

**STATE OF LOUISIANA  
DIVISION OF ADMINISTRATIVE LAW**

<b>LOUISIANA BOARD OF ETHICS</b>	*	<b>DOCKET NO.</b>
	*	
<b>IN THE MATTER OF</b>	*	
	*	
<b>JEFFREY M. LANDRY AND STANTON AVIATION, LLC</b>	*	<b>AGENCY TRACKING NO. 2022-455</b>

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**CHARGES**

The Louisiana Board of Ethics (the "BOE") voted on August 3 and 4, 2023 to and does hereby file the following Charges:

**I.**

**RESPONDENTS**

Made Respondents herein are:

**Jeffrey M. Landry**, a person of the full age of majority, domiciled in the Parish of St. Mary with the last known address of 203 Silver Oak Lane, Broussard, Louisiana 70518; and

**Stanton Aviation, LLC**, a Louisiana limited liability company, with a registered address of 308 Sawgrass Lane, Louisiana 70518.

**II.**

**JURISDICTION**

**1.**

The BOE is an agency of the State of Louisiana domiciled in East Baton Rouge Parish, Louisiana.

**2.**

The BOE is authorized to file these Charges by virtue of the provisions of La. R.S. 42:1141C(3)(a) and (b); the Ethics Adjudicatory Board has jurisdiction of this matter pursuant to La. R.S. 42:1141C(3)(a) and La. R.S. 42:1141.5; and East Baton Parish, the domicile of the BOE

and Ethics Adjudicatory Board is the proper venue pursuant to La. R.S. 42:1141.3.

**3.**

In accordance with La. R.S. 42:1141C(3)(b)(iv), on August 3 and 4, 2023, the BOE designated all staff attorneys as trial attorneys in this matter with Charles E. Reeves, Jr. serving as the Lead Trial Attorney.

**III.**

**ALLEGATIONS**

**1.**

On November 21, 2015, Jeffrey M. Landry was elected Attorney General for the State of Louisiana, and was commissioned on January 11, 2016. On October 12, 2019, Mr. Landry was re-elected Attorney General for the State of Louisiana, and was commissioned on January 13, 2020. As of the date of these Charges, Mr. Landry remains Attorney General for the State of Louisiana, and has served continuously at all times relevant herein.

**2.**

As the Attorney General for the State of Louisiana, Mr. Landry is a “public servant” as defined by Section 1102(19) of the Ethics Code, and the Louisiana Department of Justice is his “agency” as defined by Section 1102(2)(a)(i) of the Ethics Code.

**3.**

Stanton Aviation, LLC is a Louisiana limited liability company formed on May 7, 2014. The sole member of Stanton Aviation, LLC is Gregory Stanton Mosing.

**4.**

Stanton Aviation, LLC is the registered owner of a Bombardier Inc. Model Number CL-600-2B16 fixed-wing multi-engine aircraft, bearing Federal Aviation Administration registration

number N131GM (the “Subject Plane”). Stanton Aviation, LLC has owned the Subject Plane since September 26, 2019, and has owned the Subject Plane at all times pertinent herein.

5.

On June 10, 2021, the Subject Plane departed Lafayette Regional Airport and arrived at the San Diego International Airport that same day. On June 11, 2021, the Subject Plane departed San Diego International Airport and arrived at the Kahuli Airport in Maui, HI on June 12, 2021. Upon information and belief, Mr. Landry was a passenger on those flights.

6.

On June 18, 2021, the Subject Plane departed Kahuli Airport and arrived at Monterey Regional Airport in Monterey, CA that same day. On June 19, 2021 the Subject Plane departed Monterey Regional Airport and arrived at Lafayette Regional Airport that same day. Upon information and belief, Mr. Landry was a passenger on those flights. Collectively, the flights taken by the Subject Plane from Louisiana to Hawaii on June 10, 2021 through June 19, 2021 are referred to as the “Subject Flights.”

7.

The Attorney General Alliance (the “AGA”) is an organization formed by the Conference of Western Attorneys General, a non-profit organization. The AGA’s mission is to foster collaboration between Attorneys General of states in the United States of America, including issues of cannabis regulation, sports betting, and cybercrime. The AGA held its 2021 annual meeting (the “2021 AGA Meeting”) from June 14, 2021 through June 18, 2021, at the Grand Wailea Maui, a luxury beachfront resort located in Maui, HI.

8.

Mr. Landry’s purpose in travelling to Hawaii was to attend the 2021 AGA Meeting. Mr.

Landry was a featured speaker at the 2021 AGA Meeting on Panel 1, "Attorney General Authority and Cities, Counties and Municipalities," from 9:00am to 10:00a.m. on June 16, 2021. Mr. Landry attended, and appeared as a speaker at, the 2021 AGA Meeting in his capacity as Attorney General.

**9.**

Elizabeth Murrill, in her capacity as Assistant Attorney General/Solicitor General for the Louisiana Department of Justice, and Wilbur Stiles, III, in his capacity as Chief Deputy Attorney General for the Louisiana Department of Justice, also attended the 2021 AGA Meeting. Their transportation to and from Hawaii was paid for by the Louisiana Department of Justice, as they were attending the AGA meeting in their capacities as employees of the Louisiana Department of Justice.

**10.**

Mr. Landry did not pay Stanton Aviation, LLC, or any other person, for his travel on the Subject Flights. Stanton Aviation, LLC, provided the Subject Flights to Mr. Landry at no cost.

**11.**

The Louisiana Code of Governmental Ethics, pursuant to La. R.S. 42:1115.2, provides that public servants may receive complimentary reasonable transportation provided that 1) such public servant's agency head certifies that acceptance of such reasonable transportation is either of direct benefit to the agency or will enhance the knowledge or skill of the public servant as it relates to the performance of his public service; 2) such public servant's agency head approves the acceptance of such reasonable transportation prior to its acceptance; and 3) such public servant files a disclosure of such acceptance and agency head approval with the Louisiana Board of Ethics within 60 days after such acceptance, which report shall include the purpose of the acceptance, the name of the person providing the reasonable transportation, and the amount expended.

**12.**

Mr. Landry did not file any disclosure with the Louisiana Board of Ethics related to his acceptance of the Subject Flights from Stanton Aviation, LLC.

**IV.**

**PROVISIONS OF LAW**

The following provisions of the Louisiana Code of Governmental Ethics are implicated by the alleged facts stated herein:

- (a) **La. R.S. 42:1111A** prohibits a public servant from receiving anything of economic value, other than compensation and benefits from the governmental entity to which he is duly entitled, for the performance of the duties and responsibilities of his office or position.
- (b) **La. R.S. 42:1117** provides that no public servant or other person shall give, pay, loan, transfer, or deliver or offer to give, pay, loan, transfer, or deliver, directly or indirectly, to any public servant or other person any thing of economic value which such public servant or other person would be prohibited from receiving by any provision of this Part.
- (c) **La. R.S. 1102(2)(a)(i)** provides that the “agency” for a public servant in the twenty principal departments of the executive branch of state government, the office in which such public servant carries out his primary responsibilities; except that in the case of the secretary, deputy secretary, or undersecretary of any such department and officials carrying out the responsibilities of such department officers it shall mean the department in which he serves.
- (d) **La. R.S. 42:1102(9)** defines “elected official” to mean any person holding an office in a governmental entity which is filled by the vote of the appropriate electorate.
- (e) **La. R.S. 42:1102(13)** defines “governmental entity” to mean the state or any political subdivision which employs the public employee or employed the former public employee or to which the elected official is elected, as the case may be.
- (f) **La. R.S. 42:1102(19)** defines “public servant” to mean a public employee or an elected official.
- (g) **La. R.S. 42:1102(22)(a)** defines “thing of economic value” to mean money or any other thing having economic value, except promotional items having no substantial resale value; pharmaceutical samples, medical devices, medical foods, and infant formulas in compliance with the Food, Drug, and Cosmetic Act, 21 U.S.C. 301 et seq.,

provided to a physician, health care professional, or appropriate public employee for the administration or dispensation to a patient at no cost to the patient; food, drink, or refreshments consumed by a public servant, including reasonable transportation and entertainment incidental thereto, while the personal guest of some person, and, with reference to legislators and employees in the legislative branch of state government only, reasonable transportation when organized primarily for educational or informational purposes, including food and drink incidental thereto, and includes but is not limited to: (i) any loan, except a bona fide loan made by a duly licensed lending institution at the normal rate of interest, any property interest, interest in a contract, merchandise, service, and any employment or other arrangement involving a right to compensation; (ii) any option to obtain a thing of economic value, irrespective of the conditions to the exercise of such option; (iii) any promise or undertaking for the present or future delivery or procurement of a thing of economic value.

- (h) **La. R.S. 42:1153A** Upon a determination that any elected official or other person has violated any provision of any law within the jurisdiction of the Board of Ethics except violations of the Campaign Finance Disclosure Act which shall be governed by Chapter 11 of Title 18 of the Louisiana Revised Statutes of 1950, the Ethics Adjudicatory Board may censure the elected official or person, or impose a fine of not more than ten thousand dollars, or both.
- (i) **La. R.S. 42:1155A** If an investigation conducted pursuant to this Part reveals that any public servant or other person has violated any law within the jurisdiction of the Board of Ethics to his economic advantage, and after an adjudicatory hearing on the matter, the Ethics Adjudicatory Board may order the payment of penalties. Recovery may include, in addition to an amount equal to such economic advantage, penalties not to exceed one half of the amount of the economic advantage.
- (j) **La. R.S. 42:1155B** The Ethics Adjudicatory Board is authorized to order the forfeiture of any gifts or payments made in violation of this Chapter.

## V.

### PRAYER FOR RELIEF

#### 1.

Based on the foregoing facts, Jeffrey M. Landry, while serving as Attorney General for the State of Louisiana, violated La. R.S. 42:1111A by virtue of receiving complimentary private airfare to and from Hawaii to which he was not duly entitled to receive for the performance of his job duties as Attorney General.

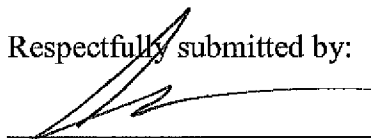
**2.**

Based on the foregoing facts, Stanton Aviation, LLC violated La. R.S. 42:1117 by virtue of providing Jeffrey M. Landry with complimentary airfare to and from Hawaii which Mr. Landry was prohibited from receiving by La. R.S. 42:1111A.

**WHEREFORE**, the Louisiana Board of Ethics respectfully prays that:

- (a) The Ethics Adjudicatory Board conduct a hearing on the foregoing charges;
- (b) The Ethics Adjudicatory Board determine that Jeffrey M. Landry violated La. R.S. 42:1111A, with respect to the foregoing facts;
- (c) The Ethics Adjudicatory Board determine that Stanton Aviation, LLC violated La. R.S. 42:1117, with respect to the foregoing facts;
- (c) The Ethics Adjudicatory Board assess appropriate penalties in accordance with the Louisiana Code of Governmental Ethics; and
- (d) The Ethics Adjudicatory Board only send electronic notices in this matter to the Lead Trial Attorney as designated above.

Respectfully submitted by:



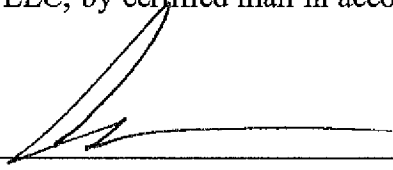
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**TRIAL ATTORNEY FOR THE LOUISIANA BOARD OF ETHICS**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of these Charges has been issued for service to each of Jeffrey M. Landry and Stanton Aviation, LLC, by certified mail in accordance with La. R.S. 42:1141.4, on this 29<sup>th</sup> day of August, 2023.



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Charles E. Reeves, Jr.  
Lead Trial Attorney

**SERVICE INFORMATION:**

Jeffrey M. Landry  
203 Silver Oak Lane  
Broussard, Louisiana 70518

Stanton Aviation, LLC  
Through its registered agent:  
Gregory Stanton Mosing  
308 Sawgrass Lane  
Broussard, Louisiana 70518