LOUISIANA BOARD OF ETHICS MINUTES

January 9, 2025

The Board of Ethics met on January 9, 2025 at 2:32 p.m. in the Griffon Room on the first

floor of the LaSalle Building located at 617 North Third Street, Baton Rouge, Louisiana with

Board Members Amato, Baños, Bryant, Colomb, Crigler, Grimley, Huval, Nowlin, Roberts and

Speer present. Board Members Grand and Scott were absent. Also present were the Ethics

Administrator, David Bordelon; the Executive Secretary, Carolyn Abadie Landry; and Council

Tracy Barker, Mallory Guillot, Jessica Meiners, Suzanne Mooney and Charles Reeves.

Mr. Jason Amato, Hon. John Crigler, Mr. Mike Huval, and Mr. Rick Nowlin were all

given their oaths of office presented by David Bordelon, after which they were introduced to the

Board and Staff.

The Board considered a general item. Section 201 of the Rules for the Board of Ethics

provides that the chairman and vice-chairman shall be elected for a two-year term at the first

meeting held following January 1 of each odd-numbered year. On motion made, seconded and

unanimously passed, the Board elected La Koshia Roberts as chairwoman and William Grimley

as vice-chairman for the Board of Ethics.

LOUISIANA BOARD OF ETHICS MINUTES

January 10, 2025

The Board of Ethics met on January 10, 2025 at 9:09 a.m. in the LaBelle Room on the 1st floor of

the LaSalle Building located at 617 North Third Street, Baton Rouge, Louisiana with Board Members

Amato, Baños, Bryant, Colomb, Grimley, Huval, Nowlin, Roberts and Speer present. Board Members

Crigler, Grand and Scott were absent. Also present were the Ethics Administrator, David Bordelon;

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Executive Secretary, Carolyn Abadie Landry; and Counsel Tracy Barker, Mallory Guillot, Jessica Meiners, Suzanne Mooney and Charles Reeves.

Gregory E. Bodin, chairperson of Baker Donelson LA PAC, appeared before the Board in Docket No. 24-776 regarding a request that the Board waive the \$1,600.00 campaign finance late fee assessed against Baker Donelson LA PAC, a political action committee, whose January 2024 monthly campaign finance disclosure report was filed 8 days late. After hearing from Mr. Bonin, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, on motion made, seconded and passed by a vote of 6 yeas by Board Members Amato, Bryant, Colomb, Grimley, Huval and Nowlin, and 3 nays by Board Members Baños, Roberts and Speer, the Board suspended all but \$500 based on future compliance.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered Docket No. 24-203 regarding a request to reconsider its decision to decline to waive the \$1,400 campaign finance late fee assessed against the Natural Resources Management Association Political Action Committee, and its committee's chairperson, Donelson T. Caffery, III, whose August 2023 Monthly report was filed 7 days late. On motion made, seconded and unanimously passed, the Board deferred the matter until February.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a reconsideration request in Docket No. 24-317 regarding its decision to reduce the \$2,000.00 original fine to \$600 campaign finance late fee assessed against Patrice Sentino, an unsuccessful candidate for Member of School Board, District 1, Orleans Parish in the November 3, 2020 election, whose 2022 Supplemental campaign finance disclosure report was filed 387 days late. On motion made, seconded and unanimously passed, the Board reaffirmed its decision to reduce to \$600 based on Rule 1205C of the campaign finance disclosure act and decline to waive.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a request in Docket No. 24-772 regarding that the Board waive the \$1,380.00, \$2,000.00 and \$2,000.00 campaign finance late fees (\$5,380.00 total) assessed against Eugene Lawrence Collins, an unsuccessful candidate for Councilman, East Baton Rouge Metro District 10 in the November 3, 2020

election, whose 30-P, 10-P and EDE-P campaign finance disclosure reports were filed 23, 451 and 433 days late, respectively. On motion made, seconded and unanimously passed, the Board declined to waive the 30-P and EDE-P report, and with respect to 10-P, the Board reduced to \$600 and declined to waive.

On motion made, seconded and unanimously passed, the Board agreed to take action on items G5-G22 en globo subject to any items being removed from the en globo listing for further discussion.

On motion made, seconded and unanimously passed, the Board adopted the staff recommendations on items G5-G-22, excluding items G10 and G21, taking the following action:

The Board considered withdrawing an advisory opinion request in Docket No. 23-1078 submitted on behalf of Senator Adam Bass regarding his potential application as a Public Tag Agent. On motion made, seconded, and unanimously passed, the Board withdrew the advisory opinion request since it was no longer necessary.

The Board considered an advisory opinion request in Docket No. 24-086 regarding the interpretation of "public position" as it relates to an ordinance prohibiting members of the newly created Personnel Board for St. Mary Parish Government from holding a "public position" in the Parish. On motion made, seconded and unanimously passed, the Board declined to render an opinion since the issue of a definition of a term contained in a Parish Ordinance is not under the jurisdiction of the Board.

The Board considered an advisory opinion request in Docket No. 24-668 regarding whether the Code of Governmental Ethics permits Clifton Gremillion to work for the Headquarters Division of the Louisiana Department of Corrections after his retirement from the Louisiana State Penitentiary. On motion made, seconded, and unanimously passed, the Board concluded that Mr. Gremillion cannot enter into any contract, subcontract, or transaction under the supervision or jurisdiction of the Technology Management division of the Department of Corrections.

The Board considered an advisory opinion request in Docket No. 24-738 regarding whether the Code of Governmental Ethics permits Heather Darby and Walter Theriot to continue employment with the Louisiana Department of Transportation and Development ("DOTD") District 03, Unit 071. On motion made, seconded and unanimously passed, the Board concluded that Heather Darby and Walter

Theriot are not prohibited from being employed within DOTD District 03, Unit 071, since neither employee is an agency head. The Board approved the disqualification plan submitted since it meets the requirements of R.S. 42:1134(A)(1) and the regulations issued by the Board of Ethics.

The Board considered an advisory opinion request in Docket No. 24-794 regarding whether the Code of Governmental Ethics permits Tamara Hingle to open a Louisiana Driving School after she retires from the Louisiana Office of Motor Vehicles. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics would not prohibit Ms. Hingle from owning and operating a driving school in Louisiana as long as she does not refer anyone to her former agency, the New Orleans East Office of Motor Vehicles.

The Board considered an advisory opinion request in Docket No. 24-857 regarding whether the Code of Governmental Ethics requires members of the Shreveport Municipal Fire and Police Civil Service Board to file annual personal financial disclosure statements pursuant to La. R.S. 42:1124.2.1. On motion made, seconded and unanimously passed, the Board concluded that members of the Shreveport Municipal Fire and Police Civil Service Board are not required to file annual personal financial disclosure statements since the Shreveport Municipal Fire and Police Civil Service Board does not have the authority to expend, disburse, or invest \$10,000 or more in funds in a fiscal year.

The Board considered an advisory opinion request in Docket No. 24-858 regarding whether the Code of Governmental Ethics permits Mrs. Christy Cox to serve as an uncertified substitute teacher for the Franklin Parish School District while her husband, Brady Cox, serves as the Principal of Crowville School. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics prohibits Mrs. Cox from serving as an uncertified substitute teacher for Crowville School while her husband, Mr. Cox, serves as the Principal since Mrs. Cox was not a regular employee of Crowville School for a year prior to Mr. Cox becoming the Principal.

The Board considered an advisory opinion request in Docket No. 24-859 regarding whether the Code of Governmental Ethics permits Kenneth Boudreaux, in his capacity as a member of the governing

authority of the City of Lafayette/ Lafayette City-Parish Consolidated Government, to vote on, discuss, deliberate, and/or participate in any matters related to contracts with the Lafayette Parish Sheriff's Office ("LPSO"). On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics does not prohibit Mr. Boudreaux, as a member of the Lafayette City Council, from the ability to vote on, discuss, deliberate, and/or participate in any way matters related to contracts between the City of Lafayette and LPSO for the purpose of booking inmates in the parish correctional facility,

The Board considered an advisory opinion request in Docket No. 24-861 regarding whether the Code of Governmental Ethics prohibits Byron Casey's continued service on the Lakeshore Crime Prevention District if he was appointed to serve on the Lakeshore Property Owners Association Board. On motion made, seconded and unanimously passed, the Board concluded that no provisions in the Code of Governmental Ethics prohibits Mr. Casey's continued service on the Lakeshore Crime Prevention District if he were appointed to serve on the Lakeshore Property Owners Association Board.

The Board considered an advisory opinion request in Docket No. 24-862 regarding whether the Code of Governmental Ethics prohibits Allie DeLeo-Allen's company, DKB Solutions, LLC, from providing contractual services to Louisiana Tech University following her retirement from Louisiana Tech University. On motion made, seconded and unanimously passed, the Board concluded La. R.S. 42:1121B(1) does not prohibit DKB Solutions, LLC from providing services on a contractual basis to Louisiana Tech University to consult on and help coordinate and manage funding proposal projects for academic units and other university divisions outside of the College of Engineering and Science.

The Board considered an advisory opinion request in Docket No. 24-863 regarding the approval of a proposed disqualification plan from the St. Martin Parish Sheriff's Office regarding the employment of Danielle Nelson Thomas and Kawaski Thomas. On motion made, seconded and unanimously passed, the Board approved the proposed disqualification plan as it meets the Board's requirements pursuant to Louisiana Administrative Code Title 52, Chapter 14, Section 1402, and it is sufficient to prevent violations of Section 1112 of the Code.

The Board considered an advisory opinion request in Docket No. 24-864 regarding whether the Code of Governmental Ethics would prohibit Kristi Fleming from qualifying as a candidate in the mayor's race for the City of Mangham while her spouse, Perry Fleming, serves as the Mangham Police Chief. On motion made, seconded, and unanimously passed, the Board concluded that there are no provisions in the Code of Governmental Ethics that prohibit spouses from running as candidates for elected office in the same city. However, if Mrs. Fleming is elected Mayor of the City of Mangham, she will be prohibited by La. R.S. 42:1112B(1) from participating in any transaction involving the Mangham Police Department in which her spouse has a substantial economic interest. She would need to recuse herself from participating in such matters pursuant to La. R.S. 42:1120.

The Board considered an advisory opinion request in Docket No. 24-865 regarding whether the Code of Governmental Ethics permits the Cameron Parish Clerk of Court's Office to employ the daughter of a member of the Cameron Parish Police Jury. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics does not prohibit the Clerk's Office from hiring Ms. Conner as an employee.

The Board considered an advisory opinion request in Docket No. 24-878 regarding whether the Code of Governmental Ethics would prohibit the continued employment of Lisa Duggen as the Park Manager for the North Webster Parish Industrial District ("NWPID") if her husband, Steve Duggen is appointed to the NWPID's Board. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics does not prohibit the continued employment of Lisa Duggan as Park Manager for NWPID if her husband Steve Duggan is appointed to the NWPID Board.

The Board considered an advisory opinion request in Docket No. 24-891 regarding whether the Code of Governmental Ethics permits Rhodes Property and Development from submitting proposals for projects funded by the Cane River Waterway Commission ("CRWC"). On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics prohibits Rhodes Property & Development from submitting proposals for projects funded by the CRWC since, pursuant to

La. R.S. 42:1113B, no member of Jim Rhodes' immediate family or legal entity in which he has a controlling interest shall bid on or enter into any contract, subcontract, or other transaction under the supervision or jurisdiction of the CRWC.

The Board considered a disqualification plan in Docket No. 24-913 regarding Brandon Edwards' promotion to Shreveport Fire Station 17 while his brother, Derrick Cooper, serves as Captain of Station 17. On motion made, seconded and unanimously passed, the Board approved the disqualification plan and concluded that the Code of Governmental Ethics does not prohibit Mr. Cooper's continued employment with Shreveport Fire Department Station 17 while his brother Derrick Cooper serves as Captain of Station 17.

The Board considered an advisory opinion request in Docket No. 24-799 from the Twin Parish Port District Board of Commissioners regarding the Port's Director also serving as its legal counsel. On motion made, seconded and unanimously passed, the Board concluded that Mr. Verrett's service as both the Port Director and the Port's legal counsel does not pose an issue under the Code of Governmental Ethics or the Board's jurisdiction, provided he does not receive compensation in excess of the terms of his contract with the Port.

The Board considered an advisory opinion request in Docket No. 24-905 regarding whether the Code of Governmental Ethics prohibits Darius Spurlock from accepting a graduate student stipend while employed at the Louisiana Office of Student Financial Aid ("LSOFA"). On motion made, seconded and unanimously passed, the Board concluded that there are no provisions of the Code of Governmental Ethics which prohibit Mr. Spurlock from accepting a graduate student stipend while employed at the LSOFA.

The Board considered a Personal Financial Disclosure Answer in Docket No. 24-892 submitted by Jason Harrison, a member of the AMI Kids Caddo Charter School Board. On motion made, seconded and unanimously passed, the Board instructed staff to advise Mr. Harrison that no further amendment is required since his employment was properly reported.

The Board considered a Personal Financial Disclosure Answer in Docket No. 24-898 regarding a former Bossier City-Parish Metropolitan Planning Commission member. On motion made, seconded and unanimously passed, the Board instructed staff to advise Mr. Mark Montgomery's family that he is not required to file the 2023 Tier 2.1 Personal Financial Disclosure report.

The Board considered a Personal Financial Disclosure Answer in Docket No. 24-899 regarding members of the Avoyelles Parish School Board. On motion made, seconded and unanimously passed, the Board instructed staff to advise that all Avoyelles Parish School Board members are now required to file Tier 3 Personal Financial Disclosure reports since all districts now have a population of less than 5,000 effective in 2022.

The Board considered the following general business agenda items:

On motion made, seconded and unanimously passed, the Board approved the minutes of the November 8, 2024 meeting and deferred the adoption of the December 6, 2024 meeting minutes until February.

The Board considered a consent opinion in Docket No. 23-327 regarding nepotism by Steven Terry, a member of the West Feliciana Hospital Service District, and his wife, Kathy Terry, who is employed by the District. On motion made, seconded and unanimously passed, the Board adopted for publication the consent opinion.

The Board considered a consent opinion in Docket No. 23-495 executed by Ms. Cooley-Redmon, a member of the Sixth Planning District Workforce Development Area 60, regarding a violation of Section 1111C(2)(d) of the Code of Governmental Ethics. On motion made, seconded and unanimously passed, the Board adopted for publication the consent opinion.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a consent opinion in Docket No. 23-887 regarding Holly Sanders, an unsuccessful candidate for Lafayette Parish School Board in the October 14, 2023 election, related to inappropriate use of campaign funds. On motion made, seconded and unanimously passed, the Board adopted for publication the consent opinion.

The Board took no action on G30 Chapters 1-7 of the Rules for the Louisiana Board of Ethics (LAC 52:I).

The Board took no action on G31, a proposed handout of suggestions to the Legislature for changes/amendments to the laws administered by the Louisiana Board of Ethics.

The Board considered the final edit request of a proposed report regarding the Board of Ethics' findings and recommendations after conducting an investigation and analysis of the best practices in other states that could be used to modernize Louisiana's campaign finance and disclosure system, including a review of technological systems that could be implemented in Louisiana. On motion made, seconded and unanimously passed, the Board authorized staff to bring to the Legislative oversight committee as written. The Board thanked the staff for an excellent job on the EF Study. David Bordelon stated that Slava Sereda, Jerri Brees, and the Campaign Finance staff worked on the study.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously agreed to take action on the requests for "good cause" waivers of late fees assessed against candidates and committees included in item G33, en globo, subject to any items being removed from the en globo listing for further discussion.

On motion made, seconded and unanimously passed, the Board adopted the staff recommendations on the items in G33, taking the following action:

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously declined to waive the campaign finance late fees assessed against the following:

Docket No. 24-774 from Christopher Williams, 40-G of a \$2,400 late fee;

Docket No. 24-777 from LA Retailers PAC, Feb 2024 Monthly of a \$1,000 late fee;

Docket No. 24-828 from New Solutions PAC, 10-P of a \$3,000 late fee; and,

Docket No. 24-828 from New Solutions PAC, 10-G of a \$3,000 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-775 regarding five \$3,000 late fees totaling \$15,000 assessed against Restore Our Coast PAC, a political action committee, and its chairperson, John Carmouche, in the October 14, 2023 election, whose 180-P, 90-P, 30-P, 10-P and 10-G campaign finance

disclosure reports were filed 381, 290, 231, 211 and 176 days late, respectively. On motion made, seconded and unanimously passed, the Board deferred the matter to February.

The Board considered a lobbying waiver request in Docket 24-867 regarding the \$50 late fee assessed against Diana Rademacher for the late filing of the August 2024 Lobbying Expenditure Report.

On motion made, seconded and unanimously passed, the Board waived the late fee.

The Board considered the General Supplemental Agenda.

The Board considered an assessment of the enhanced penalty in Docket No. 22-329 In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered an assessment of the enhanced penalty pursuant to La. R.S. 18:1505.4A(4)(a) and La. R.S. 18:1505.4A(4)(b) in Docket No. 22-329 regarding Brian J. Henly, candidate for Mayor, City of Mandeville, in the July 11, 2020 election, for failing to file his 2020 Supplemental Report.

On motion made, seconded and unanimously passed, the Board assessed an additional civil penalty of \$10,000 for failure to file the 2020 supplemental campaign finance disclosure report.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered an assessment of the enhanced penalty pursuant to La. R.S. 18:1505.4A(4)(b) in Docket No. 22-824 regarding L. Jameel Shaheer, candidate for State Representative, 99th District, Orleans Parish, in the October 12, 2019 election, for his failure to file his 2020 Supplemental Report. On motion made, seconded and unanimously passed, the Board assessed an additional civil penalty of \$10,000 for failure to file the 2020 supplemental campaign finance disclosure report.

On motion made, seconded and unanimously passed, the Board adjourned at 10:47 a.m.

	Secretary
APPROVED:	
Chairman	