

DATE

Alex Washington Jr.
The Washington Law Firm
1700 Irving Place
Shreveport, LA 71101

Re: Docket No. 2025-489
Advisory Opinion

Dear Mr. Washington

The Louisiana Board of Ethics, at its meeting on January 9, 2026, considered your advisory opinion request on behalf of the City of Natchitoches as to whether the Code of Governmental Ethics (the “Code”) permits an employee to receive additional compensation from the City through grant funding for work performed on the grant outside of her regular working hours.

FACTS PROVIDED

Nicole Gray is a full-time employee of the City of Natchitoches (the “City”) in the Community Development Department. She works as the City’s Community Outreach & Grants Manager. In this position, Nicole Gray plans, organizes, and manages community development programs for the City. She develops and leads marketing and community outreach efforts for programs that support departmental goals and citywide initiatives, and she identifies and analyzes grant funding opportunities for the City’s community development, infrastructure, and outreach initiatives. Nicole Gray is also responsible for developing grant applications for local, state, and federally funded projects, writing grants and requests for proposals, and coordinating, managing, and administering grant-funded programs throughout the lifecycle of grant-funded projects.

Nicole Gray wrote and submitted the City’s grant application to the National League of Cities Institute for the Southern Cities Economic Initiative (“SCEI”), which is a program designed to help municipalities plan and implement economic mobility and inclusion strategies. NLCI and partners will help participating cities achieve these goals by providing research and data support, peer learning opportunities, tailored technical assistance, and grants to underserved businesses and residents, ultimately leading to thriving communities and a more equitable economy. The City’s application with a proposed budget of \$15,000.00, including \$6,000.00 for personnel salaries, was accepted for participation in the SCEI planning project from April 24, 2025, through October 31, 2025. During that time, Nicole Gray worked a total of ninety-nine (99) hours outside of her normal working hours and official duties on the SCEI planning project.

Nicole Gray also wrote and submitted the City’s grant proposal to The Rapides Foundation’s Healthy Behaviors Initiative for the Strengthening Families Program (“SFP”), which is a science-based family skills training program designed to increase resilience and reduce risk factors for behavioral, emotional, academic, and social problems, while also building on protective factors by improving family relationships, parenting skills, and youth social and life skills. The City’s grant

proposal was approved for a one-year project term, starting April 1, 2025, and ending March 31, 2026, and an approved proposed budget totaling \$82,740, including \$49,060 for personnel salaries. From May 5, 2025, through September 26, 2025, Nicole Gray worked a total of fifty (50) hours outside of her normal working hours and official duties on the SFP project.

Nicole Gray performed the following services for the SCEI and SFP grant projects that are outside of her normal working hours and official duties as the Community Outreach and Grants Manager, which were development of scripts for promotional videos, curriculum development, boot camp homework assignments, business plan development, policy development for city-wide adoption, coordination with consultants, invoice management, and recruitment of program participants.

You ask whether Nicole Gray can receive additional compensation from the City's grant funds for work she performed on the SCEI and SFP projects that is outside of her normal working hours and official duties, when she wrote the grant proposals that explicitly included a budgeted amount of grant funds for program-related work.

LAW

La. R.S. 42:1111C(1)(a): No public servant shall receive any thing of economic value for any service, the subject matter of which is devoted substantially to the responsibilities, programs, or operations of the agency of the public servant and in which the public servant has participated.

La. R.S. 42:1102(2)(a)(vi) defines "agency" for public servants of political subdivisions to mean the agency in which the public servant serves, except that for members of any governing authority and for the elected or appointed chief executive of a governmental entity, it shall mean the governmental entity.

La. R.S. 42:1102(15) defines "participate" to mean to take part in or to have or share responsibility for action of a governmental entity or a proceeding, personally, as a public servant of the governmental entity, through approval, disapproval, decision, recommendation, the rendering of advice, investigation, or the failure to act or perform a duty.

La. R.S. 42:1102(18)(a) defines "public employee" to mean anyone, whether compensated or not, who is:

- (i) An administrative officer or official of a governmental entity who is not filling an elective office.
- (ii) Appointed by any elected official when acting in an official capacity, and the appointment is to a post or position wherein the appointee is to serve the governmental entity or an agency thereof, either as a member of an agency, or as an employee thereof.
- (iii) Engaged in the performance of a governmental function.
- (iv) Under the supervision or authority of an elected official or another employee of the governmental entity.

La. R.S. 42:1102(19) defines "public servant" to mean a public employee or an elected official.

La. R.S. 42:1102(20.1) defines “service” to mean the performance of work, duties, responsibilities, or the leasing, rental, or sale of movable or immovable property.

La. R.S. 42:1102(22)(a) defines "thing of economic value" to mean money or any other thing having economic value.

ANALYSIS

The City of Natchitoches is a political subdivision pursuant to La. R.S. 42:1102(17) and a governmental entity pursuant to La. R.S. 42:1102(12). Nicole Gray is a public employee pursuant to La. R.S. 42:1102(18)(a) and public servant pursuant to La. R.S. 42:1102(19). For purposes of the Code, Nicole Gray’s agency is the Community Development Department within the City of Natchitoches pursuant to La. R.S. 42:1102(2)(a)(vi).

La. R.S. 42:1111C(1)(a) prohibits Nicole Gray from receiving any thing of economic value for any service, the subject matter of which is devoted substantially to the responsibilities, programs, or operations of her agency, the Community Development Department, and in which she has participated. Here, the subject matter of the work Nicole Gray performed on the City’s SCEI and SFP grant projects outside of her normal working hours and duties as Community Outreach & Grants Manager is substantially related to the responsibilities and programs of the Community Development Department and are services in which she participated.

CONCLUSION

The Board concluded and instructed me to inform you that the Code of Governmental Ethics prohibits Nicole Gray from receiving compensation from the City’s grant funds for work she performed on the City’s SCEI and SFP projects.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Louisiana Code of Governmental Ethics. The Board issues no opinion as to past conduct or to laws other than the Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Acts, and the conflict of interest provisions contained in the Louisiana Gaming Control Law.

If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

LOUISIANA BOARD OF ETHICS

Jessica T. Meiners
For the Board