

**STATE OF LOUISIANA
DIVISION OF ADMINISTRATIVE LAW
ETHICS ADJUDICATORY BOARD**

BOARD OF ETHICS

*** DOCKET NO. 2025-6575-BOE**

IN THE MATTER OF

EMILE L. FONTENOT

*** AGENCY TRACKING NO. 5124-012**

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 Emile L. Fontenot knowingly failed to file his 10-P campaign financial disclosure report by the sixth day after it was due, and 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 Police Juror, District 2, Calcasieu Parish. The Louisiana Board of Ethics proved by clear and convincing evidence that Emile L. Fontenot 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 Emile L. Fontenot 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 October 16, 2025, in Baton Rouge, Louisiana, before Panel B of the Ethics Adjudicatory Board (EAB).¹ Charles Reeves appeared as counsel on behalf of the Louisiana Board of Ethics (BOE). Although duly noticed, Emile L. Fontenot (Respondent) did not appear for the hearing.²

¹ The Panel B of the Ethics Adjudicatory Board consists of administrative law judges Greta Gilmore (presiding), Monique D. Baham, and Anthony J. Russo.

² On May 23, 2025, a *Notice of Hearing* was mailed by the Administrative Hearings Clerk for the Division of Administrative Law to Respondent at: 2800 Guy Street, Lake Charles, Louisiana, 70615-2040. This is the same address the BOE mailed Respondent the charges contained in its *Request for Hearing*, its *Late Fee Assessment Orders*, and its discovery, including *Requests for Admissions*, all by certified mail, returned receipt requested, and

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 two campaign financial disclosure reports by their deadlines in connection with his 2023 candidacy for the office of Policy Juror, District 2, Calcasieu Parish.

The BOE requested that the EAB conduct an adjudicatory hearing to determine whether Respondent knowingly failed to file his 10-P campaign financial disclosure report by the sixth day after it was due, and 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-11, 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 failed to file his 10-P and 10-G campaign financial disclosure reports in violation of La. R.S.

the BOE received the certified mail receipts; *see* BOE exhibits 5, 7, 8, and 10. This is the same address Respondent listed as his mailing address on his *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.

18:1495.4(B)(4) and La. R.S. 18:1495.4(B)(5) 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 Police Juror, District 2, Calcasieu Parish, 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 Police Juror, District 2, Calcasieu Parish, is an “any other” level public office.⁵ Respondent did not receive sufficient votes in the primary election to participate in the general election held on November 18, 2023.⁶

On October 14, 2023, Respondent filed his 30-P campaign financial disclosure report, wherein he listed contributions of \$250 and \$500 each from two individuals.⁷

On December 1, 2023, the BOE issued a *Late Fee Assessment Order* to Respondent because he had not yet filed his 10-P campaign financial disclosure report.⁸ In the letter accompanying the *Late Fee Assessment Order*, Respondent was notified that he was required to file his 10-P report and that he could be subject to an additional penalty of \$10,000 for each report he failed to file.⁹

On February 28, 2024, the BOE issued a *Late Fee Assessment Order* to Respondent because he had not yet filed his 10-P campaign financial disclosure report.¹⁰ In the letter accompanying the *Late Fee Assessment Order*, Respondent was notified that he was required to file his 10-P report and that he could be subject to an additional penalty of \$10,000 for each

³ BOE-2; BOE-3.

⁴ BOE-2, p. 3.

⁵ BOE-4, p. 2.

⁶ BOE-3, p. 2.

⁷ BOE-6, p. 5.

⁸ BOE-7.

⁹ *Id.* at p. 1.

¹⁰ BOE-8.

report he failed to file.¹¹

As of September 8, 2025, Respondent had not filed his 10-P and 10-G campaign finance disclosure reports¹² and, as of October 16, 2025, had not filed responses to the BOE's *Requests for Admissions*.¹³

CONCLUSIONS OF LAW

The BOE proved by clear and convincing evidence that Respondent knowingly failed to file his 10-P campaign financial disclosure report by the sixth day after it was due, and 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).¹⁴

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.¹⁵ Failure to timely submit required reports constitutes a violation of the CFDA.¹⁶

The office of Police Juror, District 2, Calcasieu Parish, is an “any other” level public office.¹⁷ Every candidate for “any other” level public office (or their campaign treasurer) is required to file certain campaign financial disclosure reports by the statutory deadlines.¹⁸ Failure

¹¹ *Id.* at p. 1.

¹² BOE-9.

¹³ Respondent admitted, by operation of La. C.C.P. art. 1467(A), that he did not file her 10-P and 10-G campaign financial disclosure reports; BOE-10.

¹⁴ 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 10-G reports, or filed the 10-P and 10-G reports more than six and 11 days late, respectively, then the BOE, functioning as the Supervisory Committee on Campaign Finance Disclosure, may impose upon the candidate additional civil penalties not to exceed \$10,000.00 for each report.

¹⁵ 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).

¹⁶ La. R.S. 18:1505.1(B).

¹⁷ La. R.S. 18:1483(11); La. R.S. 18:1484(1).

¹⁸ La. R.S. 18:1495.4.

to timely submit required reports constitutes violation(s) of the CFDA.¹⁹ An "any other" level office candidate who receives a single campaign contribution of over \$200 is required to file the required campaign financial disclosure reports.

As a candidate for Police Juror, District Two, Calcasieu Parish, an "any other" level public office, Respondent was required to file campaign finance disclosure reports as he received two single campaign contributions exceeding \$200. Respondent was 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 a 10-G report by November 8, 2023, which was the 10th day prior to the general election. As of September 8, 2025, Respondent had not filed his 10-P or 10-G campaign financial disclosure reports.²⁰

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 10-P and 10-G campaign financial disclosure reports by the statutory deadlines. The BOE proved by clear and convincing evidence that Respondent knowingly failed to file his 10-P and 10-G campaign financial disclosure reports by the statutory deadlines.

Additionally, Respondent's failure to file his 10-P and 10-G campaign financial disclosure reports within three days after the final date for filing creates a rebuttable presumption of intent to not file the reports.²¹ Nothing in evidence rebuts this statutory presumption.

If, after conducting an adjudicatory hearing, the EAB determines that Respondent knowingly failed to file required campaign financial 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

¹⁹ La. R.S. 18:1505.1(B) and La. R.S. 18:1481(1).

²⁰ BOE-9.

²¹ La. R.S. 18:1505.1(A).

file.²²

The BOE proved by clear and convincing evidence that Respondent, a candidate for an “any other” level office, knowingly violated the CFDA by failing to file his 10-P and 10-G campaign financial 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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²² 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 Emile L. Fontenot for failing to file his 10-P campaign finance disclosure report by the sixth day after it was due, in connection with his 2023 candidacy for the office of Police Juror, District 2, Calcasieu Parish.

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 Emile L. Fontenot for failing 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 Police Juror, District 2, Calcasieu Parish.

Rendered and signed on November 13, 2025, in Baton Rouge, Louisiana.

NOTICE OF TRANSMISSION OF DECISION OR ORDER

I certify that on Thursday, November 13, 2025, I have sent a copy of this decision/order to all parties of this matter.

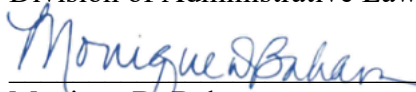
Clerk of Court

Division of Administrative Law



Greta Gilmore

Presiding Administrative Law Judge
Ethics Adjudicatory Board, Panel B
Division of Administrative Law



Monique D. Baham

Presiding Administrative Law Judge
Ethics Adjudicatory Board, Panel B
Division of Administrative Law



Anthony J. Russo

Administrative Law Judge
Ethics Adjudicatory Board, Panel B
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

FAX: (225) 342-1812

HAND DELIVERY TO:

1020 Florida Street, Baton Rouge, LA 70802

MAIL:

Division of Administrative Law

ATTN: Ethics Adjudicatory Board

P.O. Box 44033

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.