

ASSUMPTION PARISH CLERK OF COURT



INVESTIGATIVE AUDIT
ISSUED JANUARY 16, 2019

**LOUISIANA LEGISLATIVE AUDITOR
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LOUISIANA LEGISLATIVE AUDITOR
DARYL G. PURPERA, CPA, CFE

January 16, 2019

THE HONORABLE DARLENE LANDRY
ASSUMPTION PARISH CLERK OF COURT
Napoleonville, Louisiana

We are providing this report for your information and use. This investigative audit was performed in accordance with Louisiana Revised Statutes 24:513, *et seq.* to determine the validity of complaints we received.

The procedures we performed primarily consisted of making inquiries and examining selected financial records and other documents and did not constitute an examination or review in accordance with generally accepted auditing or attestation standards. Consequently, we provide no opinion, attestation or other form of assurance with respect to the information upon which our work was based.

The audit was begun after the Legislative Auditor received complaints that the Assumption Parish Clerk of Court's Office issued payments to one of the Clerk of Court's immediate family members and that the office did not send fees that were collected for the issuance of birth and death certificates to the State Treasury as required by law.

Auditors found that between July and December 2017, the clerk's daughter was paid \$1,200 to deliver files to the First Circuit Court of Appeal in Baton Rouge. In January 2018, the office began paying the clerk's granddaughter to make the deliveries and paid her \$9,049 through August 2018; however, it appears the clerk's daughter and/or son-in-law (the daughter's husband) made those deliveries. State law prohibits public servants from contracting and/or participating in transactions involving the governmental entity and their immediate family members.

In addition, auditors found that between January 2015 and August 2018 the clerk's office did not remit \$26,756 in fees that were collected from the issuance of birth and death certificates to the State Treasury. State law requires four dollars be sent to the State Treasury for each long-form birth and death certificate clerks of court issue. By not sending the money to the State Treasury, the clerk's office may have violated state law.

The accompanying report presents our findings and recommendations as well as management's response. This is a public report. Copies of this report have been delivered to the District Attorney for the 23rd Judicial District of Louisiana, the Louisiana Board of Ethics, and others as required by law.

Respectfully submitted,



Thomas H. Cole, CPA
First Assistant Legislative Auditor

THC/aa

ASSUMPTIONCLERKOF COURT

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EXECUTIVE SUMMARY

Clerk of Court Improperly Contracted with Immediate Family Member

From July 2017 to December 2017, the Assumption Parish Clerk of Court's Office (Clerk of Court) paid Clerk of Court (Clerk) Darlene Landry's daughter \$1,200 to deliver files for the Clerk of Court's office. In January 2018, the Clerk of Court's office began paying Clerk Landry's granddaughter to make such deliveries and paid her \$9,049 from January to August 2018; however, it appears that the Clerk's daughter and/or son-in-law (the daughter's husband) made the deliveries for which the Clerk's minor granddaughter was paid. State law prohibits public servants from contracting and/or participating in transactions involving the governmental entity and their immediate family members. Additionally, the payments made to the Clerk's granddaughter were deposited into a bank account on which the Clerk and her granddaughter were the only authorized signors. By contracting with an immediate family member (Clerk's daughter) and allowing her daughter and her son-in-law to make deliveries for the Clerk's office, Clerk Landry may have violated state ethics laws.

Clerk Failed to Remit Fee Collections to the Louisiana State Treasury as Required by Law

From January 1, 2015 to August 31, 2018, the Clerk of Court failed to remit \$26,756 in fees collected from the issuance of birth and death certificates to the Louisiana State Treasury (State Treasury). State law requires clerks of court to collect and remit four dollars to the State Treasury for each long-form birth and death certificate they issue. By failing to remit fees for the issuance of birth and death certificates to the State Treasury, Clerk of Court management may have violated state law.

BACKGROUND AND METHODOLOGY

Article V, Section 28 of the Louisiana Constitution provides that the parish clerks of court are elected for a four-year term and serve as the ex-officio notary public; the recorder of conveyances, mortgages, and other acts; and shall have other duties and powers provided by law.

In May 2018, the Louisiana Legislative Auditor (LLA) received a complaint that the Assumption Parish Clerk of Court's Office (Clerk of Court) issued payments to one of Clerk of Court (Clerk) Darlene Landry's immediate family members. In July 2018, the LLA received another complaint that the Clerk of Court's office failed to remit fees it collected for the issuance of birth and death certificates to the State Treasury as required by law. LLA initiated this audit to determine the validity of these complaints. The procedures performed during this audit included:

- (1) interviewing Clerk of Court employees and other persons, as appropriate;
- (2) examining selected Clerk of Court documents and records;
- (3) gathering and examining external parties' documents and records; and
- (4) reviewing applicable state laws and regulations.

FINDINGS AND RECOMMENDATIONS

Clerk of Court Improperly Contracted with Immediate Family Member

From July 2017 to December 2017, the Assumption Parish Clerk of Court's Office (Clerk of Court) paid Clerk of Court (Clerk) Darlene Landry's daughter \$1,200 to deliver files for the Clerk of Court's office. In January 2018, the Clerk of Court's office began paying Clerk Landry's granddaughter to make such deliveries and paid her \$9,049 from January to August 2018; however, it appears that the Clerk's daughter and/or son-in-law (the daughter's husband) made the deliveries for which the Clerk's minor granddaughter was paid. State law prohibits public servants from contracting and/or participating in transactions involving the governmental entity and their immediate family members. Additionally, the payments made to the Clerk's granddaughter were deposited into a bank account on which the Clerk and her granddaughter were the only authorized signors. By contracting with an immediate family member (Clerk's daughter) and allowing her daughter and her son-in-law to make deliveries for the Clerk's office, Clerk Landry may have violated state ethics laws.^{1,2,3}

Payments to Clerk Landry's Daughter

Records show that the Clerk of Court's office paid Clerk Landry's daughter, Jamie Delaughter, \$1,200 to deliver Assumption Parish case files to the First Circuit Court of Appeal in Baton Rouge between July 11, 2017 and December 28, 2017. Ms. Delaughter was paid from the Clerk of Court's Advance Deposit Fund, which consists primarily of prepaid estimated court costs, including suit filing fees, service fees, etc.; monies from the Fund are disbursed to the clerk's salary fund or to others as fees are earned.^A The Clerk of Court's office had no invoices to support the payments to Ms. Delaughter but provided copies of letters to the attorneys associated with the case files describing the costs incurred by the Clerk of Court's office (e.g., postage for mailing appeal). These letters indicate that Ms. Delaughter was paid \$25 per box of case files she delivered.^B Clerk Landry signed six of the seven checks issued to Ms. Delaughter.

Clerk Landry said she paid Ms. Delaughter to transport boxes of case files to the First Circuit Court of Appeal because: (1) shipped boxes had been damaged in the past; and (2) Ms. Delaughter's \$25 rate per box was less expensive than shipping the boxes. Clerk Landry said she stopped using her daughter to transport boxes of case files in December 2017 because she was concerned about "nepotism" rules. Clerk Landry later told us that she understood ethics laws and did not think paying Ms. Delaughter was a problem because the money used to pay her came from the attorneys associated with the case files.

^ALouisiana Revised Statute (La. R.S.) 13:842(A).

^BOne of the checks issued to Ms. Delaughter included \$20 for mileage.

Louisiana Revised Statute (La. R.S.) 42:1113(A)(1)(a) provides that no public servant or member of such a public servant's immediate family,^C or legal entity in which he has a controlling interest, shall bid on or enter into any contract, subcontract, or other transaction that is under the supervision or jurisdiction of the agency of such public servant. By contracting with her daughter – an immediate family member, Clerk Landry may have violated La. R.S. 42:1113(A)(1)(a). Further, La. R.S. 42:1112(B)(1) provides that no public servant, except as provided in La. R.S. 42:1120, shall participate in a transaction in which an immediate family member has a substantial economic interest. By signing Clerk of Court checks payable to an immediate family member, Clerk Landry may have violated La. R.S. 42:1112(B)(1).

Payments to Clerk Landry's Granddaughter

Clerk Landry stopped paying her daughter to transport case files amid concerns of nepotism in December 2017 and began paying Clerk Landry's granddaughter (Ms. Delaughter's daughter). From January 5, 2018 to August 29, 2018, the Clerk of Court's office issued 57 checks, totaling \$9,049, to Clerk Landry's granddaughter for delivering boxes of case files to the First Circuit Court of Appeal. Like the payments to her mother, Ms. Delaughter, these payments were disbursed from the Advance Deposit Fund and had no invoices to support the payments. The Clerk of Court's office again provided correspondence to the attorneys associated with the case files describing the costs incurred by the Clerk of Court's office. These records show that Clerk Landry's granddaughter also received \$25 for each box of case files she delivered.

In addition, at least 28 of the 57 payments Clerk Landry's granddaughter received included mileage reimbursements (for a total of \$1,034). Clerk Landry initially told us that her granddaughter always picked up the boxes from her office with Mr. and Mrs. Delaughter, but was not always present when Mr. and Mrs. Delaughter delivered the boxes to the First Circuit Court of Appeal. Clerk Landry later told us that she took the boxes from her office to her residence, or to a location in Gonzales, Louisiana, for her granddaughter and/or Mr. and Mrs. Delaughter to pick up. Clerk Landry estimated that her granddaughter was present for all but about four deliveries to the First Circuit Court of Appeal. The First Circuit Court of Appeal deputy clerk who received a majority of the case files from the Clerk of Court's office told us Mr. and Mrs. Delaughter made nearly all of the deliveries and that Clerk Landry's granddaughter was present for only one or two deliveries. Mr. and Mrs. Delaughter agreed that their daughter was not present for most of the deliveries, because she was in school, but was always present when they picked up the boxes from Clerk Landry.

During our audit, we found that Clerk Landry's granddaughter deposited 27 of the 57 checks (totaling \$4,386) into a bank account on which she and Clerk Landry were the only authorized signors. Clerk Landry confirmed that she is a signor on the account. Clerk Landry stated that she has not spent any of the money in the account and that she monitors the account so she will know when her granddaughter needs money. We asked Mr. and Mrs. Delaughter if they received any portion of the payments made to their daughter. They stated that their

^C **La. R. S. 42:1102(13)** states that, "Immediate family" as the term relates to a public servant means his children, the spouses of his children, his brothers and their spouses, his sisters and their spouses, his parents, his spouse, and the parents of his spouse."

daughter paid for fuel expenses when transporting boxes and sometimes reimbursed them for things with cash.

Conclusion

From July 2017 to December 2017, the Clerk of Court's office issued payments totaling \$1,200 for delivery services to Clerk Landry's daughter, Jamie Delaughter. From January 2018 to August 2018, the Clerk of Court's office issued payments totaling \$9,049 to Clerk Landry's granddaughter for delivery services; however, it appears that Ms. Delaughter and her husband continued to provide the delivery services for which Clerk Landry's granddaughter was paid. State law prohibits public servants from contracting and/or participating in transactions involving the governmental entity and their immediate family members. By contracting with an immediate family member (Clerk's daughter) and allowing her daughter and her son-in-law to make deliveries for the Clerk's office, Clerk Landry may have violated state ethics laws.^{1,2,3}

Recommendations

We recommend that Clerk of Court management:

- (1) Implement written policies and procedures to ensure compliance with the Code of Governmental Ethics (La. R.S. 42:1101, *et seq.*);
- (2) Ensure that all employees are properly trained regarding state ethics and other laws affecting the Clerk of Court's operations;
- (3) Discontinue contracting with the Clerk's immediate family members; and
- (4) Require detailed invoices and documentation of the business purpose for all expenditures.

Clerk Failed to Remit Fee Collections to the Louisiana State Treasury as Required by Law

From January 1, 2015 to August 31, 2018, the Clerk of Court failed to remit \$26,756 in fees collected from the issuance of birth and death certificates to the Louisiana State Treasury (State Treasury). State law requires clerks of court to collect and remit four dollars to the State Treasury for each long-form birth and death certificate they issue. By failing to remit fees for the issuance of birth and death certificates to the State Treasury, Clerk of Court management may have violated state law.^{4,5,6}

The clerk of court in each parish may issue certified copies of long-form birth (birth) and death (death) certificates on behalf of the State Office of Vital Records (Vital Records). Clerks of court charge \$34 for birth certificates and \$26 for death certificates, and retain \$15 for each certificate issued. La. R.S. 40:39.1 requires that, from the amount collected by a clerk of court for each long-form birth certificate or death certificate issued, four dollars is to be remitted to the

State Treasurer on the tenth day of each month.^D The remaining \$15 for birth certificates and \$7 for death certificates must be remitted to Vital Records. The following chart illustrates the fee breakdown for certificates issued:

Fee Breakdown by Type of Long-Form Certificates Issued				
Certificate Type	Customer Fee	Amount Retained by Clerk of Court	Amount Due to Vital Records	Amount Due to the State Treasury
Birth Certificate	\$34	\$15	\$15	\$4
Death Certificate	\$26	\$15	\$7	\$4

Vital Records requires clerks of court that issue birth and death certificates to submit a monthly report listing the totals of each type of certificate issued. The report summarizes the number and type of certificates issued in order to determine the amounts owed to Vital Records and the State Treasury. We reviewed the monthly reports completed by the Clerk of Court's office from January 2015 to August 2018. These reports show that the Clerk of Court issued 6,689 certificates (6,658 birth certificates and 31 death certificates) during this period. In addition, these records show that the Clerk of Court's office remitted the appropriate fees to Vital Records, but failed to remit any fees to the State Treasury. Based on the number of certificates issued (6,689), the Clerk of Court's office should have remitted fees totaling \$26,756 to the State Treasury during this period.

According to the former deputy clerk who completed the monthly reports, in 2013 Clerk Landry told her they did not need to remit the four dollar fees to the State Treasury. The former employee said she took Clerk Landry at her word until the 2015 version of the report was released, which specifically provided a line item used to calculate the amount remitted to the State Treasury.^E The former employee said she alerted Clerk Landry to the change, but Clerk Landry told her that they would not be remitting the fees to the State Treasury. The deputy clerk who currently completes the monthly reports said she is aware of the line item that calculates fees payable to the State Treasury, but her predecessor (the former deputy clerk mentioned above) trained her to not remit fees to the State Treasury.

Clerk Landry stated that after speaking to some of the other clerks of court, she decided to stop sending the four dollar fee because the State Treasury did not enforce the payment. She said that she does not know how the money is used and believes that the State Treasury should bill the clerks of court if they want to be paid. Clerk Landry stated that it has never been brought to her attention that state law required the Clerk of Court's office to remit the fees to the State

^D The funds deposited shall be credited to the Bond Security and Redemption Fund. Out of the funds remaining in the Bond Security and Redemption Fund after a sufficient amount is allocated to pay all obligations secured by the full faith and credit of the state which become due and payable in any fiscal year, the treasurer shall credit to the Vital Records Conversion Fund

^E The 2015 version of the monthly report was released in November 2015 and included a line-item that specifically included the amount to be remitted to the State Treasury. In July 2017, an electronic version of the monthly report was released, which automatically calculated the amount to be remitted to the State Treasury.

Treasury. After informing Clerk Landry of the legal requirement to remit fees to the State Treasury, the Clerk of Court's office paid the \$26,336 to the State Treasury for certificates issued from January 2015 through July 2018. By failing to remit required payments to the State Treasury from January 2015 to August 2018, Clerk of Court management may have violated state law.^{4,5,6}

Recommendations

We recommend that Clerk of Court management implement written policies and procedures to ensure compliance with state law. In addition, Clerk of Court management should review its records to determine the appropriate amounts to be remitted to the State Treasury for past issuances of birth and death certificates.

LEGAL PROVISIONS

¹ **Louisiana Revised Statute (La. R.S.) 42:1113(A)(1)(a)** states, “No public servant, excluding any legislator and any appointed member of any board or commission and any member of a governing authority of a parish with a population of ten thousand or less, or member of such a public servant’s immediate family, or legal entity in which he has a controlling interest shall bid on or enter into any contract, subcontract, or other transaction that is under the supervision or jurisdiction of the agency of such public servant.”

² **La. R.S. 42:1112(B)** states, in part, “No public servant, except provided in R.S. 42:1120, shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any of the following persons has a substantial economic interest: (1) Any member of his immediate family.”

³ **La. R.S. 14:134(A)** provides that, “Malfeasance in office is committed when any public officer or public employee shall: (1) Intentionally refuse or fail to perform any duty lawfully required of him, as such officer or employee; or (2) Intentionally perform any such duty in an unlawful manner; or (3) Knowingly permit any other public officer or public employee, under his authority, to intentionally refuse or fail to perform any duty lawfully required of him, or to perform any such duty in an unlawful manner.”

⁴ **La. R.S. 40:39.1(B)(2)** states, “Clerks shall pay to the state registrar such amounts as are required in R.S. 40:40. In addition, four dollars for each long-form birth certificate or death certificate issued by each clerk of court shall be remitted to the state treasurer on the tenth day of each month for deposit in the state treasury. The funds deposited shall be credited to the Bond Security and Redemption Fund. Out of the funds remaining in the Bond Security and Redemption Fund after a sufficient amount is allocated to pay all obligations secured by the full faith and credit of the state which become due and payable in any fiscal year, the treasurer shall credit to the Vital Records Conversion Fund, hereby created, an amount equal to the funds deposited under the provisions of this Section.”

⁵ **La. R.S. 14:134(A)** provides that, “Malfeasance in office is committed when any public officer or public employee shall: (1) Intentionally refuse or fail to perform any duty lawfully required of him, as such officer or employee; or (2) Intentionally perform any such duty in an unlawful manner; or (3) Knowingly permit any other public officer or public employee, under his authority, to intentionally refuse or fail to perform any duty lawfully required of him, or to perform any such duty in an unlawful manner.”

⁶ **La. R.S. 42:1461(A)** states, “Officials, whether elected or appointed and whether compensated or not, and employees of any “public entity,” which, for purposes of this Section shall mean and include any department, division, office, board, agency, commission, or other organizational unit of any of the three branches of state government or of any parish, municipality, school board or district, court of limited jurisdiction, or other political subdivision or district, or the office of any sheriff, district attorney, coroner, or clerk of court, by the act of accepting such office or employment assume a personal obligation not to misappropriate, misapply, convert, misuse, or otherwise wrongfully take any funds, property, or other thing of value belonging to or under the custody or control of the public entity in which they hold office or are employed.”

APPENDIX A

Management's Response



SHERI M. MORRIS

PLEASE REPLY TO:

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January 4, 2019

Daryl G. Purpera, CPA, CFE
c/o Roger Harris, via email: RHarris@LLA.La.gov
Louisiana Legislative Auditor
Post Office Box 94397
Baton Rouge, Louisiana 70804-9397

Re: Response to Findings and Recommendations

Dear Mr. Purpera:

On behalf of the Assumption Parish Clerk of Court's Office ("Clerk's Office"), I would like to thank you for the opportunity to provide a formal response to the findings and recommendations of your office. Additionally, I want to inform you that the Clerk's Office took immediate action to implement your recommendations, discontinue the practices of concern, and address the concerns raised in your findings.

I. Response to Findings

A. Fees for birth and death certificates.

Fees collected by the Clerk's Office for long form birth certificates and death certificates issued from January of 2015 through August of 2018 were deposited in the Clerk's Office's operating account. The \$4 fee to be disbursed to the State Treasury remained in the Clerk's Office's operating account until September of 2018. In September of 2018, the Clerk's Office remitted the \$4 fee for each long form birth certificate and for each death certificate issued from January of 2015 through August of 2018 to the State Treasury.

Additionally, the Clerk's Office implemented a procedure to remit the \$4 fee to the State Treasury on or before the 10th of the following month. Since implementation of this procedure in September of 2018, the \$4 fee for each long form birth certificate and for each death certificate has been timely forwarded to the State Treasury.

B. Payments for Deliveries of Suit Records (January to August of 2018).

On March 20, 2018, in response to Clerk Landry's request, the Louisiana Board of Ethics issued an opinion advising Clerk Landry the Code of Governmental Ethics did not prohibit the Clerk's Office from employing or paying her granddaughter (Attached). Additionally, funds in the advance deposit account are deposits from attorneys for payment of court costs and are not public funds.

From January through August of 2018, Clerk Landry's granddaughter received compensation for transporting suit records to the First Circuit Court of Appeal. The amount of the compensation per box was less than the commercial carrier delivery rate. Compensation for delivering suit records was deducted from the advance deposit for the suit after the service was performed. The suit records were all delivered in good condition and in a timely manner. Documentation regarding the number of boxes and dates of delivery is included in the suit records.

Clerk Landry did not use any funds received by her granddaughter as compensation for delivery of suit records. In order to address your concerns regarding Clerk Landry's ability to access funds deposited in the account and to avoid the appearance of impropriety, the amount of the checks deposited into the bank account via checks issued from the advance deposit account will be refunded to the advance deposit account. The Clerk's Office will credit the refunded amounts to the advance deposit for the suits. No fees will be charged to the suit accounts for the delivery of suit records.

In September of 2018, Clerk Landry entered an Independent Contractor Agreement for Courier Services for delivery of suit records to the First Circuit Court of Appeal. Since August 30, 2018, all records were delivered to the First Circuit Court of Appeal by the courier.

C. Payments for Deliveries of Suit Records (July to December of 2017).

Funds in the advance deposit account are deposits from attorneys for payment of court costs and are not public funds. Clerk Landry's daughter received compensation from the advance deposit account for delivering approximately 50 boxes of suit records to the First Circuit Court of Appeal. The amount of the compensation per box was less than the commercial carrier delivery rate. The suit records were all delivered in good condition and in a timely manner. Documentation regarding the number of boxes and dates of delivery is included in the suit records.

Clerk Landry was of the opinion that payments made from the advance deposit account, which are not public funds, were not subject to prohibitions in the Ethics Code. Clerk Landry requested her daughter to deliver suit records only after suit records previously delivered to the First Circuit Court of Appeal by a commercial carrier were damaged requiring the Clerk's Office to reproduce and deliver a second copy. Additionally, other suit records delivered by commercial carriers were not delivered timely causing unnecessary delays to the litigants.

January 4, 2019

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When Clerk Landry learned payments from the advance deposit account may be governed by the Ethics Code, Clerk Landry discontinued the practice. In order to address your concerns regarding the payments and to avoid the appearance of impropriety, the amount of the payments made to Clerk Landry's daughter for delivering suit records was refunded to the advance deposit account. The Clerk's Office credited the refunded amounts to the advance deposits for the suits. No fees will be charged to the suit accounts for the delivery of suit records.

In September of 2018, Clerk Landry entered an Independent Contractor Agreement for Courier Services for delivery of suit records to the First Circuit Court of Appeal. Since August 30, 2018, all records were delivered to the First Circuit Court of Appeal by the courier.

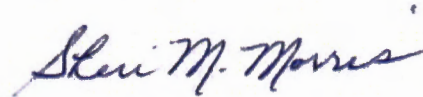
II. Response to Recommendations

The Assumption Parish Clerk of Court's Office agrees to:

- A. Implement written policies and procedures to ensure compliance with the Code of Governmental Ethics (La. R.S. 42:110, *et seq.*);
- B. Ensure all employees are properly trained regarding state ethics and other laws affecting the Clerk of Court's operations;
- C. Contract with an independent contractor for courier services; and
- D. Require the courier to verify in writing the number of boxes delivered and date of delivery.

Please contact me if you need any additional information regarding this matter.

Very truly yours,



Sheri M. Morris

Enclosure



STATE OF LOUISIANA
DEPARTMENT OF STATE CIVIL SERVICE
LOUISIANA BOARD OF ETHICS
P. O. BOX 4368
BATON ROUGE, LA 70821
(225) 219-5600
FAX: (225) 381-7271
1-800-842-6630
www.ethics.la.gov

March 20, 2018

Honorable Darlene Landry
Clerk of Court
23rd Judicial District Court
Parish of Assumption
P.O. Box 249
Napoleonville, Louisiana 70390

Re: Ethics Board Docket No. 2018-055

Dear Ms. Landry:

The Louisiana Board of Ethics, at its March 16, 2018 meeting, considered your request for an advisory opinion as to whether your granddaughter may be employed by the Clerk's Office while you serve as the Clerk of Court.

The Board concluded, and instructed me to inform you, that the Code of Governmental Ethics would not prohibit the employment of your granddaughter with the Assumption Parish Clerk of Court's Office while you serve as the Clerk of Court for Assumption Parish. **La. R.S. 42:1119A** states that no member of the immediate family of an agency head shall be employed in his agency. **La. R.S. 42:1102(13)** defines "immediate family" as the term relates to a public servant to mean his children, the spouses of his children, his brothers and their spouses, his sisters and their spouses, his parents, his spouse, and the parents of his spouse.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Ethics. The Board issues no opinion as to past conduct or as to laws other than the Code of Governmental Ethics. If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

LOUISIANA BOARD OF ETHICS

A handwritten signature in cursive script, appearing to read "Tracy M. Barker".

Tracy M. Barker
For the Board

AN EQUAL OPPORTUNITY EMPLOYER