

LAFAYETTE CENTRE DEVELOPMENT DISTRICT  
D/B/A DOWNTOWN DEVELOPMENT AUTHORITY

VERSUS

THE CITY OF LAFAYETTE  
(LAFAYETTE BOARD OF ZONING ADJUSTMENT)

15<sup>TH</sup> JUDICIAL DISTRICT COURT

PARISH OF LAFAYETTE

STATE OF LOUISIANA

NO. C-20257538

**PETITION**

The petition of the Lafayette Centre Development District d/b/a Downtown Development Authority (hereinafter referred to as "DDA"), a political subdivision of the State of Louisiana, located within the City of Lafayette, Louisiana, respectfully asserts:

1.

The Lafayette Centre Development District d/b/a Downtown Development Authority (DDA) was created by an act of the Louisiana Legislature in 1983, Act 194. That act found that it was necessary to create this body for the public health, safety, and welfare of the City of Lafayette and its Central Business District.

2.

The DDA functions through its board as a political subdivision of the State of Louisiana. Kevin Blanchard is its Chief Executive Officer.

3.

This petition is a petition to the district court seeking to overturn a decision made by the Lafayette Board of Zoning Adjustment, which granted four variances to Clifton Guidry and his company ACTP RENTALS, LLC relative to a property located at 444 Jefferson Street. (See EXHIBIT 1 attached hereto and made a part hereof) This property is located on Jefferson Street at its intersection with Congress Street in downtown Lafayette. This property is located within the geographical boundaries of political subdivision known as the Downtown Development Authority.

4.

The DDA has standing as an "aggrieved party" as that term is defined in La. R.S. 33:4727(E)(1). The DDA has standing by virtue of its inherent statutory authority to preserve the public health, safety, and welfare of the Central Business District and the properties located within its geographical boundaries.

5.

Made defendant herein is the City of Lafayette, Lafayette Board of Zoning Adjustment.

6.

The DDA has standing to seek correction of an improper and ultimately illegal decision by the Lafayette Board of Zoning Adjustment because the Lafayette Centre Development District (DDA) owns a historic property known as the Sans Souci building located at 219 East Vermilion Street, Lafayette, Louisiana. This property is located in the downtown area of the City of Lafayette within the geographical boundaries of the DDA.

7.

The DDA has a compelling interest in preserving the integrity of the Lafayette Consolidated Government Lafayette Development Code. This code was created by an ordinance of LCG. The DDA has standing and a compelling interest in preserving the integrity of its own processes and procedures and in the avoidance of false assertions by any member of the public as to those processes.

8.

Clifton Guidry on behalf of ACTP RENTALS, LLC. submitted a request for variances to Lafayette Board of Zoning Adjustment (BOZA). That application sought four distinct variances from the normal restrictions set forth in the Lafayette Development Code. Those variances generally applied to the following: a) Required Front Setback for Walkway. b) Building Footprint. c) Minimum Glaze and Glass Transparency. d) Minimum Walkway Widths.

9.

At the meeting of BOZA held on October 9, 2025, the chairman of BOZA, Mr. Garland Pennison addressed Cliff (Clifton) Guidry:

PENNISON: "That was reviewed and approved by the Downtown Development Authority"

GUIDRY: "That is correct."

10.

Prior to that sequence, Guidry had presented a revised rendering of the building. It was this revised rendering of the building that Guidry was asserting to have been approved by the DDA.

11.

In truth and in fact, neither Kevin Blanchard, the Chief Executive Officer, nor any staff member had ever approved of the revised rendering of the building nor had they approved in any way the variances sought by Guidry.

12.

Based upon these materially false representations of Guidry, BOZA voted in favor of granting the variances sought by Guidry. In an article published in *The Acadiana Advocate* on Thursday, November 6, 2025, Guidry was quoted as saying:

They (the zoning board) asked me if I meet (sic) with DDA, and I said, "Yeah, I have their approval." Which was the wrong word to use at the time.

13.

Thus the decision by BOZA was improvidently and illegally granted, and was thus arbitrary and capricious, not through the fault of BOZA or its voting members, but based upon a materially false representation asserted by Guidry that he had the approval of the DDA.

14.

The Affidavit of Kevin Blanchard, the Chief Executive Officer of the DDA, is attached hereto and made a part hereof. As part of that affidavit Blanchard asserts:

No one from the DDA indicated to Tammy Luke, April Lacombe, Neil Leboeuf, Anne Famoso, or any other LCG employee that the DDA was in favor of the variance request being granted. No one from the DDA indicated to the applicant or his architect that the DDA was in favor of the variance requested being granted.

No one from the DDA indicated to Tammy Luke, April Lacombe, Neil Leboeuf, Anne Famoso or any other LCG employee that the DDA had "reviewed and approved" a revised variance request.

No one from the DDA indicated to the applicant or his architect that the DDA had "reviewed and approved" a revised variance request.

15.

Tammy Luke and the other persons listed above are employees of Lafayette Consolidated Government.

Louisiana R.S. 33:4727(E)(2) provides that the court may allow a writ of certiorari directed to the Board of Zoning Adjustment to review its decision within ten days of this court's order or at such later time as the court, in its discretion, may think appropriate.

WHEREFORE, petitioner, Lafayette Centre Development District d/b/a Downtown Development District hereby petitions the court, in accordance with La. R.S.33:4727, to remand to the Lafayette Board of Zoning Adjustment by writ of certiorari directed to that body, so that it may review its decision and corrects its decision granting variances to Clifton Guidry and his company ACTP RENTALS, LLC.

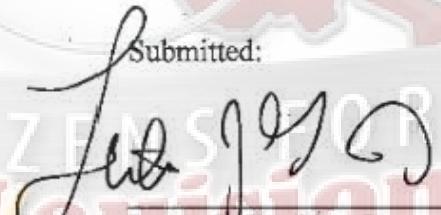
Petitioner further prays that this Court reverse or modify the improvident, arbitrary, capricious, and illegal decision of the Lafayette Board of Zoning Adjustment granting the variances to Guidry and ACTP RENTALS, LLC.

Petitioner further prays that the City of Lafayette, Lafayette Board of Zoning Adjustment, show cause why the remedies sought herein should not be granted by this court and why a stay order should not issue, staying the decision of this board until the conclusion of this litigation.

Petitioner further prays that defendant be cast with all costs of these proceedings.

Petitioner further prays for all general and equitable relief necessary under the circumstances presented in this verified petition.

Submitted:

  
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Lafayette Centre Development District  
d/b/a Downtown Development District

**VERIFICATION**

STATE OF LOUISIANA

PARISH OF LAFAYETTE

BEFORE ME, personally appeared, Kevin Blanchard, Chief Executive Officer of the Downtown Development District, who, after being duly sworn did depose and state that he has read the foregoing Petition and that all of the allegations contained therein are true and correct to the best of his knowledge, information, and belief.



Kevin Blanchard

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public, at  
Lafayette, Louisiana, this 6<sup>th</sup> day of November, 2025.



LESTER J. GAUTHIER, JR., NOTARY PUBLIC



CITIZENS FOR A  
*New*Louisiana