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CIVIL
DISTRICT COURT

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

Case No. **2025-07954** STATE OF LOUISIANA

DIVISION **"B" - 11**

EMANUEL SMITH, JR.

VERSUS

WILLIAM M. HAMMACK, SR. and LEADERSHIP MATTERS, PAC

FILED

DEPUTY CLERK

**PETITION FOR PRELIMINARY AND PERMANENT INJUNCTION
AND ATTORNEY FEES**

NOW INTO COURT, through undersigned counsel, comes Emanuel Smith, Jr., who, pursuant to Louisiana Revised Statute §18:1463, seeks a preliminary and permanent injunction against William M. Hammack, Sr. and Leadership Matters PAC for the following reasons to-wit:

PARTIES

1.

Plaintiff, Emanuel Smith, Jr., is a person of the full age of majority, domiciled in the State of Louisiana and Parish of Orleans, and is a registered voter in Orleans Parish.

2.

Made Defendant herein is William M. Hammack, Sr., (aka "Bill Hammack"), who is a person of the full age of majority, domiciled in and a resident of the Parish of Orleans.

3.

Made additional Defendant herein is Leadership Matters PAC, a political committee registered with the Louisiana Supervisory Committee on Campaign Finance Disclosure pursuant to La. R.S. 18:1481 et seq., with its principal place of business in the Parish of Orleans, State of Louisiana.

JURISDICTION AND VENUE

4.

This Court has jurisdiction over all persons sued here pursuant to Louisiana Code of Civil Procedure, Article 6, as all parties have submitted to the jurisdiction of this Court by virtue of transacting and performing business within the jurisdictional limits of this Court.

5.

This Court has jurisdiction over all claims brought here as the subject matter of this action, pursuant to Louisiana Code of Civil Procedure art. 3601, et seq., is within the legal power and authority of this Court to hear and adjudicate.

6.

Venue is proper in this Court pursuant to Louisiana Code of Civil Procedure, Article 42 and Article 74, as: (a) William M. Hammack, Sr., is domiciled in and a resident of the Parish of Orleans; (b) Leadership Matters PAC has its principal business establishment in the Parish of Orleans; and (c) the wrongful conduct complained of and/or threatened took place in the Parish of Orleans.

BACKGROUND FACTS

7.

The primary election for the Office of Mayor of the City of New Orleans is scheduled to take place on October 11, 2025.

8.

Plaintiff is a registered voter in the City of New Orleans and intends to vote in the primary election on October 11, 2025.

9.

One of the candidates running for the Mayor of the City of New Orleans in the October 11, 2025 election is Helena Moreno.

10.

Defendant, Leadership Matters PAC (hereinafter "LMPAC") supports Helena Moreno in her bid to become elected the Mayor of the City of New Orleans in the October 11, 2025 election.¹

11.

Defendant, William M. Hammack, Sr., (a/k/a and hereinafter "Bill Hammack") is the organizer and/or member and/or contributor to LMPAC.

¹ See Leadership Matters PAC's July 14, 2025 Committee Report @ Pg. 2, attached hereto as Exhibit "A."

12.

State Senator Royce Duplessis is also a candidate running for Mayor of the City of New Orleans in the October 11, 2025 election.

13.

On or about Tuesday, August 5, 2025, Bill Hammack sent an email to David Huynh, and inadvertently to Royce Duplessis, stating the following:

----- Forwarded message -----

From: Bill Hammack <hammack@hammackjones.com>

Date: Tue, Aug 5, 2025 at 5:29 PM

Subject: Please do a quick review and give me your feedback.

To: David Huynh <dave@davehuynh.com>, Royce Duplessis <royce@duplessislawfirm.com>

A couple of points first:

1. We don't know if this push poll is from Royce, although we believe it is. Therefore I don't say it's from him but I do say Royce's camp as a pattern of fabrication.
2. Should we leave the "white devil" P.S.? At some point I'm going to convey it...but it could be part of a future message.
3. Talking to Helena today I think there may be some confusion caused by our poll and this one being out at the same time. Several people have told the campaign they have been part of two polls, both of which had negative comments about Moreno.
4. Should we share this with Silas before sending. Currently, my audience is "only" those who have contributed.

Bill

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14.

The email was forwarding a draft of an email Bill Hammack proposed to send initially to LMPAC contributors (hereinafter "Draft LMPAC Email.")

15.

The Draft LMPAC Email purports to cast aspersions on the Committee to Elect Royce Duplessis and by association Candidate Royce Duplessis.

16.

In the P.S. section of the Draft LMPAC Email, Bill Hammack states the following:

P.S. One of Royce's senior campaign staff members this week referred to Helena as "a white devil"! The rich white men around her are also "white devils"! Sad...but I've been called worse!

3

17.

Two hours later, Bill Hammack, on behalf of LMPAC, sent the final email to contributors to LMPAC wherein he purports to cast dispersions on the Committee to Elect Royce Duplessis and Candidate Royce Duplessis stating they participate in "a pattern of fabrication."

² See Hammack email to David Huynh dated August 5, 2025, attached hereto as Exhibit "B."

³ *Id.* at Pg. 3.

18.

While the final email did not include the P.S. section which includes the “white devil” allegations, in Bill Hammack’s email to David Huynh, he indicated the following:

2. Should we leave the “white devil” P.S.? At some point I’m going to convey it...but it could be part of a future message.

4

19.

It is clear that Defendants plan to race-bait LMPAC contributors in particular and the electorate in general against Candidate Royce Duplessis by making the patently and demonstrably false statement that:

P.S. One of Royce's senior campaign staff members this week referred to Helena as "a white devil"! The rich white men around her are also "white devils"! Sad...but I've been called worse!

5

20.

Plaintiff is familiar with the Committee to Elect Royce Duplessis and has seen the emails forwarded by Bill Hammack over the internet and reasonably believes that said allegations are false.

21.

Defendants know or should be reasonably expected to know that the statements are false and fraudulent, but plan to use the statement for the sole purpose of race-baiting the electorate.

BASIS FOR INJUNCTIVE RELIEF

22.

Louisiana Revised Statute §18:1463(A) reads, in pertinent part, as follows:

The Legislature of Louisiana finds that the state has a compelling interest in taking every necessary step to assure that all elections are held in a fair and ethical manner and finds that an election cannot be held in a fair and ethical manner when any candidate or other person is allowed to ... publish statements that make scurrilous, false, or irresponsible adverse comments about a candidate or a proposition.

23.

Accordingly, Louisiana Revised Statute §18:1463(C)(1) establishes parameters for publishers of material, stating, in pertinent part:

No person shall cause to be distributed, or transmitted, any oral, visual, digital, or written material containing any statement which he knows or should be reasonably expected to know makes a false statement about a candidate

⁴ *Supra* Note 2.

⁵ *Supra* Note 3.

for election in a primary or general election or about a proposition to be submitted to the voters.

24.

Louisiana Revised Statute Section §18:1463(D)(1) provides a remedy for a candidate or voter for a violation of Section (C)(1), stating:

An affected candidate or voter shall be entitled to an injunction to restrain future violations of Subsections B and C of this Section.

25.

Plaintiff, as a registered voter in the City of New Orleans who intends to vote in the primary election on October 11, 2025, is entitled to request an injunction to restrain Defendants from purposefully participating in the fabricated race-baiting of sending out a written publication, via email or otherwise, accusing Royce Duplessis, through association, of calling Helena Moreno or those who support her white devils, in an attempt to cast Candidate Royce Duplessis in a bad light for the purpose of gaining an unjust and unwarranted advantage in the election.

26.

The false accusations interfere with and impede Plaintiff's rights as a voter, which include Plaintiff's right to have the upcoming election to be held in a fair, free, and ethical manner, and Plaintiff's (as well as other voters') right to receive truthful and accurate information about the candidates for the office of the Mayor of the City of New Orleans so that they will be fully informed and able to exercise their constitutional right to vote for a candidate of their choice.

RIGHT TO ATTORNEY FEES

27.

Louisiana Revised Statute Section §18:1463(D)(2) provides fee shifting in the event that a permanent injunction is granted, stating:

In the event a permanent injunction is granted, reasonable attorney fees shall be allowed the petitioner by the court which shall be taxed as costs to be paid by the defendant.

28.

As Defendants' planned action is in clear violation of Louisiana Revised Statute Section §18:1463(C)(1), Plaintiff is entitled to a permanent injunction and attorney's fees in connection therewith.

BASIS FOR EXPEDITED CONSIDERATION

29.

Pursuant to La.C.C.P. art. 3602, the hearing on the Plaintiff's request for Preliminary Injunction shall be assigned for hearing not less than two nor more than ten days after service of notice given to the opposing party.

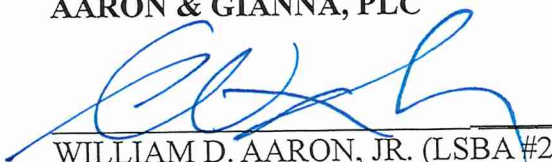
PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that, after due proceedings are conducted, judgment be rendered in Plaintiff's favor and against Defendants, William M. Hammack, Sr. and Leadership Matters PAC, who are jointly liable to the Plaintiff, in the following respects:

- (1) Ordering the Defendants to show cause on a day and at an hour to be fixed by this court, why a preliminary injunction should not be issued prohibiting the Defendants from purposefully participating in the fabricated race-baiting of sending out a written publication, via email or otherwise, accusing Royce Duplessis, through association, of calling Helana Moreno or those who support her white devils;
- (2) Granting a permanent injunction in the same form and substance as the requested preliminary injunction;
- (3) Awarding the Plaintiff all reasonable attorney fees necessitated to bring this petition and achieve an permanent injunction order and all costs of court; and
- (4) All other general and equitable relief this Court deems proper.

Respectfully submitted,

AARON & GIANNA, PLC



WILLIAM D. AARON, JR. (LSBA #2267) T.A.
DeWAYNE L. WILLIAMS (LSBA #27685)
201 St. Charles Avenue, Suite 3800
New Orleans, Louisiana 70101
Telephone: (504) 569-1800
Facsimile: (504) 569-1801
Email: waaron@aarongianna.com
dwilliams@aarongianna.com

**ATTORNEYS FOR PETITIONER,
EMANUEL SMITH, JR.**

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

Case No.

DIVISION “ ”

EMANUEL SMITH, JR.

VERSUS

WILLIAM M. HAMMACK, SR. and LEADERSHIP MATTERS, PAC

FILED

DEPUTY CLERK

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

BEFORE ME, the undersigned Notary Public, duly commissioned and qualified in and for the County aforesaid, personally came and appeared:

EMANUEL SMITH, JR.

who, being first duly sworn, did depose and say that he is the Petitioner in the above referenced matter, and that all of the allegations made in the foregoing Petition are true and correct to the best of my knowledge, information, and belief.


EMANUEL SMITH, JR.

SWORN TO AND SUBSCRIBED
BEFORE ME, NOTARY, THIS
15TH DAY OF AUGUST,
2025.



WILLIAM D. AARON, JR.
NOTARY PUBLIC
State of Louisiana
La. Bar No. 2267
My Commission is issued for Life

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

Case No.

DIVISION “ ”

EMANUEL SMITH, JR.

VERSUS

WILLIAM M. HAMMACK, SR. and LEADERSHIP MATTERS, PAC

FILED

DEPUTY CLERK

ORDER AND RULE TO SHOW CAUSE

CONSIDERING THE FOREGOING MOTION,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendants, William M. Hammack, Sr. and Leadership Matters PAC, appear through their counsel and show cause on the 27th day of August, 2025 at 2:00 o'clock p.m., why a Preliminary Injunction should not be granted as prayed for.

New Orleans, Louisiana this _____ day of AUG 15 2025, 2025.

JUDGE

Lori Jupiter (as duty Judge)
Judge Lori Jupiter

PLEASE SERVE:

William M. Hammack, Sr.
717 Girod Street
New Orleans, LA 70130

Leadership Matters PAC
Through its Chairperson
Laverne Toombs
5500 Prytania Street #305
New Orleans, LA 70115

A TRUE COPY

[Signature]
DEPUTY CLERK - MINUTE CLERK
CLERK OF CIVIL DISTRICT COURT
PARISH OF ORLEANS, STATE OF LA

COMMITTEE'S REPORT

(filed by committees that support or oppose one or more candidates and/or propositions and that are not candidate committees)

1. Full Name and Address of Political Committee

LEADERSHIP MATTERS PAC
5500 Prytania St, #305
New Orleans, LA 70115

OFFICE USE ONLY

Report Number: 128250
Date Filed: 7/14/2025

Report Includes Schedules:
Schedule A-1
Schedule E-1



2. Date of Primary

10/11/2025

This report covers from 4/5/2025 through 7/3/2025

3. Type of Report:

- X

180th day prior to primary

90th day prior to primary

30th day prior to primary

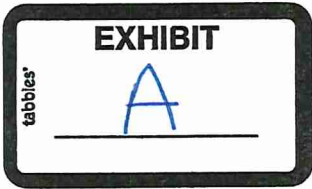
10th day prior to primary

10th day prior to general
- 40th day after general

Annual (future election)

Monthly

Amendment to prior



4. All Committee Officers (including Chairperson, Treasurer, if any, and any other committee officers)

a. Name	b. Position	c. Address
LAVERNE TOOMBS	Chairperson	5500 Prytania St #305 New Orleans, LA 70115
JORGE BADILLO	Treasurer	5500 Pyrtania St #305 New Orleans, LA 70115

5. Candidates or Propositions the Committee is Supporting or Opposing (use additional sheets if necessary)

a. Name & Address of Candidate/Description of Proposition	b. Office Sought	c. Political Party	d. Support/Oppose
On attached sheet			

6. Is the Committee supporting the entire ticket of a political party? Yes No X If "yes", which party?

7. a. Name of Person Preparing Report COMPLIANCE JULIA MANCINI
b. Daytime Telephone 928-310-1112

8. WE HEREBY CERTIFY that the information contained in this report and the attached schedules is true and correct to the best of our knowledge , information and belief, and that no expenditures have been made nor contributions received that have not been reported herein, and that no information required to be reported by the Louisiana Campaign Finance Disclosure Act has been deliberately omitted .

This 14th day of July, 2025 .

LaVerne Toombs
Signature of Committee/Chairperson

504-957-8141
Daytime Telephone

Jorge Badillo
Signature of Committee Treasurer, if any

480-375-5363
Daytime Telephone

5. Candidates or Propositions the Committee is Supporting or Opposing (use additional sheets if necessary)

a. Name & Address of Candidate/Description of Proposition	b. Office Sought	c. Political Party	d. Support/Oppose
HELENA MORENO P.O. Box 15155 New Orleans, LA 70175	Mayor	Democratic	Support

SUMMARY PAGE

RECEIPTS	This Period
1. Contributions (Schedule A-1)	\$ 148,250.00
2. In-kind Contributions (Schedule A-2)	\$ 0.00
3a. Campaign paraphernalia sales of \$25 or less	\$ 0.00
3b. Raffle ticket sales of \$25 or less	\$ 0.00
4. TOTAL CONTRIBUTIONS (Lines 1 + 2 +3a + 3b)	\$ 148,250.00
5. Other Receipts (Schedule A-3)	\$ 0.00
6. Loans Received (Schedule B)	\$ 0.00
7. Loan Repayments Received (Schedule D)	\$ 0.00
8. TOTAL RECEIPTS (Lines 4 + 5 + 6 + 7)	\$ 148,250.00

DISBURSEMENTS	This Period
9. General Expenditures (Schedule E-1)	\$ 16,764.51
10. In-Kind Expenditures (Schedule E-2)	\$ 0.00
11. Contributions made to Candidates (Schedule E-3)	\$ 0.00
12. TOTAL EXPENDITURES (Lines 9 + 10 + 11)	\$ 16,764.51
13. Other Disbursements (Schedule E-4)	\$ 0.00
14. Loan Repayments Made (Schedule B)	\$ 0.00
15. Funds Loaned (Schedule D)	\$ 0.00
16. TOTAL DISBURSEMENTS (Lines 12 + 13 + 14 + 15)	\$ 16,764.51

FINANCIAL SUMMARY	Amount
17. Funds on hand at beginning of reporting period (Must equal funds on hand at close from last report or -0- if first report for this committee)	\$ 14,996.83
18. Plus total receipts this period (less in-kind contributions received) (Line 8 above minus line 2 above)	\$ 148,250.00
19. Less total disbursements this period (less in-kind expenditures) (Line 16 above minus line 10 above)	\$ 16,764.51
20. Funds on hand at close of reporting period	\$ 146,482.32

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SUMMARY PAGE (continued)

INVESTMENTS	Amount
21. Of funds on hand at beginning of reporting period (Line 17, above), amount held in investments (<i>i.e.</i> , savings accounts, CD's, money market funds, etc.)	\$ 0.00
22. Of funds on hand at close of reporting period (Line 20, above), amount held in investments	\$ 0.00

SPECIAL TRANSACTIONS	This Period
23. Contributions received from political committees (From Schedules A-1 and A-2)	\$ 0.00
24. All proceeds from the sale of tickets to fundraising events (Receipts from the sale of tickets are contributions and must also be reported on Schedule A-1)	\$ 0.00
25a. Proceeds from the sale of campaign paraphernalia (Total receipts from the sale of campaign paraphernalia are reported on Schedule A-1 or Line 3a above)	\$ 0.00
25b. Proceeds from the sale of raffle tickets (Total receipts from the sale of raffle tickets are reported on Schedule A-1 or Line 3b above)	\$ 0.00
26. Expenditures from petty cash fund (Must also be reported on Schedule E-1)	\$ 0.00

NOTICE
A political committee must register in each calendar year in which it will have over \$500 of financial activity. The registration is accomplished by filing a Statement of Organization form and paying the \$100 filing fee. Statements of Organization are filed annually by January 31. Any committee which realizes that it will have over \$500 of financial activity after January 31 must register within ten days of its realization of that fact. However, if this occurs during the ten day period prior to an election the Statement of Organization must be filed within three days. Political committees must file reports of receipts and disbursements on an annual basis. Annual reports are due by February 15 and should cover the preceding calendar year. Also, committees must file reports of receipts and disbursements on the same schedule as the candidates it supports or opposes. Reports are also due in connection with propositions (ballot issues) the committee supports or opposes. Schedules of reporting and filing dates for all elections are available from the Campaign Finance Office.

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SCHEDULE A-1: CONTRIBUTIONS (Other than In-Kind Contributions)			
The following information must be provided for all contributions received by the committee during this reporting period, except for in-kind contributions, whether received from a political committee or some other person or entity. Contributions made by the committee are reported on SCHEDULE E-3: CONTRIBUTIONS MADE TO CANDIDATES. Information on in-kind contributions is reported on SCHEDULE A-2: IN-KIND CONTRIBUTIONS. In Column 1, check "yes" if the contributor is a political committee and "no" if not. For anonymous contributions, see SCHEDULE F. Totals and subtotals at bottom of the page are <i>optional</i> . Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.			
1. Name and Address of Contributor	2. Contributions this Reporting Period		3. Total this Year
	a. Date(s)	b. Amount(s)	
BLAKE JONES LAW FIRM, LLC 701 Poydras St Ste 4100 New Orleans, LA 70139 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$10,000.00	\$10,000.00
CARMOUCHE AND ASSOCIATES, LLC 17405 Perkins Rd Baton Rouge, LA 70810 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	06/06/2025	\$100,000.00	\$100,000.00
HENRY L COAXUM, JR 231 Harbor Circle New Orleans, LA 70126 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$250.00	\$250.00
DAVID HUYNH LLC PO BOX 677 PEPEEKEO, HI 96783 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$1,000.00	\$1,000.00
MARK ELAMM 1201 Governor Nicholls New Orleans, LA 70116 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$100.00	\$100.00
DARLENE FABER 2531 Ursulines Ave New Orleans, LA 70119 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$100.00	\$100.00
4. SUBTOTAL (this page)		\$ 111,450.00	N/A
5. TOTAL (complete only on last page of this schedule)			N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES ONLY:			
SUBTOTAL (this page) _____ \$ 0.00		TOTAL (complete only on last page of this schedule) _____	

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SCHEDULE A-1: CONTRIBUTIONS (Other than In-Kind Contributions)			
The following information must be provided for all contributions received by the committee during this reporting period, except for in-kind contributions, whether received from a political committee or some other person or entity. Contributions made by the committee are reported on SCHEDULE E-3: CONTRIBUTIONS MADE TO CANDIDATES. Information on in-kind contributions is reported on SCHEDULE A-2: IN-KIND CONTRIBUTIONS. In Column 1, check "yes" if the contributor is a political committee and "no" if not. For anonymous contributions, see SCHEDULE F. Totals and subtotals at bottom of the page are <i>optional</i> . Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.			
1. Name and Address of Contributor	2. Contributions this Reporting Period		3. Total this Year
	a. Date(s)	b. Amount(s)	
ERIC FERROUILLET, SR 2640 Barracks St New Orleans, LA 70119 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$100.00	\$100.00
IAN FISCH 1040 Huff Rd NW Apt 1403 Atlanta, GA 30318 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$100.00	\$100.00
RHAOUL GUILLAUME 8383 Bluebonnet Blvd Baton Rouge, LA 70810 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$250.00	\$250.00
SUNDIATA HALEY 650 Poydras St Suite 2015 New Orleans, LA 70130 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$250.00	\$250.00
HUGH P LAMBERT 701 Magazine St New Orleans, LA 70130 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$10,000.00	\$10,000.00
ALAN M LEVENTHAL 200 State St Fl 5 Boston, MA 02109 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$12,500.00	\$12,500.00
4. SUBTOTAL (this page)		\$ 23,200.00	N/A
5. TOTAL (complete only on last page of this schedule)			N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES ONLY:			
SUBTOTAL (this page) _____ \$ 0.00		TOTAL (complete only on last page of this schedule) _____	

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SCHEDULE A-1: CONTRIBUTIONS (Other than In-Kind Contributions)			
The following information must be provided for all contributions received by the committee during this reporting period, except for in-kind contributions, whether received from a political committee or some other person or entity. Contributions made by the committee are reported on SCHEDULE E-3: CONTRIBUTIONS MADE TO CANDIDATES. Information on in-kind contributions is reported on SCHEDULE A-2: IN-KIND CONTRIBUTIONS. In Column 1, check "yes" if the contributor is a political committee and "no" if not. For anonymous contributions, see SCHEDULE F. Totals and subtotals at bottom of the page are <i>optional</i> . Completion of totals and subtotals may assist in calculating totals that must be reported on the Summary Page.			
1. Name and Address of Contributor	2. Contributions this Reporting Period		3. Total this Year
	a. Date(s)	b. Amount(s)	
SHERRY M LEVENTHAL 200 State St Fl 5 Boston, MA 02100 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$12,500.00	\$12,500.00
ARKEBIA MATTHEWS 3657 Clermont Dr New Orleans, LA 70122 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$250.00	\$250.00
MONIQUE PERRILLOUX 184 Villere Dr Destrehan, LA 70047 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$100.00	\$100.00
NATHANAEL SCALES 201 St. Charles Ave Suite 114-260 New Orleans, LA 70170 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$250.00	\$250.00
LAVERNE TOOMBS 300 Lake Marina Ave Apt 2BW New Orleans, LA 70124 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/02/2025	\$250.00	\$250.00
IAM C TUCKER 4116 Davey St New Orleans, LA 70122 POLITICAL COMMITTEE? _____ PARTY COMMITTEE? _____	07/01/2025	\$250.00	\$250.00
4. SUBTOTAL (this page)		\$ 13,600.00	N/A
5. TOTAL (complete only on last page of this schedule)		\$ 148,250.00	N/A
6. CONTRIBUTIONS FROM POLITICAL COMMITTEES ONLY:			
SUBTOTAL (this page) _____ \$ 0.00		TOTAL (complete only on last page of this schedule) _____ \$ 0.00	

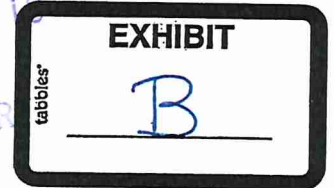
SCHEDULE E-1: GENERAL EXPENDITURES			
Use this schedule to report information on most committee expenditures, during this reporting period. If the expenditure directly benefited a particular candidate(s), list the candidate(s)' name under Item 1. However, (1) in-kind expenditures, and (2) expenditures to candidates or their committees should be reported on SCHEDULES E-2 and E-3, respectively, and should not be reported on this schedule. An "expenditure" is any payment made for the purpose of supporting or opposing the election of a candidate for public office or supporting or opposing a proposition or question submitted to the voters. Expenditures include monies spent for the committee's general operating expenses. Any payments made that are not "expenditures" should be reported on SCHEDULE E-4: OTHER DISBURSEMENTS. Totals and subtotals at bottom of page are <i>optional</i> but will assist in completing the Summary Page.			
1. Name and Address of Recipient	2. Expenditures this Reporting Period		
	a. Date(s)	b. Purpose(s)	c. Amount(s)
ACTBLUE TECHNICAL SUPPORT 14 Arrow St Ste 11 Cambridge, LA 02138	06/30/2025	Credit Card Processing Fees	\$ 86.01
AMALGAMATED BANK 1825 K Street NW Washington, DC 20006	04/25/2025	Bank Fee	\$ 26.25
AMALGAMATED BANK 1825 K Street NW Washington, DC 20006	05/29/2025	Bank Fee	\$ 26.25
AMALGAMATED BANK 1825 K Street NW Washington, DC 20006	06/27/2025	Bank Fee	\$ 26.00
LOUISIANA CAMPAIGN FINANCE PO Box 4368 Baton Rouge, LA 70821	04/18/2025	Filing Fee	\$ 100.00
THE MONEY WHEEL 1325 Holly St Phoenix, AZ 85007	06/04/2025	Compliance Services	\$ 1,200.00
THE MONEY WHEEL 1325 Holly St Phoenix, AZ 85007	07/01/2025	Compliance Services	\$ 300.00
ZERVIGON CONSULTING GROUP 3939 Prytania St New Orleans, LA 70115	04/18/2025	General Consulting Services	\$ 5,000.00
3. SUBTOTAL (optional)			\$ 6,764.51
4. TOTAL (optional - complete only on last page of this schedule)			

Form 202, Rev. 3/98, Page Rev. 3/98

SCHEDULE E-1: GENERAL EXPENDITURES			
Use this schedule to report information on most committee expenditures, during this reporting period. If the expenditure directly benefited a particular candidate(s), list the candidate(s) ' name under Item 1. However, (1) in-kind expenditures, and (2) expenditures to candidates or their committees should be reported on SCHEDULES E-2 and E-3, respectively, and should not be reported on this schedule. An "expenditure" is any payment made for the purpose of supporting or opposing the election of a candidate for public office or supporting or opposing a proposition or question submitted to the voters. Expenditures include monies spent for the committee's general operating expenses . Any payments made that are not "expenditures" should be reported on SCHEDULE E-4: OTHER DISBURSEMENTS. Totals and subtotals at bottom of page are <i>optional</i> but will assist in completing the Summary Page.			
1. Name and Address of Recipient	2. Expenditures this Reporting Period		
	a. Date(s)	b. Purpose(s)	c. Amount(s)
ZERVIGON CONSULTING GROUP 3939 Prytania St New Orleans, LA 70115	06/11/2025	General Consulting Services	\$ 10,000.00
3. SUBTOTAL (optional)			\$ 10,000.00
4. TOTAL (optional - complete only on last page of this schedule)			\$ 16,764.51

Form 202, Rev. 3/98, Page Rev. 3/98

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----- Forwarded message -----

From: Bill Hammack <hammack@hammackjones.com>

Date: Tue, Aug 5, 2025 at 5:29 PM

Subject: Please do a quick review and give me your feedback.

To: David Huynh <dave@davehuynh.com>, Royce Duplessis <royce@duplessislawfirm.com>

A couple of points first:

1. We don't know if this push poll is from Royce; although we believe it is. Therefore I don't say it's from him but I do say Royce's camp as a pattern of fabrication.
2. Should we leave the "white devil" P.S.? At some point I'm going to convey it...but it could be part of a future message.
3. Talking to Helena today I think there may be some confusion caused by our poll and this one being out at the same time. Several people have told the campaign they have been part of two polls, both of which had negative comments about Moreno.
4. Should we share this with Silas before sending. Currently, my audience is "only" those who have contributed.

Bill

Dear Friends,

You are receiving this because you have supported Leadership Matters PAC and are committed to making sure New Orleans elects Helena Moreno as our next Mayor.

I wanted you all to have a heads up that a new poll is currently in the field, being conducted by one of the competing campaigns. It is what we refer to as a "push" poll. You can find more on push polling at the end of this message.

Essentially, the person conducting the "poll", which is described by the surveyor as an "opinion" poll, is manipulating voters to get the results the pollster wants and to plant negative messages about an opponent.

We've heard from several Helena supporters who described these messages being delivered:

- *Helena is a television personality who will be made up to be whatever character she needs to be. She can try to play the mayor on television but all she wants is to show up for ribbon cuttings. She does not want to do anything else.*
- *For 8 years as city council president, she watched LaToya fail our city but has done nothing as President of City Council.*
- *She wakes up every morning in a secured neighborhood. She puts her rich neighbors ahead of the citizens of NOLA and she is getting her money from people we don't know.*

Here's an example of the feedback we received.



Suzanne-Juliette Mobley

3m ·



Yo, I just got the anti-Helena phone push poll and it's just straight up race baiting, xenophobia, and inferring ties to Trump. Like, as a voter, as a resident of New Orleans, and as a person with a brain in my head all that poll did was make me viscerally disgusted with the campaign pushing it in a way I was not before.

I suspect at some point the surveyor will ask the "horserace" question: If the election were held today, who would you vote for?" Obviously whatever the answers, this data will be skewed and inaccurate.

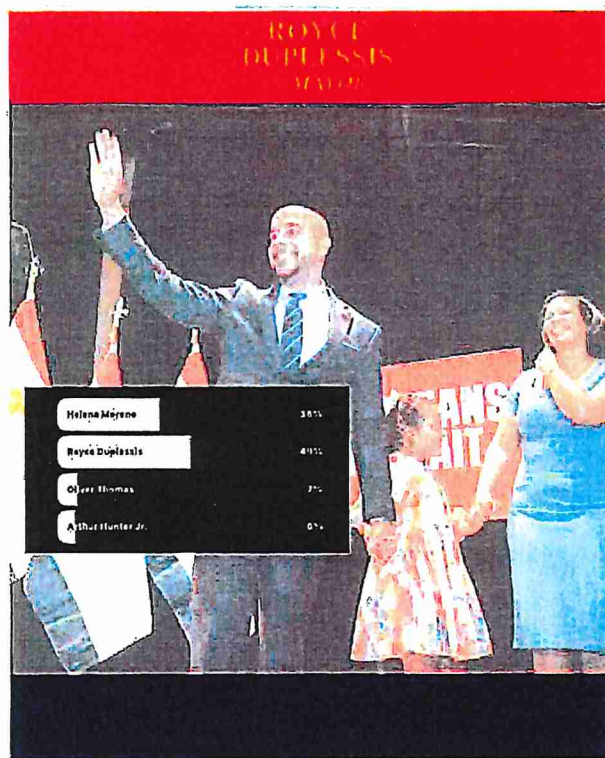
While we're not sure who is paying for the "poll", it follows a pattern of fabrication that we've seen from the Duplessis camp. They've done this before. Recently they sent out the message below, where they promoted a "jotform" poll to contact people in selected "key wards". Surprise, Surprise, the web-based poll showed:

- Royce Duplessis – 55%
- Helena Moreno – 18%
- Oliver Thomas – 16%
- Ricky Twiggs – 9%
- Arthur Hunter – 2%
- All Other – 1%

Then they did the same thing with an "Instagram" Poll. Similar results! The really sad part of all this is it's being promoted by the Committee to Elect Royce Duplessis that sent out a mass mailing bragging about the results.

NEW POLL SHOWS ROYCE LEADING IN KEY NEIGHBORHOODS

According to a *Ground Zereaux* poll powered by *Newtral Groundz*, Senator Royce Duplessis is leading the mayoral race. This strong showing confirms what residents across the city have been saying: they're ready for new leadership, bold solutions, and a City Hall that works.



So here's the bottom line. Royce is looking to cast doubt on Moreno's support while showing himself "surging". He hopes that using this fabricated data, he'll be able to persuade donors to give him money.

Please tell your friends and family that they should only believe polls that come from reputable, professional polling firms!

Call me if you have questions.

Bill

P.S. One of Royce's senior campaign staff members this week referred to Helena as "a white devil"! The rich white men around her are also "white devils"! Sad...but I've been called worse!

More on "push" polls

A **push poll** is an **interactive marketing** technique, most commonly employed during **political campaigning**, in which a person or organization attempts to manipulate or alter prospective voters' views under the guise of conducting an **opinion poll**. In a push poll, large numbers of voters are contacted with little effort made to collect and analyze their response data. Instead, the push poll is a form of **telemarketing**-based propaganda and rumor-mongering masquerading as an opinion poll. Push polls may rely on **innuendo**, or information gleaned from **opposition research** on the political opponent of the interests behind the poll.

8/11/25, 7:45 PM

Royce Duplessis Mail - Fwd: Please do a quick review and give me your feedback.

Generally, push polls are viewed as a form of **negative campaigning**.^[1] In all such polls, the pollster asks **leading questions** or **suggestive questions** that "push" the interviewee toward adopting an unfavorable response toward the political candidate or issue in question.

Push polling has been condemned by the **American Association of Political Consultants**^[4] and the **American Association for Public Opinion Research**.^[5]

----- Forwarded message -----

From: Bill Hammack <hammack@hammackjones.com>

Date: Tue, Aug 5, 2025 at 7:07 PM

Subject: RE: Please do a quick review and give me your feedback.

To: Royce Duplessis <royce@duplessislawfirm.com>

Royce,

I want to apologize for the message I just sent.. It was sent inadvertently and wasn't intended for you.

I'd appreciate it if you would delete from your inbox.

Thanks for your understanding and sorry for the confusion.

Bill