

[Redacted]

34th JDC

COURT

PETITIONER

PARISH/CITY OF

St. Bernard

v.

STATE OF LOUISIANA

Gregory B. Lirette

DIVISION

NUMBER 17-0803

DEFENDANT

FILED JUN 23 2017

CLERK:

Parent/Guardian name if defendant is a minor

Randy S. Nunez

PETITION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY AND PERMANENT INJUNCTION

Pursuant to La. Code of Civil Procedure Article 3601 et seq.

This petition is:  Initial Petition  Supplemental and Amending Petition

The petition of

[Redacted]

born

[Redacted]

your name

month/days/year

a resident of the full age of majority of the Parish/City of

St. Bernard

respectfully represents:

Paragraph 1

Petitioner files this petition on behalf of:

a.  Petitioner, and/or

b.  Minor child(ren) as follows: (Name, Date of Birth, Relationship to Petitioner)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CONFIDENTIAL

c. \_\_\_\_\_ Alleged incompetent: (Name, Date of Birth, Relationship to Petitioner)

Paragraph 2

a.  Petitioner's current address:

No. & Street

Apt. No.

City

State

Zip Code

b. \_\_\_\_\_ The minor child(ren)'s or alleged incompetent's current address:

No. & Street

Apt. No.

City

State

Zip Code

Paragraph 3

Gregory B. Lirette defendant, resides in TEXAS AND ST. BERNARD Parish

Defendant's Name

at

No. & Street

Apt. No.

City

State

Zip Code

## Paragraph 4

This Court is the proper venue for this action because:

- The defendant is domiciled in \_\_\_\_\_ Parish/city.
- The behavior sought to be enjoined is likely to occur in ST. BERNARD Parish/city
- Other: NEW ORLEANS, CONCERT VENUES [REDACTED]

## Paragraph 5

N.O.LA

**a. Domestic abuse or dating violence:**

The protected person(s) is related to the defendant as: (check all that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> Current or former spouse                                | <input type="checkbox"/> Current or former dating partner     |
| <input type="checkbox"/> Current or former intimate cohabitant of opposite sex   | <input type="checkbox"/> Parent, stepparent, or foster parent |
| <input type="checkbox"/> Current or former intimate cohabitant of same sex       | <input type="checkbox"/> Grandparent                          |
| <input type="checkbox"/> Child, stepchild, or foster child                       | <input type="checkbox"/> Grandchild                           |
| <input type="checkbox"/> Child of defendant's current or former intimate partner |   |

OR

**b. Stalking or sexual assault:**

- The defendant is an acquaintance of or stranger/unknown to the protected person(s).

## Paragraph 6

Defendant has abused and/or harassed protected person(s) and protected person(s) fears for her/his safety and believes that irreparable injury, loss, or damage may otherwise result to protected person(s) if defendant is not prohibited from committing certain acts through the rendition of a temporary restraining order, without notice, and thereafter a preliminary and permanent injunction to the same effect.

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Paragraph 7

a. Domestic abuse or dating violence: Defendant abused protected person(s) in the following manner:

- |  |   |
|--|---|
| <input type="checkbox"/> Slapped protected person(s) | <input checked="" type="checkbox"/> Threatened protected person(s) with bodily harm |
| <input type="checkbox"/> Punched protected person(s) | <input checked="" type="checkbox"/> Threatened protected person(s)' life            |
| <input type="checkbox"/> Choked protected person(s)  | <input checked="" type="checkbox"/> Threatened protected person(s) with a weapon    |
| <input type="checkbox"/> Shoved protected person(s)  | <input type="checkbox"/> Sexually abused protected person(s)                        |
| <input type="checkbox"/> Kicked protected person(s)  | <input type="checkbox"/> Abused petitioner's child(ren) or alleged incompetent      |
| <input type="checkbox"/> Stalked protected person(s) | <input checked="" type="checkbox"/> Other: <u>Threatened Family</u>                 |

b. Stalking: Defendant intentionally and repeatedly engaged in the following behavior(s) which caused the protected person to feel alarmed or to suffer emotional distress:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Followed protected person(s)  | <input checked="" type="checkbox"/> Implied or threatened protected person(s) with bodily injury   |
| <input type="checkbox"/> Harassed protected person(s)   | <input checked="" type="checkbox"/> Implied or threatened protected person(s)' life  |
| <input checked="" type="checkbox"/> Uninvited presence at protected person(s)' home   | <input type="checkbox"/> Used tracking device to monitor protected person(s)   |
| <input type="checkbox"/> Uninvited presence at protected person(s)' workplace   | <input checked="" type="checkbox"/> Stalked, harmed/threatened to harm protected person(s) or member of protected person(s)' family or acquaintance of protected person(s) |
| <input type="checkbox"/> Uninvited presence at protected person(s)' school  | <input type="checkbox"/> Implied or threatened protected person(s) with kidnapping   |
| <input checked="" type="checkbox"/> Uninvited presence at other places  | <input checked="" type="checkbox"/> Implied or threatened protected person(s) with sexual assault  |
| <input type="checkbox"/> Made/sent telephone calls, texts, emails or other electronic communications to protected person(s) | <input type="checkbox"/> Possessed a dangerous weapon during any of the foregoing behaviors  |
| <input checked="" type="checkbox"/> Sent messages via a third party, letters, pictures, public posts to social media        | <input checked="" type="checkbox"/> Threatened protected person(s) with a dangerous weapon   |
| <input type="checkbox"/> Sent unwanted gifts to protected person(s)   |  |
| <input type="checkbox"/> Other: _____   |  |

c. **Sexual assault:** Defendant intentionally assaulted the protected person in the following manner:

- Touched the protected person's genitals, anus, breasts or buttocks (either directly or through clothing) using defendant's body part(s) or other objects, without consent.
- Forced the protected person to touch the defendant's genitals, anus, breasts or buttocks (either directly or through clothing) using protected person's body part(s) or other objects.
- Penetrated the protected person's vagina or anus using defendant's body part(s) or other objects, without consent.
- Forced the protected person to penetrate the defendant's vagina or anus, using protected person's body part(s) or other objects.
- Displayed genitals, anus, and/or female breast nipples to protected person without consent, in a public place or prison/jail.
- Deceived the protected person into engaging in anal, oral or vaginal intercourse with the defendant by misrepresenting themselves as someone else known to the protected person.
- Sent an electronic communication, letter, photograph, or drawing containing sexually explicit materials or content to the protected person without consent.
- Exposed the protected person to the HIV/AIDS virus through sexual contact without the knowing and lawful consent of the protected person.
- Viewed or spied on the protected person at a private residence without consent for defendant's sexual gratification.
- Used an image or video recording device to view or observe the protected person without consent for a lewd or lascivious purpose.
- Electronically transferred an image or video of the protected person obtained by the above without the consent of the protected person.
- Gave a drug, narcotic, anesthetic, intoxicant agent or other controlled dangerous substance to the protected person without her/his consent.
- Possessed a dangerous weapon at the time of any of the foregoing behaviors.
- Threatened the protected person with a dangerous weapon during any of the foregoing behaviors.
- Other: \_\_\_\_\_

d. The facts and circumstances of the abuse, stalking or sexual assault are as follows:

The most recent incident of abuse, stalking or sexual assault which caused petitioner to file this petition happened on or about the June 22, 2017 (month/day/year), at which time the defendant did

DRIVE PAST HOME

JUNE 10, 2017 Did bang on my door @ home yelling.

MAY 22, 2017 Did observe, comment on contents of my home, driveway

DID TRAVEL FROM TEXAS TO LOUISIANA SPECIFICALLY TO ST. BERNARD PARISH.

Past incidents: HAS THREATENED TO KILL ME, FAMILY, HARASS ME, FAMILY, "INFILTRATE EVERY ASPECT OF MY LIFE" SINCE JANUARY, 2015

TRACKS [REDACTED] ONLINE SPECIFICALLY ALTHOUGH BLOCKED USING ELECTRONIC TECHNOLOGY.

Lirette has history of Alleged violence  
ARRESTS, NUMEROUS protective ORDERS, LOUISIANA &  
AND TEXAS

HAS BEEN HARASSING, TERRORIZING [REDACTED]  
SINCE 2015 USING SOCIAL MEDIA, TELEPHONE SURVEILLANCE  
THREATS TO INFILTRATE LIFE, FAMILY, <sup>MAV</sup> MOVE <sup>THAVE</sup> FROM  
TEXAS TO ST. BERNARD

#### Paragraph 8

Because of the immediate and present danger of abuse, stalking or sexual assault, petitioner requests that an ex parte Temporary Restraining Order be issued immediately without prior notice:

- a.  prohibiting defendant from abusing, harassing, assaulting, stalking, following, tracking, monitoring, or threatening the protected person(s) in any manner whatsoever. This prohibition includes the use, attempted use, or threatened use of physical force that would reasonably be expected to cause bodily injury.
- b.  prohibiting the defendant from contacting the protected person(s) personally, through a third party, or via public posting, by any means, including written, telephone, or electronic (text, email, messaging, or social media) communication without the express written permission of this court.
- c.  prohibiting defendant from going within one hundred (100) yards of the residence, apartment complex, or multiple family dwelling of the protected person(s) located at:

- d. ordering the defendant to stay away from the protected person(s)' place of employment/school and not to interfere in any manner with such employment/school located at:

Employment/school Address City State Zip Code

Employment/school Address City State Zip Code

- e. ordering the defendant not to damage any belongings of the protected person(s), not to shut off any utilities, telephone service, or mail delivery to the protected person(s), or in any way interfere with the living conditions of the protected person(s).

- f. ordering the defendant not to contact family members or acquaintances of the protected person(s)

6. RESTRAIN FROM PUBLIC EVENTS, VENUES EXPECTED TO APPEAR AT Paragraph 9

ALSO

Petitioner desires that a ruling issue herein ordering defendant to show cause why the temporary restraining order requested in Paragraph 8 should not be made a preliminary injunction and thereafter a permanent injunction and further why defendant should not be ordered:

- to pay all costs of court in this matter.
to pay attorney fees.



PRAYER

WHEREFORE, petitioner prays that service and citation issue herein, and: (check all that apply)

- that ex parte temporary restraining order requested in Paragraph 8 be granted.
- a rule issue to show cause why a preliminary injunction and thereafter a permanent injunction as requested in Paragraph 9 should not be granted.
- defendant be cast with costs.
- defendant be advised of penalties for violating Abuse Prevention Orders.
- all other equitable relief as the court deems proper and necessary.

Respectfully submitted by:

[Redacted signature block]

PETITIONER, IN PROPER PERSON

[Redacted name block]

Street Address Apt. No. [Redacted address block]

City State Zip Code

Telephone [Redacted telephone block]

FILED  
D.O.B

Telephone

PLEASE SERVE DEFENDANT:

D.O.B.  
10-19-1973

Gregory B. Lirette

employment at the following address:

personally at his/her home or place of

