2025 1st Quarter

(January 1, 2025 – March 31, 2025)

Kamau C. Marable, M.A., CIG, CFE **Inspector General**

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April 23, 2025



Message from the Inspector General



Greetings from the Office of Inspector General. It is my pleasure to present the 1st Quarter Report for 2025. With the new year, we have decided to tweak the look and feel of our Charter-mandated quarterly reports. The hope is to make the reports more approachable for readers. Rest assured; the reports will continue to detail all the activities of our Office over the quarter.

In addition to enhancing the visual appearance of the quarterly report, we have also added additional details on what we actually report. Designated

complaints are the first step of the evaluation process for matters submitted to our Office. This is the stage where we determine whether a matter is within our jurisdiction and whether there is enough information to escalate the complaint into an investigation. Those matters not escalated to an investigation were previously designated in our statistics as "Closed-No Action." Upon reflection, our management team realized that this did not accurately reflect the work done with these complaints. Most of the time, if we could not assist the complainant, we referred them to resources that could help with their concern. Therefore, instead of simply categorizing complaints as closed with no action, we now designate them into one of three categories:

- Complaint Closed-No Action
- Complaint Referred-Formal
- Complaint Referred-Informal

The "Complaint Closed-No Action" designation most likely applies to complaints without contact information or concerns outside the City's purview and outside our jurisdiction. The "Complaint Referred-Formal" refers to complaints outside our jurisdiction but still of concern, particularly a public safety matter. With items falling under this designation, we will contact the appropriate agency to address the concern via some manner of correspondence. Finally, "Complaint Referred-Informal" are usually complaints that are not in our jurisdiction but concerning a process, problem, or customer service issue. In these instances, we provide the complainants with contact information for the appropriate department or agency for them to contact directly. This more accurately describes the work our hard-working staff is actually doing.

Finally, let me share an update on our community outreach efforts. We spoke about gearing up for community outreach in the combined Annual Report/ 4th Quarter Report. Well, I can report that we have begun our program and have spoken directly to several community organizations in the first quarter of the year, with several more already scheduled for the second quarter. The need for our outreach is confirmed every time I ask the questions to the gathering, "who is aware that the City has an Office of Inspector General and who is aware of what the office does." The answer had been a resounding no, they were not aware. So, we have work to do and are up to the challenge. Once again if you are a part of a community organization or know of any organizations that may be interested in hearing from the Office of Inspector General, please contact us at 313.628.2517.

Introduction

CTOR GENERA

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 a 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, and the OIG staff participated in AIG training and received their certification in their area of discipline.

1st QUARTER HIGHLIGHTS

100 Complaints Closed

8 New Investigations

2 Closed Investigations







How OIG Complaints Are Resolved

All complaints submitted to the OIG, regardless of the method, are given a complaint number and assigned to an OIG staff member for further review. Based on initial review of the complaint, the Inspector General may:

- 1) Close the complaint and open an investigative file with a new file number.
- 2) Have an OIG employee follow-up with the complainant to obtain additional information pertaining to the complaint; or
- 3) Close the complaint without opening an investigation.

If the Inspector General elects to close the complaint without opening an investigation, one or more of the following actions will be taken:

- 1) The OIG will send a letter or an email to the complainant, or call the complainant, stating that we have decided not to investigate your complaint or that we are closing the complaint.
- 2) Refer the complaint 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
- 3) 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 complainant¹.

Based on the OIG's historical data, most of the complaints received by the OIG do not result in an investigation. However, every complaint is carefully reviewed before the complaint is closed without additional action or referred to another agency. For more information on how complaints are resolved, please visit <u>www.detroitmi.gov/inspectorgeneral.</u>

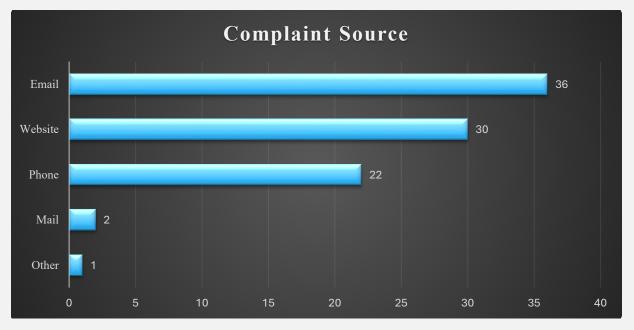
¹ For example, on occasion, two complainants with competing interests will file separate complaints with the OIG. If the OIG has a reasonable suspicion that criminal charges may result from a law enforcement investigation, the OIG will not notify either complainant before referring the case and closing it.



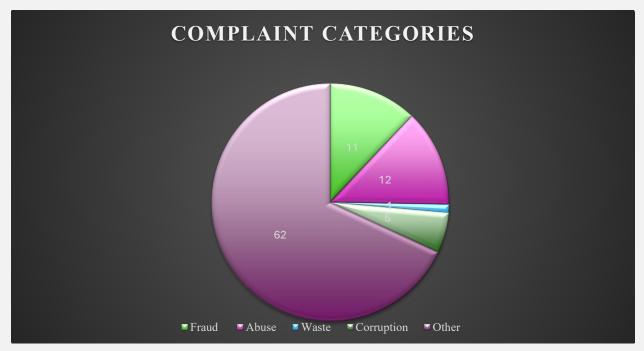
2025 1st QUARTER COMPLAINT STATISTICS

(January 1, 2025-March 31, 2025)

Sources of the 91 Complaints Received by the OIG in the 1st Quarter



Categories of the 91 Complaints Received by the OIG in the 1st Quarter





How Complaints Were Resolved by the OIG in the 1st Quarter

Complaints Pending Prior to Quarter	13
Complaints Received During the Quarter	91
Total	104
Open investigative files	8
Open audit files	0
Pending	4
Formal Referral	16
Informal Referral	50
Decline investigation (No Action)	26
Total	104

The statistics above show the OIG actively worked on 104 complaints this quarter. By the end of the quarter, 8 of the 104 complaints were resolved by opening a new investigation. The OIG also resolved 66 of the complaints through either a formal or informal referral. The OIG declined to investigate 26 of the 104 complaints. As of March 31, 2025, the OIG still had 4 complaints pending.



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 may result in findings by the OIG which 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 evidence of waste, abuse, fraud, or corruption that was not contained in the initial complaint. In such instances, the OIG may initiate an 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."

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 calendar days to either provide a written response and/or seek an administrative hearing. Reports and memorandums are not finalized until the Administrative Hearing process has concluded. For information additional this process, please visit our website on at www.detroitmi.gov/inspectorgeneral.

The OIG summarizes the findings of the investigation in the OIG's final memorandum. At times, the OIG can elect to issue a formal final report instead of an internal memorandum. 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: <u>www.detroitmi.gov/inspectorgeneral</u>. For more information on what type of reports and memorandums are published, please visit our website. You can also find copies of previously posted reports and memorandums.



2025 1st QUARTER INVESTIGATION STATISTICS

(January 1, 2025-March 31, 2025)

Categories of OIG Investigations Initiated by the OIG in the 1st Quarter



Status of OIG Investigations in the 4th Quarter



The statistics above show the OIG had 47 active investigations during the quarter. By the end of the quarter, 2 of the 47 investigations were closed. As of March 31, 2025, the OIG still had 45 investigations pending.

Summary of Investigations Closed in the 1st Quarter of 2025

20-0027-INV

CTOR GENERA

The OIG opened an investigation into a City of Detroit vendor and their use of grant funds. The complaint alleged the vendor was not following federal procurement guidelines and was favoring one person for contract work. The OIG was unable to substantiate this allegation because the services were classified as emergencies that did not require a formal bid process. Therefore, the investigation was closed.

24-0035-INV

The OIG received a complaint alleging potential fraud, waste and corruption in connection with the Detroit Housing Services (DHS) program run by the City of Detroit Housing and Revitalization Department (HRD). Specifically, the complaint alleged that an HRD/DHS employee received a financial "tip" in exchange for providing improper assistance to a fraudulent property manager. The complaint also alleged that HRD/DHS wasted City funds by issuing payments for housing to fraudulent property managers based on fraudulent property management agreements.

The OIG's initial review of evidence did not substantiate the complainant's allegations of potential fraud, waste, and/or corruption. However, the Detroit Police Department later provided a copy of an allegedly fraudulent property management agreement that it received from the complainant. The OIG also learned that the agreement had originated from HRD/DHS. Based on the new information received, the OIG initiated an investigation to examine whether an HRD employee had engaged in waste, abuse, fraud, or corruption in connection with the DHS program.

Based on the evidence reviewed the OIG did not find that a City employee engaged in fraud or corruption in this matter. Further, the OIG found no evidence that indicates that the employee received money for providing the move-in assistance described in the full report. In addition, the OIG did not find that City resources were wasted on payments made to an allegedly fraudulent property manager. In response to the complaints filed regarding this matter, HRD/DHS implemented changes to its relevant policies and procedures to prevent similar issues in the future. Further, the department trained its staff on the revised policies and procedures and was cooperative throughout the OIG's investigation.



How OIG Audits Are Conducted and Resolved

The OIG's Forensic Auditors are specially trained to investigate programs, practices, and financial transactions to obtain evidence of fraud, abuse, waste, and corruption in City of Detroit government. The Forensic Auditors use this expertise to identify fraud risks, detect the misappropriation of City assets and make recommendations to prevent future incidents. In addition, OIG Forensic Auditors review various programs, policies, and procedures to determine whether they are sufficient to detect and prevent fraud, abuse, waste, and corruption. The OIG may initiate an audit based on information received in the complaint or based on an assessment of risk.

An audit generally involves performing one or more of the following:

- 1) A preliminary survey to gather background information and identify audit objectives.
- 2) A risk assessment to identify areas of concern.
- 3) Interviews department staff and leadership.
- 4) Review of requested documents.
- 5) Analytical procedures for detailed testing.

An OIG audit may result in findings that identify actual incidents, or actions that increase the risk of waste, abuse, fraud, or corruption in the City's operations. If the audit 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." An audit can also result in an OIG investigation.

A report is drafted at the end of each audit that includes any conditions that increase the risk of fraud, abuse, waste, and corruption as well as recommendations to mitigate the conditions identified during the audit. 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 calendar days to either provide a written response and/or seek an administrative hearing. Reports are not finalized until the Administrative Hearing process has concluded. For additional information on this process, or to see copies of our audit reports, please visit our website at www.detroitmi.gov/inspectorgeneral.

*The OIG did not work on any audits during the 1st Quarter of 2025.



OIG'S OPEN RECOMMENDATIONS MADE TO CITY DEPARTMENTS AND AGENCIES

Status Report as of March 31, 2025

Case Number	Public Servant, Department, Board or Agency	Date	Status
22-0018-INV	Construction & Demolition Department	9/27/2023	Closed

Recommendation: Develop a data documentation policy and procedures that can better track dirt to ensure properly tracked from source to site.

Response: In November 2024, CAD completed their audit and shared the results with the OIG.

Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0001-AUD	DDOT	12/4/2024	Open

Recommendations from Prior Audit: Establish policies and procedures to restrict unauthorized individuals from obtaining access to the scrap, especially the scrap bin in the yard of the main campus; Identify all the scrap parts with scrap value that mechanics have removed from coaches; Revise the relevant existing policies and procedures to formalize employee expectations related to parts with scrap value to safeguard parts for waste, fraud, abuse or corruption.

Response: DDOT has installed cameras in the yard of the main campus. However, they have not yet established policies and procedures to restrict access or monitor the scrap bin. DDOT is currently testing a scanner that will allow them to catalog and track the parts. DDOT has partially revised their existing policies and procedures and are working on additional revisions.

New Recommendations: Establish policies and procedures regarding the non-ferrous scrap materials and enter into a contract with a non-ferrous processor; Ensure ODFS has the shipping records for each bin of scrap material DDOT transfers to the ferrous vendor.

Response: DDOT has requested to establish a three-year contract for scrap pickup from the DDOT Central Facility. DDOT is looking to procure recyclable parts for the upcoming bus builds to reduce the scrap quantity. DDOT established a process to keep a digital copy of the shippers in the Maintenance SharePoint for future reference. This established process is included in the VM SOP 59 for MMD employees. Also, this same receipt will be shared with the ODFS team for verification. The receipt reference in the response is the one provided by the vendor that is used for disposal purposes.



Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0005-INV	HR	2/29/2024	Closed

Recommendation: Training for City HR employees on Charter provisions and other laws/policies that are unique and relevant to the BOPC's personnel matters and voting requirements.

Response: HR stated that team members who work with BOPC have been given a copy of the Board's bylaws and have been made aware of the BOPC's voting requirements.

Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0008-INV	OCFO/ODFS/Payroll	7/2/2024	Open

Recommendation: Develop policies and procedures that require job codes to be checked against the department's approved budget to ensure that Payroll only processes payments to legitimate employees with job codes that match the budgeted positions that are properly approved.

Response: On October 21, 2024, the OCFO/ODFS/Payroll departments stated it is working with its team to review the current processes and OIG recommendations to determine the next steps for any process and policy changes.

Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0008-INV	OCFO/ODFS	7/2/2024	Open

Recommendation: Develop a policy and process that requires formal escalation of the budget issues flagged by OCFO/ODFS when the department or agency repeatedly fails to address the flagged issue and requires any budget issues flagged to be addressed before the start of the new fiscal year.

Response: On October 21, 2024, the OCFO/ODFS/Payroll departments stated it is working with its team to review the current processes and OIG recommendations to determine the next steps for any process and policy changes.



Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0008-INV	OIG	7/2/2024	Open

TOR GENER

Recommendation: The OIG should audit the BOPC's personnel processes to ensure all positions filled within the BOPC, including the OCI, are compliant with the Charter and City HR Rules.

Response: OIG management is currently reviewing the audit request to decide on the next steps.

Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0012-INV	DTC	3/12/2024	Closed

Recommendation: DTC should follow up on any duplicate payments to UPS and GE not resolved by the OIG and obtain the necessary refund or credit; Submit the status of the duplicate payments to the OAG to be included in their subsequent audit report; Adopt the various recommendations made in the OAG's audit report.

Response: On January 10, 2025, Robert Cramer responded that UPS has not yet confirmed the status of the duplicate payments. GE submitted supporting documentation showing that no duplicate was issued; instead, the original check was voided, and a new check was issued. DTC has provided OAG with a status update. DTC is still reviewing its policies and procedures for updates based on recommendations from OAG's report, needs, adjusting regulations and best practices.

Case Number	Public Servant, Department, Board or Agency	Date	Status
23-0015-INV	OCFO	5/17/2024	Open

Recommendation: Increased training for Travel Coordinators on compliance with the Travel Directive; Updates to the Travel Authorization Request Form to identify the approved travel criteria that apply to the proposed travel; Requirement to fully document any deviations from the Travel Directive, including those who approved the change

Response: In July 2024, OCFO started training the travel coordinators for the departments on a new process for travel authorizations. As of October 2024, a new travel policy has been drafted and is awaiting final approval.



Case Number	Public Servant, Department, Board or Agency	Date	Status
24-0001-INV	BOPC	10/16/2024	Closed

TOR GENERA

Recommendation: The Board should adopt records management practices that are compliant with the City of Detroit's Records Management Policy. Such practices should also be compliant with State laws governing the retention of public and personnel records. The Board should implement a formal process for initiating personnel and compensation changes, and submitting other various requests to City HR. The process may include, for example, an affidavit regarding Board approval that provides the date on which the Board voted to implement the given change(s).

Response: On January 21, 2025, the BOPC stated that it has implemented a physical and digital file maintenance system to ensure proper retention of documents and that it is working with the City's HR to ensure compliance with City and State requirements. BOPC also stated that it would reach out to the Department of Innovation and Technology to ensure it fulfills its document retention policy requirements. Finally, BOPC stated that going forward requests to City HR will include sections of relevant meeting minutes evidencing the necessary vote.

Case Number	Public Servant, Department, Board or Agency	Date	Status
24-0001-INV	HR	10/16/2024	Closed

Recommendation: City HR should review and revise, as necessary, its records management practices to ensure they are compliant with State laws governing the retention of individual personnel documents, including job descriptions and classification histories. In the event HR has not already done so, we also recommend reviewing or revising the department's use of Ultipro for recording personnel changes to ensure the program doesn't erase or overwrite information the City is required to retain.

Response: On January 21, 2025, City HR confirmed that it is using/following and updated version of the State's Document Retention schedule. HR also stated that HR team members who work with BOPC have been given a copy of the Board's Bylaws and have been made aware of the organization's voting requirements. Finally, City HR confirmed that it corrected the technical issue it had with inputting retroactive job changes into UltiPro to and that the issues experienced in the past will not likely recur.



Case Number	Public Servant, Department, Board or Agency	Date	Status
24-0003-INV	OCFO	6/10/2024	Closed

Recommendation: OCFO should work with the departments to better control overtime payments with limits on discretionary overtime and tiered approvals for employees that exceed the limit

Response: OCFO responded that the report's recommendations for policies and procedures are appreciated and OCFO will work with the departments to address how to modify or incorporate those recommendations and develop processes that best fit their needs. OCFO will continue to work with OIG to manage personnel costs and identify any inappropriate costs.



Office of the Inspector General Organizational Structure: 1st Quarter of 2025

Between January 1, 2025-March 31, 2025, the City of Detroit Office of the Inspector General (OIG) consisted of the following individuals:

Kamau Marable, M.A., CIG, CFE, **Inspector General** Jennifer Bentley, Esq., CIGI, **Deputy Inspector General** Beverly L. Murray, CIGA, CFE, **OIG Manager Investigations and Audit** Tiye Greene, Esq., **OIG Attorney** Edyth D. Porter-Stanley, CIGA, CFE, **OIG Forensic Auditor** Kelechi Akinbosede, Esq., CIGI, **OIG Investigator** April Page, M.A., CIGI, **OIG Investigator** Srinivas Gampa, **OIG Information Analyst** Kasha Graves, **Executive Administrative Assistant II** Kaniya Foster, **Executive Administrative Assistant I**



OIG Contact Information

Via Internet:

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 (8477)
Via OIG Telephone Line:	313-628-2517
Via Mail:	City of Detroit Office of Inspector General
	615 Griswold, Suite 1230
	Detroit, Michigan 48226
Via Email:	reachoig@detoig.org
Via Social Media:	Facebook:
	Instagram: O
	Twitter:
	LinkedIn:

Please use social media to stay connected to the OIG but *social media should not be used to file complaints* with our office. You can use any of the other methods listed above to file a complaint. You can also visit the OIG at the address above to file a complaint in person.