

Judgment rendered August 26, 2026.
Application for rehearing may be filed
within the delay allowed by Art. 2166,
La. C.C.P.

No. 57,056-CA

COURT OF APPEAL
SECOND CIRCUIT
STATE OF LOUISIANA

* * * * *

JONATHAN CHATMAN

Plaintiff-Appellant

versus

RALPH ABRAHAM, LOUISIANA
DEPARTMENT OF HEALTH
BYRON DECOTEAU,
LOUISIANA STATE
DEPARTMENT OF CIVIL
SERVICE

Defendants-Appellees

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Appealed from the
Twenty-Sixth Judicial District Court for the
Parish of Bossier, Louisiana
Trial Court No. 177,197

Honorable Douglas M. Stinson, Judge

* * * * *

JONATHAN CHATMAN

In Proper Person

EDWARD M. BROSSETTE
JESSICA L. MOTT

Counsel for Appellees,
Louisiana Department of
Health, Ralph Abraham,
and Bruce D. Greenstein

SHERRI L. GREGOIRE

Counsel for Appellees,
Louisiana State
Department of Civil
Service, and Byron
Decoteau

* * * * *

Before THOMPSON, ROBINSON, and ELLENDER, JJ.

THOMPSON, J.

Louisiana's State Civil Service Commission exercises exclusive jurisdiction over appeals of removal/termination of permanent civil service employees. Those appeals must be filed within 30 days from notice of termination. In this matter, rather than appeal his termination to the State Civil Service Commission, a former employee filed a wrongful termination suit against his employer and the Department of Civil Service in state court in Bossier Parish, Louisiana. In response, the defendants filed numerous exceptions, including exceptions of lack of subject matter jurisdiction, noting the State Civil Service Commission exercises exclusive jurisdiction over such matters, and pointed out that the employee had failed to avail himself of his right to appeal. The trial court granted the exceptions of lack of subject matter jurisdiction, which the employee now appeals. For the reasons set forth below, we affirm the trial court's ruling.

FACTS AND PROCEDURAL HISTORY

On February 28, 2024, Jonathan Chatman ("Chatman") was removed from his employment with the Louisiana Department of Health ("LDH"). At that time, he was a permanent, classified employee with a recognized property right to his job and a right to due process before he could be deprived of that property right. A permanent, classified state employee can exercise their right to appeal by filing an appeal to the State Civil Service Commission (the "Commission"). The letter informing Chatman of his removal also stated that he had 30 days from the receipt of the letter to appeal his removal to the Commission. It is undisputed that Chatman did not appeal his removal from employment with LDH to the Commission.

Instead, on September 4, 2025, Chatman filed a petition for wrongful termination against LDH and its former secretary, Ralph Abraham, and the Department of State Civil Service and its director, Byron Decoteau (collectively, “defendants”), in the 26th Judicial District Court for the Parish of Bossier. In that suit, Chatman raised a number of claims in multiple petitions related to the legality of his removal from employment by LDH. In each of the pleadings, he sought relief in the form of reinstatement to employment, back pay of wages, court costs, and a fair civil service hearing.

The defendants filed peremptory exceptions of subject matter jurisdiction, arguing that Chatman’s claims and requested relief fall under the Commission’s exclusive original jurisdiction to hear and decide all removal and disciplinary proceedings. The defendants also filed exceptions of improper venue. The trial court sustained the defendants’ peremptory exceptions of lack of subject matter jurisdiction and dismissed all of Chatman’s claims. This appeal by Chatman followed.

ASSIGNMENTS OF ERROR

Chatman has asserted a number of assignments of error in his in proper person brief to this court. They are as follows:

First Assignment of Error: The presiding judge did not swear in either party prior to testifying.

Second Assignment of Error: The presiding judge erred in granting the lack of subject matter jurisdiction to the commission in that district.

Third Assignment of Error: The presiding judge erred in granting the lack of subject matter jurisdiction to the Louisiana Department of Health in that any district judge can grant a writ of mandamus compelling LDH to release internal investigation records to the court after LDH publishes statements after the fact.

Fourth Assignment of Error: The court erred in granting the lack of subject matter jurisdiction in that any district judge can compel defendants to speak with the public if they refuse to speak.

Fifth Assignment of Error: The trial court erred by granting the defendant's exception of improper venue by asserting that the first circuit court of appeal was the proper venue despite the delay to appeal prescribed after 30 days in May of 2024.

Sixth Assignment of Error: The trial court erred in granting improper venue in that appeals from state civil servants can only be filed in the first circuit court of appeal by the commission.

Seventh Assignment of Error: The presiding judge erred by granting the exception of improper venue in that petitioner motioned to transfer the matter to the 19th Judicial district court on 11/17/25 and 12/18/25. The defendants asserted this venue in their exceptions and on page 16 of the transcript, the judge claimed the correct jurisdiction was the 26th JDC differing from above.

Eighth Assignment of Error: The trial court erred in granting the exception of improper venue in that the court, on its own motion, may transfer the matter or grant the petitioner's motion in that there was an interest or interests of justice pursuant to La. C.C.P. art. 121.

DISCUSSION

In his first assignment of error, Chatman contends that the district court erred in not swearing in either party prior to testifying. The record reflects that there was no testimony provided by witnesses in the hearing, only the argument of counsel, including Chatman, representing himself. As officers of the court, counsel are not required to be sworn in prior to argument. This assignment of error is without merit.

Chatman's second, third, and fourth assignments of error all relate to the trial court's granting of the defendants' exceptions of lack of subject matter jurisdiction. Subject matter jurisdiction is the legal power and authority of a court to hear and determine a particular class of actions or proceedings, based upon the object of the demand, the amount in dispute, or

the value of the right asserted. La. C.C.P. art. 2. A judgment rendered by a court which lacks subject matter jurisdiction is void. La. C.C.P. art. 3. An issue of subject matter jurisdiction raises a question of law that is reviewed de novo by the appellate court. *Thornhill v. Cypress Black Bayou Recreation & Water Conservation Dist.*, 53,843 (La. App. 2 Cir. 4/14/21), 316 So. 3d 567, *writ denied*, 21-00674 (La. 9/27/21), 324 So. 3d 90.

Classified civil service employees who have achieved permanent status, such as Chatman, cannot be terminated without a lawful cause. The Commission has the exclusive power and authority to hear and decide all removal (termination) and disciplinary cases. La. Const. Art. 10, §12(A). Jurisprudence has interpreted La. Const. Art. 10 as “evidencing an intention to grant exclusive jurisdiction to the Civil Service Commission in those areas where the commission has exercised its ‘broad and general rule-making’ power.” *Johnson v. Bd. of Supr’s of Louisiana State Univ. & Agr. & Mech. College*, 45,105 (La. App. 2 Cir. 3/3/10), 32 So. 3d 1041. As such, the Commission exercises **exclusive** jurisdiction over employment-related disputes between classified civil service employers and employees. *Id.* The thrust of the grant of exclusive jurisdiction over employment related disputes between employers and employees in civil service is to preclude the district court from having concurrent jurisdiction with the Commission over such disputes. *Id.* The Commission’s exclusive jurisdiction to hear and decide removal and disciplinary cases cannot be circumvented or defeated by styling a removal or disciplinary matter as a different type of suit. *Id.*

In the present matter, Chatman was informed by letter on February 28, 2024, that he had a right to appeal to the Commission his removal from

service within 30 calendar days from his receipt of the removal letter.

Chatman admits that he did not file an appeal for his removal with the Commission. Although Chatman has amended his petitions with the court many times, including invoking a mandamus proceedings, the relief he has sought clearly couches his claims in wrongful termination, which can only be heard by the Commission. Pursuant to La. Const. Art. 10, §12 and the corresponding jurisprudence, the district court lacked subject matter jurisdiction to hear this matter. The granting of the exception of lack of subject matter jurisdiction and dismissal of Chatman's claim was appropriate. These assignments of error are without merit.

Finally, Chatman's fifth, sixth, seventh, and eighth assignments of error all relate to the defendants' exceptions of improper venue. The record reflects that the trial court did not rule on the defendants' exceptions of improper venue. When the trial court granted the exceptions of lack of subject matter jurisdiction and dismissed all of Chatman's claims, there was no need to rule on the remaining exceptions of improper venue.

Assignments of error five, six, seven, and eight all argue various reasons why the trial court erred in granting the declinatory exceptions of improper venue. As the trial court did not grant the declinatory exceptions of improper venue, these assignments of error are without merit.

CONCLUSION

For the above reasons, we affirm the trial court's ruling on the exceptions of lack of subject matter jurisdiction. Costs of this appeal are assessed to Jonathan Chatman.

AFFIRMED.