

YOUNGSVILLE MUNICIPAL POLICE CIVIL SERVICE BOARD

CITY OF YOUNGSVILLE

PARISH OF LAFAYETTE

STATE OF LOUISIANA

PETITION FOR INVESTIGATION

NO.: _____

FILED: July 10, 2024

BEFORE THE BOARD, comes Matthew Thomassee, a qualified elector domiciled in Youngsville, Louisiana, in his capacity as Executive Director for the Professional Association of Law Enforcement Officers, a non-profit corporation¹ and juridical entity² registered and operating in the Parish of Lafayette, Louisiana, who respectfully submit the following allegations to the Youngsville Municipal Civil Service Board (the Board), which are based on information and belief:

1.

Pursuant to LSA-R.S. 33:2477, the Board is vested with broad duties and powers, including without limitation:

- Taking **any action which, it determines to be desirable or necessary in the public interest**, or to carry out effectively the provisions and purposes of this Part;
- **Representing the public interest in matters of personnel administration** for the City of Youngsville;

¹ The United States Supreme Court has long held that a corporation is considered a citizen of its State of incorporation and the State where it has its principal place of business. *Americold Realty Tr. V. Conagra Foods, Inc.*, 577 U.S. 378,381, 136 S. Ct. 1012, 1015, 194 L. Ed. 2d 71 (2016).

² There are two kinds of persons: natural persons and juridical persons. A natural person is a human being. A juridical person is an entity to which the law attributes personality, such as a corporation or a partnership. The personality of a juridical person is distinct from that of its members. LSA-C.C. 24. Furthermore, LAS-C.C.P. art 5251(12), defines "person" as a corporation.

- Advising and assisting the City Council, Mayor and Chief of Police for the City of Youngsville, with reference to the maintenance and improvement of personnel standards and administration in police services, and the classified system;
- Making reports to the governing body, either upon its own motion or upon the official request of the governing body, regarding general or special matters of personnel administration in and for the Youngsville Police Department (YPD); and
- Upon the written petition of any citizen for just cause, or upon its own motion, making an investigation concerning the administration of personnel or the compliance with the provisions of this Part in the said municipal police services.

2.

LSA-R.S. 33:2504 provides: "Political activities by and extending to employees of the classified service are hereby prohibited as follows:

(4) No employee in the classified service shall (a) be a member of any national, state, or local committee of a political party, (b) be an officer or member of a committee of any factional, political club or organization, (c) be a candidate for nomination or election to public office, (d) make any political speech or public political statement in behalf of any candidate seeking to be elected to public office, or (e) take any part in the management or affairs of any political party or in the political campaign of any candidate for public office, except to privately express his opinion and to cast his vote."

3.

In 2010 Rickey Boudreaux was elected Chief of Police for the City of Youngsville, Louisiana.

4.

Boudreaux remained the elected Chief of Police until he retired and resigned his position in August of 2023.

5.

Between 2010 through present Boudreaux operated a campaign finance account for the purpose of receiving and disbursing money received for past, present and future political campaigns.

6.

Between September 1, 2010 through February 9, 2023 Boudreaux regularly filed campaign finance reports as required by applicable Louisiana ethics laws.

7.

Based on information and belief, Boudreaux was assisted with the management of incoming and outgoing funds from his campaign finance account by Laurie Segura.

8.

Based on information and belief, Segura would routinely document incoming and outgoing funds in the transaction ledger of Boudreaux's finance account, receive and post deposits and issue checks. (Exhibit A)

9.

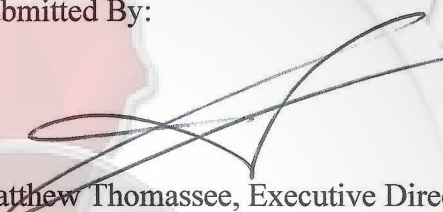
At all times relevant, Segura was a member of the classified service for the City of Youngsville.

10.

This Board recently voted to investigate alleged prohibited political activities with regards to other members of the classified service for the City of Youngsville.

WHEREFORE, premises considered, Petitioner, Matthew Thomassee, in his capacity as Executive Director for the Professional Association of Law Enforcement Officers pray that this Board receive this Petition, grant the request for an investigation, conduct said investigation, make a report to the governing body and appointing authority, render a judgment and order action to be taken by the appointing authority and/or take any other action which it determines to be desirable or necessary in the public interest or to carry out effectively the provisions and purposes of LSA-R.S. 33:2477 and LSA-R.S. 33:2500.

Submitted By:


Matthew Thomassee, Executive Director

Professional Association of Law Enforcement
Officers



CITIZENS FOR A
New Louisiana

DEPOSIT TICKET

RICKEY BOUDREAUX CHIEF OF POLICE
CAMPAIGN ACCOUNT
 420 COPPERFIELD WAY
 YOUNGSVILLE, LA 70592

4-10-12

CASH —

C
H
E
C
K
S

CHECKS OR TOTAL
FROM OTHER SIDE —

SUB TOTAL —

LESS CASH —

NET
DEPOSIT \$

DATE _____
 DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

SIGN HERE IF CASH RECEIVED FROM DEPOSIT
FARMERS STATE BANK
 & TRUST CO.
 YOUNGSVILLE BRANCH, LOUISIANA

Transaction Register

Account No. _____

Financial Institution _____

From Starting Check No. | Date

To Ending Check No. | Date

CHECKS
UNLIMITED

www.ChecksUnlimited.com
 1-800-204-2244

CITIZENS FOR A
New Louisiana

EXHIBIT

A

HOW TO USE YOUR TRANSACTION REGISTER...

...FOR ONE-LINE ENTRY

Check Entry _____
Debit Card _____
Deposit _____
Automatic Payment _____
Telephone Transfer _____
ATM _____

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT(-)	FEE(-)	TAX	DEPOSIT/CREDIT(+)	\$	437 21
421	7-12		One Stop Flowers	\$ 12 42				\$	424 79
	7-13	DC	Shop & Save	74 79					350 00
422	7-14		Murphy's Market	14 95					335 05
	7-15	D	Cash Deposit				200 00		535 05
	7-16	AP	Peak Life Insurance	127 43					407 62
423	7-16		Bob's Auto	237 51					170 11
	7-17	TT	From Acct #415207				100 00		270 11
	7-18	ATM	Cash	50 00					220 11

...FOR TWO-LINE ENTRY

Check Entry _____
Debit Card _____
Deposit _____
Automatic Payment _____

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT(-)	FEE(-)	TAX	DEPOSIT/CREDIT(+)	\$	437 21
421	7-12		One Stop Flowers	\$ 12 42				\$	-12 42
	7-13	DC	Barbs birthday Shop & Save	74 79					-74 79
			School supplies						350 00
422	7-14		Murphy's Market	14 95					-14 95
			Groceries						335 05
	7-15	D	Cash Deposit				200 00		-200 00
			Mark						535 05
	7-16	AP	Peak Life Insurance	127 43					-127 43

198		LACP	100 00						
*	1/4/17	Deposit					8355 00		
199	8/4/17	Dorovan Romero	4178 27					4176 73	
200	3-20-17	Chamber Youngsville	600 00					3576 73	
201	4-11-17	Mark Gärber Campaign	200 00					3376 73	
202	4-28-17	Youngsville Center	500 00					2876 73	
203	5-2-17	Deposit					5170 00	8046 73	
204	5-3-17	Dorovan Romero	4987 50					3059 23	
	5-3-17	Lafayette 4-H Foundation	750 00					2309 23	
*	5-3-17	Deposit					6850 00	9159 23	
*	5-3-17	Deposit					2950 00	12109 23	
*	5-3-17	Deposit					1940 00	14049 23	
205	6-13-17	City of Youngsville	400 00					13649 23	
206	7-24	Rickey Boudreamp	350 00				(NA-NM's)	13299 23	
207	8-2	Mark Speyer Memorial	500 00					12799 23	

TO REORDER: 1-800-222-2222 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$	BALANCE
4	8-10		Deposit	\$			\$1127.83		13927.06
205			Southside High	250.00					13677.06
209	8-22		Rickey Boudreaux	250.00					13427.06
210	8-23		NWYC	475.00					12952.06
211	8-31		Cajun Navy	500.00					12452.06
212	9-7		VOID	250.00					12202.06
213	9-8		Liz Breauy	300.00					11902.06
214	10-5		Michael Middlebrooks death	500.00					11402.06
made out to			Adrien Middlebrooks						
215			David Anderson Campaign	250.00					11152.06
216	10-30	7	Lions Club	125.00					11027.06
217	11-22	17	Super One	500.00					10527.06
218	12-1	17	St. Peter's Catholic Church	100.00					10427.06
219	12-		Postmaster	9.80					10417.26
220			Postmaster	44.00					10368.26
221	1-24		Bead Busters	138.53					
221	1-24	-18	Bead Busters	138.53					8986.73
222	2-8	-18	Rickey Boudreaux	2000.00					6986.73
223			loan repayment						
			Perfect Fitz	180.20					6806.53
			Campaign shirts						
224	4-16		Perfect Fitz	1226.40					5580.13
225	4-23		Youngsville Center	500.00					5080.13
			Deposit				1100.00		6180.13
			Deposit				4050.00		10230.13
			Deposit				3150.00		13350.13

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$	BALANCE
			Deposit	\$			7200 00	20580	13
			Deposit				4800 00	25380	13
			Deposit				4550 00	29930	13
226			Donovan Romero Crawfish boat	1927 50				22002	63
227			Gary Williams	200 00				21802	63
228	4/23		Mark Garber Charities	200 00				21602	63
229	4/23		Rotarian	1300 00				20302	63
230	4/23		Leukemia Lymphoma Society	250 00				20052	63
231	5-6		Ken Ritter Campaign	500 00				19552	63
232	5-9		Rickey Boudreaux	1585 00				17967	63
233	5/22		HMC - campaign refund	1000 00				16967	63
234	5/22		Process Piping campaign refund	500 00				16467	63
235	6-3		SMSH	200 00				16267	63
236	6-13		Shark Bull pen Basket	400 00				15867	63
237	7/19		VFW P-51 9210	3600 00				15507	63

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$ BALANCE
238	7-27		Youngsville Sports Complex	400 00				15107 63
239	8-29		Lee V (Seers)	1373 90				13734 23
			Star X Signs					
240	10-15		National Write Your Congressman	700 00				13034 23
241			Mark Benton Computer	300 00				12734 73
242	10-26		Susan B. Komen	250 00				12484 73
243	11-8		Erin Broussard Delcambre Project Grad.	300 00				12184 73
244			VOLVO					
245	12-2-18		Project Graduation	80 00				12104 73
246	1-2-19		Marionbank Engineering	189 79				11914 94
247	1-7-19		Bead Busters	2316 21				9598 73
*	1-17-19		Deposit				175864	11357 37
248			Laf. Parish - 4-H	750 00				10607 37
249	4-29		Youngsville Center	500 00				10107 37
*	5-3		Deposit				350 00	10457 37
*	5-3		Deposit				4400 00	14857 37
*	5-3		Deposit				2750 00	17607 37

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$ BALANCE
* 53			Deposit	\$			5550 00	23157 37
* 53			Deposit				5850 00	29007 37
* 53			Deposit				1800 00	30807 37
250	5-8		Donovan Romero	8910 00				21897 37
251	5-8		Youngsville Sports Complex	400 00				21497 37
252	5-22		Southside High	135 00				21372 37
253	6-1		Jelmy Hawk Camp	250 00				21122 37
254	6-3		North Vermilion Athletic Assoc	250 00				20872 37
255	7-18		Kevin Norquist Camp	250 00				20622 37
256	9-10		Simone Champagne	500 00				20122 37
257	9-11		SHS Sharks Fishing Club	150 00				19972 37
258	9-28		Greg Pete Champagne	250 00				19722 37
* 9-26-19			Deposit				700 00	20422 37
259	9-27-19		Simone Champagne Camp	250 00				20172 37
260	11-4		YMS	1589 65				18587 72
261	11-4		Supra One	1500 00				17087 72

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$
262	15-2020		Rotary Club	\$139.00				17087.72
263			Women's Walmart	270.20				16948.72
264			4-H	2,265.00				14678.52
265			Tiffany Laundry (Beard)	3.00				14413.52
266			Beard Ruston Buster	1,696.33				12717.19
267			Mouse Buster, Custom Co	3,125.00				9592.19
268			Rotary Club	139.00				9453.19
	6-1-2020		Deposit			✓	3035.00	12,488.19
				135.95				

269	6-25		Rotary	135.95	✓			12352.24
270	7-6		Landon Boudreaux	500.00	✓			11852.24
271	8-6		St. Jude Fundraiser	200.00	✓			
272	8-6		St. Jude Fundraiser	100.00	✓			11452.24
273	9-14		Loop Repair	500.00	✓			10952.24
274			HUNTER & LOUN DODSON	500.00	✓			10452.24
275			MSWELL BEARD & Comp	250.00	✓			10202.24
276			Michelle Bellena	500.00	✓			9702.24

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$ BALANCE
277	11-4		VFW Post	\$125.00	✓		\$	9577.24
278	11-4		Lions Club	90.00	✓			9487.24
279	12-10		Chuck Clouse	300.00	✓			9187.24
280	4-8		Coteau Custom Carts	658.80	✓			8528.44
281	5-11		Todd Escalona	250.00	✓			8278.44
282	5-27		LAGOP	250.00	✓			8028.44
283			Loon Repayment	25.00	✓			7778.44
284			Memorial day expenses					
			St. Jude	100.00	✓			7678.44

285	8-31		Southside Hgh	250.00	✓			7428.44
286	9-23		Robert Adams - Loon Repayment donation	500.00	✓			6928.44
year 2022								
287	2/9/22		Robert Adams Mond's Cars	1,000.00	✓			5928.44
288	2/10		Robert Adams Mond's Cars	1,000.00	✓			4928.44
289	3-24		Acadiana Fun Jump To ACS & CHAS Deposits	361.79	✓			4566.65
290	3-20		LAGOP	250.00	✓			4316.65
291			Cajun Printing	180.71	✓			4135.94

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$
292			Todd Escobedo	\$250.00	✓			4135.94
								3885.94
293	4-13		Angel Paine	208.00				3677.94
294	5-2		Acadiana Fun Things	387.00				3290.94
295	5-3		Youngsville Sports Complex	400.00				2890.94
296	5-3		Wildman Warehouse	400.00				2490.94
✓	5-3		Check order	21.10	✓			2469.84
✗	5-4		Error		✓		2694.69	5164.53
297	5-4		Chad Leger Campaign	250.00				4914.53
298	5-5		Stines	1089.48	✓			3825.05
			A/C Coolers					
✗	5-5		Deposit		✓		7450.00	11275.05
✗	5-5		Deposit		✓		3350.00	14625.05
✗	5-9		Deposit		✓		3256.00	17881.05
✗	5-19		Deposit				5100.00	22981.05
ATX 5-21			DAVID ANDERSON Camp	250.00				22731.05
300			Zydeco Festival Sp	500.00				22231.05
301			VANDE OLIVER Camp	250				21981.05
302			Donovan Romero	8044.50	✓			13936.55

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$
	6/21		Deposit	\$			1600.00	13930.55
303	7/18		SIMONE CAMPONCE	250.00	✓			15280.55
304	8/5		CAROL HERGEN (School Supply)	1,500.00	✓			13780.55
305	8/5		KEEL B-UDNEY (Aunt)	500.00	✓			13280.55
306	8/23		Southside High	500.00	✓			12780.55
307	8/23		Amy VANCE	290.00	✓			12540.55
308	9/16		KEEL Boudreux/Pension	800.00	✓			11740.55
			Envo Bank Deposit	100.00	✓		→ o.k.	11640.55
309	9/27		Roberta Bredrea	200.00	✓			11440.55
310	10/14		COJUL COOLING	1000.00	✓			10440.55
311	10/14		KADSO	1000.00	✓			9440.55
312	10/14		DON MENDOZA	1500.00	✓			8440.55
313	10/14		MENDOZA ROBERTA	500.00	✓			7940.55
314	1-27		BEAD BUSINESS	2236.00				5706.93
315	1-27		SOUTHSIDE POWERGENC	500.00	✓			5206.93
316			BEAD-BUSINESS	520.96				
317	3/6		CLERIC DE LO CRENS	500.00				

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

CITIZENS FOR A
New Louisiana

TO REORDER: 1-800-204-2244 • www.ChecksUnlimited.com

RICKEY BOUDREAUX CHIEF OF POLICE
CAMPAIGN FUND PH 337-278-7959
420 COPPERFIELD WAY
YOUNGVILLE, LA 70592

212
84-349/652

9-7-17

DATE

Pay to the
ORDER OF

Liz/Breaux

\$ 250.⁰⁰/_{xx}

Two hundred fifty & ⁰⁰/₁₀₀

DOLLARS



Security
Features
Details on
Back

FARMERS STATE BANK
& TRUST CO.

YOUNGVILLE BRANCH, LOUISIANA

FOR Fundraiser Kate Bailey

MP

0212

RICKEY BOUDREAUX CHIEF OF POLICE
CAMPAIGN ACCOUNT
420 COPPERFIELD WAY
YOUNGVILLE, LA 70592

244
84-349/652

11-28-18

DATE

Pay to the
ORDER OF

One hundred & ⁰⁰/₁₀₀

\$ 100.⁰⁰/_{xx}

DOLLARS



Photo
Safe
Deposit
Details on back

FARMERS STATE BANK
& TRUST CO.

YOUNGVILLE BRANCH, LOUISIANA

FOR

MP

0244

RICKEY BOUDREAUX CHIEF OF POLICE
CAMPAIGN ACCOUNT
420 COPPERFIELD WAY
YOUNGVILLE, LA 70592

271
84-349/652

8-6-2020

DATE

Pay to the
ORDER OF

St. Jude Fundraiser

\$ 200.⁰⁰/_{xx}

Two hundred & ⁰⁰/₁₀₀

DOLLARS



Photo
Safe
Deposit
Details on back

FARMERS STATE BANK
& TRUST CO.

YOUNGVILLE BRANCH, LOUISIANA

FOR

MP

0271