

Bond Case Briefs

Municipal Finance Law Since 1971

PUBLIC CONTRACTS - LOUISIANA

Robinson-Carter o/b/o Robinson-Carter v. St. John the Baptist Parish School Board

Court of Appeal of Louisiana, Fifth Circuit - April 3, 2024 - So.3d - 2024 WL 143208123-397 (La.App. 5 Cir. 4/3/24)

Unsuccessful bidder, individually and on behalf of her accounting firm, filed complaint against parish school board for detrimental reliance, fraud, and emotional distress, alleging board intentionally misrepresented aspects of its request for qualifications for contract to conduct tax collection services.

In a bench trial, the District Court rendered judgment in favor of board. Bidder appealed.

The Court of Appeal held that:

- Trial court's alleged mischaracterization of bidder's claims as being based on verbal agreement, and court's failure to address unsuccessful bidder's evidence did not constitute reversible error;
- Request's disqualification provision did not apply to warrant disqualifying or assessing lower score to successful bidder's response;
- Unsuccessful bidder could not recover costs incurred preparing response to request for qualifications under theory of detrimental reliance;
- Unsuccessful bidder failed to demonstrate that board misrepresented truth regarding process for analyzing responses to request for qualifications, as required to support fraud claim; and
- Unsuccessful bidder failed to demonstrate that board intended to obtain unjust advantage or to cause damage or inconvenience to bidder, as required to support fraud claim.