



**LAW DEPARTMENT**

Coleman A. Young Municipal Center  
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August 24, 2023

HONORABLE CITY COUNCIL

Re: Kennedy Shannon v City of Detroit, et al  
Wayne County Circuit Court Case No. 19-009435-CD

Representation by the Law Department of the City of employees or officers listed below is hereby recommended, for reasons discussed in the accompanying privileged and confidential memorandum. We, further, recommend that the City undertake to indemnify the Defendants if there is an adverse judgment. We, therefore, recommend a “YES” vote on the attacheded resolution.

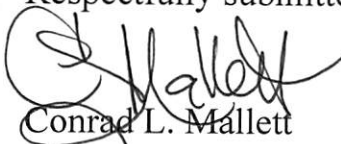
Copies of the relevant documents are submitted under separate cover.

Employees requesting representation:

**Katerli Bounds**

**Ryan Friedrichs**

Respectfully submitted,

  
Conrad L. Mallett  
Corporation Counsel



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**PRIVILEGED AND CONFIDENTIAL MEMORANDUM**

To: Hon City Council and staff

Fr: Conrad Mallett, Jr., Corporation Counsel 

Date: August 24, 2023

Re: Request for representation and indemnification pursuant to City Code section 35-2-104, regarding the lawsuit Kennedy Shannon v. City of Detroit, Katerli Bounds and Ryan Friedrichs, Wayne County Circuit Court case number No. 19-009435-CD

Plaintiff Kennedy Shannon has sued the City of Detroit and individual defendants Katerli Bounds and Ryan Friedrichs in Wayne County Circuit Court related to the termination of Kennedy Shannon's employment by the City in June 2019. Plaintiff claims that she was terminated due to alleged whistleblowing activities in violation of the Michigan Whistleblowers' Protection Act. The court denied Defendants' Motion for Summary Disposition in November 2022. The case is set for trial, to begin on September 11, 2023.

At the time of her termination, Plaintiff worked in the City's Office of Development and Grants. Katerli Bounds was, at the time of Plaintiff's termination, Director of Grants and Plaintiff's direct supervisor. Ryan Friedrichs was the City's Chief Development Officer, serving as the director of the Office of Development and Grants.

Plaintiff's employment was terminated as a result of violations of numerous City policies and guidelines including: misrepresentation and falsification of time records; performing personal work for another employer during scheduled work hours; improper use of City resources by storing inappropriate photographs and other materials on City equipment; and violations of the City's Ethics Standards by improper use of official position. The Law Department concludes that Katerli Bounds and Ryan Friedrichs were acting in good faith, and within the scope of their employment, when, for these reasons, they made the decision to terminate Plaintiff's employment. The City's Chief Financial Officer, Jay Rising, likewise recommends that City Council provide representation and indemnification.

This case is being handled by outside counsel and the Law Department is unclear why the request for representation and indemnification was not made earlier. However, the Law Department believes that the individual defendants are clearly entitled to representation and indemnification and respectfully asks that City Council approve this request.

**RESOLUTION**

By Council Member \_\_\_\_\_

**RESOLVED**, that the Law Department is hereby authorized under Section 13-11-1 et. seq. of the Municipal Code of the City of Detroit and in accordance with the foregoing communication to provide legal representation and indemnification to the following Employees in the lawsuit of **Kennedy Shannon v City of Detroit, et al; Wayne County Circuit Court No. 19-009435-CD.**

**Katerli Bounds**

**Ryan Friedrichs**

APPROVED:

BY:   
\_\_\_\_\_  
CONRAD L. MALLETT  
CORPORATION COUNSEL