City of Detroit

OFFICE OF THE AUDITOR GENERAL

Performance Audit
Detroit Board of Police Commissioners

June 2026

OFFICE OF THE AUDITOR GENERAL
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 216
Detroit, MI 48226
313.224.3101
313.224.4091
www.detroitmi.gov

MEMORANDUM

DATE : June 29, 2026

TO: Honorable City Council
Mayor Mary Sheffield

FROM: Laura Goodspeed, CPA LG
Auditor General

RE: Performance Audit of the Detroit Board of Police Commissioners (June 2026)

Attached for your review is our report in conjunction with our Performance Audit of the Detroit Board of Police Commissioners. This report contains our audit's purpose, scope, objectives, methodology, and conclusions; background; our findings and recommendations; and responses from the Detroit Board of Police Commissioners and the Office of the Chief Financial Officer, Office of Departmental Financial Services.

We would like to thank the Detroit Board of Police Commissioners, their employees, and employees of the Office of the Chief Financial Officer, Office of Departmental Financial Services for their cooperation and assistance extended to us during this audit.

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C: Detroit Board of Police Commissioners

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Victoria Camille, Commissioner, District 7
Lisa Carter, Commissioner, District 6
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Lydia Garnier, Board Secretary

Andre Blair, Agency Chief Financial Officer, Office of Chief Financial Officer
Regina Greear, Deputy Chief Financial Officer, Office of the Chief Financial Officer
John Naglick, Chief Deputy Chief Financial Officer/Finance Director, Office of the Chief Financial Officer
Angelique Rodriguez-Edge, Chief of Policy and Administration, Office of The Chief Financial Officer
Tanya Stoudemire, Chief Financial Officer, Office of the Chief Financial Officer

PERFORMANCE AUDIT OF THE DETROIT BOARD OF POLICE COMMISSIONERS
JUNE 2026

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EXECUTIVE OVERVIEW

In 2021, the Office of the Auditor General was requested by Detroit City Council to conduct an audit of the Detroit Board of Police Commissioners. Although the audit was officially started in September 2022, due to resource constraints and other unforeseen circumstances, the completion of the audit was delayed several times.

Despite the delay in reporting, we feel the Findings and Recommendations, Note of Concerns, and Noteworthy Accomplishment included in this report remain relevant and timely.

The objectives of the audit were to:

- To determine the efficiency and effectiveness of the department's core operations.
- To evaluate the adequacy of the department's internal controls over the major financial report processes, specifically, cash receipts, disbursements, capital assets, and revenues noting any control weaknesses.
- To determine whether the department is complying with applicable Finance Directives, policies, plans, procedures, laws and regulations regarding financial transactions.
- To determine the status of each audit finding and issue of non-compliance in prior audit reports.

Based on the scope and results of our audit, we concluded that the Detroit Board of Police Commissioners (BOPC):

A. Core operations were not efficient and effective.
B. Internal controls over their major financial reporting processes are adequate.
C. Complied with applicable finance directives, policies, procedures and regulations regarding financial transactions.

There were no prior audit findings or issues of non-compliance as this was the Office of the Auditor General's first audit of BOPC.

Office of Inspector General Investigations
During the course of this audit, the Office of Inspector General (OIG) conducted several investigations into allegations against BOPC. As stated in the Detroit City Charter, "The purpose of the Office of Inspector General is to ensure honesty and integrity in City government by rooting out waste, abuse, fraud, and corruption."

We reviewed several of their investigative reports relating to BOPC and found two relevant items in the "City of Detroit Office of Inspector General Potential Fraud in Administrative Closures of OCI Files, OIG File No. 23-0005-INV" report: [1]

1. The Office of Inspector General (OIG) report included similar finding conditions about the non-standard closure of certain citizens' complaints. We also found similar conditions which are reported in **Finding #1: The Board of Police Commissioners Did Not Comply With The Standard Operating Procedures For Citizen Complaint Investigations** on page 8 of this report.

   OIG concluded (in part) that :

   - Although the investigation revealed 400 or more Charter violations, no evidence reviewed indicates that Ms. White and/or others who participated in the Triage Project intended to defraud the Board or the public.[2]
   - More importantly, the triage process failed to meet the complaint resolution mandates written in the 2012 Charter of the City of Detroit (the Charter), as described in more detail in Section II(1) of this report. Nonetheless, we do not find that Ms. White, Mr. Akbar, and/or SI Hiller engaged in fraudulent activity when participating in or managing the triage pilot project.[3]

2. Based on interviews with key personnel, and reviews of BOPC's organizational documents, including the City Charter, BOPC By-Laws, organization charts, job descriptions, we found that the current By-Laws and Board Secretary's job description continue to conflict with the City's Charter. To a great degree, the City's Charter is "silent" to the functional and administrative structure of BOPC and it states that "All members of the staff are under the direction of the Board." The Inspector General and the Law Department both concluded that the Board **cannot** delegate its discretionary powers to the Board Secretary nor authorize the Secretary to perform any duties that contradict the Charter. [4]

   Yet, based on our observations, the Board Secretary continues to act as the head administrator or "de facto" department director of BOPC[5] This is further substantiated by the "Example of Duties" contained in the Board Secretaries job description which states:

   - Supervise all BOPC Executives, Administration, and employees in the performance of their duties.
   - Perform annual staff evaluations and prepare staff and Board strategic plans.
   - Cultivate and maintain a healthy work environment for all personnel.

[1] Office of Inspector "Potential Fraud in Administrative Closures of OCI Files, OIG File No. 23-0005-INV", https://www.detoig.org/home
[2] *ibid*, page 11 of 39.
[3] *ibid*, page 38 of 39
[4] *ibid*, pages 11-20 of 39
[5] De facto is a Latin phrase meaning "in fact" or "in practice". It describes a state of affairs that is true in reality, even if it is not officially sanctioned by law or formally recognized.

This internal BOPC conflict/lack of clarity is evident in the Agency's own Response to this audit report from BOPC (see **ATTACHMENT A: BOARD OF POLICE COMMISSIONERS' AGENCY RESPONSE**.)

In the response, the Board Secretary made several declarations such as:

- The OIG placed more weight on "all members of the staff [being] under the direction of the Board: than they should have and noted that "direction" is not the same as "supervision" of employees.
- The BOPC job for Board Secretary has made clear via job description and interviews that the Board directs and the Board Secretary supervises employees to comply with the direction.
- Subsequent to the OIG Report referenced by the Auditor General in the [Draft] Performance Audit Report, the BOPC approved an organizational chart with the Secretary to the Board and Chief Investigator both to report directly to the BOPC. After this change was approved (June 2024} to date, the Bylaws nor position descriptions of BOPC Staff have been revised; except that ODFS represents that all positions fall under the Chief Investigator (see UltiPro).

However, we were not provided the revised approved Bylaws nor the payroll structure (ODFS/UltiPro) referenced above.

On the other hand, and in the same Agency response, the Chief Investigator, categorically reiterated that our characterization of the Board Secretary "as the head administrator or de facto department director of BOPC, " again is not supported by the 2012 Detroit City Charter and is directly contradicted by formal opinions of the City's Law Department and the findings of the Office of Inspector General."

Auditor General's Conclusion

We are encouraged by the Board of Police Commissioners' overwhelming positive response to our operational findings and recommendations. Based on the Agency's "Implementation Tracking" response, it is evident that BOPC considered and acted upon the finding conditions which we discussed in detail during our End of Fieldwork Conference (August 2025.)

Nonetheless, the lack of a clearly agreed upon, and defined organizational structure continues to beset BOPC, specifically, the roles and responsibilities of the Board Secretary. An organizational structure is important and establishes the internal framework that dictates how roles, responsibilities, and decision-making occur, while defining reporting relationships, needed to align day-to-day tasks with operational efficiency and long-term strategic goals.

I urge the Board of Police Commissioners to work with the Administration and the City's Law Department on a path forward where the organizational and administrative needs are aligned and are in agreement with the City's Charter.

BACKGROUND

The history of civilian police oversight in Detroit begins with the establishment of the Detroit Police Department by a state legislative act in 1865. Prior to the enactment of the Detroit City Charter, the legislature provided for a four-member commission to be appointed by the Governor for eight-year terms. The four-member commission system continued until May 4, 1901, when the first single commissioner was appointed. The single commissioner form of administrative authority over the Department continued until enactment of the City Charter.

The Detroit Board of Police of Commissioners (BOPC) was created in 1974 by City Charter, which was adopted by the vote of the people. The Charter vests broad supervisory authority over the Police Department in the eleven-member civilian Board of Police Commissioners.

According to a Citizens Research Council of Michigan report on Detroit City Charter Issues (August 1993)[6]:

> A major challenge for the 1970-1973 Detroit Charter Revision Commission was how to balance two fundamental and often competing principles concerning the accountability of the police department.
>
> On the one hand, the Commission learned during long hours of hearings that an intense need existed for a police department which was responsive to the diverse people, interests, and values of Detroit. This need was expressed in terms of the importance of proper community influence on the policies and performance of the police department and more specifically in terms of the process for resolving citizen complaints fairly.
>
> On the other hand, the Charter Revision Commission was confronted with the need to assure that supervisory control over the police department was vested securely in the mayor. This was seen as a way of clearly establishing the accountability of the mayor's office for an effective and equitable police department.
>
> The Commission attempted to resolve its dilemma by creating a new police structure which provided for a five-member board of police commissioners, appointed by the mayor with council approval, to oversee the police department.
>
> The Charter Revision Commission also provided for a chief of police, appointed by the mayor, to administer the department. This new structure was actually a second attempt by the Charter Revision Commission to balance the supervisory control/citizen involvement dilemma, since an earlier charter revision proposal providing for a separate professional standards department was criticized widely.

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[6] Citizens Research Council of Michigan, "Detroit City Charter Issues" Report No. 310-06 Sixth In A Special Series On Detroit City Charter Revision Issues August 1993 The Detroit Board Of Police Commissioners: Historical And Policy Context, https://detroitmi.gov/government/boards/board-police-commissioners/learn-about-bopc-and-civilian-oversight.

> When the voters of Detroit approved the final charter proposal on November 6, 1973, a form of civilian oversight that drew on historical precedent was merged with an innovative police accountability mechanism to give Detroit a unique position in American policing.

The make-up and organization of BOPC has evolved with each successive Charter. The most recent Charter, the 2012 City of Detroit Charter, established the current composition of the board. The current 2012 City Charter provides for the Board to have eleven commissioners, with four members appointed by the Mayor (subject to the approval of the City Council) and seven elected members, one from each police commission district.

Each commissioner serves a five-year term of membership. It was envisioned that these civilian appointees would represent the various interests, values and opinions of the community – clergy, labor, medicine, legal, public interest and education.

The Charter requires BOPC to elect a new chairperson annually. The Charter also requires BOPC to meet at least once each week, but may recess during the Thanksgiving, Christmas, and New Year's holidays. BOPC meets weekly including twelve community/evening meetings in each of Detroit's seven Council districts. The strict Charter requirements for meetings are discussed in the "Note of Concerns" on page 12 of this report.

The Board appoints a Board Secretary, who serves at the pleasure of the Board and attends board meetings. The Charter states that the Board Secretary shall not have been an employee, elective, or appointive officer of the City within three (3) years prior to appointment as the Board Secretary.

Section 7-803 of the Detroit City Charter states that the Board shall:

1. In consultation with the Chief of Police, and with the approval of the Mayor, establish policies, rules and regulations.
2. Review and approve the departmental budget before its submission to the Mayor.
3. Receive and resolve any complaint concerning the operation of the Police Department and forward all allegations of criminality to the appropriate internal or external law enforcement agency for further investigation.
4. Act as a final authority in imposing or reviewing discipline of employees of the department.
5. Make an annual report to the Mayor, City Council and the public of the department's activities during the previous year, including the handling of crime and complaints and of future plans.

BOPC has an “investigation-focused model” of civilian oversight which entails employing professionally trained staff to investigate complaints of alleged misconduct independently and separately from the police department. This allows for the most independent, citizen-focused complaint resolutions and the most direct form of citizen police oversight of the types of civilian oversight models.

The internal administration of BOPC includes:

- Fiscal responsibility.
- Policy.
- Administrative activities.
- Legal advisory.
- Community outreach.
- The Office of the Chief Investigator.

The Office of the Chief Investigator (OCI) serves as the investigative staff for BOPC. OCI is staffed by civilian personnel. It is their job to direct the process for receiving, investigating, and the resolution of complaints about non-criminal police misconduct against the DPD and its personnel. All citizen complaints are forwarded to the OCI for investigation. On average, they process and investigate 1,500 to 2,000 complaints annually.

A person has the right to file a complaint against DPD personnel in the following ways:

1. File a complaint in-person at any precinct, bureau, section or unit of the Detroit Police Department or at the Office of the Chief Investigator.
2. Mail or delivery a letter to the Office of the Chief Investigator, 900 Merrill, Detroit, MI 48203.
3. Call telephone number (313) 596-2499.
4. File a complaint online via the Office of Chief Investigator City of Detroit Website: https://detroitmi.gov/government/boards/board-police-commissioners/office-chief-investigator-police-complaints.
5. Send a Fax to (313) 596-2482.

The areas investigated by OCI include, but are not limited to:

- Arrest – a seizure of greater scope or duration than an Investigatory or Terry Stop, which is when a police officer briefly detains someone suspected of being involved in criminal activity. An arrest is lawful when supported by probable cause.
- Demeanor – a gesture, language or other action which can be interpreted as offensive or of doubtful social propriety or gives the appearance of conflict of interest, misuse of influence or lack of jurisdiction or authority.

- Harassment – the method of police action was improperly selective and was predicted upon factors irrelevant, under the circumstances, to good law enforcement decision making. Whereas specific actions are insulting, taunting, unnecessary or in the form of frequent contact(s).
- Force – use or threatened use of force against an individual was improper, excessive, or inconsistent with Department directives. Force includes any of the following actions by an officer: any physical strike or instrumental contact with a person; any intentionally attempted physical strike or instrumental contact that does not take effect; or any significant physical contact that restricts the movement of a person.
- Procedure – the actions taken were in violation of Department rules, regulations, procedures or policies, or the Law Enforcement Code of Ethics.
- Service – Complaint regarding the lack, tardiness or inadequacy of police service.

The following table shows the Expenditures and Net Tax Cost for BOPC for fiscal year 2020-21 through fiscal year 2025-26. It should be noted that BOPC does not create nor have revenue. BOPC operations are not attributed to a specific agency and therefore they are budgeted as part of Non-departmental expenditures.

Detroit Board of Police Commissioners Budget						
	Fiscal Years Ending June 30, Dollars in Millions					
Budget Item	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**
Expenditures	$3.7	$3.6	$3.9	$3.8	$4.6	$4.7
Net Tax Cost	**$3.7**	**$3.6**	**$3.9**	**$3.8**	**$4.6**	**$4.7**
Full Time Employees	35	35	35	35	35	43

AUDIT FINDING AND RECOMMENDATIONS

<u>Finding #1: The Board of Police Commissioners Did Not Comply With The Standard Operating Procedures For Citizen Complaint Investigations</u>

Background

The Board of Police Commissioners (BOPC) will receive and resolve any complaint concerning the operation of the police department as prescribed in the Detroit City Charter.

The Office of the Chief Investigator (OCI) personnel assigned to investigate a citizen complaint shall complete the investigation and complete an investigation report. OCI's Standard Operating Procedures details the procedures and ways complaints are dispositioned:

A. **Findings Letter**

   The investigator will document their conclusion of the findings of their investigation in a written report and conclude the complaint as either:

   1. <u>Exonerated</u> – A preponderance of the evidence showed that the alleged conduct did occur, but did not violate the law, the Detroit Policy Department (DPD) policy, procedures or training.
   2. <u>Unfounded</u> – The investigation revealed that no facts to support that the incident complained of occurred.
   3. <u>Sustained</u> – A preponderance of the evidence showed that the alleged conduct did occur, and that the actions of the officer violated the law, DPD policy, procedure or training.
   4. <u>Inconclusive</u> – There were insufficient facts to decide whether the alleged misconduct occurred.

B. **Administrative Disposition**

   In some instances, a citizen complaint can be administratively closed by one of two methods:

   1. <u>Administrative Closure</u>

      Administrative Closures shall be reviewed and approved by a Supervising Investigator, and shall be limited to:

      a. Duplicates.
      b. Complaints referred to the appropriate outside agency including but not limited to Internal Affairs, Force Investigation, or to any other outside agency for proper investigation shall be closed in the OCI database as "transferred."
      c. Complaints made against an officer or employee who is no longer employed by DPD.
      d. Complaints where the alleged conduct does not violate law or policy.

e. Complaints which lack sufficient detail as to the officers involved, lack sufficient detail as to the facts surrounding the incident or lack merit, and if the complainant is unavailable, unwilling or unable to contribute to the furtherance of the investigation, then the Investigator will detail the basis of his/her determination, refer the matter to the Supervising Investigator for administrative closure of the file, who may refer the matter to the Chief Investigator for final review and approval.

2. Informal Complaint Resolution
Informal Complaint Resolutions must be reviewed and approved by the Chief Investigator, and shall be limited to:

   a. Informal Complaints - the citizen complaint alleges **only** inadequate service (e.g. not coupled with demeanor, procedure, etc.)

   b. Innocence of a Charge - the complainant's **only** allegation is that they deny violating any law.

C. Board Resolution

If a complaint is not resolved as a result of investigation to the satisfactory of the complainant, the respondent employee, or a member of the Board of Police Commissioners, either the complainant, the respondent employee, or Board member may request the Board to hear or review the matter. The Board may, at its option, determine that a hearing or review is warranted by the evidence, hear or review the matter itself or refer the matter to a fact finder.

After a hearing, the fact finder shall, within thirty (30) days, submit findings of facts to the Board. The Board, upon receipt of the report of the fact finder shall, within thirty (30) days, determine any discipline to be imposed. It shall then make the report and its actions public. The decision of the Board is final.

Conditions

The Office of the Chief Investigator (OCI) closed 3,237 citizen complaints during the audit period of July 1, 2020, through June 30, 2023. We selected a representative sample of 100 citizen complaints spanning the three-year audit period and tested them for compliance with OCI's Standard Operating Procedures.

During our review of the sample of complaints, we discovered that from July 2022 to December 2022, OCI staff implemented an unsanctioned triage process to expedite closing of citizen complaints to reduce the backlog. OCI stopped using the triage process in 2023, and the staff associated with the implementation of that process are no longer employed at BOPC. We determined the use of the triage process and the improper closing of multiple cases during that period to be inconsistent with how OCI historically operates, and the process was not approved by BOPC's Board of Directors. The conditions associated with the triaged complaints (15 out of the sample) are included in our audit results below.

The following table details the major conditions that were not compliant with OCI's Standard Operating Procedures:

Audit Finding Conditions Summary		
Conditions		% of Non-Compliance
A.	Complaint investigation was not completed within ninety days.	46%
	• Investigations extending beyond ninety days did not include a request for extension.	85%
B.	The complaint interview was not conducted within two weeks of the complaint assignment.	40%
	• When the complainant was not interviewed within the first two weeks, there was no effort made to contact the complainant.	30%
C.	Witnesses were not interviewed within ten days. [7]	67%
D.	Complaints to be transferred to other agencies were not transferred within seven days.	58%
E.	Complaint files did not include an OCI Report Checklist completed by the supervisor.[8]	69%
F.	Complaint files did not show evidence of review of video footage.	69%
G.	No final report was included in the complaint file.	25%

Criteria

BOPC's OCI Standard Operating Procedures contain the following criteria:

A. OCI personnel assigned to investigate a citizen complaint shall complete their investigation, including the report of the investigation within ninety days of the citizen filing the complaint. Requests for extensions beyond the ninety days require approval by the Chief Investigator.

B. Interview of the complainant should be completed within two weeks of the case assignment.

C. Sufficient efforts must be made to contact all witnesses. All efforts must be documented. Witnesses should be interviewed within ten days.

D. Complaints to be transferred to other jurisdictions should be transferred within seven (7) days of receipt.

[7] The Office of the Chief Investigator's "OCI Report Checklist," state that witnesses should be interviewed within ten days. OCI informed us that the checklist is not a requirement. However, we included the "ten-day" window since it adds specificity to the overall standard operating procedure. Consequently, we added this clarifying language to the Criteria (C) above.

[8] The Office of the Chief Investigator's "Standard Operating Procedures," do not specifically state, nor does OCI require the use of the "OCI Report Checklist." However, we determined that the checklist serves as a mechanism for supervisors to document the investigation as required by the standard operating procedure detailed in Criteria (E) on the page 11 of this report.

E. Supervising Investigators shall document and take appropriate corrective action regarding any investigative deficiencies, including failure to comply with OCI's Standard Operating Procedures.

F. All body-worn camera footage should be reviewed, and the review should be documented.

G. Written Report of Investigation – Investigators prepare and include a Citizen Complaint Investigation memorandum once all interviews have been conducted, and available evidence has been gathered.

Effect
Failure to handle citizen complaints in a timely and appropriate manner can lead to the inability of the BOPC to complete its mission to provide community-led oversight of the Police Department and its operations to ensure transparency, accountability and responsiveness. Improper handling of citizen complaints may allow police officers to go undisciplined for inappropriate behaviors and actions.

Cause
According to key personnel in BOPC, due to staffing shortages and an increase in complaint volume, OCI implemented an unapproved triage process to expedite case reviews. This approach resulted in investigations being closed without completion of all required procedures.

Recommendations
We recommend that BOPC ensure that standard operating procedures are consistently followed by the responsible personnel:

A. Supervisors should actively monitor the progress of investigations, and step in when needed to ensure all cases are completed within ninety days.

B. Investigators should interview complainants timely, and within two weeks of receipt of the assignment. All communication attempts must be documented, especially if the interview cannot be completed.

C. Investigators should attempt to locate and interview witnesses within ten days of assignment, and document all efforts made.

D. Complaints that fall under another agency's jurisdiction should be transferred within seven days of receipt and the transfer process documented. The complainant should be copied on the transfer to ensure that the complainant is aware of the transfer of the complaint.

E. The OCI Report Checklist should be completed by the assigned investigator and reviewed by the assigned complaint supervisor.

F. Investigators must include documentation showing they reviewed all available body-worn camera and police vehicle footage.

G. Every investigation file must include a copy of the final report.

NOTE OF CONCERNS
RELATING TO THE BOARD OF POLICE COMMISSIONERS

The following "Note of Concerns" warrants additional attention from the Board of Police Commissioners (BOPC) and its staff. While not an audit finding, we present them with the hope that BOPC will find added value through these concerns and address them accordingly:

1. **The Board Of Police Commissioners' Meeting Cadence Is Rigorous And Laborious.**
   The current Detroit City Charter requires the Board of Police Commissioners to meet weekly. We feel this cadence is both rigorous and laborious and interferes with their ability to carry out their mission. Based on our observations, we note that requiring the Board to meet each week may negatively impact BOPC's operations because:

   A. Preparing the documentation and information for weekly meetings is very time-consuming for BOPC's staff.

   B. Meeting weekly does not allow board members ample time to review the relevant documents for the next upcoming meeting.

   C. At times BOPC has had difficulty in having a quorum required for conducting business at the weekly meetings.

2. **Some Board Of Police Commissioners Recommendations To The 2018 Detroit Charter Revision Commission Should Be Adopted.**
   We reviewed BOPC's recommendations to the 2018 Detroit Charter Revision Commission and we agree with the following six (of fourteen) recommendations:

   A. The Board must approve all appointments and promotions made by the Chief of Police of the Detroit Police Department.

   B. The term length of appointed commissioners should be reduced from the current five year term to four years.

   C. BOPC's meeting schedule be adjusted to include a summer recess for the month of August, along with the current Christmas and Thanksgiving holiday breaks.

   D. If there is a vacancy of an elected Commissioner, then BOPC shall appoint the successor by majority vote.

   E. The Office of the Chief Investigator (OCI) must have a policy on "Cooperation in Investigations:"

   > It shall be the duty of every officer, employee, department, and agency of the City to cooperate with the Office in any investigation undertaken pursuant to this chapter. Any employee or appointed officer of the City who violates any provision of this chapter shall be subject to discipline, including but not limited to discharge, in addition to any other penalty provided in this chapter.

F. The OCI must have a policy on “Retaliation, obstruction or interference prohibited – Penalty:”

   1. Retaliation: No person shall retaliate against, punish, intimidate, discourage, threaten, or penalize any other person for reporting misconduct, making a misconduct complaint, conducting an investigation, complaining to officials, providing information, testimony or documents in an investigation, or cooperating with or assisting the Office in the performance of its powers and duties as set forth in this chapter.
   2. Obstruction or interference: No person shall willfully refuse to comply with a subpoena issued by the Office.

NOTE OF CONCERN
RELATING TO OFFICE OF THE CHIEF FINANCIAL OFFICER
OFFICE OF DEPARTMENTAL FINANCIAL SERVICES

The following “Note of Concern” warrants attention from the Office of the Chief Financial Officer (OCFO), Office of Departmental Financial Services (ODFS). While not an audit finding, we present it with the hope that ODFS will find added value through these concerns and recommendations.

The Office of Departmental Financial Services (ODFS) is a division of the Office of the Chief Financial Officer (OCFO), and it is responsible for assisting departments with their accounting needs. The mission of ODFS is to serve as a strategic financial partner to City agencies and assure the effective management and financial integrity of agency operations by developing, implementing and monitoring city-wide and department-wide plans, policies and systems in the areas of budget administration, program analysis/evaluation, finance and accounting, internal controls, financial systems, grants management, strategic planning, and performance metrics. ODFS is ultimately responsible for processing payments on behalf of BOPC.

During the audit period, BOPC had 687 invoices/payments. We tested 164 invoices and found that some accounting controls were not followed, which allowed payments to be made in violation of OCFO policy:

A. Seven (or 4.3%) invoices were missing the purchase order number.

B. Nine (or 5.5%) payments were not made within 45 days of the invoice creation date.

    - Six invoices were stipend payments for Board members.
    - Three invoices were for vendor payments.

The OCFO’s “Chief Financial Officer Directive No. 2018-101-018 – Accounts Payable, Section 6.2.4.1.3 Invoice Requirements” state that “If goods and/or services were procured using a purchase order, the invoice must contain the applicable purchase order number.”

In addition, the City of Detroit’s Prompt Payment Ordinance Sec. 18-5-74. - Duties of responsible person state that:

> Unless otherwise agreed to in a written contract or purchase order with a vendor, and subject to the provisions of section 18-5-77 of this Code, the responsible person shall take all necessary steps to ensure that payment for the vendor is mailed or delivered to the vendor within forty-five (45) business days after the vendor's delivery to the responsible person of an invoice or other written request for payment issued pursuant to the terms of the contract or purchase order.

Paying invoices without required documents circumvents internal controls created to ensure proper authorized payments. Failure to enforce policies governing payments can lead to an increased risk of fraud, and unauthorized and inappropriate transactions occurring without detection. Issuing late payments to vendors can also impact the city's reputation and interfere with its ability to conduct business with merchants.

The Office of Departmental Financial Services could not explain the exact delay in processing some invoices since the staff who processed the invoices are no longer with the city. In addition, the invoices for Board stipends were all paid late due to delays in Accounts Payable receiving the proper "recurring payment" paperwork.

Moreover, and according to an ODFS staff member, there is no written policy on when stipend payments must be made.

We recommend that ODFS consistently follow CFO Directive No. 2018-101-018 by:

A. Confirming all required information is on an invoice prior to making payment.

B. Paying invoices within 45 days of receipt. Receipt means uploaded and received in the City's Oracle financial system, or date-stamped and manually entered in the City's Oracle financial system.

We also recommend that the Chief Financial Officer create a written policy to process and pay stipend payments timely and promptly. This may include codifying the current unwritten practice of paying stipends directly after the end of each month.

NOTEWORTHY ACCOMPLISHMENT

The Board of Police Commissioners Upgraded Its Case Management Tracking System

During the audit, we were informed of and observed the following significant improvement in the case management system used by BOPC's Office of the Chief Investigator (OCI).

From 2003 to 2025, OCI relied on a Microsoft Access database, known as the Citizen Complaint Report (CCR), as its primary case management system. This system was used to track, manage, and investigate citizen complaints. However, the CCR database was outdated and lacked the following appropriate information technology internal controls, including:

A. **Access controls** - the system has only two defined roles, administrator and user. Every person with administrator user rights could change any information related to a case including closing it.

B. **Task dependencies** - a case could be closed without all necessary steps in the investigation taking place.

C. **Audit Trails** - there was no tracking of who, what and when actions are taken in the system.

The lack of these controls allowed for multiple people to have administrative access and gave them the ability to close cases without appropriate investigation. Because there was no audit trail, it was impossible to determine who closed cases outside of the standard operating procedure.

During the audit, we discussed with various Board of Police Commissioners (BOPC) and OCI officials the outdated case management system. We discovered implementing a more robust case management software had been discussed and investigated in the past, but it was determined it was cost prohibitive.

BOPC agreed that a true case management system would be beneficial to their operations and they requested and received funding in fiscal year 2024-2025 for a new case management system. OCI now uses "WingSwept" a state-of-the-art case management tracking system.

The new system has multiple levels of users' roles and responsibilities, which allows BOPC to customize and/or limit access and protect data in their system. The system makes it possible for OCI management to monitor the daily activities of the staff and their progress on assignments. OCI has streamlined documents that are part of the review of citizen complaints, and the system incorporates reporting of key operational metrics. This information can be reported to key stakeholders and used to ensure they are meeting their strategic objectives.

The case management tracking system provides:

1. System Security through the third-party provider's information technology infrastructure which aligns with industry security standards. Additional security features include secure access, built-in firewalls, unique users, multi-factor authorization, private subnets, encrypted data storage, dedicated connection option, perfect forward secrecy, security logs, access identification and configuration, centralized key management and monthly security vulnerability scans.
2. Data Backups of all content on Cloud Servers at least daily. Retention of key backup files is one year, including changed and deleted files.
3. Data Integrity because no one in BOPC (including OCI staff) can delete information in the system. Only the City's Department of Innovation and Technology has that ability.
4. An audit trail and system logs.

We acknowledge that replacement of the outdated software with the new case management tracking system will significantly increase data security, improve integrity and reduce the risk of data loss. Controls within the system should help to prevent cases from being closed outside of standard operating procedures. And when needed, the audit trail should provide a detective means to determine inappropriate activity and the responsible person.

Audit Purpose

The Office of the Auditor General (OAG) will perform an audit of the Board of Police Commissioners (BOPC) in accordance with the OAG's charter mandate as noted in Section 7.5-105(1) which states:

> The OAG shall 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 City Council.

Audit Scope

This is a performance audit conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) 2018 Revision, compiled by the Comptroller General of the United States Government Accountability Office (See "**APPENDIX B: Generally Accepted Government Auditing Standards**" on page 20 of this report for more information on GAGAS.)

The definition of Audit Scope is defined in GAGAS[9] Section 8.10.

> Scope is the boundary of the audit and is directly tied to the audit objectives. The scope defines the subject matter that the auditors will assess and report on, such as a particular program or aspect of a program, the necessary documents or records, the period of time reviewed, and the locations that will be included.

The full scope of this audit was from July 1, 2020 – June 30, 2023.

Audit Objectives

The objectives of the audit were to:

- To determine the efficiency and effectiveness of the department's core operations.
- To evaluate the adequacy of the department's internal controls over the major financial report processes, specifically, cash receipts, disbursements, capital assets, and revenues noting any control weaknesses.
- To determine whether the department is complying with applicable Finance Directives, policies, plans, procedures, laws and regulations regarding financial transactions.
- To determine the status of each audit finding and issue of non-compliance in prior audit reports.

[9] Generally Accepted Government Auditing Standards (GAGA) 2018 Revision, Compiled by the Comptroller General of the United States Government Accountability Office, https://www.gao.gov/yellowbook.

Audit Methodology

The auditor will perform the following audit steps:

- Review prior audit and permanent file working papers.
- Review applicable city ordinances, city policies, and departmental policies.
- Interview key personnel.
- Review and observe procedures performed for the area or process under review.
- Identify significant inherent and control risks in for the area or process under review.
- Document audit risk assessment.
- Develop the audit program.
- Conduct additional interviews of appropriate personnel.
- Perform test to assess the implementation of any prior audit recommendations.
- Perform testing on a sample basis of transactions to obtain sufficient evidential information to achieve the related audit objectives.
- Prepare conclusions based on the testing performed to meet the audit objectives and prepare all related finding development sheets, as warranted.
- Complete, organize, and cross-referencing to the audit working papers.
- Prepare the audit report that will be cross-referenced to the audit working papers.
- Review the report with the Department management to discuss the noted audit findings including recommendations, noncompliance issues, and other issues contained in the report.
- Developing recommendations for all findings.

Note: See "**APPENDIX B: Generally Accepted Government Auditing Standard**s" for more information on Fieldwork, Developing Findings, Reporting Conclusions and Recommendations in a Performance Audit on page 20 of this report.

The following excerpt is related to Generally Accepted Government Auditing Standards as complied by the United States Government Accountability Office (GAO) for Performance Audits. According to the GAO and GAGAS[10]:

> §1.21: Performance audits provide objective analysis, findings, and conclusions to assist management and those charged with governance and oversight with, among other things, improving program performance and operations, reducing costs, facilitating decision making by parties responsible for overseeing or initiating corrective actions, and contributing to public accountability.
>
> §1.22 Performance audit objectives vary widely and include assessments of program effectiveness, economy, and efficiency; internal control; compliance; and prospective analyses. Audit objectives may also pertain to the current status or condition of a program. These overall objectives are not mutually exclusive. For example, a performance audit with the objective of determining or evaluating program effectiveness may also involve an additional objective of evaluating the program's internal controls. Key categories of performance audit objectives include the following:
>
> a. Program effectiveness and results audit objectives. These are frequently interrelated with economy and efficiency objectives. Audit objectives that focus on program effectiveness and results typically measure the extent to which a program is achieving its goals and objectives. Audit objectives that focus on economy and efficiency address the costs and resources used to achieve program results.
>
> b. Internal control audit objectives. These relate to an assessment of one or more aspects of an entity's system of internal control that is designed to provide reasonable assurance of achieving effective and efficient operations, reliability of reporting for internal and external use, or compliance with provisions of applicable laws and regulations. Internal control objectives also may be relevant when determining the cause of unsatisfactory program performance. Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved. Internal control comprises plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity.
>
> c. Compliance audit objectives. These relate to an assessment of compliance with criteria established by provisions of laws, regulations, contracts, or grant agreements, or other requirements that could affect the acquisition, protection, use, and disposition of the entity's resources and the quantity, quality, timeliness, and cost of services the entity produces and delivers. Compliance requirements can be either financial or non-financial.

[10] Government Auditing Standards (Yellow Book) 2018 Revision; www.gao.gov/yellowbook.

d. Prospective analysis audit objectives. These provide analysis or conclusions about information that is based on assumptions about events that may occur in the future, along with possible actions that the entity may take in response to future events.

There are four "Elements of a Finding" in a Performance Audit. The following excerpt(s) from GAGAS describe how auditors develop Findings:

> §8.116 As part of a performance audit, when auditors identify findings, they should plan and perform procedures to develop the **criteria, condition, cause, and effect** of the findings to the extent that these elements are relevant and necessary to achieve the audit objectives.
>
> §8.125 **Condition**: Condition is a situation that exists. The condition is determined and documented during the audit.
>
> §8.124 **Criteria: To** develop findings, criteria may include the laws, regulations, contracts, grant agreements, standards, measures, expected performance, defined business practices, and benchmarks against which performance is compared or evaluated. Criteria identify the required or desired state or expectation with respect to the program or operation. The term program includes processes, projects, studies, policies, operations, activities, entities, and functions. Criteria provide a context for evaluating evidence and understanding the findings, conclusions, and recommendations in the report.
>
> §8.126 **Cause**: The cause is the factor or factors responsible for the difference between the condition and the criteria and may also serve as a basis for recommendations for corrective actions. Common factors include poorly designed policies, procedures, or criteria inconsistent, incomplete, or incorrect implementation, or factors beyond the control of program management. Auditors may assess whether the evidence provides a reasonable and convincing argument for why the stated cause is the key factor contributing to the difference between the condition and the criteria.
>
> §8.127 **Effect** or potential effect: The effect or potential effect is the outcome or consequence resulting from the difference between the condition and the criteria. When the audit objectives include identifying the actual or potential consequences of a condition that varies (either positively or negatively) from the criteria identified in the audit, effect is a measure of those consequences. Effect or potential effect may be used to demonstrate the need for corrective action in response to identified problems or relevant risks.

GAGAS, also provides the following "Reporting Standards for Performance Audits":

> §9.27 **Conclusions**: Report conclusions are logical inferences about the program based on the auditors' findings, not merely a summary of the findings. The strength of the auditors' conclusions depends on the persuasiveness of the evidence supporting the findings and the soundness of the logic used to formulate the conclusions. Conclusions are more compelling if they lead to the auditors' recommendations and convince the knowledgeable user of the report that action is necessary.
>
> §9.23 **Recommendations**: When feasible, auditors should recommend actions to correct deficiencies and other findings identified during the audit and to improve programs and operations when the potential for improvement in programs, operations, and performance is substantiated by the reported findings and conclusions. Auditors should make recommendations that flow logically from the findings and conclusions, are directed at resolving the cause of identified deficiencies and findings, and clearly state the actions recommended.
>
>> §9.28 Effective recommendations encourage improvements in the conduct of government programs and operations. Recommendations are effective when they are addressed to parties that have the authority to act and when the recommended actions are specific, feasible, cost effective, and measurable.
>
> §5.84 **Requirement: Peer Review Intervals.** An audit organization not already subject to a peer review requirement should obtain an external peer review at least once every 3 years. The audit organization should obtain its first peer review covering a review period ending no later than 3 years from the date the organization begins performing GAGAS audits.

ATTACHMENT A

DETROIT BOARD OF POLICE COMMISSIONERS
1301 Third St., Suite 767
Detroit, Michigan 48226
Phone 313•596•1830 TTY: 711
Fax 313•596•1831
www.detroitmi.gov

JUNE 22, 2026

City of Detroit Board of Police Commissioners
1301 Third Street, Suite 767
Detroit, Michigan 48226

Laura Goodspeed, Auditor General
Office of the Auditor General
2 Woodward Avenue, Suite 216
Detroit, Michigan 48226

Dear Auditor General:

The following attachment represents the Department/Agency's response for the indicated finding and each related recommendation in the "Performance Audit of the Detroit Board of Police Commissioners (June 2026)" prepared by the Office of the Auditor General.

For each finding and recommendation, and/or note of concern, we have provided the response, along with an action plan date, contact person, and contact person number and email address, in the formatted templated as requested.

BOPC Administration Response to Page 3, etc. of CI Warfield's Memorandum

There is NO specific reference in the Charter sections for Board Secretary or for Chief Investigator that says either position can supervise staff. ***However, it is noteworthy that the Charter mentions the Board Secretary first***.

a. Sec. 7-804

1)Secretary to the Board. The Board shall appoint a Board Secretary, who serves at its pleasure. The secretary shall not have been an employee or elective or appointive officer of the City within three (3) years prior to appointment. The secretary shall attend board meetings.

2. Investigative Staff. The Board shall also appoint a Chief Investigator and such additional staff of investigators as it deems necessary. The Chief Investigator shall not have been an employee or elective or appointive officer of the city within three (3) years prior to appointment. Investigators serve at the Board's pleasure. They must possess skills and experience necessary to complete investigative work.

3. Other Staff. The Board may hire, in accordance with Article 6, Chapter 4, such additional staff as is necessary to carry out its duties. **All members of the staff are under the direction of the Board,** and the Chief of Police has no authority over any member of the staff. (FYC -The OIG placed more weight on this statement that should have been. It is likely rooted in the early formation of the Board, where DPD staff fulfilled support roles for the Board, including complaint investigations. The statement is most likely a prohibition of DPD control of board staff. Also "direction" is not the same as "supervision" of employees, which the BOPC job for Board Secretary has made clear via job description and interviews that the Board directs and the Board Secretary supervises employees to comply with the direction)

The Charter gives *primary responsibility over complaints* to the Board Secretary by making the position the mandatory recipient of complaints filed.

b. Sec. 7-808. Complaints. Complaints concerning the Police Department filed anywhere in the Department **shall be forwarded immediately to the Board Secretary**. Copies of the complaint shall be made available to each member of the Board, the Chief Investigator, and the Chief of Police. The Chief Investigator for the Board shall investigate a complaint immediately and file a report of findings with the Board within sixty (60) days. **Within thirty (30) days of receipt of a complaint by the Board Secretary,** the Board shall send written communication informing the complainant that their complaint has been received, the guidelines on how the complaint will be handled, and the timeline on when the complainant shall receive a disposition on their complaint.

The Charter places the Board Secretary as a primary position/role for the BOPC. The Auditor General states in the *DRAFT Performance Audit Report that the "The Board Secretary acts as the head administrator or* defacto *department director of BOPC."* The Charter, in plain language, states that the position of the Secretary to the Board be the immediate recipient of complaints and copies distributed as outlined in the Charter – to the Board, to the Chief Investigator, to the Chief of Police.

Subsequent to the OIG Report referenced by the Auditor General in the instant Performance Audit, the BOPC approved an organizational chart with the Secretary to the Board and Chief Investigator both to report directly to the BOPC. After this change was approved (June 2024) to date, the Bylaws nor position descriptions of BOPC Staff have been revised; except that ODFS represents that all positions fall under the Chief Investigator (see UltiPro).

Compliance with the City Charter does not diminish or otherwise affect the public's understanding of accountability, supervisory authority, or the independence of the Chief Investigator. Rather, adherence to the Charter reinforces the Board's commitment to operating within its legally established framework while maintaining appropriate oversight and preserving the independence of the Chief Investigator's functions.

CITY OF DETROIT
BOARD OF POLICE COMMISSIONERS
Rev. Jerome L. Warfield, Sr.
Chief Investigator

OFFICE OF THE CHIEF INVESTIGATOR
900 Merrill Plaisance
Detroit, Michigan 48203
Phone: 313.596.2499 TTY: 711
Fax: 313.596-2482
www.detroitmi.gov

MEMORANDUM

TO: Commissioner Eva Garza Dewaelsche

FROM: Chief Investigator Jerome L. Warfield, Sr.

DATE: June 9, 2026

SUBJECT: Draft Response to the Auditor General's June 6, 2026, Report

Good day,

I want to begin by expressing my sincere gratitude to the Auditor General and her investigative staff for the thorough and professional manner in which this audit of the Detroit Board of Police Commissioners (BOPC) and specifically the Office of the Chief Investigator (OCI) was conducted. The cooperation, diligence, and professionalism extended by your team over the course of our engagement has been greatly appreciated.

I write to provide a formal response to the Confidential Draft of the Performance Audit of the Detroit Board of Police Commissioners (June 2026), addressing several items that pertain directly to the Office of the Chief Investigator.

1. Audit Period and Continuing Information Sharing

The draft report indicates that the audit of the BOPC began in September 2022 and concluded in June 2023. I was appointed Chief Investigator in May 2023, effectively at the end of the stated audit period.

From June 2023 through May 2026, I and my staff remained in continuous contact with investigators from the Office of the Auditor General through on-site visits, virtual meetings, and email correspondence. During that nearly three-year window, the OCI provided substantial updated information reflecting the operational transformation that has taken place under current leadership.

I respectfully ask that the final report acknowledge this ongoing dialogue and reflect the significant operational progress documented below, much of which has been shared with your office throughout 2023–2026. Limiting the reported scope to June 2023 risks presenting a picture of OCI that is nearly three years out of date at the time of publication. To ensure the record is complete, I am restating the most recent operational data here.

2. Current State of OCI Operations

A. Historical Backlog - Fully Cleared

The OCI has officially closed out its historical backlog deficit. Every backlogged case from 2021 through 2024 has been fully investigated and resolved.

- 100% of the 2021–2024 legacy backlog cleared
- 1,080 legacy backlogged cases investigated and closed
- 701 cases returned from the Office of the Inspector General - all cleared

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900 Merrill Plaisance
Detroit, Michigan 48203
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Fax: 313.596-2482
www.detroitmi.gov

In total: 1,781 backlogged cases and 765 current cases thoroughly investigated and closed

B. Record-Breaking Closure Metrics (14-Month Period)

Period	Cases Investigated & Closed
2024 (full year)	973
2025 (full year)	2,546 (162% increase over 2024)
January 1 – March 20, 2026	995
14-Month Cumulative Total	3,541

This represents the highest closure volume in OCI's history.

C. Current Case Inventory (as of March 20, 2026)

OCI's active inventory stands at 1,614 cases, distributed as follows:

- 92 cases from 2025 beyond the one-year incident date
- 1,007 cases from 2025 within one year of the incident date and subject to disciplinary action
- 125 cases from 2025 currently in the 90-day compliance phase
- 390 cases from 2026 currently in the 90-day compliance phase

An action plan is in place to investigate and close all remaining 2025 cases by June 30, 2026.

D. Historical Complaint Trends

Citizen complaints continue to climb at a concerning rate:

Timeframe	Average Complaints per Year
10-year average (2012–2022)	1,200
3-year average (most recent)	1,953
2025 total	2,145 (record-setting year)

Year-Over-Year Comparison:

Metric	2024	2025
Citizen Complaints Filed	1,971	2,145
Complaints Closed	973	2,546

Open Complaints Snapshot:

CITY OF DETROIT
BOARD OF POLICE COMMISSIONERS
Rev. Jerome L. Warfield, Sr.
Chief Investigator

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Fax: 313.596-2482
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Open Complaints as of:

- March 2025 2,711
- March 2026 1,614

E. Current Staffing

OCI currently operates with 32 employees:

1 Chief Investigator

3 Supervisors

4 Administrative Assistants

24 Investigators assigned to citizen complaints

5 Senior Investigators

19 Junior Investigators

F. Context

These results demonstrate that the operational deficiencies identified during the July 2020–June 2023 audit period have been the subject of sustained, measurable corrective action. The unsanctioned "triage" process referenced in Finding #1 was discontinued before my appointment, and the personnel associated with it are no longer employed by BOPC. Under current leadership, OCI is operating with restored adherence to its Standard Operating Procedures, supported by the new WingSwept case management system referenced in the report's Noteworthy Accomplishment.

I respectfully request that the final report include this operational context so that readers, including the City Council, the Mayor, and the public, receive a complete and current picture of OCI's posture.

3. Characterization of the Board Secretary's Role

The draft report states on page 4:

"The Board Secretary acts as the head administrator or de facto department director of BOPC."

I respectfully submit that this characterization is not supported by the 2012 Detroit City Charter and is directly contradicted by formal opinions of the City's Law Department and the findings of the Office of Inspector General.

A. What the 2012 Charter Actually Provides

The Charter establishes three distinct categories of Board staff:

1. Secretary to the Board.

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Fax: 313.596-2482
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The Board shall appoint a Board Secretary, who serves at its pleasure. The secretary shall not have been an employee or elective or appointive officer of the City within three (3) years prior to appointment. The secretary shall attend board meetings.

2. Investigative Staff.

The Board shall also appoint a Chief Investigator and such additional staff of investigators as it deems necessary. The Chief Investigator shall not have been an employee or elective or appointive officer of the city within three (3) years prior to appointment. Investigators serve at the Board's pleasure. They must possess skills and experience necessary to complete investigative work.

3. Other Staff.

The Board may hire, in accordance with Article 6, Chapter 4, such additional staff as is necessary to carry out its duties. All members of the staff are under the direction of the Board, and the Chief of Police has no authority over any member of the staff.

The Charter assigns the Board Secretary only the duties of (1) being appointed by the Board, (2) serving at the Board's pleasure, and (3) attending Board meetings. The Charter does not designate the Board Secretary as the head administrator, department director, or supervisor of any other Board staff. All members of the Board's staff — including the Chief Investigator and the OCI — are placed under the direction of the Board itself, not the Board Secretary.

B. The OIG Report Referenced on Page 6 of the Draft Reaches the Same Conclusion

The Office of Inspector General report cited within the draft audit makes this point explicitly:

OIG Report, p. 4 (Recommendations):

"Article IV, Section 10. Functions of the Secretary of the Board – As discussed herein, the Secretary is not authorized to direct or supervise other BOPC employees."

OIG Report, p. 7:

"As detailed above, the Charter provides only certain duties to the Board Secretary and places all investigative responsibilities upon the Chief Investigator. The Charter states that the Chief Investigator is responsible for investigating citizen complaints and filing a report of findings to the Board. In addition, regarding the 'chain of command,' the Charter places all members of the Board's staff under the direction of the Board. No provision in the Bylaws can override that Charter-mandated arrangement. Therefore, the Board Secretary does not have the authority to direct the activities of the Chief Investigator or the Office of the Chief Investigator. Doing so would constitute an abuse of the Secretary's position."

OIG Report, p. 14:

"As stated above, the Board Secretary does not have the authority to implement new procedures for the OCI, or to direct the Chief Investigator (or any other employees) to implement those procedures. The City's Law Department issued a legal opinion on this matter, which states that 'the Board Secretary is not authorized to direct the Chief Investigator in the performance of [their] duties to the Board.' In addition, the City's Law Department has previously opined that 'any supervisory authority delegated to the Board's Secretary must be

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Chief Investigator

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Fax: 313.596-2482
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limited to ministerial acts,' as opposed to discretionary powers that can only be exercised by the Board. Although the Board can delegate powers that are designed to carry out its decisions, 'the power so delegated can never involve the exercise of discretion or judgment.'"

C. Requested Correction

Because the draft report relies in part on the same OIG investigation that expressly rejects the "head administrator or de facto department director" characterization, I respectfully request that the final report revise or remove this sentence to accurately reflect:

- the Charter's plain language,
- the binding legal opinions of the City of Detroit Law Department, and
- the findings of the Office of Inspector General as cited within the audit itself.

Accurate characterization of the Board Secretary's role is essential, as it directly affects public understanding of accountability, supervisory authority, and the independence of the Office of the Chief Investigator under the Charter.

4. Closing

I appreciate the Auditor General's commitment to transparency and continuous improvement of City operations. The Office of the Chief Investigator shares those values, and the data above reflects a sustained, good-faith effort to address the conditions identified during the audit period and to strengthen civilian oversight of the Detroit Police Department.

I am available to meet with your team to discuss any of the foregoing points and to provide any additional documentation that would assist in finalizing the report.

Respectfully submitted,

Rev. Jerome L. Warfield, Sr.
Chief Investigator
Board of Police Commissioners
Office of the Chief Investigator
900 Merrill Plaisance Street
Detroit, Michigan 48203
313-596-1378
313-596-2482 (fax)
313-920-4086 (cell)

OFFICE OF THE AUDITOR GENERAL
PERFORMANCE AUDIT OF THE DETROIT BOARD OF POLICE COMMISSIONERS
JUNE 2026

Agency Responses and Action Plan

REF #	OBSERVATION	RECOMMENDATIONS		RESPONSIBLE DEPARTMENT	DEPARTMENT RESPONSE(S) AND ACTION PLAN	ESTIMATED/ PLANNED IMPLEMENTATION DATE	CONTACT PERSON	CONTACT PERSON NUMBER/EMAIL
		REF	SPECIFIC RECOMMENDATION					
Finding and Recommendations for the Detroit Board of Police Commissioners								
1.	**The Board of Police Commissioners Did Not Comply With The Standard Operating Procedures For Citizen Complaint Investigations t**	A.	Supervisors should actively monitor the progress of investigations, and step in when needed to ensure all cases are completed within ninety days.	The Office of the Chief Investigator	Supervising Investigators at the OCI currently actively monitor the progress of investigations, through regular team meetings and they develop coaching plans when necessary to ensure all cases are completed according to the SOP.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		B.	Investigators should interview complainants timely, and within two weeks of receipt of the assignment. All communication attempts must be documented, especially if the interview cannot be completed.	The Office of the Chief Investigator	According to the current Standard Operating Procedures of the OCI, investigators must "Contact the complainant (either in person or via telephone) within three (3) business days, excluding weekends and holidays. In addition, with exceptions to determine the nature, scope, severity of the complaint, and to identify potential witnesses and/or evidence." Pg.44	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		C.	Investigators should attempt to locate and interview witnesses within ten days of assignment, and document all efforts made.	The Office of the Chief Investigator	Please see above.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		D.	Complaints that fall under another agency's jurisdiction should be transferred within seven days of receipt and the transfer process documented. The complainant should be copied on the transfer to ensure that the complainant is aware of the transfer of the complaint.	The Office of the Chief Investigator	According to the current Standard Operating Procedures of the OCI, 1. Each complaint received by the OCI will be reviewed by a Supervising Investigator within two business (2) days of receipt. Compliance with this two-day requirement will be assessed and strictly enforced by the Chief Investigator. The Supervising Investigator will determine: b. whether OCI is the appropriate jurisdiction c. whether referral to an outside agency is appropriate (e.g. Wayne County Sheriff, DPS, casino, other law enforcement agencies, etc.) The case is transferred immediately.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov

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Agency Responses and Action Plan

REF #	OBSERVATION	RECOMMENDATIONS		RESPONSIBLE DEPARTMENT	DEPARTMENT RESPONSE(S) AND ACTION PLAN	ESTIMATED/ PLANNED IMPLEMENTATION DATE	CONTACT PERSON	CONTACT PERSON NUMBER/EMAIL
		REF	SPECIFIC RECOMMENDATION					
		E.	The OCI Report Checklist should be completed by the assigned investigator and reviewed by the assigned complaint supervisor.	The Office of the Chief Investigator	This is the current and ongoing policy and practice of the OCI.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		F.	Investigators must include documentation showing they reviewed all available body-worn camera and police vehicle footage.	The Office of the Chief Investigator	This is the current and ongoing policy and practice of the OCI.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		G.	Every investigation file must include a copy of the final report.	The Office of the Chief Investigator	This is the current and ongoing policy and practice of the OCI.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov

OFFICE OF THE AUDITOR GENERAL
PERFORMANCE AUDIT OF THE DETROIT BOARD OF POLICE COMMISSIONERS
JUNE 2026

Agency Responses and Action Plan

REF #	OBSERVATION	RECOMMENDATIONS		RESPONSIBLE DEPARTMENT	DEPARTMENT RESPONSE(S) AND ACTION PLAN	ESTIMATED/ PLANNED IMPLEMENTATION DATE	CONTACT PERSON	CONTACT PERSON NUMBER/EMAIL
Note of Concerns for the Detroit Board of Police Commissioners								
1.	**The Board Of Police Commissioners' Meeting Cadence Is Rigorous And Laborious**	The current Detroit City Charter requires the Board of Police Commissioners to meet weekly. We feel this cadence is both rigorous and laborious and interferes with their ability to carry out their mission. Based on our observations, we note that requiring the Board to meet each week may negatively impact BOPC's operations.		BOPC	The Board of Police Commissioners must comply with Charter mandate.	This action is currently in place	Board Secretary Lydia Garnier	Board Secretary Lydia Garnier 313-596-1820 Garnierl614@detroitmi.gov
2.	**Some Board Of Police Commissioners Recommendations To The 2018 Detroit Charter Revision Commission Should Be Adopted.**	A.	The Board must approve all appointments and promotions made by the Chief of Police of the Detroit Police Department.	BOPC	The Board of Police Commissioners must comply with Charter mandate.	See attached resolution requesting review of Labor contracts.	Board Secretary Lydia Garnier	Board Secretary Lydia Garnier 313-596-1820 Garnierl614@detroitmi.gov
		B.	The term length of appointed commissioners should be reduced from the current five year term to four years.	BOPC	The Board of Police Commissioners must comply with Charter mandate.	Recommend to next Charter Commission	Board Secretary Lydia Garnier	Board Secretary Lydia Garnier 313-596-1820 Garnierl614@detroitmi.gov
		C.	BOPC's meeting schedule be adjusted to include a summer recess for the month of August, along with the current Christmas and Thanksgiving holiday breaks.	BOPC	The Board of Police Commissioners must comply with Charter mandate.	Recommend to next Charter Commission	Board Secretary Lydia Garnier	Board Secretary Lydia Garnier 313-596-1820 Garnierl614@detroitmi.gov
		D.	If there is a vacancy of an elected Commissioner, then BOPC shall appoint the successor by majority vote.	BOPC	The Board of Police Commissioners must comply with Charter mandate.	Recommend to next Charter Commission	Board Secretary Lydia Garnier	Board Secretary Lydia Garnier 313-596-1820 Garnierl614@detroitmi.gov

OFFICE OF THE AUDITOR GENERAL
PERFORMANCE AUDIT OF THE DETROIT BOARD OF POLICE COMMISSIONERS
JUNE 2026

Agency Responses and Action Plan

REF #	OBSERVATION		RECOMMENDATIONS	RESPONSIBLE DEPARTMENT	DEPARTMENT RESPONSE(S) AND ACTION PLAN	ESTIMATED/ PLANNED IMPLEMENTATION DATE	CONTACT PERSON	CONTACT PERSON NUMBER/EMAIL
		E.	The Office of the Chief Investigator (OCI) must have a policy on "Cooperation in Investigations:"	The Office of the Chief Investigator	Managing risks, the BOPC/OCI seeks to provide fair and thorough investigative outcomes when confronted with allegations against its personnel and guard against frivolous, unsubstantiated claims. As part of the member's ongoing work responsibilities, all staff shall cooperate with investigations, inquiries, and/or discussions with supervisory/administrative staff members. Therefore, alleged non-criminal misconduct investigations involving members of the OCI Staff, shall be investigated and submitted through channels to the BOPC for its review and final action.	This action is currently in place.	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov
		F.	The OCI must have a policy on "Retaliation, obstruction or interference prohibited – Penalty:	The Office of the Chief Investigator	OCI is in the process of recommending an SOP update to the BOPC this year. The appropriate language concerning Retaliation will be added to the SOP concerning this matter.	Prior to November 2026	Chief Investigator Rev. Jerome L. Warfield, Sr.	313-596-1378 Warfieldj953@ detroitmi.gov

OFFICE OF THE AUDITOR GENERAL
PERFORMANCE AUDIT OF THE DETROIT BOARD OF POLICE COMMISSIONERS
JUNE 2026

Agency Responses and Action Plan

FINDING #	AUDIT FINDING	RECOMMENDATIONS		RESPONSIBLE DEPARTMENT	DEPARTMENT RESPONSE(S) AND ACTION PLAN	ESTIMATED/ PLANNED IMPLEMENTATION DATE	CONTACT PERSON	CONTACT PERSON NUMBER/EMAIL
Note of Concern for the Office of the Chief Financial Officer, Office of Departmental Financial Services								
1.	**Some accounting controls were not followed, which allowed payments to be made in violation of OCFO policy.**	A.	Confirm all required information is on an invoice prior to making payment.	▪ BOPC – Fiscal Manager ▪ ODFS	This practice is in place today and being led with strong stewardship.	This practice is currently in place.	Drew Fries, BOPC Executive Fiscal Manager	(248) 802 – 8747 friesd430@detroitmi.gov
		B.	Payi invoices within 45 days of receipt. Receipt means uploaded and received in the City's Oracle financial system, or date-stamped and manually entered in the City's Oracle financial system.	▪ BOPC – Fiscal Manager ▪ ODFS	This practice is in place today and being led with strong stewardship.	This practice is currently in place.	Drew Fries, BOPC Executive Fiscal Manager	(248) 802 – 8747 friesd430@detroitmi.gov
	Late Payment of Board Stipends	Create a written policy to process and pay stipend payments timely and promptly. This may include codifying the current unwritten practice of paying stipends directly after the end of each month.		▪ BOPC – Fiscal Manager ▪ ODFS	The present process is for all BOPC Commissioners to receive their monthly stipend on the last Friday of every month. This practice is in place today and being led with strong stewardship.	This practice is currently in place.	Drew Fries, BOPC Executive Fiscal Manager	(248) 802 – 8747 friesd430@detroitmi.gov

ATTACHMENT A

DETROIT BOARD OF POLICE COMMISSIONERS' RESOLUTION

REGARDING THE PROTECTION OF CHARTER-MANDATED AUTHORITY IN COLLECTIVE BARGAINING AGREEMENTS

WHEREAS the members of the Detroit Board of Police Commissioners (BOPC) have taken an oath to faithfully discharge the duties of their office as established by the Charter of the City of Detroit; and

WHEREAS the Charter of the City of Detroit, as authorized by state law, is the foundational governing document that establishes the authority, responsibilities, and limits of all City offices, including the BOPC; and

WHEREAS Section 6-408 of the Charter provides that the Labor Relations Division shall act for the City, under the direction of the Mayor, in the negotiation and administration of collective bargaining agreements, and that the Detroit City Council must ratify such agreements before they become effective; and

WHEREAS it is the responsibility of all City officials involved in the negotiation, approval, and ratification of collective bargaining agreements to ensure that such agreements do not conflict with, diminish, or nullify any provision of the Charter (not modified be state law); and

WHEREAS prior collective bargaining agreements, including those with the Detroit Police Officers' Association (DPOA), the Detroit Police Lieutenants & Sergeants Association (DPLSA) and Command Officers Association (COA) have contained provisions that effectively limited or circumvented the Charter-mandated authority of the BOPC; and

WHEREAS such provisions have, in practice (while legal understate law), impaired the ability of Commissioners to fulfill their duties as enumerated in Chapter 8 of the Charter, including but not limited to being the final authority in imposing or reviewing discipline as required under Chapter 8 Section 7-803, and the approval of promotions as required under Chapter 8 Section 7-814 of the Charter; and

WHEREAS in 2020, the BOPC exercised its Charter authority by unanimously voting to reject the promotion of a Corporal to Sergeant following an incident involving misconduct against a hospital patient, yet an arbitrator, acting under the terms of a labor agreement, subsequently overrode that decision; and

ATTACHMENT A

WHEREAS the use of contractual provisions or arbitration outcomes, while legal under state law, to override Charter-mandated authority undermines the intent of the Charter, erodes public trust, and raises serious concerns regarding the lawful exercise of governmental power; and

WHEREAS the BOPC recognizes that upcoming negotiations with the DPOA, DPLSA and COA present an opportunity to ensure that future agreements fully respect and preserve the authority established by the Charter;

THEREFORE, BE IT

RESOLVED that the Detroit Board of Police Commissioners formally urges the Mayor of the City of Detroit to direct the Labor Relations Division to ensure that no collective bargaining agreement is negotiated that conflicts with, limits, or nullifies any Charter-mandated authority of the BOPC or any other City official; and

BE IT FURTHER

RESOLVED that the BOPC strongly recommends the inclusion of clear contractual language in all future collective bargaining agreements stating that no provision of such agreements shall be interpreted or applied in a manner that supersedes or diminishes the Charter of the City of Detroit; and

BE IT FURTHER

RESOLVED that the BOPC calls upon the Detroit City Council to carefully review all proposed collective bargaining agreements and to refuse ratification of any agreement that is inconsistent with the Charter or that undermines the authority granted therein; and

BE IT FINALLY

RESOLVED that pursuant to state law the Detroit Board of Police Commissioners stands ready to work collaboratively with the Mayor, the Labor Relations Division, and the Detroit City Council to ensure that all agreements reflect both the letter and the spirit of the Charter, thereby preserving accountability, transparency, and public confidence in the governance of the Detroit Police Department.

Adopted by the Detroit Board of Police Commissioners on this 11th day of June, 2026.

ATTACHMENT B

OFFICE OF THE
CHIEF FINANCIAL OFFICER

Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 1100
Detroit, Michigan 48226

Phone 313•628•2535
Fax 313•224•2135
OCFO@detroitmi.gov
www.detroitmi.gov

MEMORANDUM

To: Laura Goodspeed, Auditor General, City of Detroit

From: Tanya Stoudemire, Chief Financial Officer Tanya Stoudemire

Date: June 24, 2026

RE: Performance Audit of the Detroit Board of Police Commissioners (June 2026)

Please see below for the OCFO response to the Auditor General Audit Note of Concern:

During the audit period, BOPC had 687 invoices/payments. We tested 164 invoices and found that some accounting controls were not followed, which allowed payments to be made in violation of OCFO policy:

A. Seven (or 4.3%) invoices were missing the purchase order number.

The requirement for purchase order numbers to be included on vendor invoices is being removed as part of an update to the OCFO Accounts Payable Directive. Invoices submitted by vendors are not required to display a purchase order number. Vendors submit invoices through the Oracle Supplier Portal and may upload invoices using their own invoice formats. The absence of a purchase order number on the paper invoice does not impact the effectiveness of payment controls. Oracle requires a system three-way matching process before a payment can be processed 1) an approved Purchase Order, 2) a vendor Invoice, and 3) a System Receipt confirming receipt of goods or services. While seven invoices tested did not display a purchase order number, the approved purchase orders were in Oracle and the required three-way match controls was successfully completed.

B. Nine (or 5.5%) payments were not made within 45 days of the invoice creation date.

- Six invoices were stipend payments for Board members.
- Three invoices were for vendor payments

The OCFO acknowledges that the nine payments tested were not made within the proper time period. Regarding the vendor payments, the OCFO will continue to work with the departments to help ensure invoices are approved and processed timely. In addition, reports are reviewed to monitor invoices in Oracle waiting for payments to be processed. In response to the stipends, a recurring invoice process is currently in place in Oracle for BOPC payments. Recurring invoices are set up annually (each fiscal year) and each invoice is automatically posted in the Accounts Payable module monthly to help reduce the risk of payment delays. In addition, the BOPC vendors are set up with immediate payment terms to help ensure prompt payment. The updated Accounts Payable Directive will also be inclusive of stipend payments terms.

Cc: Regina Greear, Chief Deputy CFO
John Naglick, Chief Deputy CFO