STATE OF LOUISIANA
DIVISION OF ADMINISTRATIVE LAW
ETHICS ADJUDICATORY BOARD

BOARD OF ETHICS	*	**DOCKET NO. 2024-17189-ETHICS-B**
	*	
IN THE MATTER OF	*	
	*	
FRANK SCURLOCK	*	**AGENCY TRACKING NO. 5124-005**

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DECISION AND ORDER

The Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, requested an adjudicatory hearing to have the Ethics Adjudicatory Board determine whether Frank Scurlock knowingly failed to file his 10-P and 30-P campaign finance disclosure reports by the sixth day after they were due, and knowingly failed to file his 10-G campaign finance disclosure report by the eleventh day after it was due, in connection with his 2023 candidacy for the office of Governor, State of Louisiana. The Louisiana Board of Ethics proved by clear and convincing evidence that Frank Scurlock knowingly failed to file the reports as alleged. The Louisiana Board of Ethics is authorized to impose an additional civil penalty not to exceed $10,000 against Frank Scurlock for each report pursuant to Louisiana Revised Statutes (La. R.S.) 18:1505.4(A)(4)(a) and (b).

APPEARANCES

An adjudicatory hearing was conducted September 11, 2026, in Baton Rouge, Louisiana, before Panel B of the Ethics Adjudicatory Board (EAB).[1] Jessica Meiners appeared as counsel on behalf of the Louisiana Board of Ethics (BOE). Although duly noticed, Frank Scurlock (Respondent) did not appear for the hearing.[2]

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[1] Panel B of the Ethics Adjudicatory Board consists of administrative law judges Anthony Russo (presiding), Monique Baham, and Lynette Roberson.

[2] On June 4, 2026, a *Notice of Hearing* was mailed by the Administrative Hearings Clerk for the Division of Administrative Law to Respondent at: 7816 Breakwater Drive #30, New Orleans, Louisiana, 70124. This is the same address the BOE mailed Respondent the charges contained in its *Request for Hearing*, its *Late Fee Assessment Orders*,

JURISDICTIONAL AUTHORITY

The Ethics Adjudicatory Board (EAB) is a legislatively created board, as contemplated by Article X, Section 21, of the Louisiana Constitution. The EAB has original jurisdiction under La. R.S. 42:1141.5 to determine whether violations of the Code of Governmental Ethics, La. R.S. 42:1101 *et seq*., have occurred and to conduct hearings under La. R.S. 18:1505.4 for specific violations of the Campaign Finance Disclosure Act (CFDA), La. R.S. 18:1481 *et seq*.

This adjudication is conducted in accordance with the CFDA, the Code of Governmental Ethics, the Administrative Procedure Act, La. R.S. 49:950 *et seq*., and the enabling legislation for the Division of Administrative Law, La. R.S. 49:991 *et seq*.

STATEMENT OF THE CASE

The BOE, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, alleged that Respondent failed to file three campaign finance disclosure reports by their deadlines in connection with his 2023 candidacy for the office of Governor, State of Louisiana.

The BOE requested that the EAB conduct an adjudicatory hearing to determine whether Respondent knowingly failed to file his 10-P and 30-P campaign finance disclosure reports by the sixth day after they were due, and knowingly failed to file his 10-G campaign finance disclosure report by the eleventh day after it was due, which could subject Respondent to an additional civil penalty not to exceed $10,000 for each report, pursuant to La. R.S. 18:1505.4(A)(4)(a) and (b).

At the hearing, the BOE offered its exhibits, numbered BOE-1 through BOE-12, which were admitted into evidence. Counsel presented the case on behalf of the BOE, the record was closed, and the matter was taken under advisement for a determination of whether Respondent

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and its discovery, including *Requests for Admissions*, all by certified mail, returned receipt requested, and the BOE received the certified mail receipts; *see* BOE exhibits 5, 6, 7, 8, 9, 10, and 12. This is the same address Respondent listed as his domicile address on the *Notice of Candidacy (Qualifying Form)*; *see* BOE-2. Respondent was provided an additional 15 minutes past the scheduled hearing start date but failed to appear.

failed to file his 10-P, 30-P, and 10-G campaign finance disclosure reports in violation of La. R.S. 18:1495.4(B)(4), La. R.S. 1495.4(B)(5), and La. R.S. 1495.4(B)(6) and would therefore be subject to additional civil penalties pursuant to La. R.S. 18:1505.4(A)(4)(a) and (b) for each late report.

FINDINGS OF FACT

Respondent qualified as a candidate for the office of Governor, State of Louisiana, in a primary election held October 14, 2023.[3] Respondent acknowledged that he was subject to the provisions of the CFDA when he signed the qualifying form.[4] The office of Governor, State of Louisiana, is a "major" level public office.[5] Respondent received insufficient votes in the primary election to participate in the general election held on November 18, 2023.[6]

On July 8, 2025, the BOE issued *Late Fee Assessment Orders* to Respondent because he had not yet filed his 10-P, 30-P, and 10-G campaign finance disclosure reports.[7] In the letters accompanying the *Late Fee Assessment Orders*, Respondent was notified that he was required to file his 10-P, 30-P, and 10-G reports and that he could be subject to an additional penalty of $10,000 for each report he failed to file.[8]

As of August 28, 2026, Respondent had not filed his 30-P, 10-P, and 10-G campaign finance disclosure reports[9] and, as of August 28, 2026, Respondent had not filed responses to the BOE's *Requests for Admissions*.[10]

[3] BOE-2; BOE-3.
[4] BOE-2, p. 2.
[5] BOE-4, p. 2.
[6] BOE-3, pp. 2-4.
[7] BOE-6, BOE-7, and BOE-8.
[8] BOE-6, p. 5; BOE-6, p. 5; and BOE-7, p. 5.
[9] BOE-11.
[10] *BOE-11*; counsel for the BOE stated that she reviewed the BOE database immediately before this hearing, and there was no record of Respondent filing any of the referenced reports. Respondent admitted, by operation of La. C.C.P. art. 1467(A), that he did not file his 10-P, 30-P, and 10-G campaign finance disclosure reports; BOE-9.

CONCLUSIONS OF LAW

The BOE proved by clear and convincing evidence that Respondent knowingly failed to file his 10-P and 30-P campaign finance disclosure reports by the sixth day after they were due and knowingly failed to file his 10-G campaign finance disclosure report by the eleventh day after it was due. The BOE is authorized to impose upon Respondent an additional civil penalty not to exceed $10,000 for each report, as allowed by La. R.S. 18:1505.4(A)(4)(a) and (b).[11]

In hearings under the CFDA before the EAB, the BOE must prove by clear and convincing evidence that the candidate knowingly failed to timely file a required campaign finance disclosure report.[12] Failure to timely submit required reports constitutes a violation of the CFDA.[13]

The office of Governor, State of Louisiana, is a "major" level public office.[14] Every candidate for "major" level public office (or their campaign treasurer) is required to file certain campaign finance disclosure reports by the statutory deadlines.[15] Failure to timely submit required reports constitutes violation(s) of the CFDA.[16]

As a candidate for Governor, State of Louisiana, a "major" level public office,[17] Respondent was required to file a 30-P report by September 14, 2023, which was the 30th day prior to the primary election.[18] Respondent was also required to file a 10-P report by October 4, 2023, which was the 10th day prior to the primary election. Respondent was also required to file

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[11] La. R.S. 18:1505.4(A)(4)(a) and (b) of the CFDA provides that, if after conducting an adjudicatory hearing, the EAB determines that a candidate knowingly failed to file the required 10-P and 30-P reports, or filed the 10-P and 30-P reports more than six days late, and knowingly failed to file the required 10-G campaign finance disclosure report, or filed the report more than eleven days late, then the BOE, functioning as the Supervisory Committee on Campaign Finance Disclosure, may impose upon the candidate additional civil penalties not to exceed $10,000 for each report.
[12] La. R.S. 42:1141.5(C). "'Clear and convincing evidence', in general, means that the fact of guilt must be proven to a greater degree than by 'a mere preponderance of the evidence' but less than by 'beyond a reasonable doubt.'" *Louisiana State Bar Ass'n v. Edwins*, 329 So. 2d 437, 442 (La. 1976).
[13] La. R.S. 18:1505.1(B).
[14] La. R.S. 18:1483(11) and La. R.S. 18:1484(1).
[15] La. R.S. 18:1495.4.
[16] La. R.S. 18:1505.1(B) and La. R.S. 18:1481(1).
[17] *See* BOE-4, p. 2.
[18] La. R.S. 18:1495.4(B)(2) and BOE-4.

a 10-G report by November 8, 2023, which was the 10th day prior to the general election. As of August 28, 2026, Respondent had not filed his 30-P, 10-P, or 10-G campaign finance disclosure reports.[19]

Respondent knew he was obligated to meet the CFDA filing requirements by the statutory deadlines and that additional civil penalties, not to exceed $10,000 per report, could be imposed if he did not file the 30-P, 10-P, and 10-G campaign finance disclosure reports. The BOE proved by clear and convincing evidence that Respondent knowingly failed to file his 30-P, 10-P, and 10-G campaign finance disclosure reports by the statutory deadlines.

Additionally, Respondent's failure to file his 30-P, 10-P, and 10-G campaign finance disclosure reports within three days after the final date for filing creates a rebuttable presumption of intent to not file the reports.[20] Nothing in evidence rebuts this statutory presumption.

If, after conducting an adjudicatory hearing, the EAB determines that Respondent knowingly failed to file required campaign finance disclosure reports by the sixth and the eleventh day after the reports were due, respectively, then the BOE may impose an additional civil penalty, not to exceed $10,000, against Respondent for each report that he failed to timely file.[21]

The BOE proved by clear and convincing evidence that Respondent, a candidate for a "major" level office, knowingly violated the CFDA by failing to file his 30-P, 10-P, and 10-G campaign finance disclosure reports by the statutory deadlines and by the sixth day and eleventh day after the reports were due, respectively.

The BOE, in its capacity as the Supervisory Committee for Campaign Finance Disclosure, is authorized to impose against Respondent an additional civil penalty under authority of La. R.S. 18:1505.4(A)(4)(a) and (b), not to exceed $10,000 for each report.

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[19] BOE-11.
[20] La. R.S. 18:1505.1(A).
[21] La. R.S. 18:1505.4(A)(4)(a) and (b).

ORDER

IT IS ORDERED that the Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, is authorized to impose an additional civil penalty not to exceed $10,000 against Frank Scurlock for failing to file his 30-P campaign finance disclosure report in connection with his 2023 candidacy for the office of Governor, State of Louisiana, by the sixth day after it was due.

IT IS FURTHER ORDERED that the Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, is authorized to impose an additional civil penalty not to exceed $10,000 against Frank Scurlock for failing to file his 10-P campaign finance disclosure report in connection with his 2023 candidacy for the office of Governor, State of Louisiana, by the sixth day after it was due.

IT IS FURTHER ORDERED that the Louisiana Board of Ethics, in its capacity as the Supervisory Committee on Campaign Finance Disclosure, is authorized to impose an additional civil penalty not to exceed $10,000 against Frank Scurlock for failing to file his 10-G campaign finance disclosure report in connection with his 2023 candidacy for the office of Governor, State of Louisiana, by the eleventh day after it was due.

Rendered and signed on October 15, 2026, in Baton Rouge, Louisiana.

Anthony J. Russo

Anthony Russo
Presiding Administrative Law Judge
Ethics Adjudicatory Board, Panel B

Monique Baham

Monique Baham
Administrative Law Judge
Ethics Adjudicatory Board, Panel B

Lynette Roberson
Administrative Law Judge
Ethics Adjudicatory Board, Panel B

NOTICE OF TRANSMISSION OF DECISION OR ORDER

I certify that on Wednesday, October 21, 2026, I have sent a copy of this decision/order to all parties of this matter.

Clerk of Court
Division of Administrative Law

REVIEW RIGHTS

This is the final decision of the Ethics Adjudicatory Board. You may seek rehearing or reconsideration of this decision, subject to the grounds for and time limitations provided in Louisiana Revised Statutes 49:977.1. A request for rehearing must be sent to one of the addresses listed below.

EMAIL: EABprocessing@adminlaw.la.gov	**MAIL**: Division of Administrative Law
FAX: (225) 342-1812	ATTN: Ethics Adjudicatory Board P.O. Box 44033
HAND DELIVERY TO: 1020 Florida Street, Baton Rouge, LA 70802	Baton Rouge, LA 70804-4033

You have the right to appeal this decision to the Court of Appeal, First Circuit, in accordance with Louisiana Revised Statutes 42:1142. You must file a written motion for appeal with the Ethics Adjudicatory Board within thirty (30) days after the transmittal of notice of this decision.