



STATE OF LOUISIANA
DEPARTMENT OF STATE CIVIL SERVICE
LOUISIANA BOARD OF ETHICS
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BATON ROUGE, LA 70821
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July 17, 2020

VIA SHAREPOINT

The Division of Administrative Law
1020 Florida Street
Baton Rouge, LA 70802

RE: *In the Matter of Marion Madison*
Agency Tracking No.: 2019-689

Dear Ms. Duhon:

On behalf of the Louisiana Board of Ethics, please file the attached Charges in the referenced matter.

If you have any questions, please do not hesitate to contact me at 225-219-5619, and thank you.

Kindest regards,

LOUISIANA BOARD OF ETHICS

Elizabeth Barrouquere
Staff Paralegal

Enclosures

cc: Ms. Marion Madison (via certified mail no. 70191120000179772842)

STATE OF LOUISIANA
THE LOUISIANA BOARD OF ETHICS

IN THE MATTER OF

* DOCKET NO. 2020-_____ -ETHICS__
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MARION MADISON

* AGENCY TRACKING NO. 2019-689

CHARGES

The Louisiana Board of Ethics (“BOE”) voted on July 2, 2020 to and **DOES HEREBY** file the following charge:

1.

Marion Madison (“Ms. Madison”) was employed by the Mary D. Coghill Charter School (“School”) as the Content Coordinator beginning July 2018. In August 2019, Ms. Madison was promoted to the position of Principal, where she remains to date.

2.

The Better Choice Foundation registered with the Louisiana Secretary of State as a nonprofit corporation on May 25, 2011. On December 5, 2012, the Louisiana Board of Elementary and Secondary Education approved the Better Choice Foundation’s application for a Type 5 charter school. The Better Choice Foundation Board (“Board”) is in charge of operating the School.

3.

Gretchen Bradford (“Ms. Bradford”) was appointed to the Board’s Governance Committee on July 7, 2016. Ms. Bradford resigned from the Board on October 7, 2019. Ms. Bradford is Ms. Madison’s sister

4.

La. R.S. 42:1102(3) defines “agency head” as the chief executive or administrative officer of an agency or any member of a board or commission who exercises supervision over the agency.

5.

La. R.S. 42:1119(A) states that no member of the immediate family of an agency head shall be employed in his agency.

6.

Based on the foregoing facts, Ms. Madison may have violated La. R.S. 42:1119(A) by virtue of her employment as the Content Coordinator and Principal with the School while her sister, Ms. Bradford, was a member of the Board that governed the School.

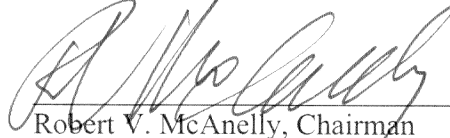
7.

In accordance with La. R.S. 42:1141(C)(3)(b)(iv), the BOE designates LaToya D. Jordan and Tracy M. Barker as the BOE’s trial attorneys in this matter.

WHEREFORE, the Louisiana Board of Ethics respectfully requests that the Ethics Adjudicatory Board: (1) conduct a hearing on the foregoing charge; (2) determine that Marion Madison violated La. R.S. 42:1119(A);and, (3) assess the appropriate penalties in accordance with the recommendation of the Louisiana Board of Ethics to be submitted during the public hearing on this matter or at another time deemed appropriated by the Ethics Adjudicatory Board.

Respectfully Submitted,

LOUISIANA BOARD OF ETHICS



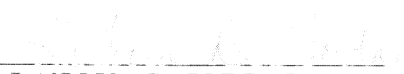
Robert V. McAnelly, Chairman
P.O. Box 4368
Baton Rouge, Louisiana 70821
Telephone: (225) 219-5600
Facsimile: (225) 381-7271

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing *Charges* have been served on the Respondent by U.S. Registered or Certified Mail this 17th day of July 2020.

RESPONDENT: Marion Madison
4734 Owens Boulevard
New Orleans, Louisiana 70122

ATTORNEY: None at this time.



LATOYA D. JORDAN
Trial Attorney