

Message from the Inspector General



I am presenting the 3rd Quarter Report as mandated by the Charter. It was indeed a very busy quarter, as the report will show. As always, I thank my hard-working and dedicated staff for their efforts in moving forward our shared goal and mandate of ensuring honesty and integrity in City government and contracting.

During this quarter, I found myself making some difficult decisions in executing my duties. I knew this would absolutely be the case when I was appointed to this Office. I am prepared and able to make those difficult calls; however, it does not mean that it's easy. I am keenly aware of the impact of the actions we take. However, our Charter mandate to detect and deter fraud, abuse, waste, and corruption is clear, and we will always carry it out to the best of our ability.















Dear Director Vought

As state and local Inspectors General, we write to express our profound concern regarding the proposed termination of funding for the Council of the Inspectors General on Integrity and Efficiency (CIGIE). We strongly urge you to reject this proposal and to ensure that CIGIE continues to receive the resources it needs to fulfill its essential mission.

CIGIE sets professional standards, coordinates cross-agency oversight efforts, and provides critical training that strengthens Inspectors General nationwide. Through its leadership, the Council ensures that federal oversight is carried out with consistency, rigor, and independence.

The ripple effects of CIGIE's work extend well beyond Washington. State and local oversight professionals, including our own offices, rely on CIGIE's work to develop best practices and promote innovation. This, in turn, helps us safeguard against waste, fraud, and abuse, ensuring that public funds are used efficiently and that public trust in government is preserved at every level.

Eliminating funding for CIGIE would not only weaken federal oversight, but also undermine oversight across American state and local governments. The result would be diminished accountability, greater vulnerability to misconduct, and reduced confidence in government institutions.

We therefore respectfully urge you to preserve funding for CIGIE, in recognition of its indispensable role in safeguarding the integrity of government operations.

Thank you for your consideration of this urgent matter, and for your continued commitment to strong, independent oversight.

Sincerely,

Lucy Lang New York State Inspector General

Megan Davey Limarzi Montgomery County, MD Inspector General

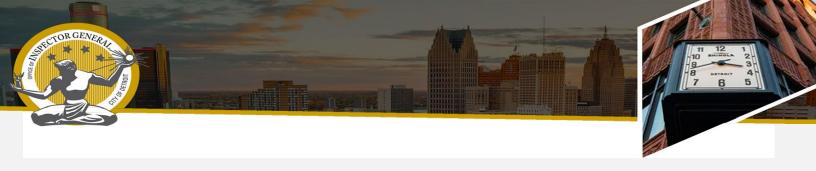
Kamau C. Marable City of Detroit Inspector General Michele Henry Pennsylvania State Inspector General

LaDawn Blackett City of Atlanta Interim Inspector General Jeffrey S. Shapiro Massachusetts Inspector General

Peter Neumer Chicago Park District Inspector General President Trump and the Office of Management and Budget recently defunded the Council of the Inspectors General on Integrity and Efficiency (CIGIE). CIGIE is a crucial organization of federal Inspectors General employees that provides training, sets professional standards, promotes innovation, and coordinates oversight across agencies. This defunding is concerning because it weakens the effectiveness of Inspectors General, increasing the vulnerability to misconduct and reducing public confidence in government. This action is part of a broader pattern that destabilize institutions supporting government transparency and accountability.

I and six of my Inspector General colleagues sent and published this letter in support of reestablishing funding for CIGIE. We hope it is met with all due consideration.

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.

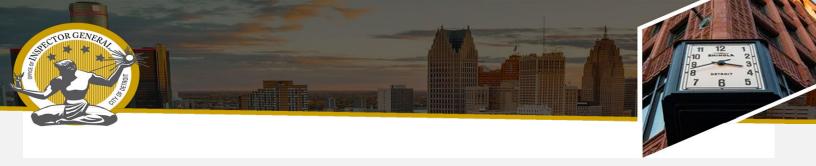
The Charter further requires that every public servant, contractor, subcontractor, licensee, applicant for certification to cooperate in the IG's investigation, as failure to do so would subject that person "to forfeiture of office, discipline, debarment or any other applicable penalty." See, Section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



3rd QUARTER HIGHLIGHTS

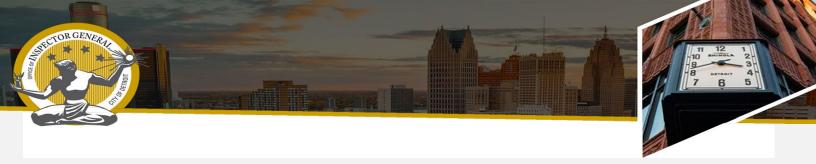
147 Complaints Closed

8 Investigations Initiated

5 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.

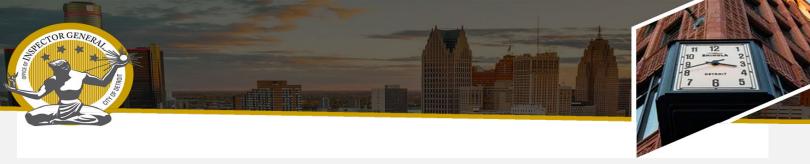
If the Inspector General elects to close the complaint without opening an investigation, one or more of the following actions will be taken:

- 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 www.detroitmi.gov/inspectorgeneral.

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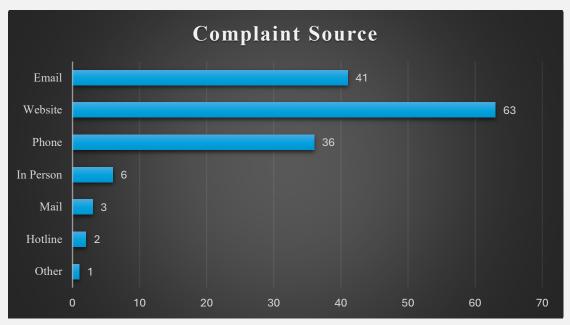
¹ For example, on occasion, two complainants with competing interests will file separate complaints with the OIG. If the OIG has a reasonable suspicion that criminal charges may result from a law enforcement investigation, the OIG will not notify either complainant before referring the case and closing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



2025 3rd QUARTER COMPLAINT STATISTICS

(July 1, 2025-September 30, 2025)

Sources of the 144 Complaints Received by the OIG in the 3rd Quarter



Categories of the 144 Complaints Received by the OIG in the 3rd Quarter

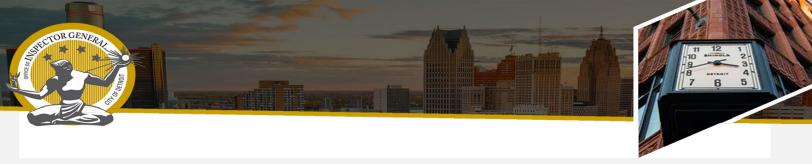




How Complaints Were Resolved by the OIG in the 3rd Quarter



The statistics above show the OIG actively worked on 155 complaints this quarter, including 11 complaints that were pending prior to the quarter. By the end of the quarter, 8 of the 155 complaints were resolved by opening a new investigation. The OIG also resolved 104 of the 155 complaints through either a formal or informal referral. The OIG declined to investigate or take other action on 35 of the 155 complaints. As of September 30, 2025, the OIG still had 8 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.

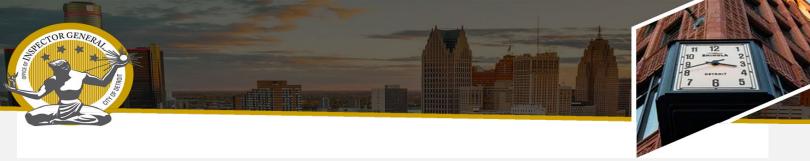
An OIG investigation may result in findings by the OIG which substantiate the complainant's allegation of waste, abuse, fraud or corruption in the City's operation or personnel or that of its contractors and/or subcontractors.

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 website www.detroitmi.gov/inspectorgeneral.

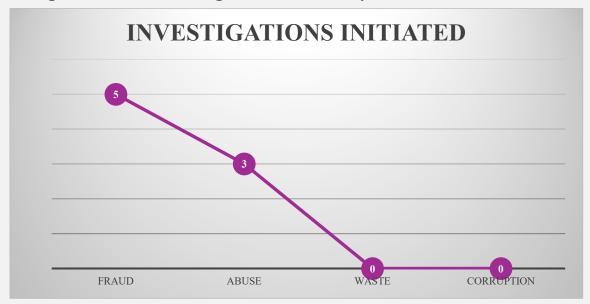
The OIG summarizes the findings of the investigation in the OIG's final memorandum. At times, the OIG can elect to issue a formal final report instead of an internal memorandum. All formal final reports have been and will continue to be published on-line. In addition, from time to time, we exercise our discretion to publish some of our internal memoranda through the City and the OIG's website at: www.detroitmi.gov/inspectorgeneral. 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.



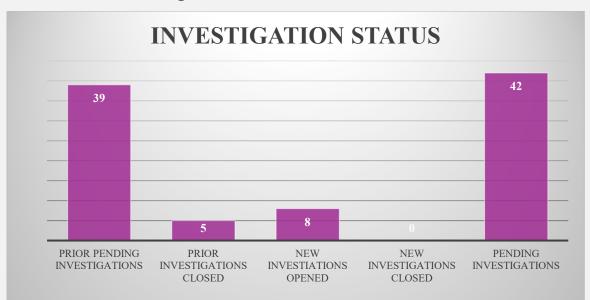
2025 3rd QUARTER INVESTIGATION STATISTICS

(July 1, 2025-September 30, 2025)

Categories of OIG Investigations Initiated by the OIG in the 3rd Quarter



Status of OIG Investigations in the 3rd Quarter



The statistics above show the OIG had 47 active investigations during the quarter. By the end of the quarter, 5 of the 47 investigations were closed. As of September 30, 2025, the OIG still had 42 investigations pending.



Summary of Investigations Closed in the 3rd Quarter of 2025

25-0002-INV

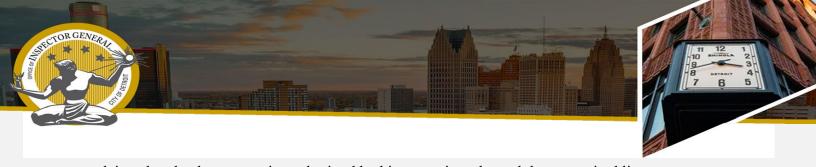
On February 24, 2025, the OIG received a complaint regarding City of Detroit contractor Lucas Enterprises, Incorporated. The complaint alleged that Lucas Enterprises and its owner, Michael Lucas, are closely associated with a debarred individual, namely, Jessica Lucas. The OIG opened an investigation to determine whether Jessica Lucas has a direct or indirect financial interest in Lucas Enterprises. In addition, the OIG sought to determine whether debarment is appropriate for Lucas Enterprises and its owner, Michael Lucas. The investigation revealed Ms. Lucas is an officer of Lucas Enterprises and, therefore, has a direct financial interest in the entity. The investigation also revealed that Michael Lucas submitted false or misleading information to the Office of Contracting and Procurement that did not identify Ms. Lucas as an officer of the entity. Further, Mr. Lucas failed to cooperate with the OIG's investigation by refusing to provide information and documents upon request. Based on a preponderance of the evidence, the OIG determined debarment is appropriate for Lucas Enterprises and Michael Lucas. In addition, Jessica Lucas received a second debarment for violating the terms of the debarment ordinance. An updated Debarment List is available on the OIG's website. Hard copies of the Debarment List are also available at the OIG.

25-0006-INV

On March 14, 2025, the OIG received a complaint alleging retaliation against a City employee for their cooperation with a 2023 OIG investigation. The complaint also alleged abuse of authority by the Board of Police Commissioners (Board or BOPC) for un-appointing the City employee without cause, in violation of the department's progressive disciplinary action policy. The OIG interviewed key BOPC personnel to determine whether the employee's un-appointment was retaliation for cooperation in an earlier investigation, or an abuse of the BOPC's authority. The OIG did not find evidence of retaliation for cooperating with the OIG. In addition, based on the appointment (and un-appointment) authority granted to the Board by the Charter, the OIG did not find abuse in connection with ending the employees' appointment without cause.

25-0009-INV

On April 14, 2025, the OIG received a complaint alleging that a City of Detroit Human Resources Department (HR) Employee Services Consultant wrongfully terminated his employment based on false documentation she received from his supervisor. The complainant



claims that the documentation submitted by his supervisor showed that a required license was denied, when it was pending review by the State and later granted after his employment was terminated. The complainant also stated that he did not receive any formal letter from the City stating the reason for the termination until he later learned it was due to poor work performance. In addition, the complainant alleges that the HR Onboarding Specialist reported false information to the State of Michigan Unemployment Insurance Agency (UIA) leading to a denial of unemployment insurance benefits.

Based on a preponderance of the evidence, the OIG finds that:

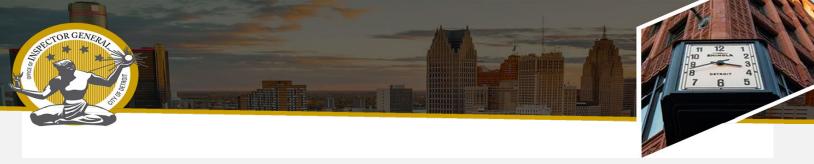
- 1. The supervisor did not falsify documentation leading to the complainant's termination,
- 2. The HR Employee Services Consultant did not abuse her authority in terminating the complainant's employment, and
- 3. The HR UIA Specialists did not provide false information to the State leading to the denial of the complainant's unemployment benefits. As such, they did not abuse their authority.

During the investigation, the OIG also found that the complainant should not have been hired initially based on his background check. However, a former HR employee allowed his employment to go through for unknown reasons. Therefore, the OIG recommends that HR review and update its policies and procedures regarding background checks conducted during the hiring process. We also recommend that HR train those responsible for conducting background checks on the updated policies and procedures.

25-0010-INV

On March 8, 2018, the OIG opened an investigation into a contractor after receiving allegations of unethical and potentially criminal activity related to car thefts and the recovery and towing of stolen vehicles. On July 20, 2018, the OIG concluded the investigation, determining that significant concerns existed regarding the contractor's actions and recommending that the City not consider the company for 2018 contracts. A debarment investigation was not conducted at that time because the City's Debarment Ordinance had not yet been enacted.

On April 24, 2025, the OIG initiated another investigation after learning the contractor's owner had purchased a current city contractor, raising questions about their ability to act as a responsible contractor in light of a permanent court injunction prohibiting the company from recovering or impounding stolen vehicles. Upon review, the OIG found that the contractor and its owners met the criteria for debarment but determined that pursuing such action would be impractical, as the misconduct occurred more than 5 years ago and the Debarment Ordinance limits debarment to periods proportionate to the conduct, generally capped at 5 years unless certain circumstances existed, which they did not in this instance.



25-0012-INV

On June 2, 2025, the OIG received an anonymous complaint alleging that an orientation for the Mayoral Fellowship Program included campaign activities. The orientation, which was held at a City building, featured two mayoral candidates as "special invited guests." According to the complaint, the moderator introduced them as candidates, and they spoke about their backgrounds and plans for the city, including their intentions to continue and expand the fellowship program. The OIG investigated whether Human Resources (HR) employees abused their authority by allowing campaign activities with City personnel on City property during work hours.

The investigation found that the employee who organized the event was unaware of the rules regarding campaign activities on city property and had never received the Board of Ethics training that informs City employees of prohibited campaign activities. Additionally, other HR employees were not aware of the candidates' presence until after the event. Therefore, the OIG did not find sufficient evidence to support the claim that HR employees abused their authority by allowing mayoral candidates to campaign on city property. The OIG recommends that Board of Ethics conduct refresher training for all employees during election years. This will help ensure employees are aware of the restrictions on do not engage in campaign activities during work hours or while on city property.

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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.

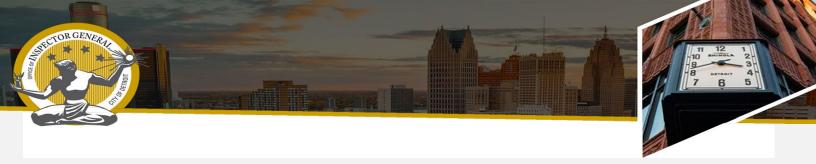
An audit generally involves performing one or more of the following:

- 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 3rd Quarter of 2025.



OIG'S OPEN RECOMMENDATIONS MADE TO CITY DEPARTMENTS AND AGENCIES

Status Report as of September 30, 2025

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 September 16, 2025, the OIG followed up with OCFO/ODFS/Payroll departments. The OIG has not received a substantive response from the OCFO/ODFS/Payroll departments regarding the OIG's recommendations.

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 September 16, 2025, the OIG followed up with OCFO/ODFS/Payroll departments. The OIG has not received a substantive response from the OCFO/ODFS/Payroll departments regarding the OIG's recommendations.

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

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
25-0009-INV	Human Resources	9/4/2025	Closed

Recommendation: The Human Resources Department should review and update its policies and procedures regarding background checks conducted during the hiring process. HR should train those responsible for conducting background checks on the updated policies and procedures.

Response: On October 1, 2025, HR followed up with the OIG by sending a policy outlining the process they have put in place for all background checks for the Fire Department hirings.

Case Number	Public Servant, Department, Board or Agency	Date	Status
25-0012-INV	Board of Ethics	8/21/2025	Open

Recommendation: BOE should conduct refresher training for all employees during election years. This will ensure employees are aware of the restrictions on do not engage in campaign activities during work hours or while on city property.

Response: Not yet due.



Office of the Inspector General Organizational Structure: 3rd Quarter of 2025

Between July 1, 2025, and September 30, 2025, the City of Detroit Office of the Inspector General consisted of the following individuals:

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

Jennifer Bentley, Esq., CIG, CIGI, Deputy Inspector General

Beverly L. Murray, CFE, CIGA, CIGI, OIG Manager Investigations and Audits

Tiye Greene, Esq., CIGI, CIGC, **OIG** Attorney

Kelechi Akinbosede, Esq., CIGI, OIG Investigator

April Page, M.A., CIGI, OIG Investigator

David Armstrong, MBA, OIG Forensic Auditor

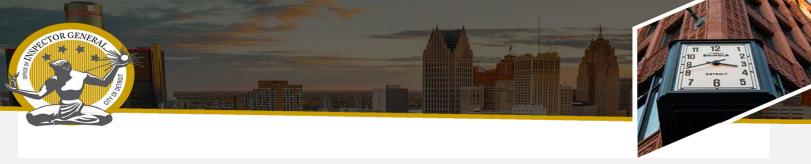
Lakita Phoeson, CFE, OIG Forensic Auditor

Srinivas Gampa, OIG Information Analyst

Kasha Graves, Executive Administrative Assistant II

Kaniya Foster, Executive Administrative Assistant I

Christina Hobson, OIG Intern



OIG Contact Information

Via Internet: <u>www.detroitmi.gov/inspectorgeneral</u>

(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: <u>reachoig@detoig.org</u>

Via Social Media: Facebook:

Instagram:

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.