddo Parish Sheriff's Office			Race	Sex	Age	Nature of Incident Investigation				
Address 501 Travis St. Shreveport, La 71101						Home Phone		Business Phone 318-681-0812			
Address of Incident / Location Description 501 Texas St. Shreveport, LA 71101						(Date / Time Occurrence)					
						From: Date Aug. 2011 Time unknw					
						To: Date Nov. 2012 Time unknw					
LRS# or Parish Ord:		Type of Criminal Activity: # 2 _____ # 3 _____ # 4 _____ # 5 _____									
1. OTH 100	B <input type="checkbox"/>	Buying/Receiving	P <input type="checkbox"/>	Possessing/Concealing	i <input type="checkbox"/>	Juvenile Gang					
2. _____	C <input type="checkbox"/>	Cultivating/Manufacturing/Publishing	T <input type="checkbox"/>	Transporting/Transmitting/Importing	G <input type="checkbox"/>	Other Gang					
3. _____	D <input type="checkbox"/>	Distributing/Selling	U <input type="checkbox"/>	Using/Consuming	N <input type="checkbox"/>	None/Unknown					
4. _____	E <input checked="" type="checkbox"/>	Exploiting Children	I <input type="checkbox"/>	Possession with Intent to Sell							
5. _____	O <input type="checkbox"/>	Operating/Promoting/Assisting	X <input type="checkbox"/>	Other							
Location of Incident: ( Check only one ) ( Enter Code Number for Offense # 2 _____ # 3 _____ # 4 _____ # 5 _____ )											
01 <input type="checkbox"/>	Air/Bus/Train Terminal	08 <input type="checkbox"/>	Department/Discount	15 <input type="checkbox"/>	Jail/Prison	22 <input type="checkbox"/>	School/College				
02 <input type="checkbox"/>	Bank/Savings & Loan	09 <input type="checkbox"/>	Drug Store/Dr.'s Office/Hospital	16 <input type="checkbox"/>	Lake/Waterway	23 <input type="checkbox"/>	Service/Gas Station				
03 <input type="checkbox"/>	Bar/Night Club	10 <input type="checkbox"/>	Field/Woods	17 <input type="checkbox"/>	Liquor Store	24 <input type="checkbox"/>	Specialty Store (TV, Fur, etc.)				
04 <input type="checkbox"/>	Church/Synagogue/Temple	11 <input checked="" type="checkbox"/>	Government/Public Buildings	18 <input type="checkbox"/>	Parking Lot/Garage	25 <input type="checkbox"/>	Other/Unknown				
05 <input type="checkbox"/>	Commercial/Office Building	12 <input type="checkbox"/>	Grocery/Supermarket	19 <input type="checkbox"/>	Rental/Storage Facility	40 <input type="checkbox"/>	Casino Land Based				
06 <input type="checkbox"/>	Construction Site	13 <input type="checkbox"/>	Highway/Road/Alley	20 <input type="checkbox"/>	Residence/Home	41 <input type="checkbox"/>	Casino River Boat				
07 <input type="checkbox"/>	Convenience Store	14 <input type="checkbox"/>	Hotel/Motel/Etc.	21 <input type="checkbox"/>	Restaurant						
Offense Involved: # 2 _____ # 3 _____ # 4 _____ # 5 _____											
A <input type="checkbox"/>	Alcohol	D <input type="checkbox"/>	Drugs	C <input checked="" type="checkbox"/>	Computers	DV <input type="checkbox"/>	Domestic Violence	Juv <input type="checkbox"/>	Juveniles	GRO <input type="checkbox"/>	Gaming Related Offense
Offense Attempted / Completed						( For Burglary Only )					
1. A <input checked="" type="checkbox"/>	2. A <input type="checkbox"/>	3. A <input type="checkbox"/>	4. A <input type="checkbox"/>	5. A <input type="checkbox"/>	Attempted Completed	<input type="checkbox"/>	Abandoned	<input type="checkbox"/>	Forcible	Number of Premises Entered: _____	
C <input checked="" type="checkbox"/>	C <input type="checkbox"/>	C <input type="checkbox"/>	C <input type="checkbox"/>	C <input type="checkbox"/>		<input type="checkbox"/>	Unoccupied	<input type="checkbox"/>	No Force		
						<input type="checkbox"/>	Occupied				
Type of Weapon/Force Used: # 2 _____ # 3 _____ # 4 _____ # 5 _____											
11. <input type="checkbox"/>	Firearms (type not stated)	15 <input type="checkbox"/>	Other Firearm	40 <input type="checkbox"/>	Personal Weapons	70 <input type="checkbox"/>	Narcotics/Drugs				
12. <input type="checkbox"/>	Handgun	20 <input type="checkbox"/>	Knife/Cutting Instrument	50 <input type="checkbox"/>	Poison	85 <input type="checkbox"/>	Asphyxiation				
13. <input type="checkbox"/>	Rifle	30 <input type="checkbox"/>	Blunt Object	60 <input type="checkbox"/>	Explosives	90 <input type="checkbox"/>	Other				
14. <input type="checkbox"/>	Shotgun	35 <input type="checkbox"/>	Motor Vehicle	65 <input type="checkbox"/>	Fire/Incendiary	95 <input type="checkbox"/>	Unknown				
							99 <input checked="" type="checkbox"/>	none			

### Victim Information

<b>1</b>	Victim's Name: Last First Middle Race Sex Age Date of Birth Alias						
Caddo Parish Sheriff's Office							Alias
Address						Home Phone	
501 Travis St. Shreveport, La 71101						318-681-0700	
Business Address / Place of Employment						Business Phone	
Social Security No.		Resident Status: <input checked="" type="checkbox"/> Resident <input type="checkbox"/> Nonresident <input type="checkbox"/> Unknown			Ethnicity: <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown		
Victim Connected to Offense #:		Type of Victim:			Type of Injury:		
1. OTH 100		I <input type="checkbox"/> Individual R <input type="checkbox"/> Religious			N <input checked="" type="checkbox"/> None M <input type="checkbox"/> Minor Injury		
2.		B <input type="checkbox"/> Business S <input type="checkbox"/> Society/Public			B <input type="checkbox"/> Broken Bones O <input type="checkbox"/> Major Injury		
3.		F <input type="checkbox"/> Financial O <input type="checkbox"/> Other			I <input type="checkbox"/> Poss. Internal Injuries T <input type="checkbox"/> Loss of Teeth		
4.		G <input checked="" type="checkbox"/> Government U <input type="checkbox"/> Unknown			L <input type="checkbox"/> Severe Laceration U <input type="checkbox"/> Unconsciousness		
5.		L <input type="checkbox"/> Law Enforcement officer					
Type of Medical Treatment:		Missing Person / Recovery:			Victim Used:		
Hospitalized at:		Disp <input type="checkbox"/> Disappeared Loc <input type="checkbox"/> Located			A <input type="checkbox"/> Alcohol		
Transported by:		MH <input type="checkbox"/> Mental Health RH <input type="checkbox"/> Returned Home			D <input type="checkbox"/> Drugs		
		Vol <input type="checkbox"/> Voluntary CP <input type="checkbox"/> Contacted Family			W <input type="checkbox"/> Weapons		
		Kid <input type="checkbox"/> Kidnapped CP <input type="checkbox"/> Contacted Police					
		Unk- <input type="checkbox"/> Unknown Unk <input type="checkbox"/> Unknown					
Missing Person Form Completed:				NCIC Form Completed:			
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
Relationship of Victim to Offender: (Put Offender/Arrestee Number in Blank)							
SE ___ Spouse	GP ___ Grandparent	SS ___ Stepsibling	ES ___ Estranged Spouse	RU <u>1</u> Relationship Unk.			
CS ___ Common-Law Spouse	GC ___ Grandchild	OF ___ Other Family	XS ___ Ex-Spouse	EE ___ Employee			
IL ___ In-Law	AQ ___ Acquaintance	NM ___ Non-Married Live-in	BE ___ Babysittee (baby)	ER ___ Employer			
SP ___ Stepparent	FR ___ Friend	CF ___ Child of "BG"	BG ___ Boy/Girl Friend	PA ___ Parent			
SC ___ Stepchild	NE ___ Neighbor	HR ___ Homosexual Rel.	OK ___ Otherwise Known	SB ___ Sibling			
XB ___ Ex-Boyfriend/ Ex-Girlfriend	CH ___ Child	ST ___ Stranger	Vo ___ Victim was Offender				

### Offender/Arrestee Information

Off.	Arr.	Name: Last First Middle Aliases				
01	01	Loomis Johnny L				
Race	Sex	Age	Date of Birth	Driver's License	State	Social Security No.
W	M	50	11/15/62	004701658	LA	
Address						Home Phone
10082 Baldwin Court Shreveport, LA 71115						318-797-2274
Business Address / Place of Employment						Business Phone
						318-286-1943



# Offender/Arrestee Information

Incident Number  
201200036175

DESCRIPTIVE	Build	Eyes	Complexion	Hair Color	Hair Style	Hair Facial	Characteristics
	1. Athletic/Muscular 2. Heavy/Large 3. Average/Medium 4. Slender 5. Petite 99. Other	1. Blue 2. Green 3. Brown 4. Black 5. Gray 6. Hazel 7. Multicolor 99. Other	1. Albino 2. Black 3. Dark 4. Light 5. Fair 6. Olive 7. Ruddy 99. Other	1. Gray 2. Black 3. Red 4. Brown 5. Blond 6. White 7. Part Gray 8. Auburn 99. Other	1. Bald 2. Short 3. Medium 4. Shoulder Length 5. Long 6. Wig 7. Afro 8. Flat Top/Crew Cut 9. Curly 10. Straight 99. Other	1. Beard 2. Goatee 3. Mustache 4. Side Burns 5. Unshaven 6. Clean Shaven 99. Other	1. Scars 2. Marks 3. Tattoos 4. Disability 99. Other

Height	Weight	Build	Eyes	Complexion	Hair Color	Hair Style	Facial Hair	Characteristics
5'5	206	4	3	4	2	2	6	

Additional Description

Date of Arrest	Time	Location of Arrest	CSO #	ATN #

LRS # or Parish Ord:	Type of Arrest:	Arrest Result of:	Arrestee Armed with:
1. _____ 2. _____ 3. _____ 4. _____ 5. _____	O <input type="checkbox"/> On-View S <input type="checkbox"/> Summoned/Cited T <input type="checkbox"/> Taken Into Custody F <input type="checkbox"/> Felony M <input type="checkbox"/> Misdemeanor	II <input type="checkbox"/> Inv. of Incidents OA <input type="checkbox"/> Observed Activity TS <input type="checkbox"/> Traffic Stop W <input type="checkbox"/> Warrant DV <input type="checkbox"/> Domestic Violence	01 <input type="checkbox"/> Unarmed 11 <input type="checkbox"/> Firearm (type not stated) 12 <input type="checkbox"/> Handgun 13 <input type="checkbox"/> Rifle 14 <input type="checkbox"/> Shotgun 15 <input type="checkbox"/> Other Firearm 16 <input type="checkbox"/> Lethal Cutting Instrument 17 <input type="checkbox"/> Club/Blackjack Brass Knuckles 18 <input type="checkbox"/> Other

Arrestee Connected to Offense #:	Offender/Arrestee Used:
1 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 5 <input type="checkbox"/> 2 <input type="checkbox"/> 4 <input type="checkbox"/>	A <input type="checkbox"/> Alcohol      D <input type="checkbox"/> Drugs C <input type="checkbox"/> Computer Equipment      N <input type="checkbox"/> Not Applicable G <input type="checkbox"/> Gaming Activity Motive of Crime

Arrestee Ethnicity:	Resident Status:	Injury Type:	Med. Treatment/Hospitalized at:
H <input type="checkbox"/> Hispanic      U <input type="checkbox"/> Unknown N <input checked="" type="checkbox"/> Non-Hispanic	R <input checked="" type="checkbox"/> Resident      U <input type="checkbox"/> Unknown N <input type="checkbox"/> Nonresident	None	None Transported by: None

Juvenile Status Offender:	Disposition of Arrestee Under 17:	Parents Notified:
<input type="checkbox"/> Run Away <input type="checkbox"/> Truant <input type="checkbox"/> Ungovernable <input type="checkbox"/> FINS Report Filed	D <input type="checkbox"/> Handled Within Department J <input type="checkbox"/> Referred to Juvenile Court or Probation Dept. W <input type="checkbox"/> Referred to Welfare Agency P <input type="checkbox"/> Referred to Other Police Agency A <input type="checkbox"/> Referred to Criminal or Adult Court	Yes <input type="checkbox"/> No <input type="checkbox"/>
		Released to Parents: Yes <input type="checkbox"/> No <input type="checkbox"/>
		Agency Referred to:

Hate / Bias Motivation of Offender/Arrestee: # 2 \_\_\_\_\_ # 3 \_\_\_\_\_ # 4 \_\_\_\_\_ # 5 \_\_\_\_\_

- |                  |   |                                  |   |                        |   |
|------------------|---|----------------------------------|---|------------------------|---|
| <b>Racial</b>    |   | <b>ETHNICITY/NATIONAL ORIGIN</b> |   | <b>DISABILITY BIAS</b> |   |
| 11               | <input type="checkbox"/> Anti-Wite                            | 32                               | <input type="checkbox"/> Anti-Hispanic                        | 51                     | <input type="checkbox"/> Anti-Physical Disability   |
| 12               | <input type="checkbox"/> Anti-Black                           | 33                               | <input type="checkbox"/> Anti-Other Ethnicity/National Origin | 52                     | <input type="checkbox"/> Anti-Mental Disability     |
| 13               | <input type="checkbox"/> Anti American Indian/Alaskan. Native |                                  |   |                        |   |
| 14               | <input type="checkbox"/> Anti-Asian/Pacific Islander          |                                  |   |                        |   |
| 15               | <input type="checkbox"/> Anti Multi Racial Group              |                                  |   |                        |   |
| <b>RELIGIOUS</b> |   | <b>SEXUAL</b>                    |   | <b>OTHER BIAS</b>      |   |
| 21               | <input type="checkbox"/> Anti-Jewish                          | 41                               | <input type="checkbox"/> Anti-Male Homosexual (Gay)           | 70                     | <input type="checkbox"/> Age                        |
| 22               | <input type="checkbox"/> Anti-Catholic                        | 42                               | <input type="checkbox"/> Anti-Female Homosexual (Lesbian)     | 71                     | <input type="checkbox"/> Ancestry                   |
| 23               | <input type="checkbox"/> Anti-Protestant                      | 43                               | <input type="checkbox"/> Anti-Homosexual (Gay & Lesbians)     | 72                     | <input type="checkbox"/> Creed                      |
| 24               | <input type="checkbox"/> Anti-Islamic (Moslem)                | 44                               | <input type="checkbox"/> Anti-Heterosexual                    | 73                     | <input type="checkbox"/> Gender                     |
| 25               | <input type="checkbox"/> Anti-Other Religion                  | 45                               | <input type="checkbox"/> Anti-Bisexual                        | 74                     | <input type="checkbox"/> Organizational Affiliation |
| 26               | <input type="checkbox"/> Multi-Religious Group                |                                  |   | 88                     | <input checked="" type="checkbox"/> None            |
| 27               | <input type="checkbox"/> Atheism/Agnosticism                  |                                  |   | 99                     | <input type="checkbox"/> Unknown                    |

W I T N E S S E S	1	Name: Last	First	Middle	Race	Sex	Age	Date of Birth	Place of Employment
		Address			Alias		Home Phone		Business Phone
	2	Name: Last	First	Middle	Race	Sex	Age	Date of Birth	Place of Employment
		Address			Alias		Home Phone		Business Phone
	3	Name: Last	First	Middle	Race	Sex	Age	Date of Birth	Place of Employment
		Address			Alias		Home Phone		Business Phone
	4	Name: Last	First	Middle	Race	Sex	Age	Date of Birth	Place of Employment
		Address			Alias		Home Phone		Business Phone

Copies to:		Case Status - Assigned to:		No. of Victims:	No. of Arrestees:	No. of Offenders:
<input type="checkbox"/> DA	<input type="checkbox"/> CID	<input type="checkbox"/> OCD	<input type="checkbox"/> IA	01		01
<input type="checkbox"/> Coroner	<input type="checkbox"/> OCD	<input checked="" type="checkbox"/> CID	<input type="checkbox"/> Other	Scene Processed by:		Investigator on Scene:
<input type="checkbox"/> Juvenile Court	<input type="checkbox"/> Patrol	<input type="checkbox"/> Patrol		Latent Prints	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Jared Marshall 1619 525 789
<input type="checkbox"/> IA	<input type="checkbox"/> Other			Photographs	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
				CSI Report	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Disposition:				Reporting Deputy:	Comm. #	
<input type="checkbox"/> Unfounded	A	<input type="checkbox"/> Death of Offender		Jared Marshall	1619	
<input type="checkbox"/> Cleared by Arrest	B	<input type="checkbox"/> Prosecution Declined		Supervisor:	Comm. #	
<input checked="" type="checkbox"/> Open	C	<input type="checkbox"/> Extradition Declined		Sgt. Paul [Signature]	525	
<input type="checkbox"/> Administrative	D	<input type="checkbox"/> Victim Refused to Cooperate		Review Deputy:	Comm. #	
<input type="checkbox"/> Cleared Exceptional	E	<input type="checkbox"/> Juvenile No Custody		[Signature]	789	
	O	<input type="checkbox"/> Other				
	N	<input type="checkbox"/> Not Applicable				
Date Cleared Exceptional:						

# Caddo Parish Sheriff's Office

## Supplemental Report

2012 000 36175

Case Number

Victim #/ Name	Last	First	Middle	Date of Occurrence	Nature of Incident
	Caddo Parish Sheriff's Office			Aug. 11-Nov. 12	Investigation

### Narrative:

On 11/13/12, I (Det. Jared Marshall) began an investigation into 50 year old Johnny Loomis, d.o.b. 11/15/62, after chat messages were found on his work computer assigned to him by the Caddo Sheriff's Office. A search warrant was obtained and computers were seized from his residence where they were forensically examined.

On 11/13/12, I received a phone call from Capt. Nunnery of the Caddo Sheriff's Office. Capt. Nunnery told me that Caddo Parish Sheriff's technical resources personnel came across a Caddo Sheriff's Deputy's work computer which contained some disturbing chat messages. He said due to the nature and content of the chat messages, the computer would be handed over to me for further forensic analysis. I made my way back to the office and waited for Technical Resources personnel to bring the computer by. A short time later, Brian Wilson and Jeremy Thompson of Technical Resources arrived at the CID office with Johnny Loomis's work computer. I spoke briefly with Jeremy Thompson about how he came across the chat messages. According to Jeremy, he was monitoring the recently activated Barracuda Web filter on the network and came across a high volume of web traffic on Johnny Loomis's work computer in his office. Jeremy said the only thing he could see on the web traffic was that someone on Loomis's computer was actively involved in chatting. Jeremy did a remote log into Johnny Loomis's work computer through the Sheriff's Office network and saw several chat windows open. He said the chats mainly contained adult sexually themed conversations.

Jeremy told me later he did a remote log into Johnny Loomis's computer and found chat logs that contained very disturbing chat conversations that involved discussions about the sexual abuse of children. Jeremy did not look into the log files any further and notified Brian Wilson of the findings. From there the computer was turned over to me for further forensic analysis.

The computer given to me was the property of the Caddo Sheriff's Office and was assigned to Johnny Loomis who worked as a Probation and Parole Deputy in the Caddo Court House. The hard drive was removed from the computer and I used a forensic previewing tool to examine the contents of the drive. Dep. Loomis had installed on the computer "Yahoo Messenger". Yahoo Messenger gives the ability to create as many user names as the user would like under the e-mail extension of @yahoo.com. It also gives the ability for the user to enter chat rooms under Yahoo Messenger. In this case Dep. Loomis was entering a chat room called "Tops and Bottoms", which is an adult gay male themed chat room. The chat logs show that he has entered this chat room as far back as August 2011, under the user names of **cajun\_dad2008** and **twistedsubmom**. Loomis also had two other user names under messenger, **granny1937luvsmomsgirlsboys** and **penneypalmer**.

I came across the chat logs, which were located in a Yahoo Messenger folder under the sub folder of J.Loomis. In the Yahoo Messenger folder there was another folder called "Log". Inside this folder there were several .log files which contained contents of the chat messages that John engaged in while on the computer. I began to cipher through the files and saw very disturbing chat messages that were highly sexual in nature. Loomis primarily used **cajun\_dad2008** and **twistedsubmom** when talking with people in the chat rooms. Under these user names, Loomis was engaging in very disturbing chat conversations that were highly sexual in nature. The common theme of the conversations revolved around the sexual abuse, even rape of children as young as newborns. Loomis under the name of **twistedsubmom**, engaged in chat conversations as a female

persona, who talked about sexually abusing her four children since they were newborns. I did a full scan of the hard drive, but found no pornography on the computer, only the sexually explicit chat conversations.

On 11/14/12, myself and Lt. Hall went to John's house to speak with him about coming to the CID office for a statement. We arrived at 10082 Baldwin Court in Shreveport and made contact with John. John agreed to follow us to the CID office for a statement. When we arrived at the office, John was directed to the interview room. Prior to the interview, I read Loomis his Miranda Rights. Loomis signed that he understood his rights, but refused to give a statement upon the request of his attorney. The interview was stopped, with no statement given. Caddo Parish Internal Affairs Personnel arrived at the CID office to conduct their administrative investigation and John was interviewed by IA personnel.

While IA was conducting their interview, I began construction on a search warrant with the intent to search John Loomis's residence and vehicle. I finished the construction of the warrant and had it signed by the judge. Myself, Lt. Hall and Sgt. Jennings drove to Loomis's residence to execute the warrant. Loomis was not home when we arrived and was still with IA personnel finishing resignation paperwork. A short time later, Loomis arrived at his residence where we were waiting. We told Loomis of the search warrant and I began my search of the residence. I located in the home several digital storage devices, three of which were computers, one laptop and two desktops. One of the desktop computers was located in what Loomis described as his office and where the primary computer that he used. Also in the home, in the attic area another desktop computer was found that contained two hard drives. The other devices were a collection of flash drives and SD cards. All items were photographed and removed from the home and Loomis was given a search warrant return of the items listed that were taken.

I arrived back at the office, where I began my forensic analysis on the hard drives taken from Loomis's residence. I began the exam of the hard drive that was taken from the desktop computer in Loomis's office area. This computer was identified as Loomis's primary computer. I conducted a full scan of the hard drive using forensic previewing tools and found a great number of adult pornography images and videos. One video was flagged as being "notable" through NCMEC, as known child pornography. The file was a video and showed what appeared to be a white pubescent male giving oral sex to an adult white female on a bed. The video clip was approx. 1 minute in length and was located in a file that contained other adult pornography videos and images. I looked in an unallocated cluster of the hard drive, where deleted files go when they are deleted from the main partition. In the cluster of the hard drive, I found a deleted file that was labeled "8yo gets molested by clown (pthc)", "pthc" which stands for pre-teen hardcore. "pthc" is a keyword search on the internet for child pornography. The file was too bad fragmented and was unrecoverable for me to review.

I continued my search of the primary hard drive and came across Yahoo Messenger that Loomis had installed on the hard drive. In Loomis's chat logs, I came across much of the same type of chats Loomis engaged in on his work computer. All of his chats on Yahoo revolved around the talk of rape and sexual abuse of children as young as newborns. Loomis used the same screen names as he did at work. The search was complete of the primary hard drive.

Next, I searched two hard drives that were found in a computer in Loomis's attic. I conducted a full scan of both hard drives and only one came back with some adult pornography. The other hard drive appeared to be a backup hard drive and contained little to no data, so I focused my attention on the other hard drive. During the scan of the hard drive that contained the pornography, I came across a "shared folder" under Yahoo Messenger. Inside this folder I found 14 images of children, ranging from ages of 6 years of age to about 12. All of the children were fully clothed, but were bound up using various items, such as tape, rope, and handcuffs. Some of the pictures appeared to be staged or in a studio type setup. The other images appeared to show children in actual distress.

On 11/16/12, I scanned the laptop that was found in Kathryn Loomis's office, but found no data on the hard drive that was a cause for concern. I arranged for Kathryn to come pick up her computer. Kathryn arrived at



the CID office and some of the items that had no evidentiary value was released to her.

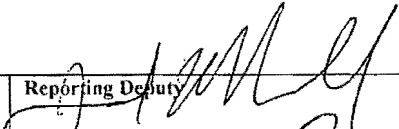
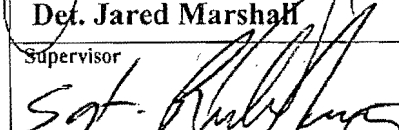
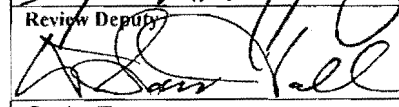
I took the images and ran the hash values through NCMEC, but received no hits. I e-mailed Megan Legg, a Senior Analyst for CVIP and NCMEC, and told her of the images I came across. She instructed me to e-mail the images to her and she would check to see if any of the images had any cases assigned to an agency. The pictures were sent through e-mail to Megan. I later received a report back from Megan which contained a report of what she was able to uncover. 3 out of the 14 images showed that some law enforcement agency has worked on cases involving those pictures. In the report it provided me with the local agency and the investigators name that worked on that case. At the time this report was written, I have not made contact with any of the investigators listed in the NCMEC report.

Due to the nature of the content that was found on Loomi's computer, it was decided to find out what children/family members John would have associated with and our interest in having those children forensically interviewed. I made contact with Debbie Chandler, who is John Loomis's sister, who lives in Dry Prong, LA. Debbie told me the only children John has ever associated with was her grandchildren, total of 7. She said 6 of them live with her daughter Jennifer Huges in Pearl River, LA and range from ages 1 to 14. The other child lives in Ball, LA and he is 11 years of age. Debbie gave me the phone numbers to the parents of those children.

I contacted Allen Chandler, who is the father of 11 year old [redacted]. I told Allen of our investigation and the Caddo Sheriff's Office interest in having [redacted] forensically interviewed. Allen told me that John Loomis has never been alone with his son and only sees John a couple of times out of the year during the holidays. He said his son is always in view of him and has never been alone with John. Allen did not want his son interviewed, but said he would contact me if he changed his mind.

Next, I contacted Jennifer Huges. I told Jennifer of the investigation and the Caddo Sheriff's Office interest in having her children forensically interviewed. Jennifer told me her children have never been alone with John and is confident John has never done anything to them. She said she would rather not have her children interviewed, but said she would contact me if she changed her mind.

At this time the Caddo Sheriff's Office is not pursuing criminal charges and Johnny Loomis resigned from the Caddo Sheriff's Office on 11/14/12.

<b>Disposition:</b> <input type="checkbox"/> Unfounded      A <input type="checkbox"/> Death Of Offender <input type="checkbox"/> Cleared By Arrest      B <input type="checkbox"/> Prosecution Denied <input checked="" type="checkbox"/> Pending      C <input type="checkbox"/> Extradition Denied <input type="checkbox"/> Administrative      D <input type="checkbox"/> Refused To Cooperate <input type="checkbox"/> Exceptional      E <input type="checkbox"/> Juvenile No Custody  <input type="checkbox"/> Other <input type="checkbox"/> Not Applicable  Date Cleared _____	Reporting Deputy  <b>Det. Jared Marshall</b>	Comm # <b>1619</b>	Date <b>11-20-12</b>
	Supervisor 	Comm # <b>525</b>	Date <b>11-26-12</b>
	Review Deputy 	Comm # <b>288</b>	Date <b>11/26/12</b>
	Copies To: <input type="checkbox"/> DA <input type="checkbox"/> IA <input type="checkbox"/> OCD <input type="checkbox"/> Coroner <input type="checkbox"/> CID <input type="checkbox"/> Juvenile Court <input type="checkbox"/> Other _____		

**Caddo Parish Sheriff's Office  
Supplemental Report**

ENTERED LDB 12-17-13  
2012 000 36175

Case Number

201200036175

Victim #1 Name Last First Middle Caddo Parish Sheriff's Office	Date of Occurrence Aug. 11-Nov. 12	Nature of Incident Investigation
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**Narrative:**

Page 1 of 1

On 12/16/13, I received word from the Caddo ADA's office that criminal prosecution on this case will be declined. The desktop computer and other hard drive taken as part of the search warrant was returned to Johnny Loomis on 12/16/13.

Case closed per Caddo ADA's office.

**Disposition:**

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Unfounded              | A | <input type="checkbox"/> Death Of Offender             |
| <input type="checkbox"/> Cleared By Arrest      | B | <input checked="" type="checkbox"/> Prosecution Denied |
| <input type="checkbox"/> Pending                | C | <input type="checkbox"/> Extradition Denied            |
| <input type="checkbox"/> Administrative         | D | <input type="checkbox"/> Refused To Cooperate          |
| <input checked="" type="checkbox"/> Exceptional | E | <input type="checkbox"/> Juvenile No Custody           |
|   | O | <input type="checkbox"/> Other                         |
|   | N | <input type="checkbox"/> Not Applicable                |

Date Cleared 12-17-13

Reported Deputy <i>[Signature]</i> Det. Jared Marshall	Comm # 1619	Date 12-17-13
Supervisor <i>[Signature]</i> Sgt. [Name]	Comm # 515	Date 12-17-13
Review Deputy <i>[Signature]</i> Det. [Name]	Comm # 209	Date 12/17/13

Copies To:

<input checked="" type="checkbox"/> DA	<input type="checkbox"/> IA	<input type="checkbox"/> OCD	<input type="checkbox"/> Coroner
<input checked="" type="checkbox"/> CID	<input type="checkbox"/> Juvenile Court	<input type="checkbox"/> Other _____	

*[Signature]*  
12-18-13

# **EXHIBIT 2**

# **EXHIBIT 2**

**February 19, 2024**

On or about March 2022, I contacted a representative via phone from the Omni Hotel in Dallas, Texas in reference to a w/m subject by the name of Johnny Loomis. Upon contact with the hotel representative, I advised the associate that,

I was a law enforcement officer in Louisiana and that I was recently contacted by Kirk Porter in reference to Mr. Loomis who was previously a Caddo Parish Sheriff's deputy in Shreveport, La.

I further advised that I was provided with a packet containing information on Loomis by the Caddo Parish District Attorney's Office. I also advised that the packet contained information related to evidence that led to Loomis leaving the Caddo Parish Sheriff's Department.

The information provided to me was in reference to allegations regarding inappropriate images of young girls wearing duct tape along with other graphic images. The DA's representative further explained that Loomis was found to be in possession of these images on his CSO computer as well as his home computer. The DA also provided me with a letter authored by the Sheriff directing the DA to refrain from prosecuting Loomis as the Sheriff chose to allow Loomis to resign.

In closing, I encouraged the hotel associate to review any computers owned by the hotel that may have been accessed by Loomis.

This is a true and accurate statement authored by me based upon information provided to me by seasoned law enforcement officials and the elected District Attorney at that time.

Sincerely,



George E. Hatfield  
Chief Deputy Constable Caddo Parish, La., Ward 7  
318.470.7059



# **EXHIBIT 3**

# **EXHIBIT 3**



# Corruption In Caddo Parish: The Truth Revealed



John Hampson · Follow

16 min read · Oct 26, 2015



72



2



*The Informer's* mission statement reads: “It is our mission to inform the public, closely examine controversial topics, ease social tensions, provide

accountability to our local leadership, and to be a powerful voice for the underrepresented.” In our magazine, we recently published a series of articles that cast the Caddo Parish Sheriff, Steve Prator, in a negative light. We were initially concerned about his continued ability to govern our community after several incidents came to our attention that we believed were worthy to report. After we began to investigate the claims we had read and heard about, it became very troublesome to continue as we faced increased threats and harassment from law enforcement and ardent supporters of the Caddo Parish Sheriff.

## **Covering up the crimes**



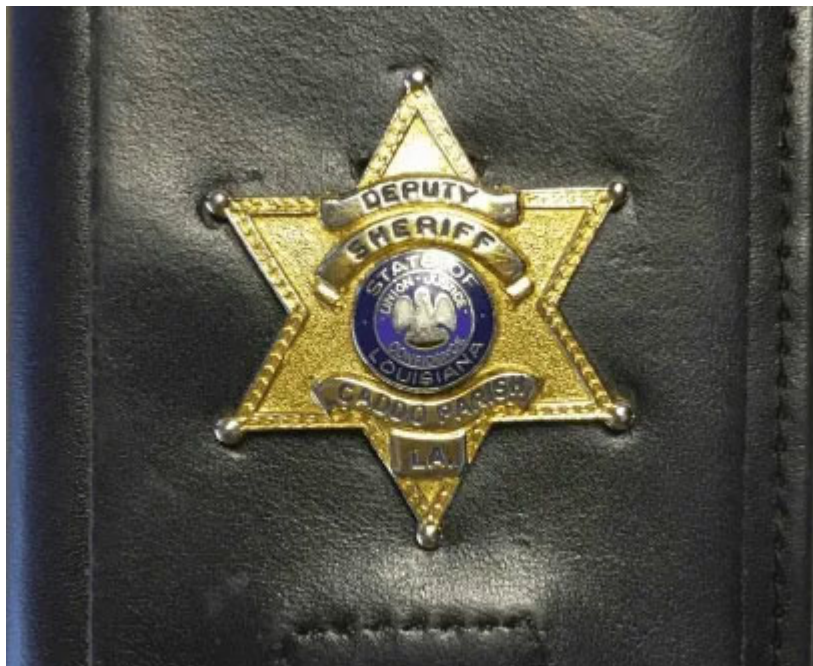
Former Deputy Johnny Loomis

The most recent of these articles addressed how Sheriff Prator covered the tracks of a staff member of the Sheriff’s Department who was caught viewing child pornography while at work. After incriminating chat messages were found on his work computer assigned to him by Caddo Sheriff’s Office, a

search warrant was obtained to investigate computers from his residence where they were forensically examined. The Sheriff was allegedly reluctant to provide the file documenting this incident, but another source was able to produce the incident reports upon request.

After review of the file, the District Attorney observed that the last lines of the report indicated that the Sheriff had advised that he did not wish to pursue any charges or prosecute the staff member. Coincidentally, the alleged pedophile, Johnny Loomis, resigned from his position the next day, and the “investigation” to this day remains open, as it has been, since the incident occurred in 2012. This individual is a threat to our community’s children, and he is now walking among us, free from consequence. “Tough on crime” apparently doesn’t apply to friends of Sheriff Prator, even when those friends could be sexual predators. *The Informer* asks for your help to make this case known so that it can be investigated by the proper federal agencies. Please help us in getting a pedophile off of our streets.

## Protecting the “Club”



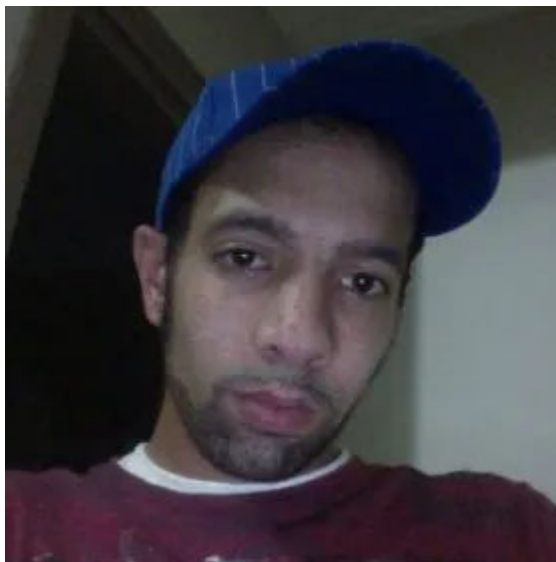
The fact that Caddo Sheriff Steve Prator let a child predator off the hook and suppressed the investigation is just the tip of the iceberg. This is a man who believes he is above the law and has demonstrated this attitude throughout his 4 term, 15 year reign over Caddo Parish (40 years if you include his four terms as Shreveport Police Chief). It is common knowledge that he lets his friends and those inside the "Caddo Club" off scot-free, when charged with, sometimes very, very serious crimes. Upon review of the "Caddo Club" list that comprised of over 330 individuals, it was noted that the recipients of these commissions are not post-certified, nor do they possess any formal law enforcement training. Some of these members advised that they were in fact solicited by Prator to purchase multiple badges, commissions, and wallet badges, at a cost of \$500 per commission.

Sheriff Prator has also been observed lying about the number of inmates at Caddo Correctional Center, as they have been cramming detainees into the facility for years in an overpopulated environment. When a routine check was done on the facility to ensure it was meeting adequate safety and health standards, inmates were placed onto buses and driven around the block several times until the investigators were leaving; however, they screwed up after they brought back at least one bus while the investigators were still at the facility, raising suspicion as to the true quality of care that these inmates and detainees receive while in Sheriff Prator's custody. Inmates have been crammed three to each cell, when conditions only allow for two inmates to be housed in each cell at this facility. Additionally, pre-trial detainees have historically been prevented from voting on election day in this facility, which is a blatant violation of their rights. Committee member Mr. Williams stated that "he is concerned with the opportunity for those pretrial inmates at CCC and their opportunity to vote, if they so desire."



## **Sheriff Prator has a public meltdown**

Our magazine gained a large readership base very quickly after our exclusive video of a political debate between the Caddo Sheriff candidates received widespread attention. Steve Prator was asked at the forum by an audience member why “*a young man was recently shot approximately 29 times by 3 different law enforcement agencies, and one of your deputies led the charge. Do you think this is appropriate, and if not, what disciplinary actions do you plan on taking to address this issue?*” The man who asked the question, our chief editor, knew the individual who was executed in the incident personally. Sheriff Steve Prator’s sealed court records were addressed, which were claimed to reveal that he choked his ex-wife and broke her arm in a domestic violence struggle, ending in their divorce.



Mohammed Ibrahim

We wrote a story prior to the debate, which caused a lot of undue outrage against the man who was murdered because of the way that local media portrayed the event. The Inquisitor even called the man who was killed an “urban terrorist” and echoed the loaded suspicions of news channels like KTBS and The Shreveport Times. The follow-up story that they did on the

incident's aftermath was much more somber. Our response was a clarified story after having contacted the family of Mr. Ibrahim and received exclusive interviews to the events that transpired, and have been in contact with several outside agencies that are willing to investigate the actual causes of this blatant oversight in authority.

No gun was ever found in Mohamed Ibrahim's possession, nor was there any evidence presented to validate the claims of his "crime spree" before being brutally executed and covered up by agencies involved. Mr. Ibrahim's body was even **stolen** *during his funeral* because the Caddo Sheriff's Department claimed that the "x-rays were blurry," but Ibrahim's father, who is a doctor, knows that an autopsy would never produce an x-ray that was too blurry to identify the cause of death in a shooting or blunt trauma. The Council on American-Islamic Relations has worked closely with the Ibrahim family and our organization to provide justice for the man who was slain by Caddo Sheriff's deputies and other local law enforcement agencies. National media outlets have been very interested in our story, and have reached out to us for further direction on how to make light of this situation.

## **Getting the "run around"**

In trying to find the documents that would prove true or false the allegations that were made at the forum, we encountered confusing and evasive responses from clerks and Caddo Sheriff's Office staff. Many staff members later shared their grievances with us privately or often confirmed our suspicions when we mentioned it, and were glad to support our cause. Every time we have interacted with the Sheriff's Department about public information requests or to receive insight about an issue, we were denied access; additionally, an elevated threat by intimidation was a common response to our questions. Sheriff deputies were commonly seen patrolling the private road that *The Informer's* office is located on. In no instance were

they able to supply evidence of a crime taking place or reasonable suspicion that there were any strange behaviors occurring at the property to justify their presence, but they wanted us to know that they were there, and they wanted us to stop asking questions.

In the Caddo Sheriff's debate at Broadmoor Presbyterian Church on September 29, Sheriff Steve Prator continued his aggressive rhetoric by ridiculing the process of due process in law enforcement, along with flipping off the District Attorney's office in front of the public. He has shown a blatant disregard for the quality of communication between his department and the citizens of Caddo Parish, and we believe it is a grave mistake to ignore this in the face of so much compelling evidence. Sheriff Prator also stripped Caddo District Attorney investigators of their commissions several months ago as well. It is no secret that Sheriff Steve Prator relentlessly attacked former Caddo District Attorney Charles Scott on a regular basis, and for no justifiable reason. In fact, Charles Scott was in Baton Rouge, working with the legislature to recover the commissions for his investigators, at the time that he passed away.





Sheriff Steve Prator Gives The Finger To Prosecutors And DA

## **Intimidating the Press**

Sheriff Steve Prator has also been known in the past to target and harass those who oppose him. The most recent case is happening right now, involving our chief editor, Joe Carstensen. To give a little back story, it is important to note that Joe wrote an article for our magazine titled “Questions for Steve Prator,” which said that: “like many other people in my generation, I find it hard to view law enforcement as entirely ‘good.’ This is not because we dislike police — it is because we dislike being treated with cruelty and indignity by police, who in doing so break the law that they are sworn to uphold. You, and others like you, make a mockery of the honor for which law enforcement is supposed to stand. I respect the badge you wear on your chest more than I respect the man behind it.”

Shortly after that story was published, the Sheriff’s department increased its harassment of our staff significantly, especially Joe. They reopened a minor

seat belt ticket charge from 2007 (one which initially listed his name incorrectly as “Joseph Cartensen”), they have issued a bench warrant for the unpaid tickets, and they are actively hunting Joseph in order to arrest him. On the Monday following the Primary Election, the Caddo Sheriff’s Department sent 3 unmarked Caddo Sheriff’s Office “warrant division” cars to his house, another 3 to The Informer’s office, and 1 to his father’s shop — all taking place within an hour of each other. This search was announced by Sheriff Steve Prator on television immediately after the election results came in Saturday evening, stating that “first thing Monday morning” he was “going to put some individuals in jail.” Currently, there is an ongoing manhunt for our chief editor over the minor seat belt violation from 2007. Sheriff Steve Prator will attempt anything in his power in order to silence this man, and to “bring him to justice” with his “tough on crime” policy. When individuals have spoken out against the Sheriff, they have been harassed and intimidated, becoming fearful for their lives and often flee the area or go into hiding.



**Active Warrant Details - #2007001703**

Warrant Date: 04/17/2007

**CARSTENSEN, JOSEPH HOWARD**

SHREVEPORT, LA 71104

DOB: 03/30/1986 Race: W Sex: M

Warrant Category: **Regular**

Warrant Type: **Bench Warrant**

Issuing Agency: **LA009DIST**

Zip Code: **71104**

Extradite?: **No**

National Warrant#:

Seq#	Offense	Offense Description	Bond Amount
1	32:295.1	SAFETY BELT USE	\$0.00

## Suspicious of Voter Fraud



Sequoia AVC Advantage voting machines

Sheriff Steve Prator recently ran and won for his **fifth** term as Caddo Parish Sheriff, after having served **four** consecutive terms as Shreveport Police Chief. The lack of term limits and limitations on cross-governmental candidacy encourages elected officials to focus on maintaining their power, influence, and bottom line. We have been battered by exclusionary political elitism for too long, and it is time to reclaim our power and remind them who they *really* work for.

A report conducted on the Sequoia AVC Advantage voting machines in New Jersey (which are also used in Caddo Parish, Louisiana), disclosed that these voting machines are known to be easy to tamper with. The report claims that, “*these machines are vulnerable to a wide variety of attacks on the voting process. It would not be in the slightest difficult for a moderately determined group or individual to mount a vote-stealing attack that would be successful and undetectable.*” We studied the information that was provided by the election

committee on the night of the Primary Election in Caddo Parish and found numerous strange occurrences in various precincts that were known to vote in entirely different patterns in most every election according to past records. These machines have been known to cause errors on a large scale in past elections as well, and there should be public outcry over the fact that these machines do not allow voter verification.

The report on investigations in New Jersey voting fraud using identical machines notes that “the plaintiffs argued that the use of DRE voting machines is **illegal and unconstitutional**: illegal, because they violate New Jersey election laws requiring that all votes be counted accurately and that voting machines be thoroughly tested, accurate, and reliable; and unconstitutional, because they violate the New Jersey constitution’s requirement that all votes count.” An expert witnesses concluded that, “there is a reason to believe that New Jersey election officials have destroyed evidence in a pending court case, perhaps to cover up the noncompliance with these measures or to cover up irregularities in this election. There is enough evidence of a cover-up that a Superior Court judge has referred the matter to the State prosecutor’s office.” Reports have been filed by concerned parties which were supposed to receive direct access to test the machines, but they were curiously “already set” *2 weeks prior to the actual election*. It is very strange that the election results appeared to be largely inaccurate when compared to voting habits in previous elections, as well as when compared with the vote tallies of the other candidates running for offices in city and statewide elections.

## **Rotten to the core**

Due to Sheriff Prator’s “missing” public records, control of the ‘Caddo Club’, and history of public intimidation, our investigations led us to find allegations of: sexual harassment, abuse of power, drinking and driving,



public intimidation, domestic abuse and battery, nepotism, electioneering, tampering with electronic ballot machines, racketeering, money laundering, among other serious white-collar crimes. We started our magazine to inform the public of what we felt was not being addressed by our leaders and local media outlets who should be held responsible for failing to seek the truth in such trying circumstances as we have set out to do. Our introduction states that, “first and foremost, our goal is to get people involved in their community. All problems get worse if you ignore them, and when it comes to social issues, don’t expect leaders to do the right thing if no one is watching.” When we faced resistance from those who were expected to work to protect us, it became clear that few else *were watching*, since all of this was happening in the public eye and discussed openly.

We have witnessed so many first hand accounts of the fallout affecting families after being arrested or incarcerated in the parish jail and later being released with small non-violent offenses, false charges, or no charges at all. The attorneys, judges and law enforcement agencies have been seen to commit injustice as policy and should be audited by a citizen’s review board or other committee to inquire the source of the problem when it has remained so widespread for such a long time. The City Tele-Coin system, operated by friends of Sheriff Steve Prator, has been gouging inmates and detainees for years, and they make regular contributions to those who will help keep their system in place. A key decision by the Federal Communications Commission to set rates for all telephone calls from jails and prisons across America is the right move for Louisiana, according to Public Service Commissioner Foster Campbell. “This FCC decision will affect Louisiana more than any other state, because we incarcerate more people per capita than any place on Earth. It will mean fair and just treatment for the families accepting calls from 40,000 inmates in state and local jails.”

## A growing (bad) reputation for Caddo Parish



Interim Caddo District Attorney Dale Cox

Caddo Parish has been observed nationally, and often globally, in a horrible light as a bottom-end statistic of how far injustice *can* go. CBSNews recently aired on their '60 Minutes' program about Glenn Ford and his 30 years in death row after being convicted in Shreveport in 1983. New York Times, Washington Post, The New Yorker, and other media outlets have run lengthy articles about the harshness of “tough on crime” law enforcement in a community, and they don't understand it. Dale Cox, the interim District Attorney of Caddo Parish, is personally responsible for over one third of the death penalty cases that have been tried in the state of Louisiana's long history. Not long ago, two Caddo Judges were charged with corruption for accepting bribes for prosecuting juveniles, and just last year, former Bossier Sheriff Larry Deen was indicted on criminal conspiracy charges after a vehicle purchase scheme was conducted. Somehow, many people of Caddo Parish seem largely unaware that these activities have been taking place for years, and at this point they almost never care until they are the ones who

have been targeted by local law enforcement agencies. When negative publicity affects the community's response to injustice in the District Attorney's office, why isn't more attention paid to those the law enforcement which conducts illegal or unjust practices in order to prosecute for profit?



Billionaire George Soros

Some media attention was driven by billionaire George Soros' substantial contribution of \$256,000 to the Louisiana Safety & Justice Super-PAC located in adjoining Bossier Parish. A second contribution quickly followed, adding \$150,000 to the now \$406,000 total available to James Stewart's campaign for Caddo District Attorney. The enormous amount of money available to a single candidate in the race caused a confused public outcry that ranged from excited to fearful, along with a public protest from the other candidates for District Attorney. Political analyst Elliot Stonecipher agrees that "we want to understand not only why it is happening, but how the money will be used to elect the identified recipient of the Soros windfall, D.A. candidate and former 2nd Circuit Court of Appeal Judge James Stewart." Many believe, without evidence, that this contribution will help James Stewart become elected in November's General Election, and that he will solve all of the

problems of racial injustice and inadequate treatment of suspected criminals and inmates in Caddo Parish after having received a lot of negative national publicity over use of the death penalty. Both James Stewart and Dhu Thompson support the death penalty in certain instances, so it is unlikely that there will be much change after the decision is made and Dale Cox is replaced. These beliefs are illusions, and it doesn't take a genius to figure out that the Soros connection is a bad omen for the future of our community. If the recent election for Caddo Parish Sheriff could be "fixed," then what will become of the runoff election for District Attorney?

## **The community gets involved**

*The Informer* received so much positive feedback from informed citizens that *already knew* about the injustices of the court system and were willing to support our efforts in a way that showed us it was a clear and present danger to the community. One commenter told us: *"the young people today are quite right in demanding accountability from law enforcement and government. My generation, and prior generations failed to hold them to higher standards. The result is what you see today. We, the people are responsible for saying what the laws are, and 'authorities' are supposed to answer to us! That is what it means to be American! Don't blame the young ones for standing up where we failed to."* We accepted that challenge, and want nothing more than accountability for our government officials, elected or appointed, because that's what is to be expected when justice is managed with a sound mind and fair judgment. You can't solve problems in the community by working to destroy the freedom of families and interrupting the lives of non-violent offenders, and we've seen the results of this long enough to know it doesn't work as it has impacted our community for years.

We have faced harsh scrutiny and criticism from other local media outlets and the supporters of Sheriff Steve Prator, it has been an exercise in personal



safety to conduct any and all types of investigation in these matters. There were at least 4 or 5 Caddo Parish Sheriff's Office patrol and undercover vehicles on our road every day. Sometimes, they would drive to the end of the road very slowly, then turn around and drive out. Sometimes, they would sit in neighboring parking lots and watch our building, even taking photographs on occasion. We have also received numerous unwarranted visits from many unmarked vehicles driven by officers from different law enforcement agencies (including the leader of Louisiana State Police Troop G). We began taking pictures of all of these cars so that we could have evidence for an intimidation lawsuit, and to corroborate our story with others who couldn't believe what we had witnessed. When one of these unmarked cars saw us with cameras, they recklessly flew down the road to get out of view. We also began backing into our parking spots to make it more difficult for them to see our license plates and monitor who came and went.

## **So, what happens next?**

Some of the opinions that we expressed were enough to inspire hatred from local authorities and supporters of law enforcement, particularly when our articles were written about the police. The potential of retaliation for these opinions kept our names from the first few issues. Our concerns proved to be justified. All of our phones started behaving strangely, and almost everyone we spoke to on the phone would call us back and tell us that their phones started doing the same after speaking with us. We also began to be followed almost everywhere we went. We predicted that we would catch heat for calling out corrupt officials and their media mouthpieces, for trying to end the stigma that certain illegal substances have received due to pharmaceutical industry brainwashing, and for trying to inform citizens of their constitutional rights in the face of powers that are trying to take them away. We knew that our constitutional rights would be challenged by the

authority figures that were used to having things their way, without opposition. Our predictions proved to be true.

We have, until now, remained mostly anonymous in order to protect ourselves and our families from people who have proven that they will break the law in order to maintain their power. These people have much of the criminal justice system on their side because they all make a living through the legal system. *Of course* they don't want to have fewer people locked up, they profit from the system staying exactly how it is. The federal government pays Caddo \$55 for each inmate per day, spending only \$3.50 per inmate per day for the sheriff's office to house inmates. Every day that injustices are carried out against the citizens of Caddo Parish is another day we lose in trying to restore our community to a condition that works for them. For many years, citizens have worked tirelessly to improve their city's well-being, and their efforts are repeatedly ignored or destroyed by harmful practices by law enforcement and administrators who break the law. **What would you have done if the sheriff in your area were accused of abusing their position of authority in order to protect criminal interests, while at the same time imposing harsh penalties for minor offenders and covering up misconduct within their own office?**



Justice for Caddo Parish

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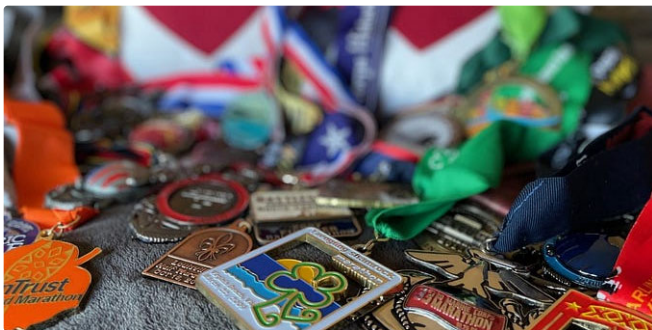
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