

**City of Detroit  
Office of Inspector General**

Potential Abuse of Authority and Waste at the Board of  
Police Commissioners & Office of the Chief Investigator  
OIG File No. 24-0001-INV



October 10, 2024

**Kamau C. Marable, MA., CIG, CFE  
Inspector General**

**CITY OF DETROIT**  
**OFFICE OF INSPECTOR GENERAL**  
**INVESTIGATIVE REPORT**

**Potential Abuse of Authority and Waste at the Board of Police  
Commissioners and the Office of the Chief Investigator**  
**OIG FILE NO. 24-0001-INV**

**DATE:**  
10/10/2024

**I. Summary**

On June 26, 2023, the City of Detroit Office of Inspector General (OIG) received a complaint from Victoria Shah, who at the time served as the Secretary to the Board of Police Commissioners (BOPC or Board). Ms. Shah’s complaint concerned potential abuse of authority and waste at the BOPC and/or the Office of the Chief Investigator (OCI).<sup>1</sup> Specifically, Ms. Shah alleged that several OCI employees received out-of-class pay without the Board’s knowledge and approval.<sup>2</sup> She also stated that their out-of-class pay was implemented without proper documentation.<sup>3</sup> The OIG initially sought to address this matter in conjunction with an earlier OIG investigation concerning the BOPC.<sup>4</sup> However, because the issues discussed in this report required additional investigation, we opened a new investigation to consider this matter separately.<sup>5</sup>

Evidence reviewed during the OIG’s investigation revealed the following:

- a. In May 2019, the City of Detroit Human Resources Department (City HR) began to manage personnel and human resources matters for the BOPC/OCI. By September 2019, all the BOPC’s/OCI’s personnel matters had been transferred to City HR from the Detroit Police Department’s Human Resources Division.<sup>6</sup>
- b. On February 21, 2021, Commissioners Willie Bell and Lisa Carter, former Commissioner Annie Holt, and former Interim-Board Secretary Melanie White submitted an Inter-Office Memorandum to City HR requesting “out-of-class pay

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<sup>1</sup> Email from former Board Secretary Victoria Shah to OIG Associate Attorney Tiye Greene, RE: 35-BOPC Monthly Financial Reports – Apr23.xlsx, dated June 26, 2023; See also, Email from former Board Secretary Victoria Shah to OIG Associate Attorney Tiye Greene, RE: 35-BOPC Monthly Financial Reports – Apr23.xlsx, dated June 27, 2023.

<sup>2</sup> *Id.* Also note, “out-of-class pay” is permitted when an employee performs additional work outside of their regular job duties.

<sup>3</sup> *Id.*

<sup>4</sup> OIG Investigation No. 23-0005-INV available online at [https://detroitmi.gov/sites/detroitmi.localhost/files/2024-02/FINAL%20Report%20of%20Findings\\_23-0005-INV\\_29Feb24\\_REDACTED%20BINDER%20%282%29.pdf](https://detroitmi.gov/sites/detroitmi.localhost/files/2024-02/FINAL%20Report%20of%20Findings_23-0005-INV_29Feb24_REDACTED%20BINDER%20%282%29.pdf).

<sup>5</sup> Memorandum to Ellen Ha, Inspector General, from Tiye Greene, OIG Associate Attorney, RE: OIG Complaint No. 23-0288-COM, January 16, 2024.

<sup>6</sup> See OIG Investigative Report No. 23-0008-INV available online at [https://detroitmi.gov/sites/detroitmi.localhost/files/2024-07/Report\\_Final%20Report%20of%20Findings%20Binder\\_23-0008-INV\\_02Jul24\\_THG.pdf](https://detroitmi.gov/sites/detroitmi.localhost/files/2024-07/Report_Final%20Report%20of%20Findings%20Binder_23-0008-INV_02Jul24_THG.pdf).

compensation forms in preparation for submission to the [City HR] and Chief Financial Office[r] [for] approval...”<sup>7</sup>

- c. On March 3, 2021, former Interim-Chief Investigator Lawrence Akbar submitted a letter to Ms. White recommending that 3 of the 4 employees named in the Inter-Office Memo be promoted to existing or newly created positions within the OCI.<sup>8</sup>
- d. By April 2021, all four (4) OCI employees named in the Inter-Office Memo received temporary changes in their work assignments and increases in pay without approval from the full Board.<sup>9</sup>
- e. City HR processed out-of-class pay for the four (4) OCI employees before any out-of-class request forms were executed by any members of the Board.
- f. On June 30, 2021, former Commissioner Charles “Jim” Holley and former Interim Board Secretary Melanie White executed out-of-class compensation request forms for three (3) of the four (4) OCI employees named in the Inter-Office Memo without approval from the full Board.<sup>10</sup> It is unclear why former Commissioner Holley and former Interim-Secretary White executed these forms 2 or more months after out-of-class pay had already begun for those employees.

## A. Findings

Based on the evidence reviewed by the OIG, we find that:

1. Commissioners Willie Bell and Lisa Carter, and former Commissioners Jim Holley and Annie Holt abused their positions by implementing out-of-class pay for several OCI employees without the full Board’s knowledge and approval.
2. The BOPC did not submit proper authorizations for the employees’ out-of-class assignments and corresponding increases in pay before City HR initiated the out-of-class payments.
3. Ms. White did not abuse her authority when submitting documents to HR regarding out-of-class assignments/pay for the employees named in the Inter-Office Memo.

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<sup>7</sup> Memorandum to former City HR Employee Services Consultant Kayetta Wilder-Holly from former BOPC Chairperson Willie Bell, former BOPC Vice-Chairperson Annie Holt, Commissioner Lisa Carter, and former BOPC Interim-Secretary Melanie White, RE: Request for Out-of-Class Compensation Forms for Completion of Requests to City Human Resources and Chief Financial Officer Departments, dated February 21, 2021. Note: The OIG was unable to determine the exact date on which the Inter-Office Memo was submitted, as the employee services officer who assisted the BOPC in this matter is no longer with the City, and information retained and submitted to the OIG by City HR did not include this information.

<sup>8</sup> Email from City HR Employee Services Manager Rosita Brockington to OIG Associate Attorney Tiye Greene, RE: Rosalia Madrigal, dated September 12, 2023. Note: The OIG was unable to determine the exact date on which the letter was submitted to City HR, as the employee services officer who assisted the BOPC in this matter is no longer with the City, and information retained and submitted to the OIG by City HR did not include this information.

<sup>9</sup> Detailed Payroll Register FY Ending 2021 for Rosalia Madrigal, Lisonya Sloan, Hajnal Hiller and Tiffany Stewart, pulled on March 7, 2024. Note: The OIG was unable to determine the exact date on which out-of-class payments began for each employee, as payroll records indicate several changes in their pay rates during the relevant time, and no City HR or Payroll department employees could identify the specific start date(s) of the out-of-class pay.

<sup>10</sup> See, for example, Email from City HR Employee Services Manager Rosita Brockington to OIG Associate Attorney Tiye Greene, RE: Stewart, Tiffany (OOC Form – 6-30-21.doc; Stewart, Tiffany (OOC – 6-30-21).pdf, dated September 12, 2023.

4. The BOPC did not retain any documentation regarding its employees' changes in work assignments and corresponding changes in pay.
5. City HR also did not retain accurate documentation regarding the relevant employees' changes in assignments and out-of-class pay.

## **B. BOPC Recommendations**

Based on these findings, the OIG reiterates the recommendations provided in OIG Investigative Report No. 23-0005-INV. Specifically, the OIG recommends the following for the BOPC:

- Training for BOPC Commissioners and staff on laws and policies that are unique and/or relevant to the BOPC's personnel matters and voting requirements.
  - Such periodic trainings would reduce the risks of waste, abuse, fraud, or corruption that are often associated with unauthorized increases in pay, and with unauthorized actions that are executed without approval from the full Board. Additionally,
- The Board should adopt records management practices that are compliant with the City of Detroit's Records Management Policy.<sup>11</sup> Such practices should also be compliant with State laws governing the retention of public and personnel records.
  - This change would bring the Board into compliance with local and State laws and would better enable it to efficiently track its personnel changes and related changes in employees' compensation.
- The Board should implement a formal process for initiating personnel and compensation changes, and submitting other various requests to City HR. The process may include, for example, an affidavit regarding Board approval that provides the date on which the Board voted to implement the given change(s).

## **C. City HR Recommendations**

Finally, the OIG makes the following recommendations for City HR:

- City HR employee services officers who process and manage requests from organizations like the BOPC which require a vote of a decision-making body before personnel changes can be implemented should receive training regarding those voting requirements that relate to personnel matters.
  - Periodic trainings would help ensure that City HR only processes legitimate requests for changes in assignments and compensation.
- City HR should review and revise, as necessary, its records management practices to ensure they are compliant with State laws governing the retention of individual personnel documents, including job descriptions and classification histories.<sup>12</sup>
- In the event City HR has not already done so, we also recommend reviewing and/or revising the department's use of UltiPro for recording personnel changes to ensure the program doesn't erase/overwrite information the City is required to retain.

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<sup>11</sup> Executive Order No. 2019-01, RE: City of Detroit Records Management Policy, (Effective July 3, 2019).

<sup>12</sup> See General Retention Schedule #26 for Local Government Human Resources, available online at <https://www.mml.org/pdf/resources/information/26-gen-sched-26-human-resources.pdf>.

Pursuant to the Charter and the OIG’s Administrative Hearing Rules (Rules), on September 24, 2024, the OIG provided a draft copy of this investigative report to Commissioners Willie Bell and Lisa Carter, and to former Commissioners Jim Holley and Annie Holt. By providing the draft report to them, the affected parties were given an opportunity to submit a written response and/or request an administrative hearing to dispute any OIG findings in the draft report. Under the Charter, an affected party can dispute our findings and the OIG Rules provide such an opportunity via a written response and/or through an administrative hearing.

On September 26, 2024, Mr. Holley acknowledged receipt of the draft report.<sup>13</sup> On September 30, 2024, Ms. Holt submitted a written response to the draft report.<sup>14</sup> After sending the draft report to Commissioners Bell and Carter on September 24, the OIG sent additional emails on September 26, October 2, and October 7. The deadline to submit responses and/or to request an administrative hearing expired on October 8, 2024. With exception to Ms. Holt, no other affected parties requested an administrative hearing or submitted a written response to the OIG’s findings in the draft report.

The OIG did not receive any responses from Commissioners Willie Bell and Lisa Carter. In addition, the OIG did not receive a written response or request for an administrative hearing from Mr. Holley. As such, we find that Commissioners Willie Bell and Lisa Carter, and former Commissioner Holley can no longer contest the OIG’s findings. Ms. Holt’s response did not provide any new or additional information to dispute the OIG’s findings. Her response is attached to this report in full.

## **II. Relevant Policies and Procedures**

### **Board of Police Commissioners Bylaws**

The BOPC’s Bylaws define matters that must be addressed by the full board and limit the authority of individual commissioners/officers of the Board. The Bylaws state, in relevant part:

#### **ARTICLE III – BOARD OF POLICE COMMISSIONERS**

##### **Section 1: General.**

The affairs of the [BOPC] organization shall be governed by the Detroit Board of Police Commissioners.

#### **ARTICLE V – MEETINGS**

##### **Section 2:**

The Committee of the Whole shall address all issues that may come before the Board including, but not limited to, those issues addressed

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<sup>13</sup> Email from Rev. Jim Holley to OIG Associate Attorney Tiye Greene, RE: Fw: Message from KM\_C450i, dated September 26, 2024.

<sup>14</sup> Email from Ms. Annie Holt to OIG Associate Attorney Tiye Greene, RE: Fwd: OIG Investigation No. 24-0001-INV | Draft Report of Finding Response from Annie Holt Along with the Affidavit with Completed Affidavit Form\_230001-INV.pdf, dated September 30, 2024.

by the standing committees: Citizen Complaints, Disciplinary Appeals, Promotional Appeal, Budget, Legal Affairs, Labor Relations, Personnel and Training, and Policy.”

[...]

As it relates to the duties and authorities granted to individual commissioners, the Bylaws state, in relevant part:

**ARTICLE IV – OFFICERS OF THE BOARD, DUTIES, REMOVAL, AND BOARD STAFF**

Section 1: Officers.

The Officers of the Board shall be a Chairperson and Vice Chairperson.

[...]

Section 6: Duties of Officers.

The duties of the Officer shall be as follows:

a) Chair: The Chairperson shall, in general supervise the affairs of the Boards.

Presides at all meetings of the Board and shall have the right to vote in all matters put before the board for a vote.

Ensures that the laws of the City or the State of Michigan pertaining to the conduct of Board meetings and other activities of the Board are followed, and all recommendations of the Board are properly conveyed.

Represents, or authorizes a designee to represent the Board with the public in all matters pertaining to the Board.

Signs all documents on behalf of the Board after same has been approved by the Board.

Calls meetings of the Board in accordance with the Bylaws and all applicable laws, rules and regulations.

“Appoints all standing committees and special committees, and serves as ex-official member of all committees.”

Performs all duties incidental to the Office of Chairperson and such other duties as may be presented by the Board.

[b)] Vice Chairperson: The Vice Chairperson performs all duties of the Chairperson in the absence or written resignation of the Chairperson or during the Chairperson’s inability or refusal to act.

Has all the powers of the Chairperson and shall be subject to the same restrictions as the Chairperson.

Fills the unexpired term of the Chairperson, should a vacancy occur.

“Serves as a member of any committee whenever designated by the Chairperson.”

Performs such other duties as from time to time may be assigned by the Chairperson or by the Board.

### **III. Analysis and Findings**

1. Current BOPC Commissioners Willie Bell and Lisa Carter and Former Commissioners Jim Holley and Annie Holt Abused Their Positions by Implementing Out-of-class Pay for Four OCI Employees Without Approval from the Full Board.

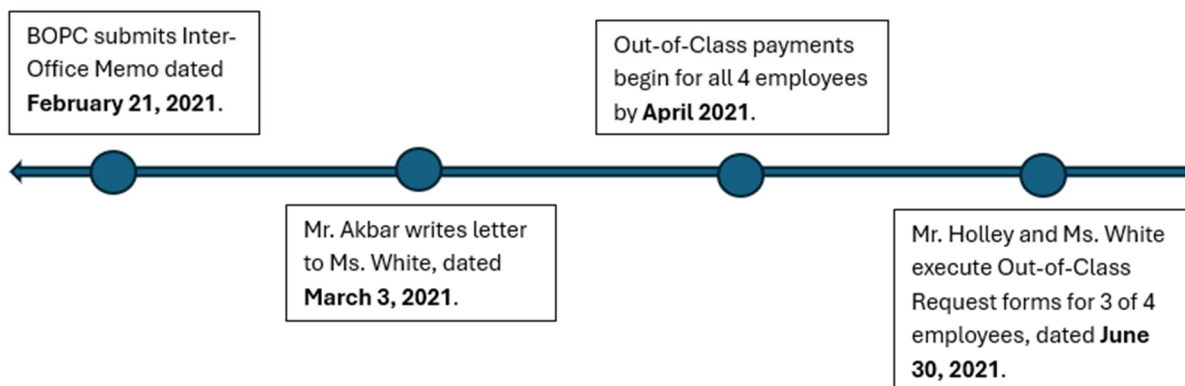
As stated in the Board’s Bylaws, the affairs of the BOPC organization must be governed by the Board as a whole. The Bylaws state that the Committee of the Whole shall address all issues that may come before the Board including, but not limited to... Budget, Legal Affairs, Labor Relations, Personnel and Training, and Policy.” This includes all matters that may come before any of its subcommittees, including issues concerning personnel and matters that may concern the organization’s budget. The Board’s Bylaws do not authorize the BOPC chair or vice-chair to make personnel decisions without a Board vote.<sup>15</sup> Further, no individual Board members, subcommittees, or BOPC staff can make staffing/compensation decisions without a vote of the full Board.

The OIG reviewed email records, payroll records and documents retained by City HR to determine whether any OCI employees received out-of-class assignments and pay in the years 2021-2023. The OIG also reviewed the BOPC’s voting record to determine whether the Board had discussed and approved any out-of-class assignments/payments for any OCI investigators during that time. As shown in the diagram below, the investigation revealed that Commissioners Willie Bell and Lisa Carter, former Commissioner Annie Holt, and former Interim Board Secretary Melanie White submitted a memorandum to HR, dated February 21, 2021, requesting “out-of-class pay compensation forms in preparation for submission to [City HR] and [the] Chief Financial Office[r] [for] approval...” Later, on March 3, 2021, former Interim-Chief Investigator Lawrence Akbar submitted a letter to Ms. White recommending promotions for three (3) of the four (4) employees named in the Inter-Office Memo to new and existing positions within the

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<sup>15</sup> See Board of Police Commissioners Bylaws, Article IV – Officer of the Board, Duties, Removal, and Board Staff, Section 6. Duties of Officers, Subsection a) Chair & Vice Chairperson.

OCI. The letter was unsigned and was later submitted with the Inter-Office Memo to City HR to support the out-of-class pay request for one (1) of the four (4) relevant OCI employees.<sup>16</sup>



**Diagram A.** General timeline of documents generated and submitted by the BOPC related to initiating Out-of-Class Pay for the employees named in the Inter-Office Memo.

Out-of-class pay was implemented by April 2021, for all four (4) employees named in the Inter-office Memo. On June 30, 2021, Mr. Holley and Ms. White inexplicably executed out-of-class request forms for three (3) of the four (4) employees who had already begun receiving out-of-class pay. While payroll records and emails reviewed by the OIG confirmed that these employees received out-of-class pay and were, in some instances, paid retroactively in connection with their out-of-class assignments, no evidence reviewed shows that the full Board approved these out-of-class payments and assignments.<sup>17</sup> In fact, the Board’s voting record shows that these significant changes were never brought before the full Board for a vote, as required by the Board’s Bylaws.<sup>18</sup>

BOPC meeting minutes and transcripts from the relevant time period further confirm that the personnel and compensation changes discussed herein were never addressed and approved by the full Board. The transcript from the Board’s March 25, 2021 meeting shows that some Board members did not know who had received out-of-class assignments, or how or why those employees had been chosen to work out of class.<sup>19</sup> When questioned about the assignments on the record by a now-former commissioner, Mr. Akbar stated the he had selected certain investigators for out-of-class work based on his knowledge of their skillsets and his experience working in the OCI. However, as noted above, the Board’s Bylaws do not authorize any

<sup>16</sup> Email from City HR Employee Services Manager Rosita Brockington to OIG Associate Attorney Tiye Greene, RE: Rosalia Madrigal, dated September 12, 2023.

<sup>17</sup> Email from Office of Chief Financial Officer (OCFO) Financial Analyst Manager James George to BOPC Secretary Victoria Shah and BOPC Administrative Specialist Robert Brown, RE: Book 1.xlsx, dated June 26, 2023; Email from OCFO Payroll Manager Jennie Shadd-Stoudemire to OIG Associate Attorney Tiye Greene, RE: [EXTERNAL] Re: OIG Request for Information | 24-0001-INV - Follow up to July 12 Meeting/Interview, dated August 2, 2024.

<sup>18</sup> Email from BOPC Administrative Specialist Robert Brown to OIG Associate Attorney Tiye Greene, RE: OIG Request for Information | 23-0005-INV, dated November 28, 2023.

<sup>19</sup> City of Detroit Board of Police Commissioners BOPC Virtual Meeting March 25, 2021, Public Meeting Transcript.



BOPC/OCI staff and/or any small groups of commissioners to reorganize personnel and increase their pay rates without explicit approval from the full Board.

Based on the evidence reviewed, we conclude that the former Interim-Board Secretary and the former Interim-Chief Investigator worked with Commissioners Bell and Carter and former Commissioners Holt and Holley to implement personnel changes at the OCI and initiate related out-of-class pay. According to the Bylaws, the members of the Board were obligated to bring the proposed changes to the attention of the full Board for approval. However, the Board's voting records and meetings transcripts show that the full Board never voted to approve out-of-class assignments and payments for the four (4) relevant employees. Further, eight (8) of the eleven (11) commissioners who are responsible for governing the BOPC organization were not included on the Inter-Office Memo that was submitted to City HR. Therefore, the OIG finds that Commissioners Willie Bell and Lisa Carter, and former Commissioners Annie Holt and Jim Holley, abused their positions by implementing out-of-class pay for four (4) OCI employees without approval from the full Board.

2. Former Interim-Board Secretary Melanie White did not Abuse her Position when Submitting Documents to HR Regarding Out-of-Class Assignments and Pay.

As discussed above, the Board's Bylaws require the Board as a whole to govern the affairs of the BOPC and the OCI. Under the Charter, the Board Secretary is an appointed member of the Board's staff who serves at the pleasure of the Board. The Board Secretary has limited authority in that they are authorized only to perform the specific duties listed in the Charter, and to perform ministerial or mechanical acts to carry out the Board's decisions.<sup>20</sup> The Secretary does not have any discretionary authority, and they cannot promote employees or authorize any increases in pay.<sup>21</sup>

In this instance, evidence shows that Ms. White acted within the limited authority granted to the Board Secretary. Ms. White did not make a unilateral decision or use her own discretion to effect out-of-class assignment/pay for the relevant employees. Instead, she worked with several commissioners and Mr. Akbar to propose personnel changes and to submit out-of-class compensation requests for those employees through City HR. As stated above, the members of the Board were responsible for ensuring that the proposed changes were brought before the full Board for a vote. Therefore, the OIG finds that Ms. White did not abuse her authority when submitting documents to City HR regarding out-of-class-pay for the employees named in the Inter-Office Memo.

3. Neither the BOPC nor City HR Retained Accurate or Complete Documentation Regarding the Subject Out-of-Class Assignments and Increases in Pay.

The OIG requested all documents regarding out-of-class pay for BOPC and OCI employees from the years 2021-2023. The OIG submitted its requests to both the BOPC and City HR. While City

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<sup>20</sup> "Ministerial Acts" are those which constitute an obedience to orders or the performance of a duty in which the individual has little or no choice. See, Memorandum from Assistant Corporation Counsel Vie Serifovski to Former Inspector General Ellen Ha, RE: Supplement to the April 2, 2019 Opinion, dated May 13, 2019.

<sup>21</sup> *Id.*

HR responded by submitting the documents it used to process and record each relevant employee's out-of-class assignments/pay,<sup>22</sup> the BOPC could not provide any documents that were responsive to the OIG's request because the organization did not retain any information regarding changes in its employees' assignments and/or compensation.<sup>23</sup> As such the OIG found that information and documents related to out-of-class payments for these employees was insufficiently maintained. No BOPC or City HR employee could accurately state when out-of-class pay started and stopped for any of the employees who had received out-of-class pay.

Although City HR provided documents related to initiating out-of-class pay for the relevant employees, City HR, like the BOPC, could not confirm when the out-of-class assignments/pay started and stopped for each employee. Information pulled and assembled by the City HR Information Systems team (HRIS) failed to identify an employee who had worked out-of-class as one who had received out-of-class compensation.<sup>24</sup> In addition, when Ms. Shah asked City HR about changes in the employees' compensation, City HR incorrectly advised that out-of-class pay started for three (3) of the four (4) OCI employees in either November or December 2022, when payments had actually started in about April 2021.<sup>25</sup> According to Ms. Shah, City HR further stated that because out-of-class pay/position changes come to HR from the department, the BOPC should have a record of the requested changes.<sup>26</sup>

When asked about the inaccurate and omitted information, the City's HRIS manager acknowledged that instead of tracking changes in compensation and job assignments, the City's payroll management system—UltiPro—had overwritten multiple records. He further stated that the paper/scanned documents maintained by City HR and/or the department would be the only complete record of an employee's changes in assignments and pay.<sup>27</sup>

The OIG finds that it is imperative that individual departments and City HR have adequate document retention policies and procedures in place to track changes in personnel and compensation. Such policies and procedures would enable the Board and City HR to accurately track and manage concerns related to employees' assignments and pay. They would also prevent the appearance of fraud, abuse, waste and corruption that can be associated with poorly documented changes in personnel and compensation. The OIG recommends that the BOPC adopt a document retention policy and procedure that requires the organization to keep a record of requests that are approved and submitted to City HR. Additionally, consistent with State laws that require individual personnel documents, including job descriptions and classification histories to be retained,<sup>28</sup> we recommend implementing a document retention policy/procedures

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<sup>22</sup> See, for example, Email from City HR Employee Services Manager Rosita Brockington to OIG Associate Attorney Tiye Greene, RE: Hajnal Hiller, dated September 13, 2023.

<sup>23</sup> OIG Interview of BOPC Executive Manager Police – Fiscal Drew Fries, May 8, 2024.

<sup>24</sup> Email from HRIS Systems Manager Benn Bukovac to City HR Director Denise Starr, RE: BOPC-OOC Employees and Pay, dated May 9, 2024.

<sup>25</sup> Email from City HR Employee Services Consultant Beth Shauntee to former BOPC Secretary Victoria Shah, RE: Payroll, dated June 27, 2023.

<sup>26</sup> Email from former Board Secretary Victoria Shah to OIG Associate Attorney Tiye Greene, RE: 35-BOPC Monthly Financial Reports – Apr23.xlsx; Book1.xlsx (18.2) KB(; Payroll (13.6 KB), dated June 27, 2023.

<sup>27</sup> OIG Interview of HRIS Systems Manager Benn Bukovac, July 3, 2024.

<sup>28</sup> See General Retention Schedule #26 for Local Government Human Resources, available online at <https://www.mml.org/pdf/resources/information/26-gen-sched-26-human-resources.pdf>.

that ensures that personnel information is not improperly lost or overwritten and that prevents disseminating misinformation related to changes in personnel and compensation.

#### **IV. Conclusion**

The OIG's investigation found that four (4) OCI employees were given out-of-class pay for more than one (1) year without proper authorization from the full Board. The evidence reviewed shows that a group of current and former police commissioners implemented out-of-class pay for these employees without bringing the matter to the full Board for a discussion and vote. The investigation also revealed that both the BOPC and City HR failed to retain adequate records regarding the employees' out-of-class assignments and pay.

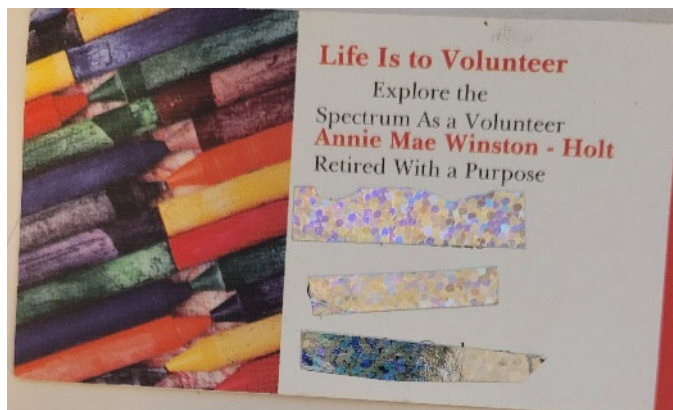
Considering the above, the OIG recommends periodic training for BOPC Commissioners and staff on laws and policies that are unique and/or relevant to the BOPC's personnel matters and voting requirements. The Board should also implement a formal process for initiating personnel and compensation changes. The process may include, for example, an affidavit regarding Board approval that provides the date on which the Board voted to implement the given change(s). Additionally, we recommend that the BOPC and City HR adopt, review and/or revise, as necessary, their records management policies and practices to ensure compliance with local and State laws governing the retention of public and personnel records, and to better facilitate tracking personnel changes and related changes in compensation. Finally, we recommend training regarding voting requirements for City HR employee services officers who process and manage personnel requests from organizations like the BOPC, which require a vote of a decision-making body before personnel changes can be implemented.

“ASK NOT WHAT YOUR COUNTRY CAN DO FOR YOU, ASK WHAT YOU CAN DO FOR YOUR COUNTRY.”

Even as I present this quote within this contention of my innocence, I see myself, 16 years old still living in the City of Birmingham, Alabama and listening to the inaugural speech of the man who had been elected as president.

I taught these words to my daughter and my students. I was shocked and impressed when one of my students presented the quote during students' presentations to the class.

My calling card and moto that expresses **my absolute volunteering way of life prior to my** retirement in 2011, as I engage more readily today.



**Innocent until proven guilty?**

**Guilty,** NOW prove you are innocent?

**OIG Investigation No. 24-0001-INV | Draft Report of Findings**

1. On February 21, 2021, Commissioners Willie Bell and Lisa Carter, former Commissioner Annie Holt, and former Interim-Board Secretary Melanie White submitted an Inter-Office Memorandum to City HR requesting “out-of-class pay compensation forms in preparation for submission to the [City HR] and Chief Financial Office[r] [for] approval...”<sup>7</sup> **(I was not aware of this action. I question, how or why was my name added to this assumption?)**

2. On March 3, 2021, former Interim-Chief Investigator Lawrence Akbar submitted a letter to Ms. White recommending that 3 of the 4 employees named in the Inter-Office Memo be promoted to existing or newly created positions within the OCI.8 **(I would not have agreed to this action without the consent of the full BOPC).**

3. By April 2021, all four (4) OCI employees named in the Inter-Office Memo received temporary changes in their work assignments and increases in pay without approval from the full Board.9 **(In that this discussion did not come to the attention of the full board of BOPC, I was not aware, so not in a position to agree with it.)**

4. City HR processed out-of-class pay for the four (4) OCI **employees before any out-of-class request forms were executed by any members of the Board. (I was not aware; therefore, I was not in a position to agree with this action.)**

5. On June 30, 2021, former Commissioner Charles “Jim” Holley and former Interim Board Secretary Melanie White executed out-of-class compensation request forms for three (3) of the four (4) OCI employees named in the Inter-Office Memo without approval from the full Board.10 **(In that this action was not brought to the attention of the full BOPS, I was not aware; Thusly, I was not in a position to support these actions.)**

6. Commissioners Willie Bell and Lisa Carter, and former Commissioners Jim Holley and Annie Holt abused their positions by implementing out-of-class pay for several OCI employees without the full Board’s knowledge and approval. Current BOPC Commissioners Willie Bell and Lisa Carter and Former Commissioners Jim Holley and Annie Holt Abused Their Positions by Implementing Out-of-class Pay for Four OCI **Employees Without Approval from the Full Board. (In that this action was not brought to the attention of the full BOPC Board, I was not aware: Thusly, not in a position to support? (I ask, how was my name included in the correspondences between the various characters noted in this investigation. I was never privy to none of these discussions or these eventual actions.)**

7. When questioned about the assignments on the record by a now-former commissioner, Mr. Akbar stated the he had selected certain investigators for out-of-class work based on his knowledge of their skillsets and his experience working in the OCI. **(Is there a ZOOM recording whereby Mr. Akbar shared this discussion with the full BOPC?)**

8. Memorandum to former City HR Employee Services Consultant Kayetta Wilder-Holly from former BOPC Chairperson Willie Bell, former BOPC Vice-Chairperson Annie Holt, Commissioner Lisa Carter, and former BOPC Interim-Secretary Melanie White, RE: Request for Out-of-Class Compensation Forms for Completion of Requests to City Human Resources and Chief Financial Officer Departments, dated February 21, 2021. **Note: The OIG was unable to determine the exact date on which the Inter-Office Memo was submitted, as the employee services officer who assisted the BOPC in this matter is no longer with the City (Interesting?), and information retained and submitted to the OIG by City HR did not include this information. (Was my name simply presented among the names of the other commissioners identified in the investigation? Was my signature presented? If not, then why was it not mandatory that a commissioner's signature be required to validated this most serious request/action? It appears that I am being accused based on the collaborations of whom?)**

**I recall the conversation noted below with a high level of accuracy. The discussion that was public and conducted with the participation of the full BOPC Board.**

#### **MOTION TO ACCEPT THE BOARD OF POLICE COMMISSIONERS BUDGET 2021-2022**

**Motion: Vice-Chairperson Holt Second: Commissioner Burch Discussion: 2021-22: Agency CFO James George stated the Board's Budget Hearing is next week before the City Council and he addressed several highlights of the budget. The number of positions are the same as Fiscal Year (FY) 2021 and the budget decreased approximately \$94,000 from fiscal year 2021 to 2022. Commissioner Burch indicated the Chaplains of the DPD do not receive a stipend, and requested for the 100 Chaplains to receive a stipend for their valuable service. Chairperson Bell responded Chaplains and Detroit Police Reserves (DPR) are all volunteer, noting there is a long standing commitment they make to the community and that the funding is not available within the Board's Budget. Commissioner Bernard questioned stated, "I understand that we send our proposed budget, then the Mayor sends in his recommendations and as a result we have \$94,362 that has been removed from our budget. Is that correct from the proposed budget?" ACFO George responded part is correct and explained the difference of \$94,362. In Fiscal Year 2021 the budgeting methodology was all the positions at the maximum rate. There is a minimum and maximum for each position. When taking the maximum rate and multiplying by 85%, that was the budget for the salaries and benefits for the employees. But in this fiscal year, the City reviewed the line items and salary rates, and based on the proposed amounts on actual salaries plus increases. That is the basis for fiscal year 2022 budget, so the difference between last year 2021 was a little bit over budgeted, in terms of salaries. But in this fiscal year the City is going with the actual salary. Commissioner Bernard requested additional clarity regarding \$110,000 difference, noting the actual salary versus the budgeted salary. Commissioner Brown expressed one of the things he was concerned about was whether the Board received some information in the packet concerning salaries and people that are working out of class. Does the budget depict the salaries of those individuals working out of class at that pay rate, or is there going to be money in the budget left for people that may have to work out of class? ACFO George indicated the way that the out of class works is you have to have a vacant position which you have existing salary not distributed to anyone, so that would cover for out**

of class pay. Commissioner Brown stated "So you are saying the position has to be vacant to put people in, out of class situations and then we just draw from that money from those positions that are not filled." ACFO George indicated that was his understanding, noting you have to have a position or a higher title that the lower title is working. " ACFO George indicated that was his understanding, noting you have to have a position or a higher title that the lower title is working. They both cannot be on the same title. 5 Commissioner Holley inquired if the Board wanted to give staff a raise is that something that can be done, citing that staff have been working hard all year, and should receive a raise. ACFO George expressed it was his understanding that the Commission wanted to give a pay raise to the employees, the civil service employees, would have to go through their Performance Evaluation process, and then a review at what is in the budget would occur to know what could be granted to each of these employees. The appointees, the Commissioners have the privilege or the freedom to determine based on what is in the budget, and that can be done through human resources. Commissioner Holley expressed his concern that the Board fully utilize all funds within its budget. Chairperson Bell expressed that is our primary concern not to give money back and expressed the Board is trying to work with ACFO George and the City of Detroit to make sure that does not happen. They have taken 5% automatically and so that is why we have to rely on ACFO George and other financial personnel to help us in terms of exploring options available to the Board. ACFO George discussed that the Chief Financial Officer is the final authorized person to approve or deny. Commissioner Davis inquired whether the Board could vote to decide that all staff return to work full time instead of having furlough days, citing that he believed that some essential work is not being done in a timely manner. Commissioner Brown expressed that regarding some of the out of class situations, he indicated there was an individual who was not paid out of class money previously. "At a meeting where you stated that we will have no more out of class positions, and here we are. At this issue again, so we are going to be paying out of class. Has this person been made whole? I will follow up with an email, but I just want to make sure that this is what we're doing, and if we're going to do that if according to what ACFO George is saying this person is due this money from over a year and still have not been paid to this date."

**Yes:** Chairperson Bell, Vice-Chairperson Holt, Commissioner Bernard, Commissioner Burch, Commissioner Carter Commissioner Hernandez, Commissioner Holley, and Commissioner Jones.

**No:** Commissioner Brown, Commissioner Burton and Commissioner Davis.

**VOTE:** Yes = 8 No = 3 Motion: ADOPTED

The actions described in this investigate suggest that I demonstrate rampant disrespect for the BOPC, my fellow colleagues, and the citizens of Detroit. The recordings of the meetings, when either I chaired or supported the actual chair, helped to reveal my honesty and regard for my responsibilities as a commissioner. The behavior I expressed was motivated by my RESPECT for the BOPC, an institution created to protect Detroit's citizens and to allow them to have a voice when they feel they have been abused by some law enforcers with DPD.

**I came to BOPC after investing close to 20 years volunteering with:**

- **my daughters' school (chair of the parent group for three years, up to when I returned to college to complete my degree)**

- my neighborhood association (recording secretary, lead advocate for seniors in the City of Detroit and my neighborhood)
- non-profit neighborhood organization (secretary and board member)
- Wayne County Health Authorities (signed citizens up for ACA/Healthy Michigan)
- City of Detroit (among my various volunteer assignments, helped deliver food to Detroit citizens isolated because of COVID; volunteered during Detroit's hiring series for FCA)
- Helped to encourage citizens complete the 2020 Census form
- my sorority's community outreach, support the veterans, provide gifts at Christmas for young folks whose parents are incarcerated, one of the largest "Trunk or Treats" events held in the City of Detroit
- my church ministries, clerk ministry, greeter's ministry
- precinct delegate (execute all the responsibilities this titled dictates)
- secretary with my congressional district (12 years)
- Democratic Neighborhood Team Lead, 2012(even the leading congressional leader attended my team's "Get Out the Votes" during various events held at my home)
- National institution that focuses on the improvement of the quality of life for seniors
- Made presentations on the urgency of the Affordable Care Act
- A state organization as we visited Lansing during most of the hearings on the passage of Healthy Michigan
- Member with a Federal Organization that works to provide resources to seniors

I received my college degree at the age of 40. To be accused at my age of abusing my authoritarian role as a member with BOPC (2019-2023) simply does not make mature common sense...at what gain or benefit to whom? Surely NOT to me, my family, friends, and various organizations for whom I demonstrate respect by my responsible, **none self-serving actions**, including BOPC. A bookkeeping system that demonstrates drastic need for more professional oversight and professional training on the parts of the various employees responsible for protecting BOPC funds.

**I included samples of my volunteer behaviors in this statement not for purposes of bragging, but because I am afraid of how easy it is for a person's name to be added to an investigation that reeks of so many inconsistencies and lacks documentations of my involvement? My basic character is being challenged?**



**Annie Mae Holt**