

LOUISIANA BOARD OF ETHICS
MINUTES
March 7, 2025

The Board of Ethics met on March 7, 2025 at 9:00 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, Bryant, Colomb, Crigler, Grand, Grimley, Huval, Nowlin and Speer present. Board Member Baños, Roberts, Scott and Whipple were absent. Also present were the Ethics Administrator, David Bordelon; Executive Secretary, Carolyn Abadie Landry; and Counsel Tracy Barker, Jessica Meiners, Suzanne Mooney and Charles Reeves.

Amanda Jane LeFleur, Council for the Development of French in Louisiana, appeared before the Board in Docket No. 24-599 regarding a request that the Board reconsider its decision to decline to waive the \$1,500 personal financial disclosure late fee assessed against Ms. LeFleur for filing her 2022 Tier 2.1 annual personal financial disclosure 169 days late. After hearing from Ms. LeFleur, on motion made, seconded and unanimously passed, the Board suspended all based on future compliance.

Alecia Ardoin, attorney representing John Carmouche, Chairperson for Restore Our Coast Political Action Committee, appeared before the Board in Docket No. 24-775 regarding a request that the Board waive the five (5) \$3,000 campaign finance late fees totaling \$15,000 assessed against Restore Our Coast PAC, 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. After hearing from Ms. Ardoin, and in its capacity as the Supervisory Committee on Campaign Finance Disclosure, on motion made, seconded and unanimously passed, the Board with respect to 180-P, declined to waive the late fee and with respect to 90-P,

30-P, 10-P and 10-G, reduced each to \$2,000 based on Rule 1205C of the Campaign Finance Disclosure Act and declined to waive.

Rykert O. Toledano, Jr., St. Tammany Parish Council/District 5, appeared before the Board in Docket No. 24-879 regarding a request that the Board waive a \$2,500 late fee assessed against Mr. Toledano for filing his 2023 Tier 2 annual personal financial disclosure 79 days late. After hearing from Ms. Toledano, on motion made, seconded and unanimously passed, the Board suspended all but \$250 based on future compliance.

Brian Landry, Louisiana Manufacturers Political Action Committee (“LAMP”), and his attorney, Randy Young, Kean Miller LLP, appeared before the Board in Docket No. 25-039 regarding a request that the Board waive the statutory provisions of La. R.S. 18:1511.2 regarding contribution limits of big PACs as implemented by Act 664 of the 2024 Legislative Session. After hearing from Mr. Landry and Mr. Young, and in its capacity as the Supervisory Committee on Campaign Finance Disclosure, on motion made, seconded and unanimously passed, the Board denied the request for rule-making.

The Board took a recess from 10:08 a.m. to 10:16 a.m.

On motion made, seconded and unanimously passed, the Board agreed to take action on items G5-G12 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-G12, excluding item G5, taking the following action:

The Board considered an advisory opinion request in Docket No. 24-621 regarding whether an East Baton Rouge Councilman can operate a bail bonds company. On motion made, seconded and unanimously passed, the Board declined to render an opinion.

The Board considered an advisory opinion request in Docket No. 24-954 regarding whether the Code of Governmental Ethics prohibits Briaron Landry's business, CX Virtual Solutions, from entering into an internship arrangement with Assumption High School (“AHS”) while she is a teacher at AHS. On motion made, seconded, and unanimously passed, the Board concluded that Section 1113A(1)(a) of the Code of Governmental Ethics prohibits Briaron Landry and CX Virtual Solutions from bidding on or entering into any contract, subcontract, or other transaction that is under the supervision or jurisdiction of Ms. Landry’s agency, AHS. This includes her proposed internship arrangement between CX Virtual Solutions and AHS since the internship will have to be approved by the Curriculum and Instruction Supervisor of Secondary Education for AHS.

The Board considered an advisory opinion request and disqualification plan proposal in Docket No. 24-963 concerning Judy Jones's promotion to the Assistant Director of Nursing A-East Division at Eastern Louisiana Mental Health Systems (ELMHS) while her sister, Laura Williams, serves as the Director of Nursing A-East Division for ELMHS. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics does not prohibit Judy Jones’ continued employment with ELMHS while her sister Laura Williams serves as Director of Nursing A-East Division for ELMHS. Additionally, the Board approved the 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 of Governmental Ethics.

The Board considered an advisory opinion request in Docket No. 24-968 from Dwight Hudson, Metro Councilman, District 9, East Baton Parish, as to whether the Code of Governmental Ethics permits his company, Port Hudson Holdings, LLC (the “Company”) to

enter into a lease with a tenant utilizing a voucher provided by the East Baton Rouge Parish Housing Authority (the "Housing Authority") or the Louisiana Housing Corporation ("LHC"). On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics permits the Company to enter into leases with tenants receiving vouchers from the Housing Authority and/or LHC. The Board also concluded that the Code of Governmental Ethics prohibits the Company from entering into leases with tenants receiving vouchers from Office of Community Development.

The Board considered an advisory opinion request in Docket No. 25-007 regarding as to whether the Code of Governmental Ethics would prohibit Jenny Welch's company, Druco Lumber, to sell to the Maintenance Division of the Avoyelles Parish School Board while she is employed in the Food Service Division of the Avoyelles Parish School Board. On motion made, seconded and unanimously passed, the Board concluded that Section 1113A(1)(a) does not prohibit Druco Lumber from selling items to the Maintenance Division of the Avoyelles Parish School District while Ms. Welch is employed as a supervisor in the Food Service Division of the Avoyelles Parish School District.

The Board considered an advisory opinion request in Docket No. 25-008 regarding as to whether the Chief Deputy Marshall of the Franklin/Third Ward Marshall's Office is permitted to serve as the Interim Police Chief for the Jeanerette Police Department. On motion made, seconded and unanimously passed, the Board concluded being employed with the Franklin/Third Ward Marshall's Office while also working for the Jeanerette Police Department does not pose an issue under the Code of Governmental Ethics. However, Marshal Weidenboerner's opinion request may present an issue associated with the Louisiana Dual Employment Laws, which is under the jurisdiction of the Attorney General and she should contact that office regarding the

application to those laws. A copy of her request and the opinion will be forwarded to the Attorney General's Office.

The Board considered an advisory opinion request in Docket No. 25-012 regarding Anthony V. Ligi, Jr, on behalf of the Louisiana Department of Education ("LDOE"), as to whether the Code of Governmental Ethics permits LDOE employees to solicit donations from third parties to cover certain costs associated with the hosting of an upcoming event. On motion made, seconded and unanimously passed, the Board concluded that the Code of Governmental Ethics prohibits LDOE employees from soliciting donations from 1) persons having or seeking to do business with LDOE; 2) persons who conduct operations or activities under the jurisdiction of LDOE; and 3) persons who have substantial economic interest in the performance of LDOE employees' duties.

The Board considered an advisory opinion request in Docket No. 24-590 regarding Gramercy Police Department (the "GPD"), as to whether the Code of Governmental Ethics permits GPD employees to receive certain benefits approved by the Board of Aldermen of the Town of Gramercy (the "Town"). On motion made, seconded, and unanimously passed, the Board concluded that the Code of Governmental Ethics prohibits GPD employees to utilize facilities of the Town. Further, to the extent that the Proposed Ordinance does not violate applicable state laws relating to use of public property, then GPD employees are permitted to accept such benefit from the Town.

The Board considered the following general business agenda items:

On motion made, seconded and unanimously passed, the Board approved the minutes of the February 6, 2025 and February 7, 2025 meetings.

The Board considered a consent opinion in Docket No. 20-622 regarding Robert Berry arising from charges for his dual positions as the Executive Director and Board Member of the Cypress Black Bayou Recreation and Water Conservation District. Robert Berry has executed the consent opinion admitting to a violation of Sections 1112A and 1113B and paid the \$10,000 civil penalty. On motion made, seconded and unanimously passed, the Board adopted and published the consent opinion and dismissed the charges pending before the Ethics Adjudicatory Board.

David Bordelon announced that the April Executive and General meetings will be in the LaBelle room. David mentioned that Southern University Law Center will possibly be considered to host a Board meeting next fall semester.

The Board considered Docket No. 3125-03 regarding Chapters 1-7 of the Rules for the Louisiana Board of Ethics (LAC 52:1). On motion made, seconded and unanimously passed, the Board approved the agency review report.

The Board considered a staff memorandum in Docket No. 3125-04 concerning the dollar amount for the food and drink limit that can be provided to a public servant per event, and whether there should be an increase based on La. R.S. 42:1115.1. On motion made, seconded and unanimously passed, the Board instructed staff to promulgate a rule which increases the current value of food and drink limit to \$81 per event beginning July 1, 2025.

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 G18, 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 G18, except Docket Nos. 24-712, 24-923, 24-940, 24-942 and 24-972, 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. 24-868 from Working on Lafourche’s Future WOLF PAC, 10-E of a \$640 late fee;

Docket No. 24-941 from George L. Branigan, 2023 Annual of a \$240 late fee;

Docket No. 24-973 from Anthony Eaves, 2024 Special of a \$400 late fee;

Docket No. 25-015 from CENLA Strong PAC, 30-P of a \$3,000 late fee;

Docket No. 25-015 from CENLA Strong PAC, 10-P of a \$800 late fee; and,

Docket No. 24-975 from Timothy “Tim” Riley, 10-G of a \$80 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously suspended all based on future compliance with the reporting requirements in the Campaign Finance Disclosure Act against the following:

Docket No. 24-951 from Sherman Jackson, 30-P of a \$40 late fee;

Docket No. 24-970 from KaTrina Chantelle Griffin, 30-P of a \$120 late fee; and,

Docket No. 24-975 from Timothy “Tim” Riley, 30-P of a \$80 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously reduced to \$1,200 based on Section 1205C of the Rules for the Board of Ethics and declined to waive the campaign finance late fee assessed against the following:

Docket No. 24-964 from W. Thomas Barrett, III, 2022 SUPP of a \$2,000 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously reduced to \$600 based on Section 1205C of the Rules for the Board of Ethics and declined to waive the campaign finance late fee assessed against the following:

Docket No. 24-964 from W. Thomas Barrett, III, 2023 SUPP of a \$2,000 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously reduced to \$400 based on Section 1205C of the Rules for the Board of Ethics and declined to waive the campaign finance late fee assessed against the following:

Docket No. 24-974 from Erin Riecke Rowan, 2023 SUPP of a \$1,000 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board unanimously suspended all but \$200 based on future compliance with the reporting requirements in the Campaign Finance Disclosure Act against the following:

Docket No. 25-029 from Joseph “Liberty Jesus” Clement, 30-P of a \$1,000 late fee.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-712 regarding (3) \$2,500 campaign finance late fees (\$7,500 total) assessed against Daniel M. "Danny" Cole, an unsuccessful candidate for Governor in the October 14, 2023 election, whose 30-P, 10-P & 10-G campaign finance disclosure reports were filed 350, 330 and 295 days late, respectively. On motion made, seconded and unanimously passed, the Board for each report (30-P, 10-P, and 10-G), reduced to \$1,000 based on Rule 1205C of the Rules for the Board of Ethics and suspend all but \$500 for each report based on future compliance.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-923 regarding the \$1,140 campaign finance late fee assessed against Ludwig Gelobter, an unsuccessful candidate for State Representative, 43rd Representative District in the October 14, 2023 election, whose 10-G campaign finance disclosure report was filed 19 days late. On motion made, seconded and unanimously passed, the Board suspended all based on future compliance.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-940 regarding the \$3,000.00 campaign finance late fee assessed against Ready Kids New Orleans, a political action committee, its committee's chairperson, Bill Hammack, and treasurer, Sharonda Williams, whose 2023 Annual campaign finance disclosure report was filed 291 days late. On motion made, seconded and unanimously passed, the Board reduced to \$2,000 based on Rule 1205C of the Rules for the Board of Ethics and declined to waive.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-942 regarding the \$1,000.00 and \$800.00 (total of \$1,800.00) campaign finance late fees assessed against LA Automobile Dealers Election Action Committee, a political action committee, its committee's chairperson, Kristie Hebert, and treasurer, Coulter McMahan, whose July 2024 and September 2024 Monthly campaign finance disclosure reports were both filed 7 days late. On motion made, seconded and unanimously passed, the Board declined to waive since filer fails to state good cause which is outside of the control of filer, as required under La R.S. 42:1157(A)(1)(b).

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a waiver request in Docket No. 24-972 regarding the two (2) \$400.00 campaign finance late fees (\$800.00 total) assessed against Tandra "Tammy" Cook, an unsuccessful candidate for Mayor-President, Metro Council, City of Baton Rouge in the November 5, 2024 election, whose 90-P and 30-P campaign finance disclosure reports were filed 6 & 5 days late, respectively. On motion made, seconded and unanimously passed, the Board deferred until a future meeting.

The Board considered a waiver request in Docket No. 24-339 submitted by Ruffin Curt Guillory, Jefferson Davis Parish Police Jury / District 9, regarding a \$500 late fee assessed for filing his amended 2022 Tier 3 Annual personal financial disclosure 80 days late and a \$500 late fee assessed for filing his amended 2022 Tier 3 Candidate personal financial disclosure 38 days late. On motion made, seconded and unanimously passed, the Board declined to waive the late fees.

The Board unanimously agreed to take action on the requests of reconsiderations of late fees assessed against individuals included in item G20, 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 G20, taking the following action:

The Board considered a reconsideration request in Docket No. 23-518 regarding to decline to waive a \$2500 late fee assessed against Charles Wayne "Carlos" Jean, Jr., unsuccessful candidate for Sheriff / East Baton Rouge Parish in the October 12, 2019 election, for filing his amended 2018 Tier 2 Candidate personal financial disclosure 1024 days late. On motion made, seconded and unanimously passed, the Board affirmed the prior decision to decline to waive the late fee since filer failed to state good cause which is outside of the control of filer, as required under La. R.S. 42:1157(A)(1)(b).

The Board considered a reconsideration request in Docket No. 24-431 regarding to decline to waive the \$350 late fee assessed against DeWayne Kevin Bowie, Cajundome and Convention Center Commission, for filing his 2022 Tier 2.1 Annual personal financial disclosure 7 days late. On motion made, seconded and unanimously passed, the Board affirmed the prior decision to decline to waive the late fee since filer failed to state good cause which is outside of the control of filer, as required under La. R.S. 42:1157(A)(1)(b).

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a reconsideration request in Docket No. 24-522 regarding to decline to waive the \$2,000, \$2,000 and \$1,920 campaign finance late fees (\$5,920 total) assessed against Betty Ward Cooper, unsuccessful candidate for Mayor, City of Monroe, Ouachita Parish, in the March 23, 2024 election, whose 2023 Annual, 30-P and 10-P campaign finance disclosure reports were filed 47, 50 and 32 days late, respectively. On motion made, seconded and unanimously passed, the Board reduced to \$200 each (\$600 total) based on financial hardship; and declined to waive.

In its capacity as the Supervisory Committee on Campaign Finance Disclosure, the Board considered a reconsideration request in Docket No. 24-562 regarding to decline to waive the \$1,000 campaign finance late fee assessed against, Patricia "Patty" McCarty, a successful candidate for Member of Parish Council, District 5, Plaquemines Parish in the November 8, 2022, whose 2023 Supplemental campaign finance disclosure report was file 280 days late. On motion made, seconded and unanimously passed, the Board reduced to \$400 based on Rule 1205C of the Rules for the Board of Ethics and declined to waive.

The Board considered a reconsideration request in Docket No. 24-711 regarding to decline to waive a \$1500 late fee assessed against Paul P. Matthews, Board of Supervisors of Southern University and Agricultural and Mechanical College, for filing his 2022 Tier 2.1 Annual personal financial disclosure 32 days late. On motion made, seconded and unanimously passed, the Board affirmed the prior decision to decline to waive the late fee since filer failed to state good cause which is outside of the control of filer, as required under La. R.S. 42:1157(A)(1)(b).

On motion made, seconded and unanimously passed, the Board adjourned at 10:43 a.m.

Secretary

APPROVED:

Chairman