

LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT

Sadra Hamilton v. Sewerage & Water Board of New Orleans

Hamilton · No. 2025-CA-0640 · Decided March 10, 2026

SUMMARY

The Louisiana Fourth Circuit Court of Appeal affirmed the Civil Service Commission’s reinstatement of Sadra Hamilton, a Sewerage and Water Board of New Orleans employee terminated for allegedly violating workplace-violence policies. The court held that the Commission did not manifestly err in finding that the Board failed to prove Hamilton brandished scissors or otherwise violated the applicable policies. The court also concluded that reinstatement was not arbitrary, capricious, or an abuse of discretion.

CASE DETAILS

COURT	Louisiana Court of Appeal, Fourth Circuit
WRITING FOR THE COURT	Rosemary Ledet; Dale N. Atkins; Nakisha Ervin-Knott
JURISDICTION	Louisiana Court of Appeal, Fourth Circuit
DECIDED	March 10, 2026
DOCKET	2025-CA-0640
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Sewerage & Water Board of New Orleans appealed a final decision of the New Orleans Civil Service Commission reinstating Sadra Hamilton with backpay and emoluments after the Board terminated her for an alleged violation of its workplace violence policy.
STANDARD OF REVIEW	Civil Service Commission factual findings are reviewed under the clearly wrong or manifest error standard; legal issues are reviewed de novo; mixed questions of law and fact are reviewed under the manifest error standard; and the Commission's disciplinary decision is reviewed for legal cause and whether it is arbitrary, capricious, or an abuse of discretion.
PRECEDENTIAL VALUE	Published Louisiana Court of Appeal opinion
PARTIES	Sewerage & Water Board of New Orleans v. Sadra Hamilton

TOPICS

employment law

municipal law

administrative law

standard of review

appellate procedure

PRACTICE AREAS

employment law

administrative law

municipal law

appellate procedure

QUESTIONS PRESENTED

1. Whether the Civil Service Commission manifestly erred in finding that the Board failed to prove Hamilton brandished scissors or another dangerous weapon during the workplace incident.
2. Whether the Civil Service Commission's reinstatement of Hamilton was arbitrary, capricious, or an abuse of discretion.
3. Whether the Board established legal cause for disciplining or terminating Hamilton under its workplace violence policies.

HOLDINGS

1. The Commission did not commit manifest error by finding that the conflicting witness testimony did not establish what object Hamilton held and that the Board failed to prove she brandished scissors or a dangerous weapon.
2. The Board failed to establish legal cause for punishment because it did not carry its burden of proving a violation of the workplace violence prevention policy.
3. The Commission's reinstatement of Hamilton was not arbitrary, capricious, or an abuse of discretion.

KEY QUOTATIONS

"We note that once the Commission found the Board failed to meet the burden of proof, no legal cause existed for punishment." (7)

"As the Commission stated, given the "totality of the circumstances" in this particular case, we find the Commission's reinstatement of Ms. Hamilton was not arbitrary, capricious, or an abuse of discretion, as a rational basis exists for the decision." (7)

FACTUAL BACKGROUND

Sadra Hamilton was a permanent classified employee and supervisor who had worked for the Sewerage & Water Board for more than a decade without prior discipline. After a subordinate employee aggressively approached her while yelling and attempting to reach her, the Board alleged that Hamilton picked up scissors and made stabbing motions. Witnesses disagreed about whether Hamilton held scissors, a pen, or phones, and the Civil Service Commission found the evidence insufficient to establish that she brandished a dangerous weapon or violated the Board's workplace violence policies.

PROCEDURAL HISTORY

The Board terminated Hamilton effective March 8, 2024, alleging that she brandished scissors and made stabbing motions toward a subordinate employee. Hamilton appealed to the Civil Service Commission, which

found that the Board failed to prove she had scissors or another dangerous weapon and ordered her reinstated with backpay and emoluments. The Board appealed to the Louisiana Court of Appeal, Fourth Circuit, which affirmed.

DISPOSITION

affirmed

CASES CITED

- Pitre v. Department of Fire, 338 So. 3d 70, 75 (La. App. 4 Cir. 2022)
- Russell v. Mosquito Control Board, 941 So. 2d 634, 639-40 (La. App. 4 Cir. 2006)
- Mathieu v. New Orleans Public Library, 50 So. 3d 1259, 1262-63 (La. 2010)
- Voltolina v. City of Kenner, 306 So. 3d 640, 644 (La. App. 5 Cir. 2020)
- Morales v. Office of Inspector General, 366 So. 3d 526, 534-35 (La. App. 4 Cir. 2022)

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