



August 22, 2014

*** VIA HAND DELIVERY

Hon. Tom Schedler
Secretary of State
Louisiana Department of State
8585 Archives Avenue
Baton Rouge, LA 70809

Dear Secretary of State Schedler:

As you know, the Constitution of the United States plainly [states](#), "No Person shall be a Senator who shall not have attained to the Age of thirty Years, and been nine Years a Citizen of the United States, and who shall not, when elected, be an Inhabitant of that State for which [she] shall be chosen." -- (Attachment "A")

Moreover, Louisiana statute R.S. 18:1275(A) reinforces these requirements [stipulating](#), "No person shall be a United States senator who has not attained the age of thirty years and who has not been a citizen of the United States for nine years and who is not, when elected, an inhabitant of *this* state." -- (Attachment "B")

And, to that end, your office makes available a guide, "Qualifications of Candidates," which explicitly [states](#) that candidates for Senate must "be an inhabitant of *Louisiana* when elected." -- (Attachment "C")

I believe that at least one of the candidates for the United States Senate fails to satisfy that requirement. Mary Loretta Landrieu - who filed for the Senate race on Wednesday, August 20 - lists 4301 S. Prieur St., New Orleans, LA 70125 as her "domicile address" on her *Notice of Candidacy*, (Attachment "D").

However, representations by Sen. Landrieu, her campaign, and other associates - both in the press and in official documents - reveal that representation to be untrue:

-- On September 17, 1997, *The New York Times* [reported](#) that Sen. Landrieu and her family had already moved to Washington DC "permanently;" -- (Attachment "E")

-- Sen. Landrieu's husband's website [states](#) that, "our family moved to DC in 1997 upon my wife Mary Landrieu's election to the U.S. Senate;" -- (Attachment "F")

-- Sen. Landrieu consistently [listed](#) her Washington, D.C. mansion - 405 E. Capitol Street, SE - as her address on her reelection paperwork in 2002, 2008, and 2014; -- (Attachments "G," and "G1-G3," inclusive)

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- Sen. Landrieu is [reported](#) to be one of only four (4) senators who does not use a home state address on FEC filings; -- (Attachment "H")
- Over the years, Sen. Landrieu and her husband [have hosted](#) numerous parties and receptions for politicians and political organizations at her "home;" -- (Attachment "I" and Attachments "I1-I8," inclusive)
- The building Sen. Landrieu is registered to vote at -- "4301 S PRIEUR ST NEW ORLEANS, LA 70125" - is [owned](#) by "LANDRIEU VERNA S NINELAND PARTNERSHIP" -- (Attachment "J")
- Despite implying that 4301 S. Prieur Street is her home, Sen Landrieu [lists](#) rental income of \$5,001 to \$15,000 from this property and refers to it as "Nineland Partnership, New Orleans, LA (real estate, cash & notes receivable)." In contrast, she also lists her "Washington, D.C. residence with rental unit" on the same page, thus implying that the former is a mere investment while the latter is a "residence" that also has a rental component; -- (Attachment "K" - (Page 8))
- "Nineland, L.L.C." is a limited liability company [registered](#) with the state of Louisiana which lists "Mary Landrieu-Snellings" as an "Officer" residing at "United States Senate, Washington DC 20510;" -- (Attachment "L")
- Sen. Landrieu's own reelection campaign [refers](#) to the building located at 4301 S. Prieur Street as, "the house she grew up in" -- not her current home; -- (Attachment "M")

In view of these representations by Sen. Landrieu, her husband, her campaign, her family members and business partners, official divisions of the State of Louisiana, *The New York Times*, and other media outlets, I respectfully request that you open a full and complete investigation into the real domicile of Sen. Landrieu and, if the same is found to be 405 East Capitol Street, Washington DC as she says, you disqualify her as a candidate for the United States Senate.

Respectfully,

Col. Rob Maness, (USAF, ret.)

C: Nancy Erickson
Secretary of the Senate

Attachments