

DEC - 1 2010

LARRY GLEN CULP

FILED: _____

VERSUS NO.

10-4142

Laurie SCWHEEN CULP

KATHY STEWART

DEPUTY CLERK OF COURT

PETITION FOR DIVORCE PURSUANT TO
LOUISIANA CIVIL CODE ARTICLE 103(2)

The Petition of LARRY GLEN CULP (hereinafter "Larry"), who is domiciled in Ouachita Parish, Louisiana, respectfully represents that:

1.

Made Defendant herein is LAURIE SCHWEEN CULP (hereinafter "Laurie"), who is domiciled in Ouachita Parish, Louisiana.

2.

The parties were married in Belize on June 24, 2006. They immediately thereafter established their matrimonial domicile in Ouachita Parish where it remained until the date of separation described herein.

3.

Of the marriage between the parties, no children were born or adopted.

4.

Larry shows that this Court has jurisdiction over this proceedings pursuant to the provisions of Louisiana Code of Civil Procedure, Article 10(A) (7), in that this is a suit for divorce, both spouses are domiciled in this State and the last matrimonial domicile of the parties was located in this Parish and State.

5.

Larry shows that venue for this action is proper in this court as provided in Louisiana Code of Civil Procedure, Article 3941.

6.

Larry shows that he and Laurie physically separated on November 11, 2010 after he learned of Laurie's adulterous relationship with Ouachita Parish Sheriff Royce Toney. The parties have not resumed living together or reconciled since that date.

**CASE ASSIGNED TO:
CV. SECT. 1**

7.

Larry desires and is entitled to a divorce upon the passage of all legal delays.

8.

Larry shows that Laurie should be served with a copy of this Petition; and, in due course, according to law, that a judgment of divorce be granted herein.

9

Larry shows that he is entitled to a divorce from Laurie pursuant to Louisiana Civil Code Art. 103(2) in that Laurie entered into an adulterous relationship with another man, namely Ouachita Parish Sheriff, Royce Toney (hereinafter "Toney"), during their marriage.

10.

Larry has recently discovered that Laurie and Toney began their adulterous affair in the fall of 2008.

11.

When confronted with the affair, Laurie initially denied the affair but later admitted to same claiming to Larry that Toney "forced himself upon her, groped her, took advantage of her, and constantly pursued her." Laurie claimed that she went along with Toney's advances because she felt he "would use his power and position to harm her or Larry." Upon information provided to Larry by Laurie, Toney suggested that he could Larry harm on multiple occasions and put him in jail.

12.

Telephone records will also show that Toney and Laurie maintained their affair by communicating by telephone calls, emails, instant messaging, and text messages exceeding 100 such communications in a single month.

13.

Larry has discovered that Laurie and Toney engaged in many adulterous sexual encounters since October of 2008 including encounters which occurred during working hours and at public locations as well as locations paid for by the citizens of Ouachita Parish.

14.

Specifically, over the course of their lengthy two year affair, Laurie and Toney engaged in sexual relations in Toney's office at the main Sheriff's Department, at his office

at the Ouachita Parish Rifle Range, and in Toney's vehicle at the Ouachita Parish Rifle Range. According to Laurie's admissions to Larry, Toney had inmates opening the gates for Laurie to enter the rifle range and to stand guard so that others would not enter.

15.

Additionally, Toney and Laurie participated in sexual relations at a training facility inside the fence of the Monroe Regional Airport, in the St. Francis Hospital parking lot on March 6, 2010, the night that a Ouachita Parish Sheriff Deputy J.R. Searcy died, at the personal residence of Toney, and at the residence and hunting club of John and Dorothy Schween.

16.

Toney even used the residences and hunting clubs of personal friends to cover up his sexual encounters with Laurie. Toney had sexual relations with Laurie at the personal residence of Sidney Wilhite located in West Monroe, Louisiana as well as the hunting club of Sidney Wilhite located outside of Mer Rouge, Louisiana.

17.

There were numerous occasions that Toney and Laurie engaged in sexual relations in the parking lot of the Monroe Athletic Club as well as in other parking lots throughout Ouachita Parish.

18.

Upon information and belief, Toney allowed Ouachita Parish Sheriff's deputies to leave their positions early at the main Sheriff's Department so that he would not be interrupted and could engage in sexual encounters with Laurie. Upon information and belief, Toney also used Ouachita Parish Sheriff's deputies to not only provide Laurie entrance to the Ouachita Parish Rifle Range but to monitor the comings and goings of others at the range so that Laurie and Toney could engage in their sexual outings.

19.

Larry further shows that Laurie became pregnant during her adulterous affair with Toney. She suffered a miscarriage of the pregnancy in April of 2010 for which Larry paid several thousands of dollars for her medical care. Larry now does not know whether the child which was conceived was his child or the child of Toney.

20.

For all of these reasons, Larry desires and is entitled to a judgment of divorce from Laurie based upon the adultery of his wife.

21.

Larry is also entitled to a reservation for possible future consideration of all other issues related to the marriage of the parties but not specifically requested and/or mentioned herein, including but not limited to entitlement to and determination of possession or use of other movables or immovables and rent for same, removal of personal property, and for other relief related to any cause of action or issue arising out of the marriage.

WHEREFORE, PETITIONER, LARRY GLEN CULP, PRAYS that:

- I. There be service of these proceedings on Defendant, LAURIE SCHWEEN CULP;
- II. There be Judgment in favor of Larry Glen Culp and against Laurie Schween Culp granting unto him a final divorce pursuant to La. C.C. Art. 103(2) and forever dissolving the bonds of matrimony heretofore existing between them.

Respectfully submitted,

LAW OFFICES OF LAURIE J. BURKETT
1900 N. 18th Street, Ste. 210
Monroe, Louisiana 71201
Telephone: (318) 388-0222
Telecopier: (318) 388-0042

BY: 

Laurie J. Burkett
Bar Roll #23670

ATTORNEY FOR LARRY GLEN CULP, PLAINTIFF

PLEASE SERVE DEFENDANT:

Laurie Schween Culp
at her place of employment
Monroe Athletic Club
3801 Chauvin Lane
Monroe, LA 71201

OR

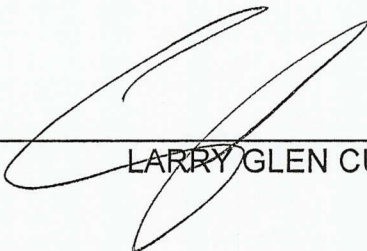
her residence located at
3202 Moore Place
Monroe, LA 71201

VERIFICATION

STATE OF LOUISIANA
PARISH OF OUACHITA

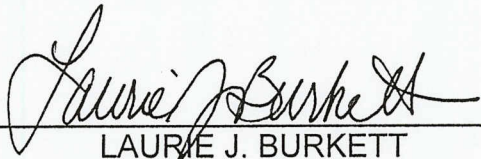
BEFORE ME, the undersigned authority, personally came and appeared LARRY GLEN CULP, who being first duly sworn, deposed and said that:

He is the Petitioner in the above and foregoing Petition; he has read same, and that all of the allegations contained therein are true and correct to the best of his knowledge, information and belief.



LARRY GLEN CULP

SWORN TO AND SUBSCRIBED before me, Notary Public this 1st day of December, 2010.



LAURIE J. BURKETT
BAR ROLL NO. 23670
NOTARY PUBLIC
OUACHITA PARISH, LOUISIANA