

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 Reality 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 Boudreux was elected Chief of Police for the City of Youngsville, Louisiana.

4.

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

5.

Between 2010 through present Boudreax 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 Boudreax regularly filed campaign finance reports as required by applicable Louisiana ethics laws.

7.

Based on information and belief, Boudreax 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 Boudreax's finance account, receive and post deposits and issue checks. (Exhibit A)

9.

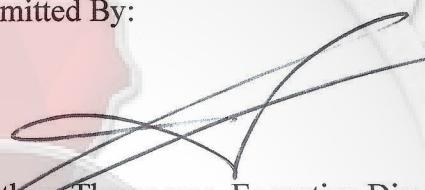
At all times relevant, Segura was a member of the classified service for the City of Youngsville.

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
NewLouisiana**

DEPOSIT TICKET

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

M-54862

CASH —
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DATE

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

SIGN HERE IF CASH RECEIVED FROM DEPOSIT
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YOUNGSVILLE BRANCH, LOUISIANA

CHECKS OR TOTAL
FROM OTHER SIDE —

TOTAL ITEMS —
 SUB TOTAL —
LESS CASH —

NET
DEPOSIT \$

Transaction Register

Account No. _____

Financial Institution _____

From Starting Check No. | Date _____

To Ending Check No. | Date _____

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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(+)	FEES(+)	TAX	DEPOSIT/CREDIT(+)	\$
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
423	7-16	AP	Peak Life Insurance	127.43				407.62
	7-16		Bob's Auto	257.51				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(+)	FEES(+)	TAX	DEPOSIT/CREDIT(+)	\$
421	7-12		One Stop Flowers	\$ 12.42		\$		424.79
	7-13	DC	Barb's birthday	74.79				350.00
			School supplies					335.05
422	7-14		Murphy's Market	14.95				14.95
	7-15	D	Groceries					335.05
			Cash Deposit				200.00	535.05
	7-16	AP	Peak Life Insurance	127.43				170.11

19.8		LACP	100.00				
*	1/4/17	Deposit					
199	1/4/17	Donovan Romero	4178.27				8355.00
200	3-20-17	Chamber Youngsville	600.00				3576.73
201	4-11-17	Mark Garber Campaign	200.00				3376.73
202	4-28-17	Youngsville Center	500.00				2876.73
203	5-1-17	Deposit					5170.00
204	5-3-17	Donovan Romero	4987.50				8046.73
		Lafayette 4-H Foundation	750.00				3059.23
*	5-3-17	Deposit					2309.23
*	5-3-17	Deposit					6850.00
*	5-3-17	Deposit					12109.23
205	6-13-17	City of Youngsville	411.00				1940.00
206	7-24	Rickey Boudreault	350.00	(NA-NM's)			13299.23
207	F-2	Mark Speyrer Memorial	500.00				13649.23

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	\$	BALANCE
#	8-10		Deposit	\$			\$1137.83	13927.06	
205			Southside High	250.00				13677.06	
209	8-12		Rickey Boudreault	250.00				13427.06	
210	8-23		NNYC	475.00				12952.06	
211	P-31		Cajun Navy	500.00				12452.06	
212	9-7		VOLID	250.00				12202.06	
213	9-8		Liz Breaux	300.00				11902.06	
214	10-5		Michael Middlebrook death	500.00				11402.06	
Made out to			Adrien Middlebrook						
215			DAVID Anderson Campaign	250.00				11152.06	
216	10-30-17		Lions Club	125.00				11027.06	
217	11-22-17		Super One	500.00				10527.06	
218	12-1-17		St. Peters Catholic Church	100.00				10427.06	
219	12-		Postmaster	9.80				10417.26	
220			Postmaster	49.00				10368.26	
221	1-26		Bead Busters	138					
222	1-24-18		Bead Busters	1381.53				8986.73	
	2-8-18		Rickey Boudreault	2000.00	50			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

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	\$
			Deposit	\$			\$7200.00	20,580.13
			Deposit				\$4800.00	25380.13
			Deposit				\$4550.00	29930.13
226			Donovan Romero Crawfish Boil	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	4/23	Leukemia Lymphoma Society	250.00				20052.63
231	5-6		Ken Ritter Campaign	500.00				19552.63
232	5-9		Rickey Boudreault	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		SMSTH	200.00				16267.63
236	6/3		Shark Ballpen Booster Club	400.00				15867.63
237	6/18		VFW Post 9210	3600.00				15507.63

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	BALANCE
238	7/27		Youngsville Sports Complex	400.00			\$	15107.63
239	8/29		Ice X (SEEDS) Star X signs	1373.90			13734.23	
240	10-15		National Write Your Congressman	700.00			13034.23	
241			Monte Carlo - 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			VOT112					
245	12-2-19		Project Graduation	80.00			12104.73	
246	1-2-19		Markbank Enterprises	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			3750.00	17607.37	

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	\$	BALANCE
* 53			Deposit	\$			\$5550.00	23157.37	
* 5-3			Deposit				5850.00	29007.37	
* 5-3			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	125.00				21372.37	
253	6-11		JEREMY HEDDLE-Camp	250.00				21122.37	
254	6-3		North Vermilion Athletic Assc	250.00				20872.37	
255	7-13		KEVIN NOJUELA 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	9-12		Greg Pete Campaing	250.00				19722.37	
* 9-26-19			Deposit				700.00	20422.37	
259	9-27-19		Simone Champagne Camp.	250.00				20172.37	
260	11-1		YMS	1584.65				18587.72	
261	11-1		Supra OMS	1500.00				17087.72	

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYOUT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	\$
262	1-5-2020		Rotary Club	\$ 139.00		\$	16948.72	17087.72
263			410 men Walmart	270.20				16618.52
264			4-11	2,265.00				14413.52
265			Tiffany Lany (Beard)	3.00				14113.52
266			Beard Punisher Buster	1,696.33				12417.19
267			Mouse Pad, GOLF Cart Custom Co	3,125.00				9292.19
268			Rotary Club	139.00				9153.19
6-1-2020			Deposit		✓	3035.00	12,188.19	
				135.95				

269	6-25		Rotary	135.95	✓		12052.24	
270	7-6		Landon Boudreaux	500.00	✓		11552.24	
271	8-6		St. Jude Fundraiser	200.00	✓			
272	8-6		St. Jude Fundraiser	100.00	✓		11452.24	
273	9-14		Loan Repay	500.00	✓		10952.24	
274			HUNGRY LOUNGE Donations	500.00	✓		10452.24	
275			McNELL BEAUREP CO. Comp	250.00	✓		10202.24	
276			Michelle Belliveau Michelle Belliveau	500.00	✓		9702.24	
			Loan Repay	500.00	✓		9702.24	

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	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 Clause	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 memorial day expenses	25.00	✓			7778.44	
284			St. Jude	100.00	✓			7678.44	
285	6-31		Southside Hgh	250.00	✓			7428.44	
286	9/23		ROBERT ADAMS - LOON REPAYMENT donation	500.00	✓			6928.44	
287	2/9/22		ROBERT ADAMS MONDAY GOLF	1,000.00	✓			5928.44	
288	2/10		ROBERT ADAMS MONDAY GOLF	1,000.00	✓			4928.44	
289	3/24		HEADS & TAILS FUN JUNG TACCS & CHADS DEP-341	361.79	✓			4566.65	
290	3/30		LAGOP	250.00	✓			4316.65	
291			Cajun Printing	180.71	✓			4135.94	

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT (-)	FEES (-)	TAX	DEPOSIT/CREDIT (+)	\$
292			TODD ESCOBAR	\$250.00	✓	\$	3885.94	4135.94
293	4-13		Angel Paws	205.10			3677.94	
294	5-2		Acadiana Fun Jungs	387.00			3290.94	
295	5-3		Youngsville Sports Complex	400.00			3890.94	
296	5-3		Wildman Warehouse	400.00			3490.94	
✗	5-3		Check Order	211.10	✓		2469.84	
✗	5-4		Error		✓	2694.69	5164.53	
297	5-4		Chad Leger Campaign	250.00			4914.53	
298	5-5		Stines A/C Coolers	1089.48	✓		3825.05	
✗	5-5		Deposit		✓	7450.00	11275.05	
✗	5-5		Deposit		✓	3350.00	14,605.05	
✗	5-9		Deposit		✓	3350.00	17,875.05	
✗	5-19		Deposit			5100.00	22975.05	
300	5-21		DAVID ANDERSON COMP	250.00			22725.05	
300			Zydeco Festival Sp.	500.00			22225.05	
301			VANCE OLIVER COMP	250			21975.05	
302			Donovan Romero	8044.50	✓		13930.55	

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NUMBER	DATE	CODE	DESCRIPTION OF TRANSACTION	PAYOUT/DEBIT (-)	FEE (-)	TAX	DEPOSIT/CREDIT (+)	\$
301	6/21		Deposit	\$			\$	13930.55
303	7/13		SIMONE Campione	255.00	✓			15530.55
304	8/15		CAROL HEBGEN (School Supply Donation)	1,500.00	✓			13780.55
305	8/15		REEL BUDWEISER (Worth)	500.00	✓			13280.55
306	8/22		Southside High	500.00	✓			12780.55
307	8/22		AMY VANCE	210.00	✓			12540.55
308	9/16		Reel Budweiser/Donation	800.00	✓			11740.55
			Error Bank Deposit	100.00	✓		→ 0.4	11640.55
309	9/27		Roberta Bredrea	300.00	✓			11440.55

310	10-14		Co-Op Cooling	1000.00	✓			10440.55
311	10-14		K-DESO	1000.00	✓			9440.55
312	10-14		DON MENDOZA	1500.00	✓			8440.55
313	10-14		MENDOZA KIOSK 500.00	500.00	✓			7940.55
314	10-14		BED BUSINESS	2233.62				5706.93
315	10-14		SOUTHSIDE POWERWASHING	500.00	✓			5206.93
316			BED-BUSINESS	520.96				
317	3/6		CLINIC DE LA CLINIC	500.00				

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

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FOR *Fundraiser Kate Bailey*

0212

RICKEY BOUDREAU CHIEF OF POLICE
CAMPAIGN ACCOUNT

420 COPPERFIELD WAY

YOUNGSVILLE, LA 70592

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84-349/652

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FOR

0244

RICKEY BOUDREAU CHIEF OF POLICE
CAMPAIGN ACCOUNT

420 COPPERFIELD WAY

YOUNGSVILLE, LA 70592

271
84-349/652

8-6-2020

DATE

\$ 200.00/xx

DOLLARS

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Two-hundred *00/100*

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YOUNGSVILLE BRANCH, LOUISIANA

FOR

0271