

# **City of Detroit**

## **Office of Inspector General**

### **2021 3<sup>rd</sup> Quarterly Report**

(July 1, 2021 – September 30, 2021)



**Ellen Ha, Esq., CIG**  
**Inspector General**

**October 11, 2021**

## A Message from the Inspector General



August marked my three-year anniversary as the City's Inspector General (IG), which means I have already served half of my six-year term.

Every year on my birthday, I reflect on my past year and start to list what I have accomplished thus far to become the better me. Likewise, as I reflect to the first half of my term, I now share with you what my staff and I have accomplished over the past three years.

Below is the list of our accomplishments I believe reflects the growth of our office during my tenure between August 20, 2018, and September 30, 2021:

1. We finalized and published the report on our investigation pertaining to the large unit demolition contractors meeting involving the Hardest Hit Funds (HHF). The investigation and the draft report were completed during the tenure of my predecessor.
2. We finalized and published reports on various tow companies and individuals with significant financial interests in the companies who were involved or benefited from bribery. These investigations were also in process prior to my appointment, and the reports were finalized during my tenure.
3. For the first time in the City's history, the OIG initiated debarment proceedings pursuant to the City's Debarment Ordinance. The ordinance became effective shortly before I took office in 2018.
4. To date, we have debarred eight (8) contractors and ten (10) individuals who had significant financial interest in the companies, some of whom were involved in bribing City officials.
5. We presented and defended debarments against various tow companies and individuals before a special session of Detroit City Council after the tow companies and individuals appealed their respective debarments to Council. After hearing from the tow companies and the OIG, Council voted unanimously to affirm the debarments and the duration of the debarments. To date, none of our debarments has been amended or overturned by Council.
6. We also issued several interim suspensions to City contractors related to abatement matters pursuant to the City's Debarment Ordinance.

7. We investigated and issued final reports on various IT companies and individuals who were involved in bribing a City official and debarred them in accordance with the City's Debarment Ordinance.
8. We received a referral from SIGTARP pertaining to ESS, an environmental company. After the conclusion of our investigation, we debarred ESS based on our findings.
9. We held ten (10) in-person and two (2) virtual administrative hearings.
10. We reviewed and disposed of six hundred forty-six (646) complaints.
11. We initiated one hundred fifteen (115) investigations and four (4) forensic audits and closed ninety-nine (99) investigations and one (1) forensic audit.
12. We updated our website.
13. We worked with City departments and agencies after completing our investigations to amend their respective policies and procedures to prevent potential future waste, abuse, fraud and corruption.
14. We summarized our closed investigative matters for each quarter and published the OIG quarterly reports on time as required by the Charter.
15. In conjunction with the publication of quarterly reports, I have initiated and continue to meet on a quarterly basis with each investigator, forensic auditor and attorney to discuss their respective accomplishments for the quarter and evaluate additional needs or set new goals for the upcoming quarter.
16. As for me, in accordance with the standard set forth by the Association of Inspectors General (AIG), after a year of service as the City's IG, I received training and certification from the AIG.
17. Likewise, my staff and I continue to receive training to maintain our respective certifications from the AIG.
18. For the first time in our Office's history, we initiated four (4) OIG audits, allowing us to take a proactive role in detecting and preventing potential waste, abuse, fraud and corruption.
19. We attended and participated in multiple 2018 Charter Revision Commission (the Commission) meetings and provided a detailed presentation and proposed changes to the members of the Commission and the public to assist the Commission in their effort to amend the City's Charter pertaining to the operation of the OIG.
20. At the request of the former Executive Director of the City's Board of Ethics, my staff and I provided presentations to visiting foreign dignitaries about our respective offices.
21. My staff and I appeared before the City Council on multiple occasions after we completed investigations and published our findings and recommendations to answer questions about our findings.

22. We gave presentations to City contractors and employees in reporting and preventing potential abuse, waste, fraud and corruption.
23. We gave a presentation to the Michigan Association of Municipal Attorneys pertaining to the creation and the function of the Detroit OIG.
24. We are currently working with the City of Detroit Human Resources Department Office of Talent and Development Management to create and provide virtual orientation training for new in-coming City employees on matters pertaining to the OIG.
25. We have continued to work hard to maintain our good working relationship with various local and federal investigative agencies and prosecutorial authorities, continuing to provide assistance when requested.
26. In addition, my staff and I meet on a weekly basis to discuss the status of all open assignments before all members of the staff. These meetings are important as we have frank, candid and robust discussions about the direction of our investigations and forensic audits, as well as sharing our past investigative experiences.
27. We finalized our standard operating procedures for our office and decided to review and update them on a regular basis, as needed.
28. We gave a presentation at a national AIG training conference pertaining to the City's debarment policies and procedures. We continue to maintain and develop our professional relationship with the members of the AIG and budget permitting, we plan to participate and give additional presentations in the future.
29. More recently, our latest addition to the staff gave a presentation at the national association for legal professional conference pertaining to the mission of the Detroit OIG and the work we perform under the City's Charter.
30. During the COVID pandemic, my staff and I worked remotely from our respective homes and continued to meet on a regular basis via video conferencing and took proactive actions to ensure we remain proactive and engaged in our duties and responsibilities.
31. We moved our office space to the Ford Building in June of this year. We are currently working in our new office space on a rotational schedule under our COVID-19 Return to Office (RTO) work policy to ensure everyone remains safe and healthy.

The Charter mandates that the OIG ensure honesty and integrity in our government. As such, I felt it was important that we first ensure what comes out of our office be honest and reflect integrity. I worked hard to foster a work environment in our office where everyone can honestly voice their opinion and share their thoughts pertaining to the complaints we receive, and investigations conducted by our office. We try to examine and investigate everything from different perspectives and ask each other the hard and the uncomfortable questions, as integrity can only be built with honesty.

We are mindful that each city department, agency, commission, board, or office exists to serve a different purpose that supports the overall efficiency of our government. While some departments may be larger than others, every department plays an important function in the operation of the City.

Likewise, public servants (including elected and appointed officials) work in their different capacities to do what is required of their respective positions. I believe each public servant is akin to a piece or a part of a whole that is bigger than our individual selves. Therefore, pieces and parts, scattered about, do not and cannot complete a whole. It is only when the pieces or parts are fitted or put together, that the pieces complete the whole.

For example, imagine pieces or parts of a vehicle laying strewn around a floor. No matter how great the engine is, a car cannot move without its wheels supported by its structural body. In addition, if you really examine the various parts of a car, there are bits and pieces within the parts of an engine, a wheel, and a body that are fitted together to ensure each part performs its function. Therefore, unless we work together and do what is required of each of us, we remain in fragments. I believe we were meant to complement and work with each other so that we can sync with efficiency.

It has not been an easy journey the last three years and I have had to make some difficult decisions at times. The Detroit OIG would not have accomplished what I've listed above and more without the dedication and the tireless work my staff put in every day. Some of my staff worked and attended meetings before and after regular business hours, as well as during the weekends. Some of them worked while they were on vacation and some of them stayed up with me late into the night in preparation for the next day's work.

It is the respect my staff and I have for each other that allows us to agree to disagree and reexamine or reconsider our respective positions when needed. In addition, it is the trust in each other that gives us the courage and the conviction to do what is required from each of us. Together, we've weathered many storms in the last three years and, no doubt, we will continue to do so.

I believe no matter where in the City you work or what position or title you hold, you and what you do is important. As such, when we unite in our effort to support and engage each other, we can make a difference in making today better than yesterday, so that tomorrow is better than today. Lessons learned from yesterday should result in today's resolve and tomorrow's hope for better things to come.

Lastly, I will continue to do my best to be a better Inspector General for the City in the next three years. In that regard, I humbly ask that you help me to do so.

## **Introduction**

Prior to filing for bankruptcy in 2013, the City of Detroit suffered another negative historic moment in 2008. At the request of the Detroit City Council, then Governor Jennifer Granholm presided over a forfeiture hearing of then Mayor Kwame Kilpatrick, who was criminally charged with public corruption and eventually sentenced to a lengthy prison term.

Shortly thereafter, the 2009 Charter Commission was created to review and recommend certain revisions to the Charter. The people of the City of Detroit later adopted the Commission's recommendations on November 8, 2011 to ensure such negative history does not repeat itself. The 2012 Detroit City Charter therefore contains lessons learned in 2008 and the prior years.

More specifically, the 2012 Charter of the City of Detroit created the Office of Inspector General (OIG); and provided the OIG with independent authority "to ensure honesty and integrity in City government."

Although the creation of the OIG appears to make the Inspector General (IG) omnipotent over all branches of City government and contractors, its powers are limited under the Charter.

Specifically, Section 7.5-305 of the Charter limits the jurisdiction of the IG to "the conduct of any Public servant and City agency, program or official act, contractors and subcontractors . . . business entities . . . and persons" seeking certification or who are participating in "any city programs."

Section 7.5-306 of the Charter further restricts the power and the authority of the IG to "investigate. . . in order to detect and prevent waste, abuse, fraud and corruption;" and to report such matters and/or recommend certain actions be taken in accordance with Sections 7.5-308 and 311.

To conduct such investigation, Section 7.5-307 of the Charter provides the IG with the power to subpoena witnesses and evidence; to administer oaths and take testimony of individuals; to enter and inspect premises; and to enforce the same.

The Charter further requires that every public servant, contractor, subcontractor, licensee, applicant for certification to cooperate in the IG's investigation, as failure to do so would subject that person "to forfeiture of office, discipline, debarment or any other applicable penalty." See, Section 7.5-310.

To encourage individuals to report "waste, abuse, fraud and corruption," Section 7.5-313 requires all investigative files to be confidential except where production is required by law; and Section 7.5-315 prohibits retaliation against any persons who participate in the IG's investigation.

In keeping with due process, Section 7.5-311 of the Charter requires that when issuing a report or making recommendations "that criticizes an official act," the affected party be allowed "a reasonable opportunity to be heard at a hearing with the aid of counsel."

Since all governmental bodies must be held accountable in their role, the Charter requires that the IG issue quarterly reports to the City Council and the Mayor, which shall be made public and published on the City's website. See, Section 7.5-306.

The Detroit Office of Inspector General is a proud and active member of the Association of Inspectors General (AIG). The Association is the professional organization for offices dedicated to government accountability and oversight. The Detroit Office of Inspector General was founded on the model principals of the Association. One of the most important roles the AIG plays is establishing and encouraging adherence to quality standards through its certification program. As

such, OIG investigators, auditors, attorneys, the deputy and the inspector general participated in AIG training and received their certification in their area of discipline. We are currently in the process of having our associate attorney to receive training and to obtain certification from the AIG.

The Detroit Office of Inspector General joins a growing community of municipal Inspector General Offices across the country including Chicago, Baltimore, New Orleans, New York, and Philadelphia. What used to be a tool for good government for Federal and State Agencies is now making its way to local government.

## Office of the Inspector General Organizational Structure: 3<sup>rd</sup> Quarter of 2021

Between July 1, 2021 and September 30, 2021, the City of Detroit Office of the Inspector General (OIG) consisted of the following individuals:

Ellen Ha, Esq., CIG, **Inspector General**;  
Kamau Marable, CIG, **Deputy Inspector General**;  
Jennifer Bentley, Esq., CIGI, **OIG Attorney**;  
Edyth D. Porter-Stanley, CIGA, CFE, **Forensic Auditor\***;  
Beverly L. Murray, CIGA, CFE, **Forensic Auditor\***;  
Jacqueline Hendricks-Moore, CIGI, CFE, **Investigator**;  
Kelechi Akinbosede, Esq., CIGI, **Investigator**;  
Norman Dotson, Esq., CIGI, **Associate Attorney**;  
Kasha Graves, **Administrative Assistant**; and  
Tracey Neal, **Administrative Assistant**.

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It is important to note the City of Detroit has three (3) different agencies which employ auditor(s) who perform unique audit functions for each agency. With three (3) different types of auditors performing different functions, it is common to confuse their activities and purpose.

### Office of Auditor General (OAG) Auditors

The OAG, like the OIG, is an independent agency pursuant to Article 7.5, Chapter 1 of the 2012 Charter of the City of Detroit (Charter). The Charter provides the OAG the authority to “make audits of the financial transactions, performance and operations of City agencies based on an annual risk-based audit plan prepared by the Auditor General, or as otherwise directed by the City Council. . . .” Therefore, the OAG provides internal audits of the City.

The OAG’s internal auditors conduct reviews of City of Detroit departments and programs, usually on regular time intervals. They report on internal control weaknesses, lack of compliance with policies and procedures, laws and regulations that result in project inefficiencies, and financial abnormalities.

### External Independent Auditors

The City of Detroit, through its OAG and Office of the Chief Financial Officer, is also required to perform an audit of the City by external auditors on an annual basis.

The external auditors perform the annual financial audit to certify the financial information is presented fairly in the City’s Comprehensive Annual Financial Report (CAFR). They accomplish this with an approach similar to that of the OAG, but the external auditors

examine the financial accuracy of the CAFR, rather than a specific program or department's operational compliance with policies and procedures.

### **OIG Forensic Auditors\***

The American Institute of Certified Public Accountants (AICPA) and the Institute of Internal Auditor (IIA) both state that the primary purpose of external and internal audits is not to detect and identify fraud. However, ***detecting and identifying fraud is the primary purpose of the OIG forensic auditors.***

The OIG's forensic auditors are specially trained to examine various financial records, reveal fraudulent activities, and identify criminal suspects. They are able to use this expertise to identify missing funds, and the reasoning for these missing funds, in conjunction with fraud investigations. As such, the auditors from the OIG often work with the auditors from the OAG; and audits performed by respective agencies complement one another. Some of the OIG investigations which are assigned to the OIG auditors are referrals from the OAG.

The OIG is currently working on policies and procedures to proactively identify fraudulent trends that can help spawn additional OIG investigations and cases for criminal prosecution.

## How OIG Complaints Are Received

The OIG receives complaints in the following manner:

**Via Internet:** [www.detoig.org](http://www.detoig.org) or [www.detroitmi.gov/inspectorgeneral](http://www.detroitmi.gov/inspectorgeneral)

*(The website is on a secure server, which allows individuals to provide information on a secure electronic report form 24 hours a day, 7 days a week.)*

**Via Telephone Hotline:** 313-964-TIPS or 313-964-8477

**Via OIG Telephone Line:** 313-628-2517 or 313-628-2114

**Via Facsimile:** 313-628-2793

**Via Mail:** City of Detroit Office of Inspector General  
615 Griswold, Suite 1230  
Detroit, Michigan 48226

**Via Email:** [oig@detoig.org](mailto:oig@detoig.org) and/or [Suggestions@detoig.org](mailto:Suggestions@detoig.org)

**Via Personal Visit to the OIG Office at the above address.**

**Some complaints are received, via a referral, from various City departments and/or agencies. The OIG is proud of the professional relationship it maintains with its fellow public servants.**

## How OIG Complaints Are Resolved

All complaints submitted via the website automatically generate an OIG File with a complaint number.

Most complaints, either audio or on paper will result in an OIG File with a complaint number.

Some complaints received over the telephone directly by OIG personnel may result in a referral to another City department or agency, or to another legal entity. For example, the OIG does not handle matters involving private parties, such as identity theft, land-lord tenant dispute, or personal injury. In these cases, the OIG will refer the complainant to the appropriate entity without creating an OIG File.

Based on initial review of the complaint, one or two of the following may occur:

- 1) An investigative file may be opened and a new file number will be assigned;
- 2) An OIG employee may follow up with the complainant to obtain additional information pertaining to the complaint;
- 3) The OIG will send a letter stating that we have decided not to investigate your complaint or that we have closed your complaint (*sometimes, we are not able to obtain additional information from the complainant which may assist us in determining whether we are able to investigate the allegations made in the complaint*);
- 4) A referral to another department, agency, or legal entity, such as the City's Ombudsman's Office, Detroit Police Department, City of Detroit Buildings, Safety Engineering, and Environmental Department, Wayne County Sheriff or Prosecutor's Office, FBI, Michigan Department of Health and Human Services, or a legal aid office; or
- 5) The OIG will close the complaint without notifying the complainant. This usually occurs when the complainant has not left contact information or if the OIG does not believe it is appropriate to contact the complainant.

*(For example, on occasion, two complainants with competing interests will file separate complaints with the OIG. If the OIG has a reasonable suspicion that criminal charges may result from a law enforcement investigation, the OIG will not notify either complainant before referring the case and closing it.)*

Based on the OIG's historical data, the majority of complaints received by the OIG do not result in an investigation. However, all of the complaints are carefully reviewed before the complaint is rejected or referred to another agency.

For example, in the first three quarters of 2018, the OIG received 204 complaints but only initiated 32 investigations. One of the primary reasons we did not initiate investigations into all complaints is a common misunderstanding of the OIG's jurisdiction. People often mistake the OIG as an agency which performs inspection of buildings, or as an agency which enforces the law. Therefore, we typically receive an inordinate amount of requests for building inspections. Other common complaints involve parking ticket resolutions, identity theft, and property owner disputes. The OIG attempts to aid each complainant in finding the appropriate entity to resolve their problems. In particular, our administrative support staff works tirelessly to ensure that each

complaint is addressed appropriately in a professional manner. Therefore, the initiated investigations-to-complaints ratio should not be confused with the OIG's workload.

## How OIG Investigations Are Conducted and Resolved

The OIG may initiate an investigation based on information received in the complaint or on its own initiative.

An investigation is initiated when an Investigative File is opened and an auditor(s) and/or investigator(s) is/are assigned to the file.

An investigation would generally involve one or more of the following:

- 1) Interview of complainant(s) and/or witness(es);
- 2) Acquisition of evidence and/or documents and review of the same; and
- 3) Analyses of the evidence and/or documents reviewed, including forensic audit or review.

An OIG investigation would result in findings by the OIG, which may substantiate the complainant's allegation of waste, abuse, fraud or corruption in the City's operation or personnel or that of its contractors and/or subcontractors.

***In some instances, although the complainant's allegations do not equate to waste, abuse, fraud or corruption, during the investigation of the allegations, the OIG may find other instances of waste, abuse, fraud or corruption. In such instances, the OIG will initiate a separate investigation on its own initiative.***

***Likewise, if the investigation reveals that criminal activity may be involved, pursuant to Section 7.5-308 of the 2012 Charter of the City of Detroit (the Charter), the Inspector General is required to "promptly refer the matter to the appropriate prosecuting authorities."***

The OIG summarizes the findings of the investigation in the OIG's final memorandum/report. All formal/final reports have been and will continue to be published on-line. In addition, from time to time, we exercise our discretion to publish some of our internal memoranda through the City and the OIG's website at:

<https://detroitmi.gov/government/office-inspector-general> or [www.detoig.org](http://www.detoig.org).

However, pursuant to Section 7.5-311(1) of the Charter, "no report or recommendation that criticizes an official act shall be announced until every agency or person affected [by the report or recommendation] is allowed a reasonable opportunity to be heard at a hearing with the aid of counsel." Therefore, when our draft findings are critical, we send a copy of our draft findings, either as a draft memorandum or as a draft report to the affected parties. Thereafter, pursuant to the OIG's Administrative Hearing Rules (Hearing Rules), the parties have 14 days to either provide a written response and/or seek an administrative hearing.

The Inspector General conducts the hearing pursuant to Sections 2-111 and 7.5-311 of the 2012 Charter, and in accordance with the OIG Administrative Rules for Hearings. The purpose of the written response and the administration hearing is to provide the affected parties with an opportunity to point out to the OIG why the findings and the conclusions in the draft memorandum or report contain error(s). In support of their position, the affected parties can submit any new evidence or information, by way of providing additional documents or testimonies of additional witnesses. It is important to note that the OIG's proceedings are administrative and not adversarial in nature. Therefore, submission of additional record or testimony are not governed by the Michigan Rules of Evidence.

Lastly, Section 7.5-311(2) of the Charter requires “after the hearing, if the Inspector General believes it necessary to make a formal report, a copy of any statement made by an agency or person affected shall accompany the report.”

## When Are OIG Investigative Summaries Published?

The information regarding what we publish may also be found on our website at <https://detroitmi.gov/government/office-inspector-general> under the FAQ section. The following is a short response to the inquiry the OIG submitted and presented to the Internal Operations Standing Committee of the Detroit City Council.

Section 75-306 (2) of the 2012 Charter of City of Detroit (the Charter) requires the OIG to “issue quarterly reports to the City Council and Mayor concerning results of investigations and audits undertaken by the OIG.” It further states “all reports shall be a public record and additionally published electronically on the World Wide Web.”

Therefore, ***all OIG’s quarterly reports and formal/final reports have been and will continue to be published on-line.*** In addition, from time to time, we exercise our discretion to publish some of our internal memoranda through the City and the OIG’s website at: <https://detroitmi.gov/government/office-inspector-general> or [www.detoig.org](http://www.detoig.org).

The purpose of the formal report is to assist public servants, City agencies, contractors and all other bodies that fall under the jurisdiction of the OIG, as well as the public, in preventing waste, abuse, fraud, or corruption by providing a detailed analysis related to the recommendation made in the formal report.

Generally, after an OIG file manager (FM)<sup>1</sup> completes his/her/their investigation or audit, the FM seeks to close the investigation or initiate an action by submitting a memorandum to the Inspector General (IG), or when necessary, to the Deputy IG (DIG). After the IG or the DIG completes the review of the memorandum, the IG or the DIG must approve the FM’s Request To Close (RTC) or Request To Initiate (RTI) action. We typically do not publish our internal memoranda, unless we find that the publication of the RTC or the RTI may be of a significant public interest. Here are some of the reasons why we exercise such discretion:

1. We want to encourage FMs to be candid and frank with their analyses, interpretations, evaluations, assessments of their findings and recommendations, without any external pressure or influence;
2. Some of the allegations or complaints require our Office to seek and confirm certain information that are personal and private to an individual;
3. Some of the complaints we receive are politically or personally motivated between individuals that lack merit, and cannot be substantiated. However, the allegations by themselves, if published, can be prejudicial or harmful to an individual; and
4. Sometimes the allegations by themselves can identify the complainant even if the complainant wished to remain anonymous and, as such, publication of such memorandum could have a negative impact on submitting or filing any future complaint.

In order to maintain the integrity and the efficiency of our Office, we must maintain our independence. Our independence is dependent on our ability to exercise discretionary authority in the operation of the Office without any undue influence, bias or fear of reprisal. As such, we

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<sup>1</sup> The FM is typically an OIG attorney, investigator, forensic auditor, law clerk or intern or a combination of OIG staff.

remain engaged and committed to the privilege and the opportunity that are provided to us through the Charter.

# 2021 3<sup>rd</sup> QUARTER OIG STATISTICS

(July 1, 2021 – September 30, 2021)

## Sources of Complaints Received by the OIG in the 3<sup>rd</sup> Quarter

Complaint Source	Number Received
Internet (Website)	27
Telephone Hotline	12
OIG Telephone	19
Mail	0
Personal Visit	0
Email	12
OIG Initiation	1
<b>Total</b>	<b>71</b>

## Categories of Complaints Received by the OIG in the 3<sup>rd</sup> Quarter

Categories of Complaints	Number Received
Waste	1
Abuse	23
Fraud	8
Corruption	1
Other	38

## How Complaints Were Resolved by the OIG in the 3<sup>rd</sup> Quarter

Open investigative files	5
Open forensic audit files	3
Decline investigation or Referral	65

### Categories of OIG Investigations Initiated by the OIG in the 3<sup>rd</sup> Quarter

Categories of Investigations	Number Initiated
Waste	0
Abuse	2
Fraud	3
Corruption	0
Other	0

### Status of OIG Investigations in the 3<sup>rd</sup> Quarter

Open	Closed
5	4

## **Short Summary of Investigations Closed in the 3<sup>rd</sup> Quarter of 2021**

The following reflects four (4) investigations the OIG closed in the 3<sup>rd</sup> Quarter of 2021 with an accompanying synopsis for each investigation.

### **21-0004-INV**

The City of Detroit Office of Inspector General (OIG) received a complaint from an anonymous complainant alleging a City of Detroit Buildings, Safety Engineering and Environmental Department (BSEED) building inspector performs inspections without a BSEED badge and uses his personal vehicle during inspections. Complainant further alleged that the BSEED building inspector informs property owners during the inspection to pay him in order to “look the other way”.

In addition to the above-referenced allegations, during the investigation, the OIG discovered that the BSEED building inspector was the resident agent for a non-profit organization with the State of Michigan. The OIG also learned that the BSEED building inspector is employed by CLEAR Corps Detroit. Therefore, the OIG investigated whether the BSEED building inspector disclosed his outside employment activities to the City and whether the nature of his involvement in the organizations violated any BSEED policy.

The OIG found that the BSEED building inspector did not abuse his authority by failing to openly display his BSEED badge or by using his personal vehicle while conducting inspections. Moreover, while the OIG investigated whether the BSEED building inspector’s failure to disclose his involvement with two outside legal entities created any conflict of interest with his employment with BSEED, the OIG did not find any evidence that his non-disclosure was improper. The OIG recommended BSEED develop a policy that prohibits its building inspectors from engaging in any outside business or participating in a non-profit organization that is involved in commercial or residential housing-related matters.

Lastly, the OIG recommended that BSEED management recognize the importance of confidentiality in OIG investigations and take necessary measures to ensure confidentiality during OIG investigations.

### **21-0005-INV**

On April 28, 2021, the OIG received an anonymous complaint alleging that the City of Detroit Law Department committed waste by initiating payments for previously cashed (i.e., fraudulent) checks.

The OIG investigation found that the Law Department initiated payments to Hanna Law in response to six (6) letters demanding payment for City-issued checks. The demand letters stated that the City-issued checks were cashed by clients of Hanna Law and subsequently not honored by the City’s banking institution. The OIG found that the Law Department acted within its discretion and did not find their actions taken by the Law Department resulted in waste, abuse, fraud, or corruption.

## **21-0008-INV**

The OIG received an allegation that a city employee abused their authority. Specifically, the complainant alleged their neighbor, who they believed to be a city employee, used their position to have a Buildings, Safety Engineering and Environmental Department (BSEED) inspector come to their house to advise that they stop doing auto repairs/installation work in their private driveway. The OIG's investigation revealed that District 4 Deputy Manager received a complaint that a homeowner was doing auto repairs/installation activities from their private residence, which is creating a noise disturbance in the neighborhood. The District 4 Deputy Manager forwarded the complaint to BSEED to be investigated. The OIG concluded that the complaint was appropriately forwarded to the proper City agencies for appropriate action. Also, the OIG found no evidence that any city employee abused their authority on this matter. The complaint was therefore closed and no further action taken.

## **21-0010-INV**

The OIG received a complaint which alleged the City of Detroit Fire Department (DFD) committed fraud when they placed a DFD Fire Captain on Workers' Compensation after he had a heart attack. Complainant alleged that the Fire Captain was off-duty and was at home when he had the heart attack. Additionally, Complainant claimed that the DFD fraudulently placed the Fire Captain on "light duty" working at home and allowed him to collect overtime pay.

The OIG investigated whether the DFD committed fraud by granting the Fire Captain Workers' Compensation benefits. The OIG found that the Fire Captain was working full-time and on active duty when he suffered the heart attack. The DFD provided evidence that the Fire Captain began experiencing symptoms related to the heart attack while on duty. This suggests that the Fire Captain injury arose out of and in the course of his employment as a Fire Captain. As such, he was eligible to receive Workers' Compensation benefits.

The OIG's investigation did not uncover sufficient evidence for the OIG to substantiate the allegations of fraud. Therefore, the OIG concluded that the DFD did not commit fraud when they approved Workers' Compensation benefits for the Fire Captain.