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BOARD OF ETHICS
DETROIT



ANNUAL REPORT 2025

Letter to the Mayor and City Council

DATE: April 1, 2026

TO: Hon. Mary Sheffield, Mayor

Hon. James Tate, City Council President

Hon. Coleman A. Young II, City Council President Pro Tem

Hon. Scott Benson, City Council Member

Hon. Latisha Johnson, City Council Member

Hon. Renata Miller, City Council Member

Hon. Denzel McCampbell, City Council Member

Hon. Gabriela Santiago-Romero, City Council Member

Hon. Mary Waters, City Council Member

Hon. Angela Whitfield Calloway, City Council Member

FROM: City of Detroit Board of Ethics

SUBJECT: Annual Report of the Board of Ethics for 2025

The Detroit Board of Ethics Annual Report includes its activities beginning January 1, 2025 to December 31, 2025. In accordance with Section 2-5-108 of the Ethics Ordinance this Report contains:

- An analysis of Board activities, including Advisory Opinions, requested and issued; Complaints filed with each disposition; and Investigations opened and their disposition.
- A compilation of Advisory Opinions issued; and,
- Recommendations for improvement of the Disclosure Requirements, Standards of Conduct, and the administration and enforcement of the Ordinance.

Additionally, this Report includes training activity updates, which are included in the City of Detroit Charter at Sec. 2-106.9 - Powers and Duties subsections 4 and 5.

cc: Hon. Janice M. Winfrey, Detroit City Clerk

Department Directors

Agency Leaders

Table of Contents

01	Letter to the Mayor and City Council	14	COGEL Conference Atlanta, Georgia
02	Message from the Executive Director	15	Ethics Presentations and Conferences
03	Year at a Glance	16	Recommendations
04	Mandated Duties of the Board of Ethics	18	Disclosures
04	Board Members & Staff	19	Gifts and Gratuities
07	Board Meetings	20	Investigations
08	Board of Ethics Retreat at WCCC - Northwest Campus	21	Hearings
09	Proportional Funding - A Win for Oversight Agencies	23	Public Admonishments
11	Ethics Training	24	Requests for Advisory Opinions
12	Learning Management System	31	Complaints
13	Outreach	35	Contact Us
			Appendix A - Advisory Opinions Issued in 2025
			Appendix B - 2025 Open Session Meeting Minutes

Message from the Executive Director

Thank you for reviewing the 2025 Annual Report for the City of Detroit Board of Ethics. This was a year marked by notable growth that will pave the way for the office's long-term effectiveness and the achievement of its goals. From growing the office's staff to developing a new online ethics training system, the Board of Ethics is entering a new chapter of expansion and is poised to have a greater impact on strengthening the city's ethical culture.

A major achievement was the collective effort of the four oversight agencies to secure proportional funding. Mandated by the 2012 City Charter, it was not implemented until 2025, following the approval of a resolution to establish a proportional funding formula. Proportional funding enabled the Board of Ethics to hire a second investigator and a marketing and outreach coordinator, increasing our small staff from four to six by the end of 2025. Proportional funding has also been used to develop a learning management system that, for the first time, is under the control of the Board of Ethics to dictate its design, content, and functionality. Scheduled to be rolled out by Spring 2026, the learning management system will offer more comprehensive online ethics training, aiming to significantly increase the number of public servants trained.

Challenges persist for the Board of Ethics despite the progress made. The year ended with two board vacancies and a lack of quorum for the last three regularly scheduled meetings. One of our recommendations, on page 17, is to expedite the appointment of Board of Ethics members to achieve the goal of holding monthly board meetings.

After receiving the most disclosures in its history in 2024, the Board of Ethics is committed to receiving annual disclosures from appointees and elected officials. Despite not receiving the requested disclosures from the outgoing administration in 2025, the Board of Ethics will continue to prioritize disclosures and request conflict of interest disclosures from the mayor's office to ensure transparency and accountability.

For the second consecutive year, the Board of Ethics is recommending a shift from Law Department-assigned attorneys to hiring a full-time attorney that will allow the Board of Ethics to operate without Law Department control or influence. Achieving independent counsel will enable the Board of Ethics to strengthen public trust in how the City of Detroit addresses ethical dilemmas.

I am profoundly grateful for the opportunity to serve as Executive Director during this pivotal moment for the Board of Ethics. I'd like to thank the citizens of Detroit for their continued support in the challenging yet rewarding effort to improve governmental ethics in the City of Detroit.

Christal Phillips
Executive Director, Detroit Board of Ethics



Year at a Glance

1

PROPORTIONAL FUNDING

The implementation of proportional funding increased the Board's funding from \$591,407 in FY24-25 to \$899,788 in FY25-26.

2

TWO NEW STAFF HIRES

The Board's small staff of four was increased to six with the addition of a new Investigator and a Marketing & Outreach Coordinator.

3

10 BOARD MEETINGS HELD

The Board held 8 regularly scheduled monthly meetings and 2 special meetings for a total of 10 meetings in 2025. Meeting minutes can be found in Appendix B.

4

4 HEARINGS HELD

Four hearings were held in 2025 stemming from one complaint and two board-initiated investigations. Visit pages 21 through 23 for information on hearings and the public admonishment.

5

83 INVESTIGATIONS

The Investigator completed 62 First Steps, 4 Fact-finding Reports, 13 Investigation Summaries, and testified at 4 Hearings in 2025.

6

30 RAOS FILED AND 16 OPINIONS ISSUED

Thirty RAOs were filed and sixteen opinions were issued in 2025. Redacted opinions can be found in Appendix A.

Mandated Duties of the Board of Ethics

CHARTER MANDATED OVERSIGHT AGENCY

Established in 1997, the Detroit Board of Ethics is a charter-created oversight agency mandated to train public servants and implement the ethics ordinance enacted by the City Council in 2000.

ETHICS TRAINING

Pursuant to Section 2-106.9 of the City Charter, the Board of Ethics is mandated to provide training for the Mayor, City Council, City Clerk, all appointees, and employees.

Training is offered both in-person and online. Additional information on ethics training and the development of the new online learning management system can be found on pages 11 and 12 of this report.

ENFORCEMENT

In addition to providing ethics training and guidance, the Board is tasked with enforcing the ethics ordinance. A violation of the ethics ordinance may result in penalties as set forth in the City Charter, which include public admonishment, recommendation for disciplinary action to a public servant's supervisor, prosecution by the City's Law Department, and suspension, disqualification, or disbarment of a contractor or vendor.



The Board of Ethics holds the unique position of having jurisdiction over all public servants in both the Executive and Legislative branches.



The City Charter requires public servants to cooperate with investigations by the Board of Ethics.



Board Members & Staff

Board Members as of December 31, 2025

- David Teeter, Vice Chairperson
- Raymond Card, Member
- Dr. Yvette McElroy Anderson, Member
- LaTanya Richardson, Member
- David Sanchez, Member
- Vacancy (Mayoral Appointment vacant since July 2025)
- Vacancy (Joint Appointment vacant since November 2025)

The Board of Ethics received two new members in 2025. Raymond Card was appointed by City Council. David Sanchez was appointed by the Mayor's Office. Both gentlemen will serve a term of five years and will be eligible for reappointment for a second term of five years.



Outgoing Board Members

- Kristin Lusn, Esq. ended her second term on July 13, 2025. Robert Watt ended his second term on June 30, 2025. Ms. Lusn and Mr. Watt served on the Board of Ethics for a total of ten years and were presented with a Spirit of Detroit award for their dedicated service. Ms. Lusn currently serves on the Elected Officials Compensation Commission.
- Robert Jones, resigned on July 31, 2025, and was subsequently appointed to a seat on the Board of Police Commissioners.
- Dr. Jameel Smith resigned from her role as Board Chair on November 12, 2025.

Board Staff

- Christal Phillips, Executive Director
- Dawn Widman, Senior Investigator
- Katherine Oren, Investigator
- Michael O'Connell, Training Specialist
- Brandon Flynn, Marketing & Outreach Coordinator
- Christine Connolly, Administrative Assistant

Board Meetings

The Board of Ethics held a total of ten meetings in 2025. The Board is required to hold a minimum of four meetings annually, as per its administrative rules.

Meetings were held at the Butzel Family Center. The public is invited to attend in person or virtually via Zoom.

Open session minutes from these meetings can be found in Appendix B, Open Session Meeting Minutes.

Meetings Held in 2025	
January 15, 2025	June 16, 2025
February 19, 2025	June 18, 2025
March 19, 2025	August 20, 2025
April 16, 2025	September 10, 2025
May 21, 2025	November 12, 2025

Meetings of the Board of Ethics are held at the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214, on the third Wednesday of each month from 1:00 pm to 4:00 pm.

Meeting notices and cancellations are posted on the Board of Ethics website, at the Butzel Family Center, and the Coleman A. Young Municipal Center.

For additional meeting information, visit www.detroitethics.org.

Board of Ethics Retreat at WCCCD - Northwest Campus

ANNUAL TRAINING

Training has been provided to Board members each year. The one-day retreat at Wayne County Community College provided an opportunity for longstanding members to refresh their knowledge of ethics and for new members to receive training and guidance on conducting meetings from staff.

Registered parliamentarian Maurice Henderson presented on Robert's Rules of Order for meetings and hearings.

STRATEGIC PLANNING

A strategic planning session was held at the retreat. Board and staff members discussed existing strengths and areas for improvement to enhance monthly meetings, hearings, and the understanding of complaints and investigations.

The internal process for the organization of monthly meetings is being continuously improved. Expectations were also outlined for members' time commitment to the Board.



DID YOU KNOW?

Board of Ethics members are appointed evenly by City Council and the Mayor with one joint appointment.



Proportional Funding: A Win for Oversight Agencies

2022 Beginnings

In November 2022, City Council passed a resolution to create a proportional funding working group to ensure that the City's four oversight agencies, the Board of Ethics, the Office of Inspector General, the Office of the Auditor General, and the Office of the Ombudsman, would receive equitable funding as stated in the 2012 City Charter, Section 8-214, requiring City Council to enact a proportional funding method.

The directors of the four oversight agencies held biweekly working group meetings. On July 3, 2024, City Council adopted an ordinance amendment to Chapter 17 of the 2019 Detroit City Code, which directed the City Council to adopt a resolution to establish a proportional funding formula by February 10, 2025, that ensured the oversight agencies receive adequate funding to perform their duties.



Resolution Approved

On April 8, 2025, City Council voted to approve a resolution for establishing a proportional funding formula for the four oversight agencies. This resolution completes the ordinance that was approved on July 3, 2024. The resolution states that a “Target Proportional and Equitable Funding” (TEF) percentage will be calculated, as well as the creation of an alternative minimum funding threshold.

Impact of Proportional Funding

Proportional funding made it possible for the Board of Ethics to create two new FTEs in fiscal year 2025-2026 - a second Investigator and a Marketing & Outreach Coordinator. The addition of these new employees will help improve investigations, education, and public outreach.

The increase in funds also went toward the creation of a Learning Management System to build a more robust online ethics training program with the goal of increasing the number of public servants trained.

Targeted Equitable Funding Request Over 3-Year Ramp Up

		Board of Ethics	
		Adopted & Target	Proportional and Equitable Funding Percentage
		Equitable Funding Amounts (Dollars)	
		Description	
FY24	\$ 1,319,487,321	FY24 Adopted Budget	\$ 545,278 0.04%
FY25	\$ 1,474,146,820	FY25 Adopted Budget (Current)	\$ 682,960 0.05%
FY25	\$ 1,474,146,820	Mayor's FY26 Proposed Budget	\$ 591,195 0.04%
FY25	\$ 1,474,146,820	Target Equitable Funding (TEF)	\$ 1,383,664 0.09%
Total Required Additional Funding to Reach TEF		\$ 792,469	
Proposed FY26 TEF Funding		\$ 308,593	
Proposed FY27 TEF Funding		200,000	
Proposed FY28 TEF Funding		283,876	
Total Required Additional Funding to Reach TEF		\$ 792,469	

The resolution adopted by City Council includes a three-year phase-in period, with a 0.09% funding increase for the Board of Ethics. The total additional funding required to reach target equitable funding is \$792,469 by FY 2027-2028.

The Next Chapter for Detroit's Oversight Agencies

Despite the agreement to ramp up funding over the next three years for the oversight agencies, it is projected that funding will decrease in FY 2026-2027. The oversight agencies will continue to advocate for proportional funding, as mandated by the City Charter, to ensure its continuation for years to come.



Ethics Training

In 2025, Ethics Training took a new approach to the delivery of Ethics Education in Detroit. One of the projects that the Board of Ethics undertook after receiving Proportional Funding was the development of a Learning Management System to provide more robust online training options for City of Detroit public servants.

In addition to building a new online ethics training system, the Education team focused on in-person training. Proportional Funding enabled the Board of Ethics to double its training staff to support in-person education and outreach. In 2025, the Board of Ethics conducted in-person training for 1,824 public servants on the Ethics Ordinance.

With data-driven analysis, the Ethics Education program will seek to double training results in 2026 with the rollout of the Learning Management System.

Learning Management System

The Board of Ethics began the search for a Learning Management System in 2024. After releasing a request for proposals, there were no suitable proposals that met with functionality or budgetary requirements. The determination was made to request another round of proposals with updated criteria.

A contractor was selected during the second round of proposals that met both budgetary constraints and functionality requirements. The Board selected Clear Company LMS. Once approved, work began to create the initial structure and import of user data from UKG for all public servants.

The timeline for implementation is slated to begin March 2026 with an introductory training to familiarize users with the system, with other modules focused on each of the provisions in the Ethics Ordinance to follow periodically.

While the Clear Co. system will be implemented for internal training, the Board will be repurposing the EasyGenerator System for public training and information.

Once the implementation of the Clear Co. System is complete, training schedules will adjust due to the increased capability. Currently, the Board is maintaining the bi-annual training schedule.



ClearCo

Outreach

The Board seeks to raise awareness of the Department's purpose and activities through multiple outlets.

Say Nice Things: A Detroit Ethics Podcast

The Board launched the Say Nice Things podcast to provide an easily digestible form of information on the purpose of each Ordinance provision.

City of Detroit Employee Resource Fairs

The Ethics Education team participated in multiple HR Resource fairs, providing information and promotional items to Detroit public servants to raise departmental visibility and training compliance.

Detroit Pistons

The Board of Ethics had a table at Little Caesars Arena where staff distributed promotional items to the public at a Detroit Pistons Game in April.

Bridging Communities Mental Health Wellness Fair

Bridging Communities hosted a mental health wellness fair, a free community resource event, at the Butzel Family Center on May 2, 2025. The Board of Ethics was in attendance to meet with Detroiters and answer their questions.

Election Block Party

Training Specialist Michael O'Connell represented the Board of Ethics at the Department of Elections "Party at the Polls" Block Party on October 25, 2025.

COGEL Conference Atlanta, Georgia

ABOUT COGEL

The Council on Governmental Ethics Laws (COGEL) is the premier international non-governmental organization dedicated to promoting good governance.

Throughout the year, Board of Ethics members and staff participate in COGEL's virtual training and professional development sessions, culminating in an annual conference held in December.



2025 CONFERENCE

The 2025 COGEL Conference was attended by nine Board members and staff. The 4-day conference provided fruitful discussions on campaign finance, investigations, FOIA, training, and leadership.

Senior Investigator Dawn Widman served on two investigative panels and one roundtable. Training Specialist Michael O'Connell participated in a roundtable and two panels focused on training and marketing efforts.

Training Specialist Michael O'Connell was also elected to the COGEL Executive Board where he will help shape and guide the continued development of the organization.

DID YOU KNOW?

COGEL is the preeminent organization in the field of governmental ethics. COGEL holds an annual conference in December that brings together ethics offices from around the world.

Presentations and Conferences

The Board of Ethics staff gave academic talks, presented at, and attended conferences on the topic of ethics. Education in ethics and compliance is another way for the Board of Ethics to inform the public about ethical values in government and develop the professional skills of its staff.

Ethics in Local Government Panel Discussion

The American Society for Public Administration's Detroit Metropolitan Chapter held an "Ethics in Local Government" panel discussion at the University of Michigan-Dearborn on February 20, 2025. Executive Director Christal Phillips was a panelist, along with Novi City Manager Victor Cardenas and University of Michigan-Dearborn and Wayne State Political Science Lecturer Bill Hatley.

Society of Corporate Compliance and Ethics Conference

Executive Director Christal Phillips and Senior Investigator Dawn Widman participated in the SCCE Conference in Nashville. Topics covered included ethics, compliance risks, investigations, privacy and data security, and professional skills.

Guest Lecture at Wayne State University

Executive Director Christal Phillips was invited by Professor Brian Byung Min to guest lecture for his Public Personnel Management Class at Wayne State University. Executive Director Phillips discussed the role of the Board of Ethics in city government with Professor Min's graduate students.

Re:Con Conference

Executive Director Christal Phillips presented on "Ethical Dilemmas When Working with Persons Served" at the Incompass Michigan's Re:Con Conference in Kalamazoo in November 2025. The annual conference is designed for professionals who support individuals with disabilities and other barriers.

OSMOSIS Investigation Training

Senior Investigator Dawn Widman successfully completed the OSMOSIS Association 8-week investigation training and certification program.

Recommendations

The Board of Ethics acknowledges areas for improvement and includes recommendations in its annual report to support its mandated goals.

Independent Counsel

For the second consecutive year, the Board of Ethics is recommending hiring its own full-time attorney rather than having one assigned by the Law Department. Six assigned attorneys have been rotated through the Board of Ethics over the past four years, resulting in instability and conflicts of interest that compromise the Board's ability to operate as an independent oversight agency.

In June 2025, Council Member Santiago Romero requested a memo from the Legislative Policy Division on separate legal counsel for independent agencies in Detroit. Specifically, to the Board of Ethics, questions included the ability of the Board of Ethics to hire its own legal counsel with Proportional Funding.

As of December 31, 2025, the Board of Ethics has not been able to view the Legislative Policy Division's memo on securing independent counsel, Executive Director Phillips' memo to the Legislative Policy Division, or the Law Department's response memo. The Board of Ethics requests that the privilege be lifted from these memos for full transparency and review by all Board of Ethics members and staff.

Amending the Ethics Ordinance and Charter

The Board of Ethics recommends closing the loopholes in the ethics ordinance and relevant sections of the City Charter. Amendments would enable the Board to provide clearer guidance to public servants. The Board of Ethics is exploring an amendment to go before voters, or a petition, rather than waiting for the possibility of another Charter Revision Commission in 2034.

Recommendations (cont'd)

Quicker Appointment of Board Members

The lack of a quorum to hold monthly meetings when there is not a full board in place has been one of the Board's biggest challenges. The Board has had to contend with long-term vacancies for years, which places a burden on the existing volunteer members and delays its response to complaints and requests for advisory opinions. As of December 31, 2025, there were two vacancies, one of which has been vacant since July 2025. The Board recommends that the Mayor's Office and City Council act more expeditiously to appoint members.

Cooperation with Disclosures

For the first time in 2024, the Board of Ethics was able to successfully obtain conflict of interest disclosures from the Mayor's Office. The Duggan administration promised the Board that these disclosures would be submitted to the Board of Ethics annually; however, conflict of interest disclosures were not submitted in 2025. It is recommended that conflict of interest disclosures be provided to the Board of Ethics on an annual basis.

Disclosures

Accountability and Transparency to the Public

Disclosures have become a focal point for the Board of Ethics, aimed at improving accountability and transparency to the public. The goal has been to increase disclosures from all public servants, particularly from the City's elected officials and high-ranking appointees.

In 2024, the Board received the highest number of disclosures in its history after requesting conflict of interest disclosures from the Mayor's Office. Despite not receiving disclosures from the Mayor's Office in 2025, the Board will continue to request these disclosures each year.

The Board investigator reviewed and completed sixteen First Step Forms on the Disclosures filed as required in 2025. This may include advising the filer that a Request for Advisory Opinion is warranted.

The Board emphasizes the importance of disclosures in its opinions and training. During election year 2025, the Board sent out reminders to City Council to turn in disclosures for Campaign Contributions and Expenditures.

Types of Disclosures



Relationships



Campaign Contributions
and Expenditures



Disclosure of Interest
Public Servants



Disclosure of Interest
Contractors and Vendors

Gifts and Gratuities

Zero Dollar Prohibition on Gifts

Section 2-5-70 of the ethics ordinance prohibits gifts and gratuities of any value from any person or entity doing business or seeking to do business with the City. There are some exceptions to this rule. The Board of Ethics recommends that public servants file a Request for Advisory Opinion for a more nuanced analysis of the gifts and gratuities policy and its application to their individual situations.

What is a Gift?

A gift can come in many forms, both physical and digital, that have monetary value. Examples include, but are not limited to, gift cards, gift baskets, venue tickets, and meals.

What is a Gratuity?

A gratuity is a monetary payment or reduced pricing, including but not limited to tips, cryptocurrency, and certain discounts.

Gifts Donated in 2025

Departments and public servants are advised to return gifts to the giver or submit them to the Board of Ethics for review. Gifts submitted to the Board of Ethics are processed by the Investigator and returned to the givers, along with a letter outlining the gift and gratuity policy.

Gifts that cannot be returned to the giver are donated to local organizations that do not do business with the City of Detroit. In 2025, the Department of Innovation and Technology submitted six gift packages and a snack box. The General Services Department submitted a Swiss Colony gift box. All of these gifts were donated to the non-profit organization Vets Returning Home.



Investigations

Section 2-5-161, Board initiated investigations

Section 2-5-161 of the Ethics Ordinance authorizes the Board of Ethics to conduct Investigations, on its own initiative, regarding a Public Servant's perceived violation of the disclosure requirements that are found in Division 2 of this article, or the standards of conduct that are found in Division 3 of this article.

In this process, a matter is brought to the attention of the Investigator by a Board Member, the Executive Director, or by the Investigator themselves. The Executive Director then approves moving forward with the gathering of information, which is presented to the Board in a Memorandum.

In 2025, the Investigator completed (2) two Memorandums, which the Board approved into (2) two Board-initiated Investigations. One investigation led to a hearing, and the other matter is pending a hearing.

Hearings

The Board of Ethics may schedule a hearing when it has determined that an investigation has compiled facts sufficient to constitute a possible violation of the ethics ordinance. The Board of Ethics held four hearings in 2025.

Investigation 2024-01

The Board initiated an investigation into Antoine Bryant, Director of the Planning and Development Department, for the execution of a \$215,000 contract with Street Art for Mankind Corp. without proper approval from City Council. A hearing was conducted on March 19, 2025, where the Board voted to dismiss the investigation. On May 21, 2025, the Board amended the determination of I-2024-01 based on the opinion from legal counsel to add that there were no facts sufficient to support a violation of the ethics ordinance.

Complaint 2024-15

A complaint was filed against Willie Burton, a Commissioner with the Board of Police Commissioners. The complaint alleged violations of Section 2-5-61. Willful Neglect of Duty and Section 2-5-62. Improper Use of Confidential Information Prohibited. A hearing was held on March 19, 2025. The complainant failed to attend the hearing, and the Board of Ethics voted to dismiss the complaint.

Complaint 2024-19

Juwan Outlaw filed a complaint alleging ethical violations by the Respondent, Angela Whitfield Calloway, a City Council member. The Board voted to conduct a hearing, held on June 16, 2025, to determine whether Councilmember Whitfield Calloway had violated Section 2-5-62. Improper use of disclosure of confidential information prohibited. and Section 2-5-72. Prohibition on campaign activities by using City personnel or property, or during working hours. The Board voted to dismiss the complaint pursuant to 2-5-145(b)(1)(b) of the ethics ordinance.

Hearings (cont'd)

Investigation 2025-01

On August 20, 2025, the Board initiated an investigation into and scheduled a hearing for Alvin Horhn, Deputy CFO/Assessor, for possible violations of the ethics ordinance due to his admission at a Budget, Finance & Audit (BFA) Committee Meeting held on June 4, 2025, that he approved a waiver of penalties without City Council review and approval. The Board voted to find that Mr. Horhn in violation of Section 2-5-61. Willful Neglect of Duty Prohibited, and adopt a resolution of public admonition pursuant to Section 2-5-168(a), with no further action.

Public Admonishments

The Board publishes its public admonishments in the Detroit Legal News and the Michigan Chronicle. In 2025, the Board published one admonishment in the matter of Investigation 2025-01.

David Teeter, Vice Chairperson
Raymond Card, Member
Dr. Yvette McElroy Anderson, Member
LaTanya Richardson, Member
David Sanchez, Member

A RESOLUTION BY THE CITY OF DETROIT BOARD OF ETHICS ADMONISHING ALVIN HORHN, DEPUTY CFO/ASSESSOR, OFFICE OF THE ASSESSOR

Whereas the Detroit City Charter and the Ethics Ordinance mandate disclosure requirements and standards of conduct to ensure that governmental decisions are made in the public's best interest by prohibiting public servants from participating in matters that affect their personal or financial interests;

Whereas the Board of Ethics applies and enforces disclosure requirements and standards of conduct by, but not limited to, conducting investigations and, where appropriate, issuing notice of charges in order to ensure the integrity of City government, through the subpoenaing of witnesses, the administering of oaths, the taking of testimony, and the compulsion of the production of relevant evidence;

Whereas on August 20, 2025, the Board of Ethics opened an investigation regarding Alvin Horhn, a city appointee, for possible violations of:
Sec. 2-5-61. – Willful neglect of duty prohibited; and
Sec. 2-5-66. – Improper use of official position prohibited;

Whereas after an investigation that compiled facts sufficient to constitute a possible violation of this article, a Hearing, with proper notice, was held on Wednesday, November 12, 2025, on Investigation 2025-01, Board of Ethics, as to Mr. Horhn;

Whereas during said Hearing, the Board of Ethics found that Mr. Horhn admitted to approving a waiver of penalties associated with late filings of property transfer affidavits for approximately 13,500 sales of Detroit Land Bank Authority properties from 2014 through 2020, as required by the Michigan General Property Tax Act, in violation of Section 2-5-61 of the ethics ordinance;

Whereas during said Hearing, the Board of Ethics acknowledged that Mr. Horhn, despite being in violation of the ethics ordinance and choosing not to follow the letter of the law, that his actions were intended to assist residents; and,

Whereas in the event the Board of Ethics determines that a violation of this article has occurred, the Board may adopt a resolution of public admonition against an elective officer, or an appointee, regarding the violation; now, therefore, be it

Resolved, that the Board of Ethics:

1. Publicly admonishes Alvin Horhn for violation of Sec. 2-5-61. – Willful neglect of duty prohibited; with no further action, and,
2. Sends this resolution to the Mayor, City Council, the City Clerk, and to local media entities.

Detroit Board of Ethics
7737 Kercheval, Suite 213
Detroit, MI 48214
(313) 224-9521

Dated: November 24, 2025

Requests for Advisory Opinions

In 2025, the Board responded to thirty requests for advice from public servants. Upon receipt, the Investigator completes a First Step Form to provide succinct information quickly to the Board so they may provide a timely opinion to the Requestor.

First Steps

Upon receipt of a Request for Advisory Opinion, the Investigator completes a First Step Form within 10 days of receipt. This form reviews the jurisdictional criteria and requests information from the Requestor for the Board's timely review. The investigator anticipates any information that may be needed for the Board's determination.

In 2025, the Investigator completed thirty First Step Forms on Requests for Advisory Opinions for the Board's review.

Fact-Finding Report

Upon the Board's review, it may require additional information to provide a thorough opinion to the Requestor.

To obtain and provide the additional information requested by the Board, interviews are conducted, the information is verified, and the results are presented in a Fact-Finding Report to the Board.

In 2025, the Investigator completed four Fact-Finding Reports related to Requests for Advisory Opinions for the Board's review.

RAO-2024-18

The Requestor sought an advisory opinion on accepting a discount for professional development training from an entity contracted to do business with the City as a professional service sub-consultant. The Board opined that the Requestor may accept the discount for the professional training given by the City sub-consultant contractor not associated with the Requestor. (Indicated ordinance sections: 2-5-70(b)(4)(b))

RAO-2024-20

The Requestor sought an advisory opinion on any foreseeable conflicts between their current and previous positions with the City. The Requestor advised that in their former position, they submitted applications and were awarded projects within the City. The Board opined that the Requestor should not work on prior contracts with which they are familiar from their prior employment. However, the Requestor may work on a project not completed under their previous employment provided they comply with the applicable Standards of Conduct. (Indicated ordinance sections: 2-5-62, 2-5-65, and 2-5-66)

RAO-2024-22

The Requestor sought an advisory opinion on whether the Requestor may accept an invitation to attend a “lunch and learn” presentation given by a vendor to the Requestor’s department to introduce new products. The Board opined that if the vendor is doing business with the City or seeking to do business with the City, accepting lunch would be a violation of the Ethics Ordinance because the meal would be considered a gift or thing of value from an entity doing business with the City, without exception. The vendor may still provide a presentation without providing lunch for the department. If the vendor is not doing business with the City or seeking to do business with the City, then the Board should deny the request where the request does not relate to this article. (Indicated ordinance sections: 2-5-70 and 2-5-124(b)(1))

RAO-2025-01

The Requestor sought an advisory opinion on the application of the Standards of Conduct as related to their ability to serve on the Board of a Fund which sponsors programs in the City of Detroit. The Board opined that the Requestor may serve as an advisor on the Board with the requirement that the Requestor follow City procedures for declaration of conflict and recusal on all City actions involving the Board as well as any of the organizations sponsored or funded by that organization. (Indicated ordinance sections: 2-5-31, 2-5-66, 2-5-70)

RAO-2025-02

The Requestor sought an advisory opinion on whether their activity on an annual conference planning committee should be considered as an extension of their work duties or whether it would be more appropriate to use vacation leave for these activities. The Board opined that the Requestor's participation in the planning committee and the official conference are considered an extension of the Requestor's public service duties. (Indicated ordinance sections: 2-5-124(b)(4))

RAO-2025-03

The Requestor sought an advisory opinion regarding the Director of a Board of Review job description to determine if the assigned responsibilities aligned with ethical governance standards and the appropriate scope of authority for this role. The Board declined to issue an advisory opinion as such is restricted to the ethical compliance of the requestor, not of a different party. (Indicated ordinance sections: 2-5-124(b)(1))

RAO-2025-04

The Requestor sought an advisory opinion regarding their private consulting with their outside employment and a customer who would like to do business with the City of Detroit. The Board opined that there should be compliance with the recusal requirements of the Ethics Ordinance and a recommendation to prohibit the extension of the Requestor's role or authority as a city employee in any meetings with city agencies. The Board further recommended that the Requestor not use their position with the city in any capacity to gain any type of approval from outside agencies. (Indicated ordinance sections: 2-5-62, 2-5-65, 2-5-70)

RAO-2025-05

The Requestor sought an advisory opinion regarding their bid for appointment to Ombudsperson and being in compliance in doing so. The Board declined to issue an advisory opinion in this matter. (Indicated ordinance sections: 2-5-124(b)(1))

RAO-2025-06

The Requestor sought an advisory opinion regarding the possible conflict of interest between the volunteer duties of the Requestor on a city commission and their employment as the director of a residential and commercial district in the city. The Board opined that the Requestor's volunteer role on the city commission raises conflict concerns that could be damaging to both their volunteer role and position with the city. The Board further opined that if the number of commission determinations from properties in the residential and commercial district in the city is minor, then the effect of the Respondent's recusal will be limited and acceptable. If the frequency is significant, this would support a determination that these are incompatible responsibilities. The Board advised that the Respondent not represent themselves in their position with the commission before other organizations. (Indicated ordinance sections: 2-5-31, 2-5-64, 2-5-65)

RAO-2025-07

The Requestor sought an advisory opinion regarding the Requestor's proposed role as the co-chair of a fundraising activity for a tax-exempt non-profit entity. The Board opined that the Requestor's proposed role as co-chair of a fundraising event would present two conflicts with City of Detroit ethical rules: (1) prohibition on gifts and gratuities; and (2) incompatible rendering of services. (Indicated ordinance sections: 2-5-31, 2-5-64, 2-5-70)

RAO-2025-08

The Requestor sought an advisory opinion regarding whether the Requestor's possible candidacy for an elected commissioner position would present ethical concerns. The Board opined that the Respondent may continue their employment while seeking City office, and noted that the request properly poses the ethical issues of prohibition of campaign activities during periods of employment and, if elected, conflict of responsibilities. (Indicated ordinance sections: 2-5-64, 2-5-72)

RAO-2025-09

The Requestor sought an advisory opinion regarding campaigning prohibitions during public meetings and in government buildings, either in-person, by telephone, or virtually. The Board declined to issue an advisory opinion. (Indicated ordinance sections: 2-5-124(b)(1))

RAO-2025-10

The Requestor sought an advisory opinion inquiring if sitting in on interviews for partners for a development project represented a conflict of interest. The Board opined that the Requestor's role did not present an ethical issue; however, that determination was based on the Respondent not being involved in any requests for funding from the City of Detroit or in City oversight. The Board cautioned the Respondent not to disclose confidential information obtained in their role with the City and reminded them to file any applicable disclosures with the Board of Ethics. (Indicated ordinance sections: 2-5-62, 2-5-64)

RAO-2025-11

The Requestor sought an advisory opinion regarding the acceptance of airfare and hotel fees from a non-profit environmental advocacy group that has a contract with the city, to attend a summit sponsored by the group. The Board opined that as the Requestor does not exercise significant authority over the group's contract with the city, and the summit directly relates to the services provided by the Requestor's department, acceptance of the group's sponsorship to attend the summit was permissible. (Indicated ordinance sections: 2-5-70)

RAO-2025-12

The Requestor sought an advisory opinion on behalf of another individual, inquiring if a gift of a flag from a Native Tribe could be accepted. The Board declined to issue an advisory opinion. (Indicated ordinance sections: 2-5-124(b)(1))

RAO-2025-13

The Requestor sought an advisory opinion as to whether their service as a member of a neighborhood corporation board conflicts with their position with the City of Detroit. The Board opined that the Requestor's position on the neighborhood board would not violate ethical standards, provided they recuse themselves from any neighborhood board activities that would cause a conflict or be detrimental to their position with the City. The Board further opined that the Requestor should not represent the neighborhood board before the Planning Department, and that any representation of the neighborhood board before any other City agency should be uncompensated and during leave periods. The Board also advised the Requestor not to disclose or use any confidential information obtained through their employment with the City, and to file a disclosure if a neighborhood board position is offered and accepted. (Indicated ordinance sections: 2-5-62, 2-5-64, 2-5-65)

RAO-2025-14

The Requestor sought an advisory opinion regarding their ability to accept an employment offer from a private sector company contracted with the City in which they may have played a role in selecting, working with, and/or managing in their current position, provided they did not work on projects with the City. The Requestor subsequently withdrew their request.

RAO-2025-15

The Requestor sought an advisory opinion on the permissibility of becoming an advisory board member, and if permitted to accept the advisory board member position, if there are any restrictions to serving in that capacity. The Board opined that the Requestor may serve on the advisory board, consistent with their duties with the City of Detroit and cautioned the Requestor to recuse themselves in any instance of their requested participation in City oversight or involvement. The Board also recommended that the Requestor file any applicable disclosures. (Indicated ordinance sections: 2-5-64)

RAO-2025-16

The Requestor sought an advisory opinion on the permissibility of purchasing City of Detroit-owned commercial property. The Board opined that the Requestor was prohibited by Michigan law from purchasing City property. (Indicated ordinance sections: 2-5-2)

RAO-2025-17

The Requestor sought an advisory opinion on whether the Requestor's prior involvement in the evaluation and awarding of a contract to a company would be a violation of the Ethics Ordinance if the Requestor accepted a job offer with that company. The Board opined that the Requestor should refrain from accepting a position with a person or entity doing business with the City or working on City-related services in any new job capacity for a period of one year from the date the Requestor stepped down from their City role. (Indicated ordinance sections: 2-5-71)

RAO-2025-18

The Requestor sought an advisory opinion on whether a proposed agreement for the establishment of services between the City and an external organization was appropriate. The Board declined to issue an advisory opinion as the request did not involve the Requestor's own conduct. (Indicated ordinance sections: 2-5-124(b)(1))

RAO-2025-19

The Requestor sought an advisory opinion on whether their potential employment with a company doing business with the City of Detroit would violate the post-employment prohibition of the Ethics Ordinance. The Board opined that because the Requestor's City of Detroit position did not involve either awarding or managing any City contract, nor sharing confidential information, the Requestor may work for the prospective employer. However, the Requestor was reminded not to disclose confidential information based on their City employment and not to appear before City Council or make requests of City Council on behalf of their new employer for one year. (Indicated ordinance sections: 2-5-71)

Complaints

Unlike Requests for Advisory Opinions, which can only be filed by public servants, complaints may be filed by anyone except members of the Board of Ethics, provided that person believes a public servant, contractor, or vendor has violated the ethics ordinance. A complaint must be filed within two years of when the alleged violation occurred.

Complaints must be submitted on the official complaint form, which is available on the Board of Ethics website or at its office located at the Butzel Family Center.

The Board of Ethics received sixteen complaints and disposed of them in 2025. Upon receipt of a Complaint, the Investigator has 10 days to complete a First Step Form to provide Board information for their review. As noted previously, this provides the Board with jurisdictional information, basic public information, and details on what an investigative plan may entail if an investigation is ordered.

Of the complaints received, three became investigations. Investigations consist of interviews with the Complainant, the Respondent(s), witnesses, and the obtaining of any supporting documentation provided for the Board's review in an extensive investigative report.

From the three Complaint investigations, three led to hearings in which the Investigator provided testimony and information to assist the Board in their determination.

Complaint 2024-15 alleged that the Respondents' behavior violated the Standards of Conduct by misbehaving following a City meeting, uttering expletives at the Complainant, and failing to apologize. The Board determined further information was needed and initiated an investigation pursuant to Section 2-5-145(b). Following a hearing, this matter was dismissed as there were not enough facts to support that a violation of the ethics ordinance had occurred pursuant to Section 2-5-167.

Complaint 2024-19 alleged that the Respondent asked/required the Complainant to attend campaign events and/or contribute to the Respondent's campaign after work hours and possibly be fired if the Complainant failed to do so. The Complainant alleged that after speaking out on this issue at a staff meeting, the Respondent had the Complainant's work location changed and discussed firing the Complainant with other staff while the Complainant was on FMLA. The Complainant further alleged that the Respondent spoke with other staff about the Complainant's FMLA and edited the Complainant's timesheet in UltiPro, resulting in the Complainant not being paid for one week. The Complainant also alleged that the Respondent improperly used City property, purchased unapproved items on a City purchasing card, withheld requested equipment from the Complainant, and improperly disclosed the Complainant's personal information. Pursuant to Sec. 2-5-145(b)(3)(a), the Board of Ethics ordered an investigation into the facts alleged in the Complaint to determine if the evidence is sufficient to constitute a violation of the Ethics Ordinance. Following a hearing, this matter was dismissed as the facts presented were not sufficient to constitute a violation of the ethics ordinance pursuant to 2-5-145(b)(1)(b).

Complaint 2024-20 alleged that the Respondents are City of Detroit employees who hold leadership positions on the board of a non-profit group, representing a potential conflict of interest. Pursuant to Sec. 2-5-145(b)(3)(a), the Board of Ethics ordered an investigation into the facts alleged in the Complaint to determine if the evidence was sufficient to constitute a violation of the Ethics Ordinance. It was determined that there were not fact sufficient to constitute a violation of the ethics ordinance and there were other pending proceedings arising out of the same transaction or occurrence; therefore, the Complaint was dismissed pursuant to 2-5-145(b)(1)(b).

Complaint 2025-01 alleged that the Respondents engaged in fraud and corruption without noting specific violations of the Standards of Conduct. It was determined that the Complaint was defective in a manner that resulted in the Board of Ethics being unable to make any sound determination and was dismissed pursuant to Section 2-5-145(b)(1)(d).

Complaint 2025-02 alleged that the Respondent violated the Standards of Conduct in their position by exceeding their legal authority and infringing upon the authority of a board. The Complainant also alleged that the Respondent improperly engaged in activities in which they had a personal conflict of interest. The Complainant did not provide evidence or documentation to support their allegations. It was determined that the Complaint did not allege facts sufficient to constitute a violation of the ethics ordinance pursuant to 2-5-145(b)(1)(b).

Complaint 2025-03 alleged that the Respondents committed ethics violations in granting permission to operate a marina in 1980, failing to hold a hearing regarding his allegations relating to the marina, and exhibited bias against the Complainant in the filing of a position with the city. It was determined that the Board of Ethics did not have jurisdiction over the matter, and the Complaint was dismissed pursuant to 2-5-145(b)(1)(a).

Complaint 2025-04 alleged that the Respondent embezzled funds to pay for re-election campaign materials. It was determined that the Complaint did not allege facts sufficient to constitute a violation of the ethics ordinance pursuant to 2-5-145(b)(1)(b).

Complaint 2025-05 alleged that the Respondents violated the Standards of Conduct in their associated duties as employees of a City of Detroit contractor. It was determined that the Board of Ethics did not have jurisdiction over the matter, and the Complaint was dismissed pursuant to 2-5-145(b)(1)(a).

Complaint 2025-06 alleged that the Respondent violated the Standards of Conduct for using their official position or city resources for political purposes. An investigation was initiated by the Board on August 20, 2025. The Board closed the complaint due to the expiration of the matter.

Complaint 2025-07 alleged that the Respondent violated the Standard of Conduct by prior involvement with agencies in the City resulting in improper personal benefit, restrictions on confidential information, and failing to disclose personal relationship(s). It was determined that the Complaint did not allege facts sufficient to constitute a violation of the ethics ordinance pursuant to 2-5-145(b)(1)(b).

Complaint 2025-08 alleged that the Respondent violated the Standard of Conduct prohibiting the expenditure of public funds for political purposes. It was determined that no violation of the ethics ordinance occurred, and the matter was dismissed pursuant to 2-5-145(b)(2).

Complaint 2025-09 alleged that the Respondent colluded with a County Clerk to deceive voters with a scripted disqualification and reinstatement on the ballot, thereby engaging in campaign activities during work hours and improperly using their position to influence decisions. It was determined that the complaint did not allege facts sufficient to constitute a violation of the ethics ordinance and the matter was dismissed pursuant to 2-5-145(b)(1)(b).

Complaint 2025-10 alleged that the Respondent accepted campaign contributions and failed to disclose them as well as lying about it in a debate. It was determined the Board of Ethics did not have jurisdiction and the matter was dismissed pursuant to 2-5-145(b)(1)(a).

Contact Us

The Board of Ethics is available Monday through Friday to answer questions and assist with training scheduling, as well as the filing of Requests for Advisory Opinions, Complaints, and Disclosures. Forms are available in person at the Board of Ethics office or can be downloaded from the Board of Ethics website.

THANK YOU!

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Appendix A: Advisory Opinions Issued in 2025



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David Teeter, Member
Robert Watt, Member

Advisory Opinion #2024-18
Issued: January 15, 2025

Advisory Opinion #2024-18: In response to Request for Advisory Opinion 2024-18, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as to whether the Requestor, a [REDACTED], in the City of Detroit [REDACTED], may accept a discount for professional development training by the [REDACTED]. In the past, the Requestor's department has sent staff to [REDACTED] training on a discount when available. [REDACTED] just signed on to do business with the City as a professional services subconsultant on a [REDACTED] contract.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2024-18 ("the Request") by email on October 2, 2024. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor did not waive confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on January 1, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on April 2, 2025.

At its January 15, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is a [REDACTED] for the Detroit [REDACTED], and would like to accept a registration discount (approximate value \$700)

for professional development training given by the [REDACTED], a nationally recognized nonprofit organization helping communities [REDACTED], [REDACTED]. In the past, [REDACTED] has sent staff to [REDACTED] training on discount when available. [REDACTED] recently signed on to do business with the City as a professional services subconsultant on a [REDACTED] contract.

The Requestor is not involved in the contract work with [REDACTED]. [REDACTED] would be using Departmental funds to provide other usual associated costs, registration balance, travel, and lodging expenses (\$1500.00). The Requestor seeks a Board Opinion on whether there is any ordinance violation with accepting that discount.

III. Applicable Charter and Ordinance Sections

The facts of this Request implicate the standards of conduct set forth in Section 2-5-70 of the Ethics Ordinance, Prohibition on gifts and gratuities; exceptions because Requestor is a public servant who is receiving something of value from an entity, specifically a discounted rate on the registration fee (approximately \$700.00 in value) as follows:

Section 2-5-70. – Prohibition on gifts and gratuities; exceptions.

- (a) A public servant **shall not accept gifts, gratuities, honoraria, or other thing of value** from any person or entity **doing business or seeking to do business with the City**, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.
- (b) The prohibition in Subsection (a) of this section shall not apply:
 - (1) To an award publicly presented to a public servant by an individual, governmental body, or non-governmental entity or organization in recognition of public service;
 - (2) To complimentary copies of trade publications, books, reports, pamphlets, calendars, periodicals or other informational materials;
 - (3) To a gift received from a public servant's immediate family member or relative, provided, that the immediate family member or relative is not acting as a third party's intermediary or an agent in an attempt to circumvent this prohibition.
 - (4) **To an admission or registration fee, travel expenses, entertainment, meals or refreshments that are furnished to the public servant:**
 - a. **By the sponsor of an event, appearance or ceremony, which is related to official City business in connection with such an event, appearance or ceremony and to which one or more members of the public are invited; or**

- b. In connection with teaching, a speaking engagement, or the provision of assistance to an organization or another governmental entity as long as the City does not compensate the public servant for admission or registration fees, travel expenses, entertainment, meals or refreshment for the same activity.**

Section 2-5-70(a) of the Ethics Ordinance generally prohibits public servants from accepting gifts or other things of value from entities doing business with the City. Section 2-5-70(b) provides several exceptions to the prohibition. The only exception that is relevant to events hosted by contractors is provided in Section 2-5-70(b)(4), which provides an exception for “an admission or registration fee, travel expenses, entertainment, meals or refreshments” in two specified types of situations.

An example that may be applicable to employees of the City [REDACTED] department would be an employee attending a conference on [REDACTED] that’s sponsored by a contractor and the employee’s attendance is requested, or approved, by the employee’s supervisor. The exception also requires “one or more members of the public are invited” to the event. Although the term “members of the public” is not defined in the Ethics Ordinance or in the Charter, that requirement is easily satisfied when people other than just the public servant and employees of the contractor are invited to attend.

The other type of situation to which the exception provided in Section 2-5-70(b)(4) may be applicable to events hosted by a contractor is where a public servant attends such an event “[i]n connection with teaching, a speaking engagement, or the provision of assistance to an organization ... as long as the City does not compensate the public servant for admission or registration fees, travel expenses, entertainment, meals or refreshment for the same activity.” An example of such a situation would be when a contractor invites a public servant to teach or speak at the contractor’s event. However, the exception for this type of situation does not apply if the City compensates the public servant for any specified expenses or items for the same teaching activity, speaking engagement, or provision of assistance.

A public servant’s attendance at an event hosted by a contractor is not, in itself, a violation of the Ethics Ordinance’s prohibition on accepting gifts or other things of value from an entity doing business with the City. However, if other attendees of such an event are required to pay an admission or registration fee, and the public servant is not, then the public servant’s attendance would be a violation of the prohibition unless either of the two types of situations described in Section 2-5-70(b)(4) of the Code are applicable. Furthermore, even if one of the two types of situations described in Section 2-5-70(b)(4) apply to the public servant’s attendance at the event, the prohibition would still apply to any gifts or other things of value from the contractor other than “an admission or registration fee, travel expenses, entertainment, meals or refreshments.”¹⁷ If neither of the two types of situations described in Section 2-5-70(b)(4) are applicable, then the exception does not apply, and the public servant would be prohibited from accepting any gift or other thing of value from the contractor without paying for it, including meals or drinks that may be complimentary to other guests. The request specifically delineates that this is for admission or a registration fee such that the Requestor would not be prohibited from accepting the discount as indicated. However, the Requestor may rely on the language of 2-5-70 of the Code for general guidance.

V. Conclusion

In response to Request for Advisory Opinion 2024-18, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor may accept the discount for the professional training given by the City subconsultant contractor not associated with the Requestor, which would be within the exception of Section 2-5-70(b)(4)(b).

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Dated: January 31, 2025



BOARD OF ETHICS
DETROIT

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David Teeter, Member
Robert Watt, Member

Advisory Opinion #2024-20 Issued: January 15, 2025

Advisory Opinion #2024-20: In response to Request for Advisory Opinion 2024-20, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding any foreseeable conflicts in [REDACTED] role as a [REDACTED] in the [REDACTED] and her previous position with [REDACTED]. Specifically, the Requestor worked as part of a team at [REDACTED] that submitted applications and received awards for [REDACTED] projects [REDACTED] within the City of Detroit.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2024-20 (“the Request”) by email on November 5, 2024. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor has waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on February 5, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on May 7, 2025.

At its January 15, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor seeks an advisory opinion regarding [REDACTED] role with the City as a [REDACTED] for the [REDACTED]. In this role, [REDACTED] will assist developers with [REDACTED] as a part of their [REDACTED].

development within the City.

The Requestor previously worked as part of a team at [REDACTED] that submitted applications and received awards for [REDACTED] projects [REDACTED] within the City. One project, [REDACTED], is moving forward with the City and has received a [REDACTED] award,¹ and [REDACTED] is still in negotiation.

The Requestor seeks an advisory opinion on any foreseeable conflicts with working on prior projects that [REDACTED] assisted with during her employment at [REDACTED] and best practices to avoid any ethical violations in her new position.

III. Applicable Charter and Ordinance Sections

There is no express prohibition from working on projects from previous employment while employed for the city. However, such an arrangement presents the opportunity for potential Ethics Ordinance violations elsewhere. The Requestor should comport [REDACTED] conduct in her dual roles in compliance with the following relevant sections of the Ethics Ordinance:

Section 2-5-62. – Improper use or disclosure of confidential information prohibited.

Except as otherwise provided for by applicable law, a public servant shall not **knowingly use or disclose to third parties' confidential information** which is gained by reason of his or her official duties, **concerns the property, government or affairs of the city, or any office, department or agency thereof**, and is not available to members of the public.

Section 2-5-62 of the Code generally prohibits public servants from knowingly using confidential information outside the scope of the public servant's official duties or disclosing confidential information to third parties. The Ethics Ordinance provides the following definition for the phrase "confidential information."

[I]nformation that has been obtained by a public servant in the course of acting as a public servant, that is not available to members of the public pursuant to the Michigan Freedom of Information Act. . . . or pursuant to other law, regulation, policy or procedure recognized by law, and that the public servant is unauthorized to disclose.

Accordingly, any information that the Requestor has obtained either in the course of acting as a public servant as a [REDACTED] with the [REDACTED] Department that is not available to members of the public and that the Requestor has not been authorized to disclose, is confidential information. The Requestor is prohibited from using or disclosing information obtained in [REDACTED] prior role in fulfilling [REDACTED] current role. If the Requestor believes the use or disclosure of confidential information is warranted, [REDACTED] must seek approval to use or disclose that information from the appropriate City officials.

Section 2-5-65. – Representation of private person, business, or organization prohibited; exceptions.

¹ The [REDACTED] award is an award for [REDACTED] to receive a [REDACTED] if their [REDACTED] has [REDACTED].

A public servant shall not act as an agent, attorney, or **representative** for another person, business, or **organization in any matter that is pending before a City agency, except that:**

- (1) **A public servant may represent another person, business, or organization before a city agency where such representation is a required part of the public servant's official duties;**
- (2) **A public servant who is an uncompensated member of a city board, commission, or other voting body may act as an agent, attorney, or representative for another person, business, or organization in a manner that is pending before a city agency, other than the board, commission, or other voting body on which the public servant is a member; or**
- (3) **A public servant who is compensated by the City may act as an agent, attorney, or representative for another person, business, or organization in a matter that is pending before a City board, commission or other voting body, other than the board, commission or other voting body on which the public servant serves as an appointee or as an employee, or under a personal services contract, as long as the public servant does so:**
 - a. Without compensation; and
 - b. On the public servant's leave time; and
 - c. For appointees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave; or
 - d. For non-union employees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave, and the City's Civil Service Rules; or
 - e. For union employees, in accordance with the employee's respective union contract and the City's Civil Service Rules; or
 - f. For individuals who provide services to the City pursuant to a personal services contract, in accordance with the applicable provisions of the contract.

Section 2-5-65 generally bars public servants from representing persons, businesses, or organizations in any matter pending before a City agency. This Code section has a number of exceptions. The Requestor is no longer representing [REDACTED] prior employment with the city. However, [REDACTED] should be cautious not to favor or otherwise “assist” [REDACTED] in any contracts [REDACTED] may interact with in [REDACTED] current position. To avoid any impression of impropriety, the Requestor should recuse [REDACTED] in any new situation where [REDACTED] is dealing with [REDACTED] prior employer.

Section 2-5-66. – Self-interested regulation and participation prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly vote, or knowingly participate in the negotiation or making of any City contract, or any other type of transaction with any business entity in which the public servant or an immediate family member has a financial interest.

Section 2-5-66 generally prohibits public servants from using their stations to benefit any business entity in which they or an immediate family member has a financial interest. Like Sections 2-5-64 and 2-5-65, the Requestor should recuse ██████ in any situation where ██████ is dealing with projects that may have a self-interest or said decision directly impact on ██████ current position.

V. Conclusion

In response to Request for Advisory Opinion 2024-20, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor should not work on prior ██████ contracts ██████ is familiar with from ██████ prior employment. However, the Requestor may work on a project not completed under ██████ previous employment provided ██████ comports ██████ conduct with the applicable Standards of Conduct set forth above.

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Dated: January 27, 2025



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Advisory Opinion #2024-22
Issued: January 15, 2025

Advisory Opinion #2024-22: In response to Request for Advisory Opinion 2024-22, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as to whether the Requestor may accept an invitation to attend a “lunch and learn” presentation given by a vendor to introduce new products.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2024-22 (“the Request”) by email on December 20, 2024. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor did not waive confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on March 21, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on June 20, 2025.

At its January 15, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor serves as [REDACTED]. The Requestor would like [REDACTED] to accept a “lunch and learn” presentation from a vendor to introduce new products. The vendor would bring lunch for the department to learn about new products from the vendor. It is not indicated whether the vendor is seeking work with the City of Detroit. The Request asks the Board to opine whether the Requestor can accept the “lunch and learn” presentation without violating the ethics ordinance.

III. Applicable Charter and Ordinance Sections

The facts of this Request implicate the standards of conduct outlined in Section 2-5-70 of the Ethics Ordinance, *Prohibition on gifts and gratuities; exceptions* because the Requestor is a public servant who is receiving something of value from an entity, specifically a lunch and learn presentation of unknown value.

Section 2-5-70. – Prohibition on gifts and gratuities; exceptions.

(a) A public servant **shall not accept gifts**, gratuities, honoraria, or other thing of value from any person **or entity doing business or seeking to do business with the City**, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.

(b) The prohibition in Subsection (a) of this section shall not apply:

(1) To an award publicly presented to a public servant by an individual, governmental body, or non-governmental entity or organization in recognition of public service;

(2) To complimentary copies of trade publications, books, reports, pamphlets, calendars, periodicals or other informational materials;

(3) To a gift received from a public servant's immediate family member or relative, provided, that the immediate family member or relative is not acting as a third party's intermediary or an agent in an attempt to circumvent this prohibition.

(4) To an admission or registration fee, travel expenses, entertainment, meals or refreshments that are furnished to the public servant:

a. By the sponsor of an event, appearance or ceremony, which is related to official City business in connection with such an event, appearance or ceremony and to which one or more members of the public are invited; or

b. In connection with teaching, a speaking engagement, or the provision of assistance to an organization or another governmental entity as long as the City does not compensate the public servant for admission or registration fees, travel expenses, entertainment, meals or refreshment for the same activity.

Section 2-5-70(a) of the Ethics Ordinance generally prohibits public servants from accepting gifts or other things of value from entities doing business with the City. Section 2-5-70(b) provides several exceptions to the prohibition. The only exception that is relevant to events hosted by contractors is provided in Section 2-5-70(b)(4), which provides an exception for “an admission or

registration fee, travel expenses, entertainment, meals or refreshments” in two specified types of situations. Neither exception applies to the delineated facts by Requestor.

If the vendor is not currently or seeking to do business with the City of Detroit, the applicability of the 2012 Detroit City Charter and the Ethics Ordinance of the 2019 Detroit City Code would not apply. If the vendor is currently or will be seeking to do business with the City of Detroit, then the department would be prohibited from accepting a “lunch” from the vendor to learn about the vendor products.

The request specifically delineates that lunch would be for this department only provided by the vendor and no other public would be in attendance. The Requestor may rely on the language of 2-5-70 of the Code for general guidance that none of the exceptions are implicated by the facts described in the Request. Therefore, if the vendor is currently or seeking to do business with the city, it would be a violation of the Ethics ordinance for the vendor to provide “lunch” to learn of the vendor’s new products.

V. Conclusion

In response to Request for Advisory Opinion 2024-22, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor should be advised that if the vendor is doing business or seeking to do business with the City accepting the lunch meal would be a violation of Section 2-5-70 of the Ethics Ordinance because the meal would be considered a gift or thing of value from an entity doing business with the City, without exception. The vendor may still provide a presentation without providing lunch for the department. If the vendor is not doing business or seeking to do business with the City, then the Board should under Section 2-5-124(b)(1) deny the request where the request does not relate to this article.

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Dated: January 27, 2025



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Advisory Opinion #2025-01
Issued: April 16, 2025

Advisory Opinion #2025-01: In response to Request for Advisory Opinion 2025-01, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to the Requestor's ability to serve on the Board for the [REDACTED] Fund which sponsors programs in the City of Detroit.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-01 ("the Request") by email on January 16, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on April 17, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on June 17, 2025.

At its April 16, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor serves as a [REDACTED] member. The Requestor seeks an advisory opinion regarding whether serving as a board member on the [REDACTED] Fund would conflict with their duties as a [REDACTED] member. The request for an advisory opinion concerns the Requestor's activities for a private client proposing a [REDACTED] in the City. The private client has requested the Requestor to assist [REDACTED] with a pre-development staff meeting with City of Detroit officials regarding [REDACTED] private development project.

The [REDACTED] Fund, Inc. is a tax-exempt charitable organization that was established in [REDACTED] where it retains its headquarters (i.e., [REDACTED]). The organization was founded in [REDACTED], and in [REDACTED] had total income of \$ [REDACTED] and expenses of \$ [REDACTED] with net income of \$ [REDACTED].

The organization operates in [REDACTED]. The general approach used in the organization is to identify specific needs of these urban areas and then sponsor programs to meet identified goals. Sponsorship of programs by the [REDACTED] Fund can take different forms but one of their common approaches is to provide funding or support to other agencies that specialize in the required services so as to extend these services to the targeted area.

In the City of Detroit, the agency sponsors [REDACTED] programs (collectively “ [REDACTED] Fund Detroit Agencies”): [REDACTED]

In the request for an advisory opinion, the Requestor stated that they had been asked to serve on the “board for the [REDACTED] Fund.” However, in examining the website for the parent organization (i.e., [REDACTED] Fund”) the only legal entity identified was the parent organization located in [REDACTED]. No distinct legal entity was identified for provision of the Detroit services and therefore it appears to merely be a branch office of the [REDACTED] entity. The Detroit office of the [REDACTED] Fund does have an extensive list of local advisors which may be the capacity the Requestor is referring to.

Regardless of the role of the Requestor as an advisor, or board member, there is the potential for conflict of interest in their service with the entity. In [REDACTED], at least one of the agencies sponsored by the [REDACTED] Fund (i.e., [REDACTED]) applied to the City of Detroit for funding through the Community Development Block Grant (“CDBG”) funding. CDBG, is one of the longest-running programs of the U.S. Department of Housing and Urban Development and funds local activities such as affordable housing, anti-poverty programs, and infrastructure development. In 2024, the City of Detroit was awarded approximately \$95.2 million in CDBG funds. As part of their annual funding, the City accepts applications and then after evaluation makes a recommendation for City Council approval of funding.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether the Requestor serving on the [REDACTED] Fund poses a conflict of interest. The Request implicates the Standards of Conduct of the following sections of the Ethics Ordinance:

Section 2-5-31. – Disclosure of interests by public servants.

- (a) Except as otherwise provided for by applicable law, a public servant who exercises significant authority over a pending matter shall disclose:
- (1) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before City Council;
 - (2) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before or within any office, department, or agency of the City; and
 - (3) Any interest that the public servant, or an immediate family member has in real or personal property that is subject to a decision by the City regarding purchase, sale, lease, zoning, improvement, special designation tax assessment or abatement, or a development agreement.
- (b) All disclosures that are required under Subsection (a) of this section shall be made, in writing, on a form that is created by the Law Department and sworn to in the presence of a notary public. After completion, the form shall be filed with the Board of Ethics, which shall forward a complete copy of the form to the applicable department director or agency head.

Any public servant who exercises significant authority must disclose any direct or indirect financial interest that he or she has in any contract or matter pending before City Council. Additionally, public servants are prohibited from employment or the provision of services which are incompatible with the proper discharge of his or her public duties. Such disclosures shall be made in a sworn and notarized affidavit. If the Requestor follows through with their commitment to be on the Advisory Council of the ██████████ Fund-Detroit, the Requestor may consider completing a disclosure form. It was reported that one of the CDBG/NOF award recipients, the ██████████, assisted by the ██████████ Fund, will be before the full Council in the fall for specific approval of the CDBG/NOF funds.

Section 2-5-66. – Self-interested regulation and participation prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly vote, or knowingly participate in the negotiation or making of any City contract, or any other type of transaction with any business entity in which the public servant or an immediate family member has a financial interest.

If the Requestor has a relationship with the ██████████ Fund and is asked to make a determination as to allocation of funding to one of their associated agencies this would present a clear conflict of interests. To avoid this conflict the Requestor would have to identify and declare this conflict and recuse themselves from voting.

This recusal may pose its own conflict of interest depending on the CDBG project approval process used by the City. The information provided indicates that in presentations to the City

Council for funding of CDBG combines multiple projects together for Council approval. This grouping of multiple CDBG projects for a single City Council vote may preclude the separation of [REDACTED] projects from an individual vote and the recusal of the Requestor on these limited CDBG [REDACTED] projects. This could require the Requestor to abstain from voting on any CDBG combined funding decisions in which any associated [REDACTED] projects are included to avoid conflict. This preclusion from voting on multiple CDBG projects poses its own ethical issue. If CDBG funding is determined in a single vote, this would entail expenditures in excess of \$ [REDACTED] [REDACTED] dollars that have direct and significant impact upon the community (e.g., house redevelopment, neighborhood revitalization).

The CDBG program is a federal HUD program that "...supports community development activities to build stronger and more resilient communities." HUD Rules, Title 24-Housing and Urban Development, Subtitle B, Chapter V, Subchapter C, Part 570, Subpart K, Section 570.611(b), "Conflicts prohibited. The general rule is that no persons described in paragraph (c) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter."

HRD's policy Conflict of Interest Standards of Conduct for HUD Funded Programs, dated 1/25/22, reads: "POLICY-The City of Detroit (City) and its contractors and sub-recipients shall avoid conflicts of interest, in fact and perception, and shall notify, in writing, HRD's Director & assigned program staff and the Department of Housing and Urban Development – Detroit Office (HUD) within twenty-four (24) hours of the occurrence or existence of potential conflicts, whether perceived or actual." Further, "conflict of interest standards of conduct are overseen locally by the City of Detroit's Board of Ethics." The Requestor is advised to delineate their roles in the two entities and follow the disclosure and recusal process for CDBG/NOF applicants as dictated by HUD and Council Rules.

Section 2-5-70. – Prohibition on gifts and gratuities.

- (a) A public servant shall not accept gifts, gratuities, honoraria, or other thing of value from any person or entity doing business or seeking to do business with the City, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.

The Requestor should be mindful of accepting any gifts, gratuities, or items of monetary value that may be given in the hope of a favorable decision in their role on [REDACTED].

V. Conclusion

In response to Request for Advisory Opinion 2025-01, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor may serve as an advisor on the [REDACTED] Fund with the requirement that the Requestor follow City procedures for declaration of conflict and recusal on all [REDACTED] actions involving the [REDACTED] Fund as well as any of the organizations sponsored or funded by this

organization.

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Dated: April 30, 2025



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Advisory Opinion #2025-02
Issued: February 19, 2025

Advisory Opinion #2025-02: In response to Request for Advisory Opinion 2025-02, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as to whether their activity on an annual conference planning committee should be considered an extension of their work duties or whether it would be more appropriate to use vacation leave for these activities.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2025-02 (“the Request”) in person on January 28, 2025. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor has waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on April 29, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on July 29, 2025.

At its February 19, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is a [REDACTED] with the [REDACTED]. The Requestor volunteers on the planning committee for the [REDACTED] (“[REDACTED]”), a professional organization for government agencies and other organizations working in [REDACTED]. The 2025 annual conference for [REDACTED] is to be held on [REDACTED]. The [REDACTED] is budgeted funding by the City for its staff and board members to [REDACTED].

attend the [REDACTED] conference annually. The request concerns the Requestor's participation in the annual conference planning commission ("Conference Planning Activities") and whether taking [REDACTED] trips for the Conference Planning Activities and the annual conference in [REDACTED] should be considered as the Requestor's assigned work duties or a personal activity chargeable to vacation leave. The Requestor stated that they are not receiving any compensation or associated reimbursement of expenses from [REDACTED] for their participation in this activity.

III. Applicable Charter and Ordinance Sections

The facts of this Request implicate the disclosure requirements and standards of conduct set forth in the following sections of the Ethics Ordinance:

Section 2-5-31. Disclosure of interests by public servants.

- (a) Except as otherwise provided for by applicable law, a public servant who exercises significant authority over a pending matter shall disclose:
- (1) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before City Council;
 - (2) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before or within any office, department, or agency of the City; and
 - (3) Any interest that the public servant, or an immediate family member has in real or personal property that is subject to a decision by the City regarding purchase, sale, lease, zoning, improvement, special designation tax assessment or abatement, or a development agreement.
- (b) All disclosures that are required under Subsection (a) of this section shall be made, in writing, on a form that is created by the Law Department and sworn to in the presence of a notary public. After completion, the form shall be filed with the Board of Ethics, which shall forward a complete copy of the form to the applicable department director or agency head.

An important element in this requirement is a determination that an individual has substantial authority in the related activity. An individual exercises substantial authority in a matter when he or she has the ability to influence the outcome of a decision on behalf of the government in the course of performing the individual's duties.

However, as a [REDACTED] with the [REDACTED], the Requestor is not in a position of substantial authority to make decisions in regard to the Board's membership with [REDACTED] or participation in its annual conference. These decisions are those of the Board and its Executive Director. Although not specifically required under the disclosure requirements, it is noted that the Requestor has been forthright about his association with [REDACTED], and indicated in the request for advisory opinion that they desire to avoid any inappropriate implications. For these reasons, the Requestor's actions in this matter should be deemed consistent with the City's disclosure requirements.

Section 2-5-64. Incompatible employment or rendering of services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

The second ethical issue applicable in the current case concerns whether the Requestor's participation in Annual Conference Planning is incompatible with his public duties. Under the City Charter and Detroit Code, no employee may render services if such services conflict or are incompatible with the proper discharge of official duties or impairment of independence of judgment. This is to avoid establishing bias in government decisions based on external relationships.

In this case, the Requestor's Executive Director made the decision that the Requestor's participation in the Conference Planning Activity is consistent with and in furtherance of agency purposes. Specifically, the agency has decided to fund the Requestor's travel expenses and provision of per diem allowance for both the Conference Planning Activities and Annual Conference attendance. The Executive Director stated that it is beneficial for the [REDACTED] to play a leading role in [REDACTED]'s organizing annual conference efforts and that the Requestor's participation in [REDACTED] planning benefits the department. For this reason, the department has budgeted attendance for board and staff members who wish to attend the 2025 annual conference in [REDACTED].

V. Conclusion

In response to Request for Advisory Opinion 2025-02, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor's attendance at the Annual Conference Planning and the official conference in [REDACTED] 2025 are considered an extension of the Requestor's public service duties.

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Dated: February 24, 2025



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Advisory Opinion #2025-04
Issued: April 16, 2025

Advisory Opinion #2025-04: In response to Request for Advisory Opinion 2025-04, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to the Requestor's private consulting with their outside employment and a customer who would like to do business with the City of Detroit.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-04 ("the Request") by email on February 3, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on May 5, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on August 4, 2025.

At its April 16, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor serves as [REDACTED] of the City of Detroit [REDACTED] Commission and operates a [REDACTED] consulting firm. The [REDACTED] Commission is part of the legislative branch of City government and consists of [REDACTED] members appointed by City Council. The [REDACTED] Commission advises the City Council on "[REDACTED] matters" and performs other functions as directed by City Council. The Commission is assisted by staff of the [REDACTED] Department in evaluating proposals for [REDACTED] development.

The request for an advisory opinion concerns the Requestor's activities for a private client [REDACTED] development in the City. The private client has requested the Requestor to assist [REDACTED] with a [REDACTED] staff meeting with City of Detroit officials regarding [REDACTED] project.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether the Requestor's private interest representation in a private [REDACTED] project would violate the ethics ordinance. The Requestor should comport their conduct in compliance with the following sections of the Ethics Ordinance:

Section 2-5-62. – Improper use or disclosure of confidential information prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly use or disclose to third parties confidential information, which is gained by reason of the public servant's official duties, concerns the property, government or affairs of the City, or any office, department or agency thereof, and is not available to members of the public.

The Requestor stated that they were hired by the [REDACTED] because of their understanding and knowledge of the City's processes and procedures. The Requestor is advised to utilize only information and City resources available to the public, not procured through their role on the [REDACTED].

Section 2-5-65. – Representation of private person, business, or organization prohibited; exceptions.

A public servant shall not act as an agent, attorney, or representative for another person, business, or organization in any matter that is pending before a City agency, except that:

- (1) A public servant may represent another person, business, or organization before a City agency where such representation is a required part of the public servant's official duties;
- (2) A public servant who is an uncompensated member of a City board, commission, or other voting body may act as an agent, attorney, or representative for another person, business, or organization in a manner that is pending before a City agency, other than the board, commission, or other voting body on which the public servant is a member; or
- (3) A public servant who is compensated by the City may act as an agent, attorney, or representative for another person, business, or organization in a matter that is pending before a City board, commission or other voting body, other than the board, commission or other voting body on which the public servant serves as an appointee or as an employee, or under a personal services contract, as long as the public servant does so:

- a. Without compensation; and

- b. On the public servant's leave time; and
- c. For appointees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave; or
- d. For non-union employees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave, and the City's Civil Service Rules; or
- e. For union employees, in accordance with the employee's respective union contract and the City's Civil Service Rules; or
- f. For individuals who provide services to the City pursuant to a personal services contract, in accordance with the applicable provisions of the contract.

The Requestor is an uncompensated, [REDACTED] commissioner on the [REDACTED] whose secondary employment [REDACTED], would like to provide consulting and project management services to a [REDACTED] who would like to do business with the City. The Requestor disclosed that [REDACTED] will initially be an unpaid consultant in the [REDACTED] process and later become a paid consultant. Further, the Requestor reported that they will be representing the [REDACTED] in several City departments, including but not limited to [REDACTED].

As an uncompensated City position, the Requestor may act as an agent pending before a City agency other than that in which they serve. This representation is allowed in recognition that uncompensated members of Boards and Commissions are often employed in the industry associated with their volunteer activities, and the City draws from their experience in private business. However, the Requestor should be reminded of the recusal process with [REDACTED] when representing themselves before other departments.

Section 2-5-70. – Prohibition on gifts and gratuities, prohibited.

- (a) A public servant shall not accept gifts, gratuities, honoraria, or other thing of value from any person or entity doing business or seeking to do business with the City, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.
- (b) The prohibition in Subsection (a) of this section shall not apply:
 - (1) To an award publicly presented to a public servant by an individual, governmental body, or non-governmental entity or organization in recognition of public service;
 - (2) To complimentary copies of trade publications, books, reports, pamphlets, calendars, periodicals or other informational materials;

- (3) To a gift received from a public servant's immediate family member or relative, provided, that the immediate family member or relative is not acting as a third party's intermediary or an agent in an attempt to circumvent this prohibition;
- (4) To an admission or registration fee, travel expenses, entertainment, meals or refreshments that are furnished to the public servant:
 - a. By the sponsor of an event, appearance or ceremony, which is related to official City business in connection with such an event, appearance or ceremony and to which one or more members of the public are invited; or
 - b. In connection with teaching, a speaking engagement, or the provision of assistance to an organization or another governmental entity as long as the City does not compensate the public servant for admission or registration fees, travel expenses, entertainment, meals or refreshment for the same activity.

The Requestor should avoid receiving any additional gifts and gratuities that may be offered in addition to any compensation for their expertise and services.

V. Conclusion

In response to Request for Advisory Opinion 2025-04, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, there should be compliance with the recusal requirements of the Ethics Ordinance and a recommendation to prohibit the extension of the Requestor's role or authority as a member of the ██████████ Commission in any meetings with City agencies. It is recommended that the Requestor not use their appointment as the ██████████ of the ██████████ Commission in any capacity to gain any type of approval from outside agencies.

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Dated: May 8, 2025



BOARD OF ETHICS
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Advisory Opinion #2025-06
Issued: April 16, 2025

Advisory Opinion #2025-06: In response to Request for Advisory Opinion 2025-06, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to whether there is a possible conflict of interest between the volunteer duties of the Requestor as [REDACTED] of the [REDACTED] Commission and [REDACTED] employment as the [REDACTED] Detroit.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2025-06 (“the Request”) by email on February 17, 2025. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on May 19, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on August 18, 2025.

At its April 16, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is currently a [REDACTED] on the [REDACTED] and has been since [REDACTED]. The [REDACTED] is involved in the approval process in many [REDACTED] projects. The Requestor was recently hired by [REDACTED], which has had substantial involvement with community development and other projects in [REDACTED] Detroit. The question of the request is whether it will be a conflict of interest if the Requestor can remain on the [REDACTED] and work with her new employer. The Requestor stated that

they addressed this with the [REDACTED] director.

III. Applicable Charter and Ordinance Sections

Section 2-5-31. – Disclosure of interests by public servants.

- (a) Except as otherwise provided for by applicable law, a public servant who exercises significant authority over a pending matter shall disclose:
- (1) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before City Council;
 - (2) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before or within any office, department, or agency of the City; and
 - (3) Any interest that the public servant, or an immediate family member has in real or personal property that is subject to a decision by the City regarding purchase, sale, lease, zoning, improvement, special designation tax assessment or abatement, or a development agreement.
- (b) All disclosures that are required under Subsection (a) of this section shall be made, in writing, on a form that is created by the Law Department and sworn to in the presence of a notary public. After completion, the form shall be filed with the Board of Ethics, which shall forward a complete copy of the form to the applicable department director or agency head.

Under the disclosure requirements, a public servant who exercises significant authority shall disclose any financial interest, direct or indirect, that she has in any matter pending before or within any office, department, or agency of the City. In this case, the Requestor recognized that their position as both the [REDACTED] of a major commercial/institutional/residential area of the City, as well as the [REDACTED] of the [REDACTED] Commission, will likely result in conflicts of interest. As the [REDACTED] of the [REDACTED] Commission, the Requestor has a duty to properly interpret and implement City of Detroit [REDACTED] standards in the best interest of the City. As [REDACTED], the Requestor is paid to promote and facilitate the [REDACTED] [REDACTED] in the [REDACTED] and assist in obtaining City approvals. Thus, the Requestor has a conflicting professional interest in obtaining City approvals of [REDACTED] projects by the [REDACTED] Commission. The Requestor's disclosure and acknowledgement of this potential conflict in their request for an advisory opinion is consistent with disclosure requirements.

Section 2-5-64. – Incompatible employment or rendering services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such

employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

It should be considered whether the Requestor's role as [REDACTED] of the [REDACTED] Commission is incompatible with their duties as [REDACTED] of [REDACTED] Detroit.

The [REDACTED] Commission serves an important role in [REDACTED] development. However, even if a staff member provides representation to City agencies, no representation by [REDACTED] Detroit in any capacity would be allowed before the [REDACTED] Commission due to the Requestor's conflicting role as [REDACTED]. This conflict would not be eliminated by the Requestor's recusal from voting, as any employee representation of [REDACTED] Detroit personnel could be considered as an extension of the Requestor's authority as [REDACTED] and in violation of the prohibition of appearance by a public servant before a City agency on which he or she serves.

As the [REDACTED] of the [REDACTED] Commission, the Requestor has an important participatory duty. Conflicting responsibilities that significantly interfere with this responsibility would undermine proper performance of this important function. The required recusal of the Requestor from any [REDACTED] Commission matter involving any business, institution, residence or property located in [REDACTED] Detroit could be significant and should be considered and addressed by the Requestor. Frequent [REDACTED] Commission recusals could be considered a factor inhibiting the proper performance of both the Requestor's duties as the [REDACTED] of [REDACTED] Detroit and [REDACTED] of the [REDACTED] Commission.

Section 2-5-65. – Representation of private person, business, or organization prohibited; exceptions.

A public servant shall not act as an agent, attorney, or representative for another person, business, or organization in any matter that is pending before a City agency, except that:

- (1) A public servant may represent another person, business, or organization before a City agency where such representation is a required part of the public servant's official duties;
- (2) A public servant who is an uncompensated member of a City board, commission, or other voting body may act as an agent, attorney, or representative for another person, business, or organization in a manner that is pending before a City agency, other than the board, commission, or other voting body on which the public servant is a member; or
- (3) A public servant who is compensated by the City may act as an agent, attorney, or representative for another person, business, or organization in a matter that is pending before a City board, commission or other voting body, other than the board, commission or other voting body on which the public servant serves as an appointee or as an employee, or under a personal services contract, as long as the public servant does so:

- a. Without compensation; and
- b. On the public servant's leave time; and
- c. For appointees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave; or
- d. For non-union employees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave, and the City's Civil Service Rules; or
- e. For union employees, in accordance with the employee's respective union contract and the City's Civil Service Rules; or
- f. For individuals who provide services to the City pursuant to a personal services contract, in accordance with the applicable provisions of the contract.

The second ethical issue of concern is any representation of [REDACTED] businesses by the Requestor with City agencies. [REDACTED] Detroit's website states they work "with the city of Detroit to help [REDACTED] Detroit." The provision of direct private representation with City of Detroit agencies raises ethical concerns.

There is an exception to this prohibition for uncompensated public servants who are allowed to act as a representative for another person, business, or organization in a manner that is pending before a City agency, other than the board or commission on which the public servant is a member. This policy encourages the most highly qualified individuals to serve the City in uncompensated positions while allowing these individuals to earn their livelihood. In this case, clarity is needed on the specific role that the Requestor would have in meeting with City agencies for [REDACTED] interests. The principal concern is the Requestor's meetings in their [REDACTED] Detroit [REDACTED] capacity with [REDACTED] Commission staff and the [REDACTED] Department, as this raises conflict issues.

V. Conclusion

In response to Request for Advisory Opinion 2025-06, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Respondent's plays an important role in the [REDACTED] area of the City as [REDACTED] of the [REDACTED] Detroit [REDACTED]. However, [REDACTED] role as [REDACTED] of the [REDACTED] Commission raises conflict concerns that could be damaging to both institutions. If it is found that the number of [REDACTED] Commission determinations from properties within [REDACTED] Detroit is minor, then the effect of the Respondent's recusal will be limited and could be accepted. If the frequency is significant, this would support a determination that these are incompatible responsibilities. It is important for the Respondent not to represent themselves as the [REDACTED] of the [REDACTED] Commission before other organizations.

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Dated: May 2, 2025



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Advisory Opinion #2025-07
Issued: April 16, 2025

Advisory Opinion #2025-07: In response to Request for Advisory Opinion 2025-07, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to the Requestor's proposed role as co-chair of a fundraising activity for [REDACTED], Inc., a tax-exempt non-profit entity.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-01 ("the Request") by email on March 7, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on June 9, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on September 8, 2025.

At its April 16, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor serves as the [REDACTED]. The Requestor was invited to co-chair a fundraising event for [REDACTED], Inc., which the Requestor has personally supported in the past. Given the Requestor's current role with the City, the Requestor wants to know if they can participate in raising awareness and support for the non-profit's fundraising event with their network of contacts, should any individuals have or may have in the future business with the City.

██████████, Inc. is a 501(c)(3) tax-exempt non-profit entity. ██████████ vision is to give under-resourced youth a safe and enriching space that furthers their future development. According to the organization, ██████████ teach children critical traits, including perseverance, empathy, responsible risk-taking, confidence, and self-control.

In 2015, ██████████ Inc. launched two pilot summer camps serving 18 youth. Since then, ██████████ has brought over 500 Detroit youth to partner ██████████ outside the city for free summer ██████████ camps and an after-school program. The goal of their programs is to teach kids how to ██████████ and take care of ██████████ and offer exposure to guest speakers representing various ██████████ professions. According to their website the most important lessons are what ██████████ can teach kids about themselves: the confidence that comes from ██████████, taking responsibility for another living being, not giving up when things get hard, and more.

██████████ Inc. has been searching for the right vacant land site within Detroit's city limits to build an urban ██████████ center. This future facility will increase the scale and accessibility of ██████████ youth impact program and strengthen the Detroit neighborhoods where students grow up. In October 2019, ██████████ reached an agreement with the Detroit Public Schools Community District and is now preparing to begin construction on a transformational urban ██████████ center on a ██████████ demolished school site.

The ██████████, ██████████ by the Requestor, has broad authority over development in the City.

III. Applicable Charter and Ordinance Sections

The Request implicates the Standards of Conduct of the following sections of the Ethics Ordinance:

Section 2-5-31. – Disclosure of interests by public servants.

- (a) Except as otherwise provided for by applicable law, a public servant who exercises significant authority over a pending matter shall disclose:
- (1) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before City Council;
 - (2) Any financial interest, direct or indirect, that the public servant or an immediate family member has in any contract or matter pending before or within any office, department, or agency of the City; and
 - (3) Any interest that the public servant, or an immediate family member has in real or personal property that is subject to a decision by the City regarding purchase, sale, lease, zoning, improvement, special designation tax assessment or abatement, or a development agreement.
- (b) All disclosures that are required under Subsection (a) of this section shall be made, in writing, on a form that is created by the

Law Department and sworn to in the presence of a notary public. After completion, the form shall be filed with the Board of Ethics, which shall forward a complete copy of the form to the applicable department director or agency head.

A public servant who exercises significant authority shall disclose any financial interest, direct or indirect, that he or she has in any matter pending before or within any office, department, or agency of the City. In this case, the Requestor's position as both the [REDACTED] and co-chair of the fundraising committee of [REDACTED], Inc. will likely result in conflicts of interest. This potential is accentuated by the Requestor's statement that they plan to use their contacts to assist in their fundraising efforts. As the [REDACTED] of the [REDACTED], the Requestor plays an important role in the review and recommendation of [REDACTED] projects in the City and interaction with parties of interest.

Section 2-5-64. – Incompatible employment or rendering services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

The Requestor's role as co-chair in fundraising activities for a private organization in which they will be soliciting gifts is incompatible with their duties as [REDACTED] as contributors could be left with the assumption that they could rely on this gift in future dealing with the Department, even if not accurate. The solicitation of gifts also places the Requestor in a difficult position as they may feel an obligation to donors who in the future call on the Requestor for assistance with City projects. For these reasons, the role of co-chair of fundraising activities for a private organization seems incompatible with the Requestor's position as [REDACTED].

Section 2-5-70. – Prohibition on gifts and gratuities.

- (a) A public servant shall not accept gifts, gratuities, honoraria, or other thing of value from any person or entity doing business or seeking to do business with the City, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.

The Requestor has stated that in their proposed role as co-chair of the [REDACTED], Inc. they intend to "reach out to my network of contacts to raise awareness about the organization, the event, and the opportunity to make a donation to their cause." In this solicitation effort, the Requestor cannot put aside their continuing role as the [REDACTED] and the authority they have on [REDACTED] within the City. Any individual the Requestor solicits for contributions will be aware of the Requestor's important role in City [REDACTED]. Donations received based on the Requestor's solicitation could be considered as prohibited gifts, although the property of [REDACTED], Inc. For this reason, the proposed role of the Requestor as co-

chair of a private fundraising event could be considered in conflict with the ethical rules of the City of Detroit Charter and Code.

V. Conclusion

In response to Request for Advisory Opinion 2025-07, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor's proposed role as co-chair of a fundraising event would present two conflicts with City of Detroit ethical rules: (1) prohibition on gifts and gratuities; and (2) incompatible rendering of services.

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Dated: April 30, 2025



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Advisory Opinion #2025-08 **Issued: April 16, 2025**

Advisory Opinion #2025-08: In response to Request for Advisory Opinion 2025-08, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to whether the Requestor's possible candidacy for the elected position of [REDACTED] Commissioner would present ethical concerns.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-08 ("the Request") by email on March 10, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on June 9, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on September 8, 2025.

At its April 16, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is currently employed as a [REDACTED] t with the City of Detroit [REDACTED] and [REDACTED] ethical issues concern candidacy for the position of a [REDACTED] commissioner.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether the Requestor's candidacy or election to the

position of [REDACTED] commissioner presents a conflict of interest.

The first issue examined is whether the Requestor may be both a City of Detroit employee and a candidate for a City of Detroit elective office. An examination of local candidacy requirements is required to examine this issue properly. Candidacy requirements for elected positions in the City of Detroit are established by ordinance. Detroit City Charter, Section 7-802. Board of [REDACTED] Commissioners lays out the legislative qualifications for elective and appointed officers of the City of Detroit require that they must be:

1. a citizen of the United States;
2. a resident and qualified and registered voter of the City of Detroit for one (1) year at the time of filing for office and retain that status throughout their tenure in any such elective office

In addition, the City Charter provides a specific requirement for appointed officials to the Board of [REDACTED] Commissioners in which it is prohibited to appoint a member of the Board if he or she has been an employee or elective or appointive officer of the City within three (3) years prior to appointment or while serving as a member of the Board.

Neither the City of Detroit ordinances nor State of Michigan statutes precludes application of the “resign-to-run rule” law. Therefore, there is no prohibition on the retention of [REDACTED] employment while seeking a City of Detroit elective office.

Section 2-5-72. – Prohibition on campaign activities by using City personnel or property, or during working hours.

- (a) Elective officers, as defined in Section 2-5-3 of this Code, are prohibited from soliciting appointive officers, appointees, and employees to work on political campaign activities using City property or during working hours.
- (b) Appointive officers, appointees, and employees are prohibited from engaging in campaign activities by using City property or engaging in such activity during working hours.

The ordinance specifically addresses the issue of campaign activity during employment. These sections specifically prohibit an employee “from engaging in campaign activities...during working hours.” Thus, although there is no prohibition on an employee running for elective office, there is a strict prohibition on any campaign activity during employment hours.

Section 2-5-64. – Incompatible employment or rendering services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

The role of a [REDACTED] commissioner is one of oversight and advisory as to [REDACTED] operations. There are supervisory and managerial perspectives that would place a [REDACTED] in the simultaneous positions of management approval of department policies and budget, serve as quasi judiciary role for hearing of complaints and disciplinary proceedings, and critiquing agency operations while still serving as a [REDACTED]. These are directly conflicting responsibilities and, as stated in Section 2-5-64 of the ordinance, would “reasonably [be] expected to impair the public servant’s independence of judgment or action in the performance of the public servant’s official duties for the City.” Therefore, if elected, the service as a [REDACTED] commissioner while trying to simultaneously continue employment as a [REDACTED] would violate the ordinance and City Charter.

V. Conclusion

In response to Request for Advisory Opinion 2025-08, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Respondent may continue their employment while seeking City office, but the request properly poses the ethical issues of prohibition of campaign activities during periods of employment and, if elected, conflict of responsibilities.

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Dated: May 2, 2025



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Advisory Opinion #2025-10 Issued: June 18, 2025

Advisory Opinion #2025-10: In response to Request for Advisory Opinion 2025-10, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to being allowed to participate on a church committee to interview potential donors for the redevelopment of the church.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2025-10 (“the Request”) by email on May 6, 2025. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor did not waive confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on August 5, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on November 4, 2025.

At its June 18, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is the Operations General Manager with the City of Detroit [REDACTED] Department. The [REDACTED] Church in Detroit is doing a fundraiser and the Respondent is a co-chair of the ministry team. The purpose of the fundraising is to identify and obtain funding for restoration of church property. The Requestor’s role will be to assist in identifying revenue sources for the proposed project. These sources have not been determined but could include private and public contributions. Possible sources could include application for local, state and federal grants.

This activity may involve submission of funding requests to the City of Detroit. The Respondent's participation in seeking funding sources would be limited to the initial exploratory stage and the Respondent has emphasized that they will not be participating in any presentations, review of requests or oversight of any funded projects. Additionally, the Respondent has stated that they have no role in the awarding of any grants or presentations to the Mayor and City Council in regard to grant funding or analysis.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether it is permissible for the Requestor to participate in the redevelopment proposal of a church located in Detroit that may receive public and private contributions. The Request implicates the Standards of Conduct of the following sections of the Ethics Ordinance:

Section 2-5-62. – Improper use of confidential information.

Except as otherwise provided for by applicable law, a public servant shall not knowingly use or disclose to third parties confidential information, which is gained by reason of the public servant's official duties, concerns the property, government or affairs of the City, or any office, department or agency thereof, and is not available to members of the public.

As an Operation General Manager with the [REDACTED] Department, the Respondent has direct knowledge of City [REDACTED] programs some of which may still be in the development stage and not publicly announced. Disclosure of this information could impact City activities.

In this case, the [REDACTED] Church has publicly disclosed plans for renovation of the structure at issue. The church is not involved in real property speculation or other development projects other than its long-standing ownership of this single parcel. Therefore, knowledge of future proposed City of Detroit [REDACTED] projects would not be relevant. Therefore, this area of information would not present an ethical issue.

The other area of confidential information would involve City of Detroit [REDACTED] processes. As an Operation General Manager, the Respondent would have knowledge of the City's grant funding process. The [REDACTED] Department plays an important review and recommendation process in the provision of grant funding. The Respondent has stated that their duties are focused on the operational activities of the Department and they are not involved in grant reviews, or recommendations. Additionally, the Respondent states that they would have no role in the presentation of any request to the City for funding.

Although the Respondent has stated that they have no involvement in the review and presentation of the Department's grant funding, they should be noticed that information concerning City of Detroit internal grant funding processes are confidential and this information should not be disclosed.

Section 2-5-64. – Incompatible employment or rendering services prohibited.

Except as otherwise provided for by applicable law, a public servant

shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

The second area of ethical concern in regards to the Respondent's proposed service as the co-chair of the Ministry Council is whether these services would be incompatible with their duties as a General Manager of the [REDACTED] ion Department. The Respondent's role as a [REDACTED] Church committee member would be limited to identifying possible sources of funding for the renovation of church property. The Respondent has stated that they will have no role in the development of funding applications or presentations to the City of Detroit, nor in the actual project redevelopment. Therefore, the Respondent's role as co-chair should not present an ethical issue. However, the Respondent should be aware that the ethics ordinance prohibits their involvement in making any presentations for funding applications to the City of Detroit or oversight of any associated redevelopment permitting.

V. Conclusion

In response to Request for Advisory Opinion 2025-10, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor's role as co-chair of the funding committee for the [REDACTED] Church does not present an ethical issue; however, this determination is based on the Respondent not being involved in any requests for funding from the City of Detroit or in City oversight of actual redevelopment. The Respondent is cautioned not to disclose any confidential information they may obtain in their duties in their role with the City of Detroit. It is also recommended that the Respondent file any applicable disclosures with the Board of Ethics.

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Dated: July 9, 2025



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Advisory Opinion #2025-11
Issued: May 21, 2025

Advisory Opinion #2025-11: In response to Request for Advisory Opinion 2025-11, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as to whether the Requestor may accept funding for airfare and hotel from a non-profit [REDACTED] group to attend a summit it is sponsoring.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2025-11 (“the Request”) by email on April 22, 2025. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on July 22, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on October 21, 2025.

At its May 21, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is employed as the [REDACTED] of the City of Detroit Office of [REDACTED]. The Office of [REDACTED] is a [REDACTED] advocate for a [REDACTED] Detroit. The Office supports city-wide efforts to advance [REDACTED] set by the [REDACTED] and the Detroit [REDACTED]. The [REDACTED] of the Office of [REDACTED] connects [REDACTED] with city resources and shapes policy on [REDACTED].

██████ network.

The 2025 ██████████ Summit will be held on ██████████. The purpose of the summit is to examine the issue of ██████████ and develop possible solutions. Mainstage and breakout sessions will focus on a wide range of topics from consumer trends, ██████████, the new policy landscape, alternative financing, and ██████████ collaboration.

The ██████████ was founded in ██████████ as the ██████████ group to focus on legal action to protecting the ██████████. According to the Requestor, the ██████████ has an existing ██████████ contract with the City of Detroit ██████████ that was established prior to ██████████ employment with the Department. According to information provided by the Board of Ethics investigator, the Requestor has no control or authority over the ██████████ contract. On ██████████, 2025, the ██████████ agreed to the Requestor's associated transportation and lodging expenses to attend the ██████████ Summit up to an aggregate value of \$1,600, as the summit is directly related to the Requestor's duties as a public servant.

III. Applicable Charter and Ordinance Sections

Section 2-5-70. – Prohibition on gifts and gratuities, prohibited.

- (a) A public servant shall not accept gifts, gratuities, honoraria, or other thing of value from any person or entity doing business or seeking to do business with the City, is seeking official action from the City, has interests that could be substantially affected by the performance of the public servant's official duties, or is registered as a lobbyist under applicable law and Section 2-5-35 of this Code.
- (b) The prohibition in Subsection (a) of this section shall not apply:
 - (1) To an award publicly presented to a public servant by an individual, governmental body, or nongovernmental entity or organization in recognition of public service;
 - (2) To complimentary copies of trade publications, books, reports, pamphlets, calendars, periodicals or other informational materials;
 - (3) To a gift received from a public servant's immediate family member or relative, provided, that the immediate family member or relative is not acting as a third party's intermediary or an agent in an attempt to circumvent this prohibition;
 - (4) To an admission or registration fee, travel expenses, entertainment, meals or refreshments that are furnished to the public servant:
 - a. By the sponsor of an event, appearance or ceremony, which is related to official City business in connection with such an event, appearance or ceremony and to which one or more members of

the public are invited; or

- b. In connection with teaching, a speaking engagement, or the provision of assistance to an organization or another governmental entity as long as the City does not compensate the public servant for admission or registration fees, travel expenses, entertainment, meals or refreshment for the same activity.

The provision of \$1,600 of funds to pay for the Requestor's attendance at the [REDACTED] Summit would be considered a voluntary transfer of property to another without reciprocal consideration, which by definition is considered a gift and would generally be prohibited by the Ethics Ordinance. However, as the Requestor exercises no control over the existing [REDACTED] contract, the Requestor is in no position to "substantially affect" this contract or the provision of the related services. Additionally, the topic associated with the conference is directly related to the services provided by the City of Detroit [REDACTED] Office of [REDACTED]. For these reasons, the acceptance of funding for transportation and lodging at the [REDACTED] Summit could be permitted under the Ethics Ordinance.

V. Conclusion

In response to Request for Advisory Opinion 2025-11, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor does not exercise significant authority over the [REDACTED] contract, and the activities and forums provided at the [REDACTED] Summit are directly related to the area of municipal operations provided by the [REDACTED] of the Office of [REDACTED]. As such, acceptance of sponsorship of the Requestor at the summit is permissible under the Ethics Ordinance.

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Dated: May 29, 2025



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Robert Watt, Member

Advisory Opinion #2025-13
Issued: May 21, 2025

Advisory Opinion #2025-13: In response to Request for Advisory Opinion 2025-13, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to the Requestor's service as a member of the ██████████ Neighborhood Corporation Board would conflict with the Requestor's City of Detroit position.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-13 ("the Request") by email on April 23, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on July 23, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on October 22, 2025.

At its May 21, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is employed by the City under a ██████████ contract funded by the ██████████ as the ██████████ in the ██████████ Department. The ██████████ is a ██████████ that will unify Detroit's neighborhoods. The ██████████

like the [REDACTED]. The [REDACTED].
[REDACTED] As the [REDACTED], of the [REDACTED]
the Requestor assists in [REDACTED] and providing analysis in how
the [REDACTED]. The [REDACTED]. None
of the [REDACTED] occur in the [REDACTED]
neighborhoods.

A colleague of the Requestor asked if the Requestor would be interested in joining the [REDACTED]
[REDACTED], which began as an outgrowth of
efforts to improve the [REDACTED] Neighborhood. The [REDACTED]
neighborhoods are adjacent to [REDACTED]. As the community
focused on improving the [REDACTED] neighborhood, it was determined that efforts to
improve the community would be facilitated by the establishment of a non-profit corporation
focused on the provision of neighborhood redevelopment and social services to area residents.
Thus, the [REDACTED].

III. **Applicable Charter and Ordinance Sections**

The questions presented by this Request involve (1) the [REDACTED], a City of Detroit
[REDACTED] activity for which the Requestor is employed, and (2) the [REDACTED], which is
considering offering the Requestor position as a Board Member.

Section 2-5-62. – Improper use or disclosure of confidential information prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly use or disclose to third parties confidential information, which is gained by reason of the public servant's official duties, concerns the property, government or affairs of the City, or any office, department or agency thereof, and is not available to members of the public.

The City is involved in delicate negotiations with parties to settle disputes, establish contracts, and prosecute the law. These decisions are subject to internal discussions and strategies to protect the public interest and could be undermined by inappropriate disclosure of internal discussions. To protect this interest, public servants are prohibited by the Ethics Ordinance from disclosure of these details.

As the [REDACTED] of the [REDACTED], the Requestor has daily involvement in discussions concerning future [REDACTED] and [REDACTED] that would be detrimental to the public's interest should this information be prematurely disclosed to the public. This may include [REDACTED] information that could impact the [REDACTED]. As such, the Requestor must be cautioned that any disclosure of confidential City of Detroit information to the [REDACTED] or any third party would be a direct violation of the Ethics Ordinance.

Section 2-5-64. – Incompatible employment or rendering of services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly

render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

Should the Requestor be appointed to the [REDACTED] would perform traditional duties associated with [REDACTED]. As the [REDACTED] has full-time staff and an Executive Director, the Board's typical duties would be focused on [REDACTED].

As provided by the Ethics Ordinance and City Charter, the focus is on the possible impact outside interests would have on the performance of the employee's City duties. Following this focus, the question that is posed is whether the duties as a Board Member of [REDACTED] would "tend to impair his or her independence of judgment or action in the performance of official duties."

In examining this issue, the Requestor's duties as the [REDACTED], for the [REDACTED] are limited to [REDACTED] activities and [REDACTED] services associated with the [REDACTED]. The [REDACTED] does not involve the [REDACTED] neighborhoods, as they are not within the designated routing. Therefore, the Requestor's duties as a board member of [REDACTED] should not conflict or impair [REDACTED] City of Detroit responsibilities. However, should any situation arise in which the Requestor's duties as a board member of [REDACTED] involve their City responsibilities, the Requestor should be instructed that it would be their duty to recuse themselves from partaking in these deliberations and actions.

Section 2-5-65. – Representation of private person, business, or organization prohibited; exceptions.

A public servant shall not act as an agent, attorney, or representative for another person, business, or organization in any matter that is pending before a City agency, except that:

- (1) A public servant may represent another person, business, or organization before a City agency where such representation is a required part of the public servant's official duties;
- (2) A public servant who is an uncompensated member of a City board, commission, or other voting body may act as an agent, attorney, or representative for another person, business, or organization in a manner that is pending before a City agency, other than the board, commission, or other voting body on which the public servant is a member; or
- (3) A public servant who is compensated by the City may act as an agent, attorney, or representative for another person, business, or organization in a matter that is pending before a City board, commission or other voting body, other than the board, commission or other voting body on which the public servant serves as an appointee or as an employee, or under a personal services contract, as long as the public servant does so:

- a. Without compensation; and
- b. On the public servant's leave time; and
- c. For appointees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave; or
- d. For non-union employees, in accordance with Chapter 35, Article III, Division 2, of this Code, Vacation, Sick, Departmental, Funeral, and Jury Leave, and the City's Civil Service Rules; or
- e. For union employees, in accordance with the employee's respective union contract and the City's Civil Service Rules; or
- f. For individuals who provide services to the City pursuant to a personal services contract, in accordance with the applicable provisions of the contract.

As an individual under a [REDACTED] contract, the Requestor is a compensated individual and must comply with the requirements of their [REDACTED] contract. The [REDACTED] contract requires compliance with the City Ethics Ordinance. As such, the Requestor is prohibited from appearing before elements of the [REDACTED] Department. Additionally, any representation for the [REDACTED] by the Requestor before a City agency must be during periods of leave.

The [REDACTED] has ongoing relations and contracts with the City, as they have been past recipients of United States Department of Housing and Urban Development Community Development Block Grant Funds and other grants. In the Requestor's role as the [REDACTED] [REDACTED] the Requestor has had no role in the review or approval of these grants and thus is not in a position to exercise significant authority over these grant applications. Under the ethical standards, the Requestor would be prohibited from participation or representation before the [REDACTED] Department in regards to these grants.

V. Conclusion

In response to Request for Advisory Opinion 2025-13, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, if the Requestor's membership on the [REDACTED] would not violate the ethical standards of the City of Detroit, it should comply with the foregoing analysis to not engage in any activities of the [REDACTED] that would cause a conflict or be detrimental to their duties as the [REDACTED] [REDACTED]. In any such matters, the Requestor should recuse themselves. The Requestor is prohibited from representing or engaging in any activities before the City of Detroit [REDACTED] Department as an agent or representative of the [REDACTED]. Furthermore, any representation of the [REDACTED] before any other City agency should be in an uncompensated manner and during leave periods. Confidential information obtained as a component of the Requestor's duties as the [REDACTED], must not be disclosed to any parties outside of City government, as this would be detrimental to the public interest.

The Requestor is also advised to file a disclosure with the Board of Ethics upon joining the [REDACTED] pursuant to Section 2-5-31 of the Ethics Ordinance.

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Advisory Opinion #2025-15
Issued: June 18, 2025

Advisory Opinion #2025-15: In response to Request for Advisory Opinion 2025-15, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to what is allowed or restricted if the Requestor becomes an advisory board member of a local community center.

I. Procedural Background

The Board of Ethics (“the Board”) received Request for Advisory Opinion 2025-15 (“the Request”) by email on May 14, 2025. In accordance with the Detroit Ethics Ordinance (“the Ordinance”), as codified at Section 2-5-121(a) of the 2019 Detroit City Code (“the Code”), the Request was submitted by a public servant. The Requestor did not waive confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code (“Code”), the 91-day period for review of this request concludes on August 13, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on November 12, 2025.

At its June 18, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is the [REDACTED]. The Requestor has previously worked with the [REDACTED] Center; however, the Requestor’s involvement was limited to that of a speaker at one of their events. The Requestor has stated that their office has no existing contracts with the [REDACTED] Center and has not been requested to review any funding requests or award grants to the [REDACTED] Center. The Requestor has been invited to become an advisory board member to the [REDACTED] Center.

The ██████████ Center of Detroit is a non-profit corporation in the ██████████ neighborhood, founded in ██████████. The organization has received public funding and has a broad vision of social services, but at present, it appears that its services are focused on public service advocacy and operation of the ██████████ Center, which is located on ██████████ Street in Detroit. Among the areas that the Center is involved in are ██████████ development, housing for the ██████████, and ██████████ art.

The ██████████ Center's advisory board meets quarterly and serves several functions, including advocacy, strategic input, and resource sharing. The organization is relatively small and seeks to expand its reach and resources through the selection of advisory board members who can bring their expertise and advocacy to the organization.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether it is permissible for the Requestor to join the Center's advisory board, and if so, what is allowed or restricted. The Request implicates the Standards of Conduct of the following sections of the Ethics Ordinance:

Section 2-5-64. – Incompatible employment or rendering services prohibited.

Except as otherwise provided for by applicable law, a public servant shall not knowingly engage in or accept employment, or knowingly render services, for a private or public interest where such employment or service is in conflict or incompatible with the proper discharge of the public servant's official duties for the City, or where such employment or service is reasonably expected to impair the public servant's independence of judgment or action in the performance of the public servant's official duties for the City.

In the Requestor's role with the City, their activities mainly concern advocacy for the ██████████ in City programs. The Requestor has stated ██████████ has had no prior involvement in overseeing or approving any ██████████ Center activities in ██████████ City role. The role of a member of the Advisory Board of the ██████████ Center is an unpaid position and strictly volunteer service. The organization seeks to draw on the Requestor's experience in the promotion of services for the ██████████ in the development of the ██████████ Center programs.

These limited services would not be "in conflict or incompatible with the proper discharge" of the Requestor's official duties. In fact, aiding the ██████████ Center in the promotion of programs for the ██████████ is in furtherance of the Requestor's duty to promote and expand opportunities for the ██████████ population of the City of Detroit.

V. Conclusion

In response to Request for Advisory Opinion 2025-15, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor may serve on the advisory board of the ██████████ Center, which would be consistent with the Requestor's primary City of Detroit duties. However, the Requestor should recuse ██████████ in any instance of ██████████ requested participation in City oversight or involvement with the ██████████ Center. It is also recommended that the Requestor

file the applicable disclosures with the Board of Ethics.

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Dated: June 27, 2025



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Advisory Opinion #2025-16 Issued: August 20, 2025

Advisory Opinion #2025-16: In response to Request for Advisory Opinion 2025-16, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to whether the purchase of City of Detroit owned commercial property would present an ethical violation with the Requestor's position as a City employee.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-16 ("the Request") by email on May 23, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on August 22, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on November 21, 2025.

At its August 20, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor is the [REDACTED]. The Requestor wants to purchase a [REDACTED] commercial structure and [REDACTED] garage at [REDACTED] Street, in the [REDACTED] neighborhood where the Requestor [REDACTED] and [REDACTED].

The City of Detroit owns the property and is attempting to redevelop this area in conjunction with the Detroit Building Authority and the Neighborhood Development Team. The City invested approximately \$ [REDACTED] to stabilize the structure and retained the services of Summit Realty to

market the property. In [REDACTED] 2024, Summit began marketing the structure and accepted bids for purchase on [REDACTED] 2025.

According to the Requestor, no offers were submitted for the structure, and the Requestor contacted the realty company to discuss a possible purchase. [REDACTED] is actively involved in efforts to promote the revitalization of the [REDACTED] Street area, an important area in [REDACTED] district. The Requestor stated that their office has had no involvement with this particular structure's marketing, sale, ownership, or promotion. The Respondent's interest in the structure is as an investment. Any sale of real property owned by the City requires City approval.

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether it is permissible for the Requestor to purchase City owned property in [REDACTED] role as [REDACTED]. In accordance with Section 2-5-2, the Ethics Ordinance is to be construed in conformity with state law regulating conflicts of interest involving public contracts under the Michigan Contracts of Public Servants with Public Entities Act. Under Michigan law, a public servant shall not solicit or be a party, directly or indirectly, to any contract between himself and the public entity of which he or she is an officer or employee unless authorized by an identified exception. MCL §15.322(1).

Under Michigan law MCL § 15.322(2), a public servant is prohibited from soliciting for the establishment of a contract between the public entity of which he or she is employed and any of the following:

- a) him or herself personally,
- b) any entity in which he or she is a partner, member or employee,
- c) any private corporation in which he or she is a shareholder owning more than 1% of the total outstanding stock if the stock is not listed on a stock exchange
- d) any private corporation in which the stock is listed on a stock exchange with a present market value in excess of \$25,000;
- e) any private corporation which he or she is a director, officer or employee; and
- f) any trust of which he or she is a beneficiary.

A public servant who has any of the relationships identified above, is prohibited from taking part in any associated contract negotiations, amendments, renegotiations or approval of these contracts or representation of either party in the transaction. MCL § 15.322(3). The penalty for violation of this statute is a felony punishable for up to one year imprisonment or a fine of not less than \$1,000 or 3 times the value of the property purchased. MCL § 15.324(2). This law is the sole law superseding all other acts of the state in regards to public contracts involving public servants other than members of the legislature and state officers. MCL § 15.328.

The law provides several exceptions to the prohibitions of contracts between public servants and their employer. The law identifies three exceptions: (1) public servants working less than 25 hours per week; (2) public servant employed by public secondary learning institute; and (3) purchase of residential property. MCL §§ 15.323, 15.324.

The transaction in question would require the establishment of a sales contract between the Requestor and the City, facilitated by the City's real estate broker, Summit Realty. The terms of controlling Michigan law prohibit this transaction, as it is a contract between a public servant and [REDACTED] employer. MCL §§ 15.322. The Requestor's proposed transaction does not fall within any of the three exceptions to Michigan law.

V. Conclusion

In response to Request for Advisory Opinion 2025-16, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. In line with the foregoing analysis, the Requestor's contract to purchase City property is prohibited by Michigan law.

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Dated: August 27, 2025



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Advisory Opinion #2025-17
Issued: August 20, 2025

Advisory Opinion #2025-17: In response to Request for Advisory Opinion 2025-17, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to whether the Requestor's prior involvement in the evaluation and awarding of a contract to a company would be a violation of the Ethics Ordinance if the Requestor accepts a job offer with said company.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-17 ("the Request") by email on June 11, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor has not waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on September 10, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on December 10, 2025.

At its August 20, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor worked as the [REDACTED] with the [REDACTED] Department. The Requestor stated in their request that they had conversations with [REDACTED] employees about potential employment opportunities and applied for a position in [REDACTED].

The City has a contract with [REDACTED], to provide [REDACTED] technology for the [REDACTED] Department. The Requestor admitted to playing a role on a bid selection committee that ensured technical and policy requirements were met for a contract that was ultimately awarded to [REDACTED]. The Departments of Information Technology and Public

Works also played a significant role in this RFP.

III. Applicable Charter and Ordinance Sections

After submitting the Request for Advisory Opinion, the Requestor left the City and is no longer seeking a position with [REDACTED]. The Requestor stated that he has accepted a position with an agency that has no current or prior contracts with the City. For that reason, the Requestor submitted a letter to the Board of Ethics requesting to withdraw their request.

However, the Requestor, like all public servants who leave the City, is still bound by the one-year post-employment prohibition:

Sec. 2-5-71. One year post-employment prohibition.

(a) Subject to state law, for one year after employment with the City, a public servant shall not lobby or appear before the City Council or any City department, agency, board, commission or body, or receive compensation for any services in connection with any matter in which the public servant was directly concerned, personally participated, actively considered or acquired knowledge while working for the City.

(b) Subject to state law, for one year after employment with the City, a public servant shall not accept employment with any person who, or entity which, did business with the City during the former public servant's tenure where the public servant was in any way involved in the award or management of the contract, or the employment would require the sharing of confidential information.

The Requestor should be mindful of not accepting employment with any entity that does business with the City for one year from the date the Requestor resigned from their City position.

IV. Conclusion

In response to Request for Advisory Opinion 2025-17, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. In line with the foregoing analysis, the Requestor is advised to continue to refrain from accepting a position with a person or entity doing business with the City or working on City-related services in any new job capacity for a period of one year from the date the Requestor stepped down from their City role.

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Dated: August 28, 2025



Butzel Family Center
7737 Kercheval Avenue
Suite 213
Detroit, MI 48214
www.detroitethics.org
(313) 224-9521

Dr. Jameel Smith, Chairperson
David Teeter, Vice Chairperson
Raymond Card, Member
Dr. Yvette McElroy Anderson, Member
LaTanya Richardson, Member

Advisory Opinion #2025-19
Issued: September 10, 2025

Advisory Opinion #2025-19: In response to Request for Advisory Opinion 2025-19, it is the decision of the Board of Ethics to issue an advisory opinion pursuant to Section 2-5-124(b)(4) of the Code. The Requestor seeks an advisory opinion regarding the application of the Standards of Conduct as it relates to whether the Requestor's acceptance of a position at [REDACTED] would violate the one year post-employment prohibition.

I. Procedural Background

The Board of Ethics ("the Board") received Request for Advisory Opinion 2025-19 ("the Request") by email on August 22, 2025. In accordance with the Detroit Ethics Ordinance ("the Ordinance"), as codified at Section 2-5-121(a) of the 2019 Detroit City Code ("the Code"), the Request was submitted by a public servant. The Requestor has not waived confidentiality.

Pursuant to Section 2-5-124(a) of the 2019 Detroit City Code ("Code"), the 91-day period for review of this request concludes on November 22, 2025. Section 2-5-124(a) also provides that the Board may, under extraordinary circumstances, extend its time to respond to a specific request by not more than 91 additional days and notify the requestor, in writing, of the specific reasons for such extension. The 91-day extension period concludes on February 21, 2026.

At its September 10, 2025 meeting, the Board determined that the Request met the basic requirements of a Request for Advisory Opinion under Section 2-5-121 of the Ethics Ordinance. The Board heard a Preliminary Analysis from legal counsel on the same day. After consideration and discussion of the issues presented, pursuant to Section 2-5-124(b)(4) of the Ethics Ordinance, the Board voted to issue this Advisory Opinion.

II. Information from the Request

The Requestor serves as the City of Detroit's [REDACTED]. [REDACTED] duties include [REDACTED]. The Requestor reported that [REDACTED] employment with the City involves overseeing property tax and income tax administration, [REDACTED]. The Requestor noted that they do not determine assessed or taxable values for any property or control over property tax exemptions, abatements, assessment changes, or Board of Review decisions.

The Requestor stated that his job at the potential employer would “ [REDACTED]

[REDACTED] The Requestor added that this position “would not require lobbying or appearing before City Council or any City entity in connection with any matter in which I was directly concerned while working for the City.”

III. Applicable Charter and Ordinance Sections

The question presented by this Request is whether the Requestor’s accepting a job with [REDACTED] would violate the one year post-employment prohibition.

Section 2-5-71 – One year post-employment prohibition.

- (a) Subject to state law, for one year after employment with the City, a public servant shall not lobby or appear before the City Council or any City department, agency, board, commission or body, or receive compensation for any services in connection with any matter in which the public servant was directly concerned, personally participated, actively considered or acquired knowledge while working for the City.
- (b) Subject to state law, for one year after employment with the City, a public servant shall not accept employment with any person who, or entity which, did business with the City during the former public servant’s tenure where the public servant was in any way involved in the award or management of the contract, or the employment would require the sharing of confidential information.

The potential employer, [REDACTED], has [REDACTED] programs with the City: (1) [REDACTED] projects; (2) [REDACTED]; and (3) [REDACTED] programs. The Requestor’s office was not involved in the approval or administration of the City of Detroit [REDACTED]. Nor did it play a role in evaluating or awarding [REDACTED] Programs, and the Requestor has not directly participated in these activities. The one year post-employment prohibition is for employment activities in which the public servant was involved in the award or management of the contract, or the employment would require sharing confidential information. Since the Requestor has not been involved with [REDACTED] contract awards or management, their employment by [REDACTED] would pose no restrictions on their activity in these areas. The Requestor’s office did not play a role in the evaluation or establishing community benefit programs, and the Requestor has not directly participated in these activities.

It is thus determined that of the [REDACTED] contracts or relations that [REDACTED] has with the City of Detroit, the Requestor or their office, the [REDACTED], is not involved. As such, the Requestor’s future employment with [REDACTED] would not be restricted by the Requestor’s City of Detroit employment activities.

V. Conclusion

In response to Request for Advisory Opinion 2025-19, it is the decision of the Board to issue an advisory opinion pursuant to Section 2-154(b)(4) of the Code. In line with the foregoing analysis, the Requestor may work for [REDACTED]. However, the Requestor is

reminded not to disclose confidential information based on their City employment and not to appear before City Council or make requests of City Council on behalf for one year. [REDACTED]

Detroit Board of Ethics
7737 Kercheval, Suite 213
Detroit, MI 48214
(313) 224-9521 (office)
ethics@detroitethics.org

Dated: September 25, 2025

Appendix B: 2025 Open Session Meeting Minutes

Board Members:

Dr. Jameel Smith, Chairperson	P
Kristin A. Lusn, Vice Chairperson	A
Robert Jones	P
Dr. Yvette McElroy Anderson	P
David Teeter	P
Robert Watt	A
LaTanya Richardson	P

Chairperson Dr. Jameel Smith called the meeting to order at 2:01 PM. A Quorum was established.

II. Roll Call.

III. Approval of the Agenda.

Member Robert Jones motioned to approve the agenda, moving item A. Complaint 2025-01 under Section VI. Reports: Complaints, Requests, and Investigations to Section VII. Closed Session as item H., removing item E. Complaint 2024-16 under Section VII. Closed Session, adding item B. Administrative Rules to Section IX. Executive Directors Report and adding item B. Nomination and Vote for Offices for 2025 to Section XI. New Business. No objections. Motion Carried.

IV. Period for Public Comment.

Delecia Coleman and Patrick Cunningham provided public comments.

Member Dr. Yvette McElroy Anderson motioned for a recess to consider the information presented during public comment. Member Robert Jones seconded. No objections. Motion carried. Recess at 2:08 PM. Meeting reconvened at 2:48 PM.

Member David Teeter motioned to postpone Hearing I-2024-01 to a date to be determined by the Board. There were no objections. The motion carried.

Member Robert Jones motioned to have Senior Investigator Dawn Widman compile historical data on matters involving an individual no longer a public servant; however, the Board decided to hold a hearing while that individual was a public servant, and the Board proceeded with the hearing.

Member Dr. Yvette McElroy Anderson motioned to have Senior Investigator Dawn Widman gather information for the Board's consideration on whether the current employment of subject of I-2024-01 makes him a contractor/vendor with the City of Detroit.

Member David Teeter motioned to have the Law Department provide historical information on instances where the Board did not proceed with a hearing when an individual was no longer a public servant; however, the decision to hold a hearing was made while the individual was a public servant.

~~V. Hearing on I 2024-01 (Antoine Bryant)~~

- ~~I. Chairperson's Remarks.~~
- ~~H. Presentation of Evidence & Witnesses.~~
 - ~~A. Chairperson Swears in Witnesses~~
 - ~~B. Opening Statements~~
 - ~~C. Testimony~~
 - ~~D. Submission of Evidence~~
 - ~~E. Rebuttals~~
 - ~~F. Closing Statements~~
- ~~III. Procedure for Decision.~~
- ~~IV. Deliberation. (Closed Session)~~
- ~~V. Decision.~~

VI. Review and Approval of the Minutes.

- A. Approval of the Meeting Minutes from December 16, 2024. Open Session.

Member David Teeter motioned to approve the December 16, 2024, open meeting minutes.

Member Robert Jones seconded. No objections. Motion Carried.

- B. Approval of the Meeting Minutes from December 16, 2024. Closed Session.

Member Robert Jones motioned to approve the December 16, 2024, closed meeting minutes.

Member David Teeter seconded. No objections. Motion Carried.

VII. Reports: Complaints, Requests, and Investigations.

- ~~A. Complaint 2025-01. Received January 2, 2025. (Moved to closed session.)~~

VIII. Closed Session.

Member Robert Jones motioned to enter Closed Session to discuss Section VII, items A. through H. Member Dr. Yvette McElroy Anderson seconded. No objections. Motion carried.

Roll call vote: Robert Jones (Yes), David Teeter (Yes), LaTonya Richardson (Yes), Dr. Yvette McElroy Anderson (Yes).

****CLOSED SESSION BEGAN AT 3:03 PM****

****CLOSED SESSION ENDED AT 3:49 PM****

Member Robert Jones motioned to reenter Open Session. No objections. Motion carried.

Roll call vote: Robert Jones (Yes), LaTonya Richardson (Yes), David Teeter (Yes). (Dr. Yvette McElroy Anderson departed at 3:40 PM)

- A. RAO 2024-18. January 1, 2025/April 2, 2025. Fact Finding, and
- B. RAO 2024-20. February 5, 2025. Preliminary Analysis.

Member David Teeter motioned to dispose of these matters pursuant to Section 2-5-124(b)(4). No objections. Motion Carried.

- C. RAO 2024-22. March 21, 2025. Preliminary Analysis.

Member Robert Jones motioned to dispose of this matter pursuant to Section 2-5-124(b)(4). No objections. Motion Carried.

- D. Complaint 2024-15. November 28, 2024/February 27, 2025. Investigation Status.

No action taken.

- ~~E. Complaint 2024-16. March 18, 2025. Preliminary Analysis.~~

Removed from the agenda.

- F. Complaint 2024-19. March 18, 2025. Preliminary Analysis, and
- G. Complaint 2024-20. March 19, 2025. Preliminary Analysis.

Member David Teeter motioned to dispose of these matters pursuant to 2-5-145(b)(3)(a). No objections. Motion Carried.

- H. Complaint 2025-01. Received January 2, 2025.

Member Robert Jones motioned to dispose of this matter pursuant to 2-5-145(b)(1)(d). No objections. Motion Carried.

Chairperson Dr. Jameel Smith motioned to adjourn. No objections. Motion Carried.

Meeting Adjourned at 3:52 PM.

~~IX. Executive Director's Report.~~

- ~~A. Proportional Funding.~~
- ~~B. Administrative Rules.~~

~~X. Unfinished Business.~~

- ~~A. Learning, Training, Website, and Marketing.~~
- ~~B. BOE in the News.~~

~~XI. New Business.~~

- ~~A. 2025 Board of Ethics Meeting Schedule.~~
- ~~B. Nomination & Vote for Offices for 2025.~~

~~XII. Announcements.~~

- ~~A. The next General Meeting of the Board of Ethics is Wednesday, February 19, 2025, at 2:00 PM. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.~~

Board Members:

Dr. Jameel Smith, Chairperson	P
Kristin A. Lusn, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
David Teeter	A
Robert Watt	A
LaTanya Richardson	P

Chairperson Dr. Jameel Smith called the meeting to order at 2:08 PM. A Quorum was established.

II. Roll Call.

III. Approval of the Agenda.

Member Robert Jones motioned to approve the agenda. No objections. Motion Carried.

IV. Period for Public Comment.

No public comments.

V. Review and Approval of the Minutes.

A. Approval of the Meeting Minutes from January 15, 2025. Open Session.

Member Dr. Yvette McElroy Anderson motioned to approve the January 15, 2025, Open Session meeting minutes. No objections. Motion Carried.

B. Approval of the Meeting Minutes from January 15, 2025. Closed Session.

Member Robert Jones motioned to approve the January 15, 2025, Closed Session meeting minutes. No objections. Motion Carried.

VI. Reports: Complaints, Requests, and Investigations.

A. Introduction to New Legal Counsel and Office Location.

Executive Director Christal Phillips introduced new legal counsel, James Stump. James Stump summarized his curriculum vitae.

B. Postponed Hearing on I-2024-01. Request for Opinion from Law Department.

Executive Director Christal Phillips summarized the Board's request and advised that Adam Saxby, Law Department, would present the opinion in Closed Session.

C. Postponed Hearing on I-2024-01. Request for Information from Senior Investigator.

Executive Director Christal Phillips summarized the Board's requests and advised that she would present her memoranda and Dawn Widman, Senior Investigator, would present the information she garnered during Closed Session.

D. RAO 2025-05. Received February 6, 2025.

Executive Director Christal Phillips noted no action was needed and advised that the Law Department's Preliminary Analysis was due February 20, 2025.

E. RAO 2025-06. Received February 17, 2025.

Executive Director Christal Phillips noted no action was needed and advised that the Law Department's Preliminary Analysis was due March 3, 2025.

VII. Closed Session.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session. No objections. Motion carried.

Roll call vote: Dr. Yvette McElroy Anderson (Yes), Robert Jones (Yes), LaTonya Richardson (Yes).

****CLOSED SESSION BEGAN AT 2:15 PM**
Vice Chairperson Kristin Lusn arrived at 2:32 PM
CLOSED SESSION ENDED AT 3:59 PM**

Member Robert Jones motioned to reenter Open Session. No objections. Motion carried.

Roll call vote: Kristin Lusn (Yes), Dr. Yvette McElroy Anderson (Yes), Robert Jones (Yes), LaTonya Richardson (Yes).

A. Postponed Hearing on I-2024-01. Law Department Opinion on BOE Investigatory Jurisdiction.

Member Robert Jones motioned to request a legal analysis regarding contractor/vendors' status as public servants. Member Dr. Yvette McElroy Anderson seconded. No objections. Motion carried.

B. Postponed Hearing on I-2024-01. Finding from Senior Investigator.

Member Robert Jones motioned to reschedule the hearing on I-2024-01 for March 19, 2025. No objections. Motion carried.

C. RAO 2025-01. April 17, 2025. Preliminary Analysis and

F. RAO 2025-04. May 5, 2025. Preliminary Analysis.

Member Kristin Lusn motioned to request additional Fact Finding and any necessary Supplemental Preliminary Analyses. Member Robert Jones seconded. No objections. Motion carried.

D. RAO 2025-02. April 29, 2025. Preliminary Analysis.

Member Kristin Lusn motioned to dispose of this matter pursuant to Section 2-5-124(b)(4). Member Robert Jones seconded. No objections. Motion carried.

E. RAO 2025-03. Preliminary Analysis.

Member Kristin Lusn motioned to dispose of this matter pursuant to Section 2-5-124(b)(1). Member Robert Jones seconded. No objections. Motion carried.

F. RAO 2025-04. May 5, 2025. Preliminary Analysis. (Disposed of with Item C. above.)

G. Complaint 2024-15. November 28, 2024 / February 27, 2025. Investigation Status.

Member Robert Jones motioned to dispose of this matter pursuant to 2-5-145(b)(5) and schedule a hearing. Member Dr. Yvette McElroy Anderson seconded. No objections. Motion Carried.

- H. Complaint 2024-19. March 18, 2025. Investigation Status. Extension Needed. and
- I. Complaint 2024-20. March 19, 2025. Investigation Status. Extension Needed.

Member Kristin Lusn motioned to extend both matters 91 days. Member Dr. McElroy Anderson seconded. No objections. Motion carried.

- J. Complaint 2025-02. May 5, 2025. Preliminary Analysis.

The matter was tabled, and no action was taken.

~~IX. Executive Director's Report:~~

- ~~A. Revised Administrative Rules.~~
- ~~B. Board of Ethics 2024 Annual Report.~~
- ~~C. Budget Hearing.~~
- ~~D. Proportional Funding Resolution.~~
- ~~E. Proposed Board Retreat.~~

X. Unfinished Business.

- A. Learning, Training, Website, and Marketing.

Training Specialist Michael O'Connell updated the Board on the training partnership with the Detroit Pistons on March 26, 2025. He also advised the Board that the first Say Nice Things podcast was complete and ready to be uploaded. **Member Kristin Lusn motioned to approve the podcast episode's release. Member Robert Jones seconded. No objections. Motion carried.**

- ~~B. BOE in the News.~~

XI. New Business.

- A. 2025 Board of Ethics Meeting Schedule.

Member Dr. Yvette McElroy Anderson motioned to accept the 2025 Board of Ethics Meeting Schedule. Member Kristin Lusn seconded. No objections. Motion carried.

- B. Nomination & Vote for Offices for 2025.

Member Kristin Lusn motioned for Chairperson Dr. Jameel Smith to continue as Chairperson. Member Dr. Yvette McElroy Anderson seconded. No objections. Motion carried. The motion for the Vice Chairperson position was tabled until the next board meeting.

XII. Announcements.

- A. The next General Meeting of the Board of Ethics is Wednesday, March 19, 2025, at 2:00 PM. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XIII. Adjournment.

Member Kristin Lusn motioned to adjourn. No objections. Motion Carried. The meeting was adjourned at 4:07 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
Kristin A. Lusn, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
David Teeter	P
Robert Watt	A
LaTanya Richardson	P

I. Call to Order.

Chairperson Dr. Jameel Smith called the meeting to order at 2:02 PM. A Quorum was established.

II. Roll Call.

III. Approval of the Agenda.

Member Robert Jones motioned to approve the agenda with item XII. New Business moved to Section V. No objections. Motion Carried.

IV. Period for Public Comment.

Taura Brown inquired if non-profit organizations are beholden to the Ethics Ordinance. Patrick Cunningham also made public comments on behalf of Mr. [Antoine] Bryant.

V. Review and Approval of the Minutes.

A. Approval of the Meeting Minutes from February 19, 2025. Open Session.

Member Robert Jones motioned to approve the February 19, 2025, Open Session meeting minutes. No objections. Motion Carried.

B. Approval of the Meeting Minutes from February 19, 2025. Closed Session.

Member Robert Jones motioned to approve the February 19, 2025, Closed Session meeting minutes. No objections. Motion Carried.

C. IX. New Business. Nomination & Vote for Vice Chair for 2025.

Member Robert Jones nominated Member David Teeter for Vice Chair for 2025. Member LaTanya Richardson seconded the motion. Member David Teeter accepted. No objections. Motion carried.

Member Roberts Jones motioned to enter Closed Session. No objections. Motion Carried.

Roll Call vote: Robert Jones (Yes); David Teeter (Yes); LaTanya Richardson (Yes); Chair Dr. Jameel Smith (Yes).

****CLOSED SESSION BEGAN AT 2:12 PM****

- VI. Confidential Communications (Closed Session)
- A. Postponed Hearing on I-2024-01. Law Department Opinion on Contractor Versus Vendor.
 - B. Postponed Hearing on I-2024-01. Memo from Senior Investigator.

****CLOSED SESSION ENDED AT 2:28 PM****

Member David Teeter motioned to return to Open Session.

Roll Call vote: Robert Jones (Yes); David Teeter (Yes); LaTanya Richardson (Yes); Chair Dr. Jameel Smith (Yes).

- VII. Hearing on I-2024-01 (Antoine Bryant)
- I. Chairperson's Remarks.

Chair Dr. Jameel Smith recused herself from the hearing due to a potential conflict of interest and gave the chair to Vice Chair David Teeter. A recess was called due to a quorum loss. Members Kristin Lusn and Dr. Yvette McElroy Anderson arrived at 2:33 PM, and the quorum was re-established. Chair Dr. Jameel Smith called the meeting back to order.

Vice Chair David Teeter called the hearing to order at 2:33 PM.

Vice Chair David Teeter remarked that on June 4, 2024, the Board initiated an investigation into possible violations of the Ethics Ordinance due to the Respondent, Antoine Bryant's, execution of a \$215,000 contract with Street Art for Mankind Corp. without proper approval from Detroit City Council. At the November 20, 2024, General Meeting of the Board of Ethics, in accordance with Section 2-5-161 of the Ethics Ordinance, this Board found that Investigation 2024-01 compiled facts sufficient to constitute a possible violation of the Ethics Ordinance and voted to conduct a hearing with proper notice to determine whether a violation occurred.

- II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.

Vice Chair David Teeter swore in witness Dawn Widman, Senior Investigator for the Board of Ethics.

- B. Opening Statements.

Respondent not in attendance. No opening statement was made.

- C. Testimony.

Dawn Widman, Senior Investigator, summarized the facts of the investigation and responded to questions from Vice Chair David Teeter and Members Yvette McElroy Anderson, Robert Jones, and Kristin Lusn.

Christal Phillips, Executive Director, remarked that the Board's Administrative Rule 2.701 governs the representation of complainants and public servants in a hearing before the

Board. Ms. Phillips further remarked that the Law Department opined on this issue previously.

D. Submission of Evidence.

Member Kristin Lusk motioned to accept Dawn Widman, Senior Investigator, testimony and evidence into the public hearing record. Member LaTanya Richardson seconded the motion. No objections. Motion carried.

E. Rebuttals.

No rebuttals.

F. Closing Statements.

No closing statements.

III. Procedure for Decision.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session for the purpose of Deliberation and to determine any potential penalties. Member LaTanya Richardson seconded the motion.

Roll call: Kristin Lusk (Yes); Dr. Yvette McElroy Anderson (Yes); LaTanya Richardson (Yes); Robert Jones (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION FOR DELIBERATION ON I-2024-01 BEGAN AT 3:01 PM****

IV. Deliberation. (Closed Session)

Member Robert Jones motioned to return to Open Session. Member Kristin Lusk seconded the motion.

Roll call: Kristin Lusk (Yes); Dr. Yvette McElroy Anderson (Yes); LaTanya Richardson (Yes); Robert Jones (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION FOR DELIBERATION ON I-2024-01 ENDED AT 3:17 PM****

V. Decision.

Member Kristin Lusk motioned to dismiss Investigation 2025-01. Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Member Kristin Lusk motioned to request a Law Department analysis surrounding the disposition of Investigation 2024-01 via dismissal and whether or not the Board needs to tie the dismissal to a section of the ordinance. Robert Jones seconded the motion. No objections. Motion carried.

Member Dr. Yvette McElroy Anderson motioned to adjourn the public hearing. Member Robert Jones seconded the motion. No objections. Motion carried.

Hearing adjourned at 3:24 PM.

VIII. Hearing on C-2024-15 (Ronald Foster v. Willie Burton)

I. Chairperson's Remarks.

Chairperson Dr. Jameel Smith called the hearing to order at 3:43 PM.

Chairperson Dr. Jameel Smith remarked that on August 29, 2024, a Complaint was filed by Ronald Foster with the Board of Ethics alleging two violations from the Respondent, Willie Burton, a Commissioner of the Board of Police Commissioners. At the February 19, 2025, General Meeting of the Board of Ethics, in accordance with Section 2-5-145(b)(5) of the Ethics Ordinance, this Board determined that the investigation into Complaint 2024-15 compiled facts sufficient to constitute a possible violation of the Ethics Ordinance, and that the Board would dispose of the Complaint and conduct a hearing with proper notice to determine whether a violation occurred.

The Complainant was not present.

The Respondent requested the Hearing be held in Closed Session.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session for the purpose of conducting the hearing on Complaint 2024-15. Member Robert Jones seconded the motion.

Roll call vote: Chairperson Dr. Jameel Smith (Yes); Kristin Lusn (Yes); Dr. Yvette McElroy Anderson (Yes); Robert Jones (Yes); LaTanya Richardson (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION HEARING ON COMPLAINT 2024-15 BEGAN AT 3:50 PM****

- II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.
 - B. Opening Statements.
 - C. Testimony.
 - D. Submission of Evidence.
 - E. Rebuttals.
 - F. Closing Statements.
- III. Procedure for Decision.
- IV. Deliberation.

****CLOSED SESSION HEARING ON COMPLAINT 2024-15 ENDED AT 5:00 PM****

Member Robert Jones motioned to return to Open Session. Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Roll call vote: Kristin Lusn (Yes), Dr. Yvette McElroy Anderson (Yes), Robert Jones (Yes), LaTonya Richardson (Yes), Vice Chair David Teeter (Yes), Chair Dr. Jameel Smith (Yes).

Member Robert Jones motioned to enter the witness list and evidence into the hearing record. Vice Chair David Teeter seconded the motion. No objections. Motion carried.

V. Decision

Member Robert Jones motioned to dismiss Complaint 2025-15. Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Member Dr. Yvette McElroy Anderson motioned to adjourn the hearing. Vice Chair David Teeter seconded the motion.

Hearing adjourned at 5:06 PM.

Vice Chair David Teeter motioned to request a legal opinion regarding tying an ordinance section to the dismissal of a Complaint. Member Robert Jones seconded the motion. No objections. Motion carried.

Vice Chair David Teeter motioned to direct the Executive Director to draft a memorandum to the Board of Police Commissioners, encouraging them to address their issues with attendance. Member Robert Jones seconded the motion. No objections. Motion carried.

Member Robert Jones motioned to extend RAO 2025-01 for 91 days. Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

IX. Closed Session. [Items B through F, no action taken.]

A. RAO 2025-01. April 17, 2025. Fact-finding. Supplemental Preliminary Analysis.

Motion made extending 91 days. See above.

B. RAO 2025-04. May 5, 2025. Fact-finding. Supplemental Preliminary Analysis.

C. RAO 2025-05. May 8, 2025. Preliminary Analysis.

D. RAO 2025-06. May 20, 2025. Preliminary Analysis.

E. RAO 2025-07. June 9, 2025. Preliminary Analysis.

F. Complaint 2025-02. May 5, 2025. Preliminary Analysis.

X. Executive Director's Report.

A. Board of Ethics 2024 Annual Report.

Executive Director Christal Phillips summarized the report and reviewed its recommendations.

Member David Teeter motioned to approve the report with the addition of the Executive Director's photograph. Member Robert Jones seconded the motion. No objections. Motion carried.

B. Budget Hearing.

Executive Director Christal Phillips advised the Board that the hearing was scheduled for Monday, March 31, 2025, at 1:00 PM at the Coleman A. Young Municipal Center.

C. Memo to the Office of the Assessor

Executive Director Christal Phillips summarized the Auditor General's email request of the Board of Ethics as it relates to the audit of the Office of the Assessor.

Member David Teeter motioned for the Office of the Assessor to take up the matter. Vice Chair Kristin Lusk seconded the motion. No objections. Motion carried.

XI. Unfinished Business.

A. Learning, Training, Website, and Marketing.

Michael O'Connell, Training Specialist, updated the Board regarding the status of the negotiations with a vendor for the Learning Management System, the Piston's training event on March 26, 2025, and his participation in the COGEL program committee.

XII. New Business.

A. Nomination & Vote for Vice Chair for 2025.

Moved up to Section V. Review and Approval of the Minutes.

XIII. Announcements.

A. The next General Meeting of the Board of Ethics is Wednesday, April 16, 2025, at 2:00 PM. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XIV. Adjournment.

Member Robert Jones motioned to adjourn. Vice Chair David Teeter seconded the motion. No objections. Motion Carried. The meeting was adjourned at 5:09 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
Kristin A. Lusn, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
David Teeter	P
Robert Watt	A
LaTanya Richardson	P

V. Hearing on I-2024-01 (Antoine Bryant)

I. Chairperson's Remarks.

Chair Dr. Jameel Smith recused herself from the hearing due to a potential conflict of interest and gave the chair to Vice Chair David Teeter. A recess was called due to a quorum loss. Members Kristin Lusn and Dr. Yvette McElroy Anderson arrived at 2:33 PM, and the quorum was re-established. Chair Dr. Jameel Smith called the meeting back to order.

Vice Chair David Teeter called the hearing to order at 2:33 PM.

Vice Chair David Teeter remarked that on June 4, 2024, the Board initiated an investigation into possible violations of the Ethics Ordinance due to the Respondent, Antoine Bryant's, execution of a \$215,000 contract with Street Art for Mankind Corp. without proper approval from Detroit City Council. At the November 20, 2024, General Meeting of the Board of Ethics, in accordance with Section 2-5-161 of the Ethics Ordinance, this Board found that Investigation 2024-01 compiled facts sufficient to constitute a possible violation of the Ethics Ordinance and voted to conduct a hearing with proper notice to determine whether a violation occurred.

II. Presentation of Evidence & Witnesses.

A. Chairperson Swears in Witnesses.

Vice Chair David Teeter swore in witness Dawn Widman, Senior Investigator for the Board of Ethics.

B. Opening Statements.

Respondent not in attendance. No opening statement was made.

C. Testimony.

Dawn Widman, Senior Investigator, summarized the facts of the investigation and responded to questions from Vice Chair David Teeter and Members Yvette McElroy Anderson, Robert Jones, and Kristin Lusn.

Christal Phillips, Executive Director, remarked that the Board's Administrative Rule 2.701 governs the representation of complainants and public servants in a hearing before the Board. Ms. Phillips further remarked that the Law Department opined on this issue previously.

D. Submission of Evidence.

Member Kristin Lusk motioned to accept Dawn Widman, Senior Investigator, testimony and evidence into the public hearing record. Member LaTanya Richardson seconded the motion. No objections. Motion carried.

E. Rebuttals.

No rebuttals.

F. Closing Statements.

No closing statements.

III. Procedure for Decision.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session for the purpose of Deliberation and to determine any potential penalties. Member LaTanya Richardson seconded the motion.

Roll call: Kristin Lusk (Yes); Dr. Yvette McElroy Anderson (Yes); LaTanya Richardson (Yes); Robert Jones (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION FOR DELIBERATION ON I-2024-01 BEGAN AT 3:01 PM****

IV. Deliberation. (Closed Session)

Member Robert Jones motioned to return to Open Session. Member Kristin Lusk seconded the motion.

Roll call: Kristin Lusk (Yes); Dr. Yvette McElroy Anderson (Yes); LaTanya Richardson (Yes); Robert Jones (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION FOR DELIBERATION ON I-2024-01 ENDED AT 3:17 PM****

V. Decision.

Member Kristin Lusk motioned to dismiss Investigation 2025-01. Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Member Kristin Lusk motioned to request a Law Department analysis surrounding the disposition of Investigation 2024-01 via dismissal and whether or not the Board needs to tie the dismissal to a section of the ordinance. Robert Jones seconded the motion. No objections. Motion carried.

Member Dr. Yvette McElroy Anderson motioned to adjourn the public hearing. Member Robert Jones seconded the motion. No objections. Motion carried.

Wednesday, March 19, 2025
City of Detroit
BOARD OF ETHICS
I-2024-01 Hearing
Open Meeting Minutes

Butzel Family Center
7737 Kercheval
Detroit, MI 48214
2:00 p.m. – 4:00 p.m. EST

Hearing adjourned at 3:24 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
Kristin A. Lusn, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
David Teeter	P
Robert Watt	A
LaTanya Richardson	P

V. Hearing on C-2024-15 (Ronald Foster v. Willie Burton)

I. Chairperson's Remarks.

Chairperson Dr. Jameel Smith called the hearing to order at 3:43 PM.

Chairperson Dr. Jameel Smith remarked that on August 29, 2024, a Complaint was filed by Ronald Foster with the Board of Ethics alleging two violations from the Respondent, Willie Burton, a Commissioner of the Board of Police Commissioners. At the February 19, 2025, General Meeting of the Board of Ethics, in accordance with Section 2-5-145(b)(5) of the Ethics Ordinance, this Board determined that the investigation into Complaint 2024-15 compiled facts sufficient to constitute a possible violation of the Ethics Ordinance, and that the Board would dispose of the Complaint and conduct a hearing with proper notice to determine whether a violation occurred.

The Complainant was not present.

The Respondent requested the Hearing be held in Closed Session.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session for the purpose of conducting the hearing on Complaint 2024-15. Member Robert Jones seconded the motion.

Roll call vote: Chairperson Dr. Jameel Smith (Yes); Kristin Lusn (Yes); Dr. Yvette McElroy Anderson (Yes); Robert Jones (Yes); LaTanya Richardson (Yes); Vice Chair David Teeter (Yes).

****CLOSED SESSION HEARING ON COMPLAINT 2024-15 BEGAN AT 3:50 PM****

- II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.
 - B. Opening Statements.
 - C. Testimony.
 - D. Submission of Evidence.

- E. Rebuttals.
- F. Closing Statements.

- III. Procedure for Decision.
- IV. Deliberation.

****CLOSED SESSION HEARING ON COMPLAINT 2024-15 ENDED AT 5:00 PM****

Member Robert Jones motioned to return to Open Session. Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Roll call vote: Kristin Lusn (Yes), Dr. Yvette McElroy Anderson (Yes), Robert Jones (Yes), LaTonya Richardson (Yes), Vice Chair David Teeter, Chair Dr. Jameel Smith (Yes).

Member Robert Jones motioned to enter the witness list and evidence into the hearing record. Vice Chair David Teeter seconded the motion. No objections. Motion carried.

V. Decision

Member Robert Jones motioned to dismiss Complaint 2025-15. Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion carried.

Member Dr. Yvette McElroy Anderson motioned to adjourn the hearing. Vice Chair David Teeter seconded the motion.

Hearing adjourned at 5:06 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
David Teeter, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	A
Kristin A. Lusn	A
Robert Watt	P
LaTanya Richardson	P

Chairperson Dr. Jameel Smith called the meeting to order at 2:02 PM. A Quorum was established.

II. Roll Call.

III. Approval of the Agenda.

Vice Chairperson David Teeter motioned to approve the agenda. No objections. Motion Carried.

IV. Period for Public Comment.

No public comments.

V. Review and Approval of the Minutes.

A. Approval of the Meeting Minutes from March 19, 2025. Open Session.

Member Robert Jones motioned to approve the March 19, 2025, Open Session meeting minutes. No objections. Motion Carried.

Vice Chairperson David Teeter motioned to approve the Open Session meeting minutes, with a correction. No objections. Motion Carried.

B. Approval of the Meeting Minutes from March 19, 2025. Closed Session.

Vice Chairperson David Teeter motioned to approve the March 19, 2025, Closed Session meeting minutes. No objections. Motion Carried.

C. Approval of the Meeting Minutes from March 19, 2025. I-2024-01 Hearing. Open.

Member Robert Jones motioned to approve the March 19, 2025, I-2024-01 Hearing, Open meeting minutes. No objections. Motion Carried.

D. Approval of the Meeting Minutes from March 19, 2025. I-2024-01 Hearing. Closed.

No action taken.

E. Approval of the Meeting Minutes from March 19, 2025. C-2024-15 Hearing. Open.

Member Robert Jones motioned to approve the March 19, 2025, C-2024-15 Hearing, Open meeting minutes. No objection. Motion Carried.

F. Approval of the Meeting Minutes from March 19, 2025. C-2024-15 Hearing. Closed.

Member Robert Jones motioned to approve the March 19, 2025, C-2024-15 Hearing, Closed meeting minutes. No objections. Motion Carried.

VI. Reports: Complaints, Requests, and Investigations.

A. Letter to the Administration Requesting Annual Mayoral Disclosures.

Executive Director Christal Phillips reported on the plan to request these disclosures on an annual basis and advised a draft letter was ready for the Board’s approval. Vice Chairperson David Teeter motioned to approve the letter requesting the 2024 Disclosure forms from the Mayor.

B. Request for Legal Opinion. Public Comment Inquiry on Whether Non-Profit Organizations are Beholden to the Ethics Ordinance.

Executive Director Christal Phillips noted that Ms. Taura Brown requested this information during public comment at the last Board meeting. Ms. Phillips advised the Board discussed obtaining a legal opinion but did not motion to request the opinion at that time. Ms. Phillips advised she would request a legal opinion on the topic on the Board’s behalf.

C. Report on Ethics Ordinance Inconsistencies.

Training Specialist Michael O’Connell summarized his report. Vice Chairperson David Teeter motioned to have the Law Department provide a legal opinion on the ordinance inconsistencies report, to be delivered within 60 days, by the Board’s June 18, 2025, meeting. Member Robert Watt seconded the motion. No objections. Motion Carried.

VII. Closed Session.

Member Robert Jones motioned to enter Closed Session. Member LaTanya Richardson seconded the motion. No objections. Motion Carried.

Member Robert Jones motioned to amend the motion to enter Closed Session to include Items A. through H. No objections. Motion Carried.

Roll call vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), LaTanya Richardson (Yes), Robert Jones (Yes), Robert Watt (Yes).

****CLOSED SESSION BEGAN AT 2:48 PM****

****CLOSED SESSION ENDED AT 3:57 PM****

Member Robert Jones motioned to reenter Open Session. No objections. Motion carried.

Roll call vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), LaTanya Richardson (Yes), Robert Jones (Yes), Robert Watt (Yes).

A. Legal Opinion. Tying the Ethics Ordinance to a Hearing Dismissal.

No action taken.

B. RAO 2025-01. April 17, 2025 / June 17, 2025. Fact Finding Report. Supplemental Preliminary Analysis,

- C. RAO 2025-04. May 5, 2025. Fact Finding Report. Supplemental Preliminary Analysis,
- E. RAO 2025-06. May 19, 2025. Preliminary Analysis,
- F. RAO 2025-07. June 9, 2025. Preliminary Analysis, and
- G. RAO 2025-08. June 9, 2025. Preliminary Analysis.

Member Robert Jones motioned to dispose of these matters pursuant to 2-5-124(b)(4). No objections. Motion Carried.

- D. RAO 2025-05. May 8, 2025. Preliminary Analysis.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-124(b)(1). No objections. Motion Carried.

- H. Complaint 2025-02. May 5, 2025. Preliminary Analysis.

Member Robert Jones motioned to dispose of this matter pursuant to 2-5-145(b)(1)(b) with explanation. No objections. Motion Carried.

VIII. Executive Director's Report.

- A. FY26 Budget and Proportional Funding.

Executive Director Christal Phillips summarized the budget hearing season and thanked Vice Chairperson David Teeter for attending and advocating for independent counsel. Ms. Phillips stated that the Proportional Funding Resolution was passed, and the Board of Ethics will receive \$308,593 in additional funding for fiscal year 2026, as well as additional funding in both 2027 and 2028, which will permit the addition of staff and further development of the Learning Management System. Ms. Phillips noted that during the hearings, the City Council President stated they would like the Board to hold more meetings.

- B. Board Retreat for Strategic Planning.

Executive Director Christal Phillips discussed plans for the retreat this summer or early fall and noted that the City of Birmingham is considering holding an ethics training this year. Chairperson Dr. Jameel Smith stated that she would like training sooner rather than later to focus on reviewing the recent hearings. Executive Director Christal Phillips advised that training could be scheduled before another hearing is held.

IX. Unfinished Business.

- A. Learning, Training, Website, and Marketing.

Training Specialist Michael O'Connell updated the Board on the status of the contract negotiations for the Learning Management System, the success of the Pistons training event, and advised that the Pistons have agreed to participate in more events in the future.

- B. BOE in the News.

Executive Director Christal Phillips summarized the articles published recently regarding the hearing on Antoine Bryant.

X. New Business.

- A. 2025 COGEL Conference.

Administrative Assistant Christine Connolly advised that the conference will be held in Atlanta, Georgia, from December 7 to December 10.

B. Memo to LPD for Independent Counsel.

Executive Director Christal Phillips thanked Vice Chairperson David Teeter for his advocacy before the City Council regarding independent counsel. Ms. Phillips noted that obtaining independent counsel is possible because the Board has now been given additional funding. She suggested the Board continue conversations with LPD and obtain a memo from LPD on how to best utilize funds to hire independent counsel. Vice Chairperson David Teeter suggested discussion begin with Council President Sheffield.

XI. Announcements.

A. The next General Meeting of the Board of Ethics is Wednesday, May 21, 2025, at 2:00 PM. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XII. Adjournment.

Member Robert Jones motioned to adjourn. No objections. Motion Carried. The meeting was adjourned at 4:16 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
David Teeter, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
Kristin A. Lusn	P
Robert Watt	P
LaTanya Richardson	P

- I. Call to Order: Chairperson Dr. Jameel Smith called the meeting to order at 2:04 PM. A Quorum was established.
- II. Roll Call.
- III. Approval of the Agenda.
Member Robert Jones motioned to approve the agenda. No objections. Motion Carried.
- IV. Period for Public Comment.
No public comments.
- V. Review and Approval of the Minutes.
 - A. Approval of the Meeting Minutes from March 19, 2025. Open Session.
Member Robert Jones motioned to approve the amended minutes from March 19, 2025, Open Session. No objections. Motion Carried.
 - B. Approval of the Meeting Minutes from March 19, 2025. I-2024-01. Closed.
Robert Jones motioned to approve the minutes from March 19, 2025, I-2024-01, Closed. No objections. Motion Carried.
 - C. Approval of the Meeting Minutes from April 16, 2025. Open Session.
Member Robert Jones motioned to approve the minutes from April 16, 2025, Open Session. No objections. Motion Carried.
 - D. Approval of the Meeting Minutes from April 16, 2025. Closed Session.
Member LaTanya Richardson motioned to approve the minutes April 16, 2025, Closed Session. No objections. Motion Carried.
- VI. Reports: Complaints, Requests, and Investigations.
 - A. Letter to the Administration Requesting 2025 Mayoral Disclosures.
Vice Chairperson David Teeter motioned to approve of sending a letter requesting the 2025 Mayoral Disclosures. Member Kristin Lusn seconded the motion. No objections. Motion Carried.
 - B. Request for Legal Opinion. Report on Ethics Ordinance Inconsistencies. Due June 18, 2025.
Executive Director Christal Phillips advised that a letter was sent to Conrad Mallett on April 22, 25 requesting that a legal opinion on the Ethics Ordinance Inconsistencies be provided

by June 18, 2025. James Stump, Law Department, advised the request was received and is being worked on.

VII. Closed Session.

Member Robert Jones motioned to enter Closed Session. Member Dr. Yvette McElroy Anderson seconded the motion.

Roll Call Vote: Chairperson Dr. Jameel Smith, (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusn (Yes), Dr. Yvette McElroy Anderson (Yes), LaTanya Richardson (Yes), and Robert Jones (Yes).

****CLOSED SESSION BEGAN AT 2:15 PM****
(Board Member Robert Watt arrived at 2:41 PM)
****CLOSED SESSION ENDED AT 4:06 PM****

Member Robert Jones motioned to reenter Open Session. Member Kristin Lusn seconded the motion. No objections. Motion carried.

Roll Call Vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), Kirstin Lusn (Yes), LaTanya Richardson (Yes), Robert Jones (Yes).

- A. Legal Opinion. Tying the Ethics Ordinance to a Hearing Dismissal, **and**
- B. Legal Opinion. Public Comment Inquiry on Whether Non-Profit Organizations are Beholden to the Ethics Ordinance.

The Board received communications from the Law Department regarding both matters.

- C. Hearing Outcome for I-2024-01.

Member Kristin Lusn motioned to amend the determination of I-2024-01, adopted on March 19, 2025, based on the opinion from legal counsel that the Board requested referencing 2-5-167, to add that there are not facts sufficient to support a violation. No objections. Motion Carried.

- D. Hearing Outcome for C-2024-15.

Member Kristin Lusn motioned to amend the determination of C-2024-15, adopted on March 19, 2025, based on the opinion from legal counsel referencing 2-5-167, to add that there are not facts sufficient to support a violation. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

- E. RAO 2025-09. Preliminary Analysis. July 3, 2025.

Member Robert Jones motioned to dispose of this matter pursuant to 2-5-124(b)(4). Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

- F. RAO 2025-10. Preliminary Analysis. August 5, 2025.

No action taken.

- G. RAO 2025-11. Preliminary Analysis. July 22, 2025,
- H. RAO 2025-12. Preliminary Analysis. July 14, 2025, **and**

I. RAO 2025-13. Preliminary Analysis. July 23, 2025.

Member Kristin Lusn motioned to dispose of these matters pursuant to 2-5-124(b)(4). Member Robert Jones seconded the motion. No objections. Motion Carried. Vice Chairperson David Teeter motioned to add to the Advisory Opinion as to Item I. that a Disclosure be completed. Member Robert Jones seconded the motion. No objections Motion Carried.

J. RAO 2025-15. Preliminary Analysis. August 13, 2025.

No action taken.

K. Complaint 2024-19. Investigation Status. March 18, 2025 / June 17, 2025.

Vice Chairperson David Teeter motioned to dispose of the Complaint pursuant to 2-5-145(b)(5) and to hold a hearing by June 16, 2025. Member Robert Jones seconded the motion. No objections. Motion Carried.

L. Complaint 2024-20. Investigation Status. March 19, 2025 / June 18, 2025.

No action taken.

M. Complaint 2025-03. Preliminary Analysis. June 24, 2025, and

N. Complaint 2025-04. Preliminary Analysis. July 10, 2025.

Member Kristin Lusn motioned to extend both matters 91 days. Member Robert Jones seconded the motion. No objections. Motion Carried.

VIII. Executive Director's Report.

A. Board Retreat for Strategic Planning Update.

Executive Director Christal Phillips requested suggestions for venue options and dates of Board Member's availability for the retreat.

B. Memo to LPD for Independent Counsel Update.

IX. Unfinished Business.

A. Learning, Training, Website, and Marketing.

Training Specialist Michael O'Connell requested approval of the next podcast. Vice Chairperson David Teeter motioned to approve the release of the podcast episode on Campaign Activities. Member Kristin Lusn seconded the motion. No objections. Motion Carried.

B. BOE in the News.

X. New Business.

A. Board of Ethics Logo and City Brand Guidelines.

B. COGEL Conference Update.

Administrative Assistant Christine Connolly disseminated and requested Board Members review and sign travel authorization forms.

C. Rescheduling September Board of Ethics Meeting.

Executive Director Christal Phillips noted the September meeting will need to be rescheduled as she and Senior Investigator Dawn Widman will be attending a conference. September 10, 2025, was decided upon as a tentative date.

XI. Announcements.

- A. The next General Meeting of the Board of Ethics is Wednesday, June 18, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XII. Adjournment:

Member Robert Jones motioned to adjourn. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried. The meeting was adjourned at 4:16 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
David Teeter, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	E
Kristin Lusn	P
Robert Watt	A
LaTanya Richardson	P

- I. Call to Order.
Chairperson Dr. Jameel Smith called the hearing to order at 2:03 PM.

- II. Roll Call.
Dr. Jameel Smith (Chairperson), David Teeter (Vice Chairperson), Robert Jones (Member), and LaTanya Richardson (Member).

- III. Approval of the Agenda.
Robert Jones motioned to approve the agenda. No objections. Motion carried.

- IV. Period for Public Comment.
Porcha Edwards made public comment.

- V. Hearing on C-2024-19 (Juwana Outlaw v. Council Member Angela Whitfield Calloway)
 - I. Chairperson’s Remarks.

Chairperson, Dr. Jameel Smith remarked that on December 17, 2024, Juwana Outlaw filed a complaint with the Board of Ethics alleging ethical violations by the Respondent, Angela Whitfield Calloway, a City Council member. At the May 21, 2025 General Meeting of the Board of Ethics, in accordance with Section 2-5-145(b)(5) of the Ethics Ordinance, this Board determined that the investigation into Complaint 2024-19 compiled facts sufficient to constitute a possible violation of the Ethics Ordinance, and that the Board would dispose of the Complaint and conduct a hearing with proper notice to determine whether a violation has occurred.

The Complainant was present.

The Respondent requested the Hearing be held in Closed Session.

Member David Teeter (Vice Chairperson) motioned to enter Closed Session for the purpose of conducting the hearing on Complaint 2024-19. Member LaTanya Richardson seconded the motion. No objections. Motion carried.

Roll call vote: Chairperson Dr. Jameel Smith (Yes); Vice Chairperson David Teeter (Yes), LaTanya Richardson (Yes), Robert Jones (Yes).

****CLOSED SESSION HEARING ON COMPLAINT 2024-19 BEGAN AT 2:10 PM**
Member Kristin Lusk arrived at 2:16 PM.**

- II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.
 - B. Opening Statements.
 - C. Testimony.
 - D. Submission of Evidence.
 - E. Rebuttals.
 - F. Closing Statements.
- III. Procedure for Decision.

****CLOSED SESSION HEARING ON COMPLAINT 2024-19 ENDED AT 3:37 PM****

Member Robert Jones motioned to return to Open Session. Vice Chairperson David Teeter seconded the motion. No objections. Motion carried.

Roll call vote: Chair Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusk (Yes), LaTonya Richardson (Yes), Robert Jones (Yes).

Member Robert Jones motioned to enter all evidence and witnesses into the hearing record. Vice Chairperson David Teeter seconded the motion. No objections. Motion carried.

Member Kristin Lusk motioned to reenter Closed Session for Deliberation. Robert Jones seconded the motion. No objections. Motion carried.

Roll call vote: Chair Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusk (Yes), LaTonya Richardson (Yes), Robert Jones (Yes).

****CLOSED SESSION DELIBERATION ON HEARING FOR COMPLAINT 2024-19
BEGAN AT 3:38 PM****

- IV. Deliberation.

****CLOSED SESSION DELIBERATION ON HEARING FOR COMPLAINT 2024-19
ENDED AT 4:07 PM****

Monday, June 16, 2025
City of Detroit
BOARD OF ETHICS
C-2024-19 Hearing
Open Meeting Minutes

Butzel Family Center
7737 Kercheval
Detroit, MI 48214
2:00 p.m. – 4:00 p.m. EST

Member Robert Jones motioned to return to Open Session. No objections. Motion carried.

Roll call vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusn (Yes), LaTonya Richardson (Yes), Robert Jones (Yes).

V. Decision

Member Kristin Lusn motioned to dismiss Complaint 2025-19 pursuant to 2-5-145(b)(1)(b). Member Robert Jones seconded the motion. No objections. Motion carried.

Vice Chairperson David Teeter motioned to adjourn the hearing. Member Kristin Lusn seconded the motion. No objections. Motion carried.

Hearing adjourned at 4:08 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
David Teeter, Vice Chairperson	P
Robert Jones	P
Dr. Yvette McElroy Anderson	P
Kristin A. Lusn	P
Robert Watt	A
LaTanya Richardson	P

- I. Call to Order: Chairperson Dr. Jameel Smith called the meeting to order at 2:03 PM. A Quorum was established.
- II. Roll Call.
- III. Approval of the Agenda.
Vice Chairperson David Teeter motioned to approve the agenda. Member Kristin Lusn seconded. No objections. Motion Carried.
- IV. Period for Public Comment.
No public comments.
- V. Review and Approval of the Minutes.
A. Approval of the Meeting Minutes from May 21, 2025. Open Session.
Vice Chairperson David Teeter motioned to approve minutes from May 21, 2025, Open Session. Member Kristin Lusn seconded. No objections. Motion Carried.
B. Approval of the Meeting Minutes from May 21, 2025. Closed Session.
Member Kristin Lusn motioned to approve the minutes from May 21, 2025, Closed Session. Vice Chairperson David Teeter seconded. No objections. Motion Carried.
- VI. Reports: Complaints, Requests, and Investigations.
A. RAO 2025-17. September 10, 2025.
Executive Director, Christal Phillips, advised the Preliminary Analysis should be available at the July meeting.
- Member Robert Jones motioned to enter Closed Session. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.**
- Roll Call Vote: Chairperson Dr. Jameel Smith, (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusn (Yes), LaTanya Richardson (Yes), Robert Jones (Yes).**

VII. Closed Session.

****CLOSED SESSION BEGAN AT 2:06 PM****
(Member Dr. Yvette McElroy Anderson arrived at 2:14 PM)
****CLOSED SESSION ENDED AT 3:24 PM****

Member Dr. Yvette McElroy Anderson motioned to reenter Open Session. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

Roll Call Vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), Kristin Lusn (Yes), Dr. Yvette McElroy Anderson (Yes), LaTanya Richardson (Yes), Robert Jones (Yes).

A. Legal Opinion. Ethics Ordinance Inconsistencies.

No action taken.

B. RAO 2025-09. July 3, 2025.

Vice Chairperson David Teeter motioned to rescind the Board's previous decision. Member Robert Jones seconded the motion. No objections. Motion Carried. Member Kristin Lusn motioned to dispose of this matter pursuant to 2-5-124(b)(1). Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

C. RAO 2025-10. Preliminary Analysis. August 5, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-124(b)(4) with encouragement to the Requestor to submit Disclosure form(s). Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion Carried.

D. RAO 2025-12. Discussion to Issue Opinion. July 14, 2025.

Vice Chairperson David Teeter motioned to rescind the Board's previous decision. Member Robert Jones seconded the motion. No objections. Motion Carried. Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-124(b)(1). Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion Carried.

E. RAO 2025-15. Preliminary Analysis. August 13, 2025.

Member Kristin Lusn motioned to dispose of this matter pursuant to 2-5-124(b)(4), with encouragement to the Requestor to submit Disclosure form(s). Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

F. RAO 2025-16. Preliminary Analysis. August 22, 2025.

No action taken.

G. Complaint 2024-20. Investigation Status. March 19, 2025 / June 18, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-145(b)(1)(b) and (e). Member Kristin Lusn seconded the motion. No objections. Motion Carried.

H. Complaint 2025-03. Preliminary Analysis. June 24, 2025 / September 23, 2025.

Member Robert Jones motioned to dispose of this matter pursuant to 2-5-145(b)(1)(a). Member Dr. Yvette McElroy Anderson seconded the motion. No objections. Motion Carried.

I. Complaint 2025-04. Preliminary Analysis. July 10, 2025 / October 9, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-145(b)(1)(b). Member Kristin Lusn seconded the motion. No objections. Motion Carried.

J. Complaint 2025-05. Preliminary Analysis. September 2, 2025.

Member Dr. Yvette McElroy Anderson motioned to dispose of this matter pursuant to 2-5-145(b)(1)(a). Member Robert Jones seconded the motion. No objections. Motion Carried.

VIII. Executive Director's Report.

A. Board Retreat for Strategic Planning Update.

Executive Director Christal Phillips advised Member Dr. Yvette McElroy Anderson secured a facility at WCCC for the Board retreat, with a tentative date of Friday, October 3, 2025.

B. Memo to LPD for Independent Counsel Update.

Executive Director Christal Phillips advised that after meeting with Council Member Gabriella Santiago Romero, the Council Member has agreed to submit a memo to the Legislative Policy Division to analyze ways in which the Board can obtain independent counsel.

IX. Unfinished Business.

A. Learning, Training, Website, and Marketing.

Training Specialist Michael O'Connell encouraged the Board to review section 2-5-104, regarding limitations on partisan political activities due to the upcoming elections noting that there are campaign contribution limits for Board members. Mr. O'Connell reminded the Board members not to register their Ethics email accounts for anything other than Board of Ethics/City of Detroit business. Mr. O'Connell reported that the LSM contract appears to have stalled out and may not be implemented for approximately 12 months. Mr. O'Connell advised the next podcast will be on post-employment issues which will be ready for approval in July. He encouraged the Board to consider podcast topics outside the Standards of Conduct for future podcasts. Lastly, Mr. O'Connell noted that "best practices" guidance papers for subject matter other than campaign activities, may be beneficial if the Board deems same appropriate.

B. BOE in the News.

Executive Director Christal Phillips advised two articles were recently in the news, one was a Detroit Free Press article regarding a FOIA request relating to Mayor Duggan and the other was in the Bridge Detroit Newsletter regarding the hearing recently held on Complaint 2024-19.

X. New Business.

A. COGEL Conference Update.

Administrative Assistant Christine Connolly advised requests for travel will be submitted at the end of June.

B. Board of Ethics Logo and City Brand Guidelines.

Executive Director Christal Phillips advised that the department recently became aware that the current Board of Ethics logo is reportedly not in keeping with the City’s branding guidelines. A discussion was held and no action was deemed necessary at this time.

C. Special Presentation.

Executive Director Christal Phillips presented a Spirit of Detroit award to outgoing Board member Kristin Lusn. Outgoing Board member Robert Watt also received an award; however, he was not present to receive it. Ms. Phillips noted that new potential Board members are being interviewed by City Council and will be put forward for a vote within the next couple of weeks. A Mayoral nominee has not been received to date.

XI. Announcements.

A. The next General Meeting of the Board of Ethics is Wednesday, July 16, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XII. Adjournment:

Member Dr. Yvette McElroy Anderson motioned to adjourn. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried. The meeting was adjourned at 3:54 PM.

Board Members:

Dr. Jameel Smith, Chairperson	E
David Teeter, Vice Chairperson	P
Dr. Yvette McElroy Anderson	P
LaTanya Richardson	P
Raymond Card	P
Vacant	
Vacant	

I. Call to Order: Vice Chairperson David Teeter called the meeting to order at 2:05 PM. A Quorum not being present, the Board decided to hear public comment.

II. Roll Call.

IV. Period for Public Comment. (Member LaTanya Richardson arrived at 2:07 PM.)
Reverend Lucious Conway and Ruben Crowley made public comment.

****ADJOURNED TO CALL OF THE CHAIR AT 2:14 PM****
****BACK IN SESSION AT 2:40 PM****

Roll Call: Vice Chairperson David Teeter, Dr. Yvette McElroy Anderson, LaTanya Richardson, Raymond Card.

III. Approval of the Agenda.

Member Raymond Card motioned to approve the agenda. No objections. Motion Carried.

V. Review and Approval of the Minutes.

A. Approval of the Meeting Minutes from March 19, 2025. C-2024-15 Hearing. Open.
Member Raymond Card motioned to approve a record previously adopted, meeting minutes from March 19, 2025, Hearing. Open. No objections. Motion Carried.

- B. Approval of the Meeting Minutes from June 16, 2025. C-2024-19 Hearing. Open,
- C. Approval of the Meeting Minutes from June 16, 2025. C-2025-19 Hearing. Closed,
- D. Approval of the Meeting Minutes from June 18, 2025. Open Session, and
- E. Approval of the Meeting Minutes from June 18, 2025. Closed Session.

Member Raymond Card motioned to approve the minutes from June 16, 2025, C-2024-19 Hearing, Open and Closed, and June 18, 2025, Open and Closed Session. No objections. Motion Carried.

VI. Reports: Complaints, Requests, and Investigations.

A. Update to the Board's Request for 2025 Mayoral Disclosures.

Executive Director, Christal Phillips, advised that Corporation Counsel Conrad Mallet submitted the 2024 Mayoral Disclosures despite the Board's request for the 2025 Mayoral

Disclosures. Ms. Phillips further advised Mr. Mallet stated that the 2025 Mayoral Disclosure process would begin after Labor Day.

B. Memo to City Council: Requirements of the Board of Ethics Members.

Executive Director, Christal Phillips, advised that a memo was submitted to City Council advising of Board Member requirements.

C. Memo to LPD for Independent Counsel.

Executive Director, Christal Phillips, advised that Council Member Gabriela Santiago Romero submitted a memo to the Legislative Policy Division (LPD) requesting an analysis regarding how the Board of Ethics can hire independent legal counsel. LPD advised their analysis will be completed when City Council returns from recess.

D. Board Request: Preliminary Analysis Template.

Executive Director, Christal Phillips, advised an RAO template was created based on the Board's request. Law Department representative James Stump requested that the Law Department have an opportunity to review the template before being adopted by the Board. Member Dr. Yvette McElroy Anderson motioned to bring this matter back at the September 2025 Board meeting. No objections. Motion Carried.

E. Memo: Request to Open Investigation.

Executive Director, Christal Phillips, summarized the memo to open an investigation into Alvin Horhn, Deputy CFO in the Assessor's office and schedule a hearing.

Member Raymond Card motioned to initiate an investigation pursuant to 2-5-161(b). No objections. Motion Carried.

Member Dr. Yvette McElroy Anderson motioned to add I-2025-01 to Closed Session as Item H., for the purpose of scheduling a hearing due to the admission made during a City Council session.

F. Memo: Request to Open Investigation.

Executive Director, Christal Phillips, summarized the memo to open an investigation into Councilmember Angela Whitfield Calloway.

Member Raymond Card motioned to table this matter until the September 2025 Board meeting. No objections. Motion Carried.

Member Dr. Yvette McElroy Anderson motioned to enter Closed Session. No objections. Motion Carried.

Roll Call Vote: Vice Chairperson David Teeter (Yes), Dr. Yvette McElroy Anderson (Yes), LaTanya Richardson (Yes), Raymond Card (Present).

VII. Closed Session.

****CLOSED SESSION BEGAN AT 3:28 PM****

****CLOSED SESSION ENDED AT 4:25 PM****

Member Yvette McElroy Anderson motioned to reenter Open Session. No objections. Motion Carried.

Roll Call Vote: Vice Chairperson David Teeter (Yes), Dr. Yvette McElroy Anderson (Yes), LaTanya Richardson (Yes), Raymond Card (Yes).

A. Legal Opinion. Ethics Ordinance Inconsistencies.

Member Raymond Card motioned for a legal opinion relative to one of the questions contained therein.

B. RAO 2025-16. Preliminary Analysis. August 22, 2025.

Member Dr. Yvette McElroy Anderson motioned to dispose of this matter pursuant 2-5-124(b)(4) and include a verbal notice to the Requestor. No objections. Motion Carried.

C. RAO 2025-17. Preliminary Analysis. September 10, 2025.

Member LaTanya Richardson motioned to dispose of this matter pursuant to 2-5-124(b)(4) and include information regarding the one-year post employment provision of the ordinance. No objections. Motion Carried.

Member LaTonya Richardson motioned to request a legal opinion on withdrawing a Request for an Advisory Opinion before the Board of Ethics. No objections. Motion Carried.

D. RAO 2025-18. Preliminary Analysis. September 15, 2025.

Member Raymond Card motioned to dispose of this matter pursuant to 2-5-124(b)(1) and include information on requesting training for clarifications on the Ethics Ordinance. No objections. Motion Carried.

E. Complaint 2025-06. Preliminary Analysis. September 19, 2025.

Member Raymond Card motioned to dispose of this matter pursuant to 2-5-145(b)(3)(a). No objections. Motion Carried.

F. Complaint 2025-07. Preliminary Analysis. September 30, 2025.

Member Dr. Yvette McElroy Anderson motioned to dispose of this matter pursuant to 2-5-145(b)(1)(b) and include information to the Respondent regarding potential additional Disclosure(s). No objections. Motion Carried.

G. Complaint 2025-08. Preliminary Analysis. October 20, 2025.

Member Dr. Yvette McElroy Anderson motioned to dispose of this matter pursuant to 2-5-145(b)(2). No objections. Motion Carried.

H. I-2025-01.

Member Raymond Card motioned to dispose of this matter pursuant to 2-5-166(4). No objections. Motion Carried.

VIII. Executive Director's Report.

A. New Board Member and Vacancies.

Executive Director Christal Phillips welcomed new Board Member Raymond Card. Mr. Card introduced himself to the Board. Ms. Phillips advised that the Mayor's office has two board member positions to fill.

B. Rescheduling September Board Meeting.

Executive Director Christal Phillips advised the September meeting needed to be rescheduled due to two staff traveling for training. The Board agreed to reschedule the meeting for September 10, 2025.

C. Board Retreat for Strategic Planning.

Executive Director Christal Phillips updated the Board on the venue selection, Wayne County Community College Northwest Campus, for the Retreat tentatively scheduled for October 3, 2025. Ms. Phillips also updated the Board on the consulting companies interviewed to present at the Retreat.

IX. Unfinished Business.

A. Learning, Training, Website, and Marketing.

Training Specialist Michael O’Connell updated the Board on the Learning Management System’s (LMS) development and advised of the tentative release date for the LMS to the training population in mid-January. Mr. O’Connell advised the Board of plans to incorporate the LMS training into the agenda for the new City Council’s Orientation in January. Mr. O’Connell updated the Board regarding the Post-Employment provision podcast in need of Board approval. Mr. O’Connell updated the Board on the renewal of the Detroit Pistons partnership. Mr. O’Connell advised the Board that he was nominated for the COGEL Board of Directors, which may require travel in the future.

Member Raymond Card motioned to approve the Post-Employment Provision podcast. No objections. Motion Carried.

B. BOE in the News.

Executive Director Christal Phillips summarized the two articles regarding the Board of Ethics published by Bridge Detroit in August 2025 and the other by M.L. Elrick in July 2025.

X. New Business.

A. 2025 COGEL Conference.

Administrative Assistant Christine Connolly advised registration fees have been paid and hotel reservations secured. Flight reservations will be made in the last week of September. The conference is 12/7/25 through 12/10/25, travel dates will be 12/6/25 and 12/10/25.

XI. Announcements.

A. The next General Meeting of the Board of Ethics is Wednesday, September 10, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XII. Adjournment:

Member Dr. Yvette McElroy Anderson motioned to adjourn. No objections. Motion Carried. The meeting was adjourned at 4:43 PM.

Board Members:

Dr. Jameel Smith, Chairperson	P
David Teeter, Vice Chairperson	P
Dr. Yvette McElroy Anderson	E
LaTanya Richardson	P
Raymond Card	P
Vacant	
Vacant	

I. Call to Order: Vice Chairperson David Teeter called the meeting to order at 2:10 PM. A Quorum not being present, the Board decided to hear public comment.

II. Roll Call.

IV. Period for Public Comment.
No public comment made.

****ADJOURNED TO CALL OF THE CHAIR AT 2:11 PM**
(Chairperson Dr. Jameel Smith arrived at 2:27 PM)
BACK IN SESSION AT 2:29 PM**

III. Approval of the Agenda.

Vice Chairperson David Teeter motioned to approve the agenda with the noted amendment. Member Raymond Card seconded the motion. No objections. Motion Carried.

V. Review and Approval of the Minutes.

A. Approval of the Meeting Minutes from August 20, 2025. Open Session.

Vice Chairperson David Teeter motioned to approve the meeting minutes from August 20, 2025, Open Session. Member Raymond Card seconded the motion. No objections. Motion Carried.

B. Approval of the Meeting Minutes from August 20, 2025. Closed Session.

Vice Chairperson David Teeter motioned to approve the meeting minutes from August 20, 2025, Closed Session. Member Raymond Card seconded the motion. No objections. Motion Carried.

VI. Reports: Complaints, Requests, and Investigations.

A. Board Request: Preliminary Analysis Template.

Executive Director, Christal Phillips, advised the template was presented at last month's meeting per the Board's request and brought back following discussion of the Law Department providing feedback. James Stump, Law Department, advised he was opposed to the template, but agreed to review the template and provide feedback.

B. Memo: Request to Open Investigation into Councilmember Angela Whitfield-Calloway.

Executive Director, Christal Phillips, advised this matter was brought back from last week's meeting for the Board's consideration.

Vice Chairperson David Teeter motioned to open an Investigation 2025-02. Member Raymond Card seconded the motion. Chairperson Dr. Jameel Smith opposed the motion. Motion Carried.

C. Request for Legal Analysis: Individuals Serving on Multiple Boards.

Executive Director, Christal Phillips, summarized a request made by Councilmember Latisha Johnson on this topic and noted this may be applicable to the Board and warrant a similar request.

Vice Chairperson David Teeter motioned to request a legal analysis regarding individuals serving on multiple boards. Member LaTanya Richardson seconded the motion. No objections. Motion Carried.

Member Raymond Card motioned to enter Closed Session to discuss Items A. through G. and I-2025-02 as Item H. Vice Chairperson David Teeter seconded the motion. No objections. Motion Carried.

Roll Call Vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Yes), LaTanya Richardson (Yes), Raymond Card (Yes).

VII. Closed Session.

****CLOSED SESSION BEGAN AT 2:58 PM****

****CLOSED SESSION ENDED AT 3:45 PM****

Vice Chairperson David Teeter motioned to reenter Open Session. Member Raymond Card seconded the motion. No objections. Motion Carried.

Roll Call Vote: Chairperson Dr. Jameel Smith (Yes), Vice Chairperson David Teeter (Present), LaTanya Richardson (Yes), Raymond Card (Yes).

- A. Request for Legal Analysis: What Allows Requestors to Withdraw an RAO?;
- B. Request for Legal Analysis: Judicial Due Process in the Hearing Process and Ability to Assess Fines if a Violation Does Not Rise to a Misdemeanor;
- C. Complaint 2025-06. Investigation Status;
- G. Investigation 2025-01. Preliminary Analysis Pending. Investigation Status; **and**
- H. Investigation 2025-02.

No action taken.

D. Complaint 2025-09. Preliminary Analysis. November 13, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-145(b)(1)(b). Member Raymond Card seconded the motion. No objections. Motion Carried.

E. Complaint 2025-10. Preliminary Analysis. November 13, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-145(b)(1)(a). Member Raymond Card seconded. No one was in favor of the motion, and it did not pass.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-145(b)(1)(a) with a letter of guidance referencing 2-5-142(b) from the Executive Director regarding harassment and accusations without fact and notification that further Complaints from this Complainant will be reviewed for merit prior to being forwarded to the Board for consideration. Member Raymond Card seconded the motion. No objections. Motion Carried.

F. RAO 2025-19. Preliminary Analysis. November 21, 2025.

Vice Chairperson David Teeter motioned to dispose of this matter pursuant to 2-5-124(b)(4) with guidance from the Executive Director not to disclose confidential information based upon City employment, as well as not appearing before City Council or making requests of City Council, on behalf of the Requestor's new employer for one year.

VIII. Executive Director's Report.

A. Mayoral Board Vacancies.

Executive Director, Christal Phillips, advised there are two Mayoral vacancies on the Board of Ethics and no information has been received from the Mayor's office regarding appointments since August 2025. Executive Director Phillips noted it was undetermined if the vacancies would be filled before the new administration.

B. New Board of Ethics Hire.

Executive Director, Christal Phillips, advised a new Marketing and Outreach Coordinator Brandon Flynn was hired and will begin September 22, 2025.

C. Board Retreat for Strategic Planning.

Executive Director, Christal Phillips, advised the Retreat will be held Friday, October 3, 2025, and provided time, location, and general information.

****ADJOURNED TO CALL OF THE CHAIR AT 3:55 PM****

****BACK IN SESSION AT 3:55 PM****

D. LPD Memo Relative to Inquiry into Separate Legal Counsel for Independent Agencies. **Executive Director, Christal Phillips, advised the Internal Operations Standing Committee received and filed a confidential memorandum from the Legislative Policy Division analyzing independent counsel for Independent Agencies. Executive Director Phillips and the Board discussed options for moving forward to obtain access to the memoranda.**

E. Campaign Contributions and Expenditures Disclosures.

Executive Director, Christal Phillips, advised City Council were reminded to submit their campaign contributions and expenditures disclosures via memoranda.

F. Update to the Board's Request for 2025 Mayoral Disclosures.
Executive Director, Christal Phillips, advised the Board on the status of the Board's request for 2025 Mayoral Disclosures, which have not been received.

IX. Unfinished Business.

A. Learning, Training, Website, and Marketing.

Training Specialist, Michael O'Connell, updated the Board on the development of the Learning Management System (LMS), working with UKG and UltiPro Detroit Team on its development, the need to update the LMS contract due to an anticipated expenditure for technology that now cannot be used. Mr. O'Connell advised the anticipated release date for the LMS is the week of January 19, 2026. Mr. O'Connell advised the new Marketing and Outreach Coordinator will be assisting in the development of LMS training and outreach efforts and that the Board will be purchasing a new camera for these purposes.

B. BOE in the News.

Executive Director, Christal Phillips, advised there was one article referencing the Board of Ethics by Outlier Media on August 28, 2025.

X. New Business.

A. 2025 COGEL Conference.

Administrative Assistant, Christine Connolly, advised flight reservations for COGEL will be made in the month of October. The conference is 12/7/25 through 12/10/25, travel dates will be 12/6/25 and 12/10/25.

XI. Announcements.

A. The next General Meeting of the Board of Ethics is Wednesday, October 15, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.

XII. Adjournment:

Vice Chairperson David Teeter motioned to adjourn. Member Raymond Card seconded the motion. No objections. Motion Carried. The meeting was adjourned at 4:06 PM.

Board Members:

Dr. Jameel Smith, Chairperson	A
David Teeter, Vice Chairperson	P
Dr. Yvette McElroy Anderson	E
LaTanya Richardson	P
Raymond Card	P
Vacant	
Vacant	

- I. Call to Order: Vice Chairperson David Teeter called the meeting to order at 2:06 PM. A Quorum not being present, the Board decided to hear public comment.
- II. Roll Call.
- III. Approval of the Agenda.
- IV. Period for Public Comment.
Monica Hunt, counsel for the Respondent in I-2025-02, summarized the response submitted on her client's behalf.
- V. Hearing on I-2025-01. (Alvin Horhn)
 - I. Chairperson's Remarks.
 - II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.
 - B. Opening Statements.
 - C. Testimony.
 - D. Submission of Evidence.
 - E. Rebuttals.
 - F. Closing Statements.
 - III. Procedure for Decision.
 - IV. Deliberation. (Closed Session).
 - V. Decision.
- VI. Review and Approval of the Minutes
 - A. Approval of the Meeting Minutes from September 10, 2025. Open Session.
 - B. Approval of the Meeting Minutes from September 10, 2025. Closed Session.
- VII. Reports: Complaints, Requests, and Investigations.
 - A. Update to the Board's Request for Mayoral Disclosures.
 - B. Request for Legal Analysis: Judicial Due Process in the Hearing Process and Ability to Assess Fines if a Violation Does Not Rise to a Misdemeanor.
 - C. RAO 2025-22. Preliminary Analysis Needed. Due October 7, 2025.

- VIII. Closed Session.
- A. Request for Legal Analysis: What Allows Requestors to Withdraw an RAO?
 - B. Request for Legal Analysis: Individuals Serving on Multiple Boards.
 - C. RAO 2025-20. December 19, 2025. Preliminary Analysis.
 - D. RAO 2025-21. December 23, 2025. Preliminary Analysis.
 - E. Complaint 2025-11. December 9, 2025. Preliminary Analysis.
 - F. Complaint 2025-12. December 30, 2025. Preliminary Analysis.
 - G. Investigation 2025-01. Preliminary Analysis.
 - H. Investigation 2025-02. Preliminary Analysis.
- IX. Executive Director's Report.
- A. Mayoral Board Vacancies.
Executive Director Christal Phillips apologized for the lack of quorum and noted that the Board of Ethics two Mayoral vacancies have been awaiting appointments since July 2025.
 - B. Update to LPD Memo into Separate Legal Counsel for Independent Agencies.
 - C. Request for Campaign Contributions and Expenditures Disclosures.
- X. Unfinished Business.
- A. Learning, Training, Website, and Marketing.
 - B. BOE in the News.
- XI. New Business.
- A. COGEL Conference.
- XII. Announcements.
- A. The next General Meeting of the Board of Ethics is Wednesday, November 19, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.
- XIII. Adjournment:
Vice Chairperson David Teeter moved to adjourn. No objections. Motion Carried. The meeting was adjourned at 2:11 PM.

Board Members:

David Teeter, Vice Chairperson	P
Dr. Yvette McElroy Anderson	P
LaTanya Richardson	E
Raymond Card	P
David Sanchez	P
Vacant	
Vacant	

I. Call to Order: Vice Chairperson David Teeter called the meeting to order at 2:36 PM.

II. Roll Call.

III. Approval of the Agenda.

Member Dr. Yvette McElroy Anderson moved to approve the agenda with Item D. in Section VII., moved to Closed Session as Item K. and Item I. in Closed Session moved before V. Hearing on I-2025-01. (Alvin Horhn). No objections. Motion Carried.

IV. Period for Public Comment.

Public comment was made by representatives of the Coalition for Property Tax Justice to include Professor Bernadette Atuahene; Michael Hartt; Zyronica Smith; Rebecca Anderson; Duane Daniels; Damond Williams; Thomas M. Lewis; and Tahira Ahmad. Professor Bernadette Atuahene presented a memorandum to be included with public comment. Alvin Horhn also made public comment.

Member Raymond Card moved to go into Closed Session for a confidential discussion of the Preliminary Analysis on I-2025-01.

Roll Call Vote: Dr. Yvette McElroy Anderson (Support); David Sanchez (Support); Raymond Card (Support) and Vice Chairperson David Teeter (Support).

****CLOSED SESSION BEGAN AT 2:57 PM****

****CLOSED SESSION ENDED AT 3:09 PM****

Member Raymond Card moved to reenter Open Session.

Roll Call Vote: Dr. Yvette McElroy Anderson (Support); David Sanchez (Support); Raymond Card (Support) and Vice Chairperson David Teeter (Support).

V. **Hearing on I-2025-01. (Alvin Horhn)**

I. Chairperson's Remarks.

Vice Chairperson David Teeter called the hearing to order at 3:11 PM.

Vice Chairperson David Teeter remarked that on August 20, 2025, the Board opened an investigation and scheduled a hearing for Mr. Horhn, the Deputy CFO/Assessor, for possible violations of the ethics ordinance due to his admission at a Budget, Finance & Audit (BFA) Committee Meeting held on June 4, 2025, that Mr. Horhn approved a waiver of penalties without City Council review and approval. This hearing is to determine whether the Respondent has violated Sections 2-5-61. Willful neglect of duty prohibited. and 2-5-66. Improper use of official position prohibited.

The Respondent requested the Hearing be held in Closed Session.

Member Dr. Yvette McElroy Anderson moved to enter Closed Session for the purpose of conducting the hearing on I-2025-01.

Roll Call Vote: Dr. Yvette McElroy Anderson (Support); David Sanchez (Support); Raymond Card (Support) and Vice Chairperson David Teeter (Support).

**** CLOSED SESSION BEGAN AT 3:13 PM ****

- II. Presentation of Evidence & Witnesses.
 - A. Chairperson Swears in Witnesses.
 - B. Opening Statements.
 - C. Testimony.
 - D. Submission of Evidence.
 - E. Rebuttals.
 - F. Closing Statements.
- III. Procedure for Decision.
- IV. Deliberation (Closed Session).

**** CLOSED SESSION ENDED 4:11 PM ****

Member Raymond Card moved to reenter Open Session. No objections. Motion Carried.

Roll Call Vote: Dr. Yvette McElroy Anderson (Support); David Sanchez (Support); Raymond Card (Support) and Vice Chairperson David Teeter (Support).

V. Decision.

Member Dr. Yvette McElroy moved to find the Respondent in violation of Section 2-5-61, Willful Neglect of Duty Prohibited, and adopt a resolution of public admonition pursuant to Section 2-5-168(a), with no further action. No objections. Motion Carried.

Member Raymond Card moved to accept and enter into the record all hearing evidence and witnesses. No objections. Motion Carried.

Vice Chairperson David Teeter adjourned the hearing at 4:17 PM.

Member David Sanchez moved to extend all matters on the agenda expiring before March 3, 2026. No objections. Motion Carried.

Member Raymond Card moved to extend C-2025-14, RAO-2025-24, RAO-2025-25, and ROA-2025-26.

Member Dr. Yvette McElroy Anderson left at 4:21 PM and due to a loss of Quorum, the meeting was ended.

~~VI. Review and Approval of the Minutes.~~

- ~~A. Approval of the Meeting Minutes from September 10, 2025. Open Session.~~
- ~~B. Approval of the Meeting Minutes from September 10, 2025. Closed Session.~~
- ~~C. Approval of the Meeting Minutes from October 13, 2025. Open Session.~~

~~VII. Reports: Complaints, Requests, and Investigations.~~

- ~~A. Update to the Board's Request for Mayoral Disclosures.~~
- ~~B. Request for Legal Analysis: Judicial Due Process in the Hearing Process and Ability to Assess Fines if a Violation Does Not Rise to a Misdemeanor.~~
- ~~C. RAO-2025-23. Preliminary Analysis Needed. Due November 7, 2025.~~
- ~~D. Complaint 2025-13. Preliminary Analysis Needed. Due November 12, 2025. (Moved to Closed Session, as Item K.)~~

~~VIII. Closed Session.~~

- ~~A. Request for Legal Analysis: What Allows Requestors to Withdraw an RAO?;~~
- ~~B. Request for Legal Analysis: Individuals Serving on Multiple Boards;~~
- ~~C. RAO 2025-20. December 18, 2025. Preliminary Analysis.~~
- ~~D. RAO 2025-21. December 23, 2025. Preliminary Analysis.~~
- ~~E. RAO 2025-22. December 23, 2025. Preliminary Analysis.~~
- ~~F. Complaint 2025-06. September 19, 2025.~~
- ~~G. Complaint 2025-11. December 9, 2025. Preliminary Analysis.~~
- ~~H. Complaint 2025-12. December 30, 2025.~~

- ~~I. Investigation 2025-01. November 21, 2025. Preliminary Analysis. (Matter taken prior to commencement of hearing on I-2025-01.)~~
- ~~J. Investigation 2025-02. December 11, 2025. Preliminary Analysis.~~
- ~~K. Complaint 2025-13. Preliminary Analysis Needed. Due November 7, 2025. (Moved from Section VII. Item D.)~~

- ~~IX. Executive Director's Report.~~
 - ~~A. Mayoral Board Vacancies.~~
 - ~~B. Update to LPD Memo into Separate Legal Counsel for Independent Agencies.~~
 - ~~C. Request for Campaign Contributions and Expenditures Disclosures.~~
 - ~~D. Re:Con Conference Ethics Presentation.~~

- ~~X. Unfinished Business.~~
 - ~~A. Learning, Training, Website, and Marketing.~~
 - ~~B. BOE in the News.~~

- ~~XI. New Business.~~
 - ~~A. 2025 COGEL Conference.~~

- ~~XII. Announcements.~~
 - ~~A. The next General Meeting of the Board of Ethics is Wednesday, November 19, 2025, at 2:00 pm. The location is the Butzel Family Center, 7737 Kercheval, Detroit, MI 48214.~~

- ~~XIII. Adjournment.~~

MEMORANDUM

TO: Detroit City Councilmembers & Legislative Policy Division
FROM: The Coalition for Property Tax Justice
DATE: November 10, 2025
SUBJECT: Deficiencies in Detroit's Assessment Administration under City Assessor Alvin Horhn and Required Corrective Action

Under the leadership of Alvin Horhn, Detroit's Assessment Division persists in violating Michigan law and State Tax Commission (STC) requirements. More specifically, the office has systematic depreciation errors, poor Economic Condition Factor (ECF) analysis, assessment notice deficiencies, mishandles Principal Residence Exemptions, and does not update the Detroit BS&A system. In addition, Alvin Horhn does not have the state certification commensurate with his position and is under a Detroit Board of Ethics review. These transgressions perpetuate property tax injustice. Detroit needs to bring its procedures into conformance with the STC Assessor's Manual, hire an assessor that holds the proper certifications, and reinstate due process for taxpayers.

Problems

Horn Does Not Have MMAO Certification

Under State Tax Commission (STC) certification rules and Michigan law,¹ only individuals who hold an MMAO certification can act as the assessor of record and sign an assessment roll with a State Equalized Value (SEV) at Detroit's scale — greater than or equal to \$3.7 billion, or with commercial, industrial, and utility SEV plus special acts properties totaling at least 20 percent of that amount (approximately \$747 million). Candidates must complete a one-year program to achieve the MMAO certification, which includes four advanced courses, an appraisal report, and both a written and project-based examination, all requiring a passing score of 75 percent or higher.

Alvin Horhn has not passed the required Michigan Master Assessing Officer (MMAO) examination. While Michigan law allows for an assessing district that does not have a qualified assessor to employ one to verify and sign the assessment roll,² as Detroit currently does, this is an unorthodox practice that puts Detroiters at a disadvantage compared to residents of peer cities,

1

<https://www.michigan.gov/treasury/-/media/Project/Websites/treasury/STC/Education-Classes/How-to-Become-a-Certified-Assessor-in-the-State-of-Michigan.pdf>; MCL 211.10d(7)

² MCL 211.10d(6)

who benefit from having a fully qualified assessor oversee every component of their assessment process.

- **Remedial Step:** Remove Alvin Horhn as the City Assessor and install a certified MMAO as assessor of record immediately.

Systematic Errors in Depreciation

The Michigan Assessors Manual instructs assessors to calculate the depreciation of a house in average condition at a standard rate of 1% for each year of age, up to 55 years.³ For instance, a home that is 55 years old or older has a depreciation rate of 55%, so it should be valued at 45% of its original value. This 1% depreciation rate is the objective standard and deviations from this standard should be rare. The City of Detroit, however, does not base depreciation rates on this standardized formula, nor does it report which formula(s) it uses. This practice inflates property tax assessments for older homes and depresses it for newer homes, contributing to regressivity in the City. Because most Detroit homes are old, the practice systematically over assesses many properties.

- **Remedial Step:** Direct Alvin Horhn's Assessment Division to automatically default to the STC age-based table for all residential structures except when documentation of extraordinary maintenance, extensive remodeling, or extraordinary obsolescence by in-person inspection is received. Require full photo documentation and work-order substantiation to support any exception, and maintain those exceptions in a publicly kept log.

Economic Condition Factor (ECF) Analysis is Poor

When assessing property values, the Office of the Assessor only physically inspects about 20% of Detroit houses each year.⁴ To determine the value of the remaining 80% of properties, the Office of the Assessor divides the city into ECF neighborhoods, which are presumed to contain similar homes, based on an ECF analysis.⁵ The ECF is a multiplier calculated by valid arms-length sales of similar homes within the past 24 months.⁶ However, ECF neighborhoods do not produce correct estimates because Horhn and his Assessment Division often group homes together which contain significant dissimilarities. For instance, by including multi-unit dwellings in the same ECF neighborhood as single family homes, this skews values because there is no apples to apples comparison. Additionally, Alvin Horhn's Assessment Division currently only uses warranty deeds in their ECF analysis, ignoring the impact of other transfers of ownership such as quitclaim deeds, which is how most property is transferred in Detroit. This also improperly inflates values.

³ MCL 211.10e (requiring assessing officers to use the official Michigan Assessors Manual, or a manual consistent with the Michigan Assessors Manual that is approved by the state tax commission).

⁴ STATE TAX COMM'N, MICH. ASSESSORS MANUAL, VOL. III, at 40-42 (2018), https://www.michigan.gov/-/media/Project/Websites/treasury/MISC_7/Merged_Volume_III_With_All_Edits_051817.pdf?rev=c3fd59d67f4ed09d6d8a5fab298c80

⁵ *Id.*

⁶ *Id.*

- **Remedial Step #1:** Mandate that the Assessment Division NOT use only warranty deeds in their ECF analysis.
- **Remedial Step #2:** Ensure that the ECF analysis is comparing apples with apples, rather than doing things like treating single family residences and multi unit homes similarly.

Assessment Notices are Deficient

The City of Detroit continues to mail assessment notices that do not comply with the Property Tax Reform Ordinance passed in Nov. 2023. The notice still lacks:

- (1) Clear mailing date
- (2) Plain-language explanation of changes in assessed value, beyond simply stating “market value.” Examples could include “neighborhood’s home values increased in aggregate,” “home renovations,” or “assessor re-evaluated home characteristics.”
- (3) The HOPE/Poverty Tax Exemption percentage on record as of February 1
- (4) Legally accurate appeal language. The notices, for example, should state “any person considering themselves aggrieved by reason of this assessment may appeal this assessment” in the Assessor’s Review section. The current notices should not have language stating “only the taxpayer of record or an authorized agent can file the appeal.”
- (5) A direct link to an FAQ which must include at least the following questions: “How do I calculate if the City is over assessing my property;” “What is a property tax assessment appeal;” “When and how can I file a property tax appeal for residential real property;” “What types of arguments can I include in my property tax appeal;” “What is Detroit’s millage rate;” “How can I estimate my property tax bill;” and “What are free property tax assistance resources available in Detroit.”

The current format suppresses Detroit residents’ ability to understand their property tax assessment or file a property tax assessment appeal.

- **Remedial Step:** Publish a revised notice template that complies with Council requirements.

Principal Residence Exemptions Mishandled

Alvin Horhn’s Assessment Division mishandles the Principal Residence Exemption (PRE) in two ways.

First, it allows properties owned by Limited Liability Companies (LLCs) to improperly claim the PRE, although this is expressly against the law.⁷ According to the City of Detroit’s Current Parcel list, last updated June 10th, 2025, there are 731 parcels with a partial or full PRE where the taxpayer listed is an LLC. The reported taxable value for each of these 731 parcels multiplied

⁷ MCL 211.7dd (defining “owner” as an individual person, distinguishable from an LLC, for purposes of PRE eligibility under MCL 211.7cc); *VanderWerp v. Plainfield Charter Township*, 278 Mich. App. 624 (2008) (confirming that a business entity such as an LLC does not meet the statutory definition of “person” and therefore cannot qualify for the PRE).

by the maximum 18 mills reduction multiplied by the percentage of the PRE received (100% = full exemption, 0% = no exemption) yields \$332,431.7 in lost tax revenue for the City of Detroit.

Second, eligible homeowners risk losing their PRE due to burdensome verification requirements and unclear communication imposed by Alvin Horhn's Assessment Division. In 2023, Detroit mailed around 6,000 audit letters asking owners to verify occupancy. A spokesperson from the Office of the Assessor revealed that the response rate was only 40-50%, meaning that up to 60% of audited households, many of whom may have been eligible, lost their PRE simply for missing or misunderstanding a single notice. In addition, the process for reinstating a PRE is unnecessarily complicated, lacks clear communication, and often requires multiple interactions with city staff during work hours, which creates barriers for Detroit's most vulnerable homeowners.

- **Remedial Step #1:** Remove PRE for properties titled to LLCs, as required by law.
- **Remedial Step #2:** Before removing the exemption, the city should send at least two clear, plain-language notices by mail, text, and/or email. The city should provide at least 60 days to respond, offer free in-person help at neighborhood resource centers, and offer community workshops in partnership with trusted local groups to guide residents through reinstatement.
- **Remedial Step #3:** This report should show the number of LLC or business-owned properties removed from the PRE rolls, the number of removals and reinstatements processed for individual homeowners, response rates to audits and steps taken to improve outreach, and estimated revenue protected or recovered.

BS&A System Not Updated

The Auditor General's third interim report showed a significant average lag between the sale date of properties recorded by the Wayne County Register of Deeds and the date those same sales were reflected in Detroit's BS&A system.⁸ The Auditor General found that this is due to the Office of the Assessor's untimely and sometimes inaccurate updates into their data system. This negligence will result in incorrect property valuations and property tax liabilities.

- **Remedial Step #1:** Follow the Auditor General's suggestion to "ensure that the monthly files received from the Wayne County Register of Deeds, which contain the previous months recorded property ownership transfers (deeds) are properly, timely, and accurately updated in the City's CAMA data system."
- **Remedial Step #2:** Follow the Auditor General's suggestion to "collaborate with the Detroit Land Bank Authority and update the internal "Detroit Land Bank Authority Sales Entry Policy and Procedure" to ensure that it is efficient and effective and provides for proper, timely, and accurate updates of property ownership transfers in the City's CAMA data system."

⁸ <https://pub-detroitmi.escribemeetings.com/FileStream.ashx?DocumentId=219509> (pg. 118)

Board of Ethics Review

The Detroit Board of Ethics is investigating Alvin Horhn and the Detroit Assessor's Office for waiving Property Transfer Affidavit late fees on 13,500 Detroit Land Bank Authority properties from 2014 through 2020 without consulting city council. The Auditor General reported on this in its third interim report, finding that this not only led to the Assessors Office collecting much less revenue than it should have from the Detroit Land Bank, but also that it reduced public trust in the Assessors Office.