

# Memorandum



CITY OF DALLAS

June 1, 2026

DATE

Honorable Members of the Ad Hoc Committee on General Investigating and Ethics:  
TO Gay Donnell Willis (Chair), Lorie Blair, Laura Cadena, Cara Mendelsohn, Kathy Stewart

TO

**Consideration of amendments to Chapter 12A, “Code of Ethics,” pursuant to Section 12A-64 [Office of the Inspector General], Item B.**

SUBJECT

## Introduction and Next Step

There are several Chapter 12A Code of Ethics amendment recommendations coming to the committee for consideration. This memorandum provides a brief overview of the process, the history behind the recommendations, and a high-level categorization of the proposed changes.

The next step in the process is for the committee to consider the recommendations and determine if they are ready for Council consideration or if more questions need to be addressed by the Ethics Advisory Commission. Because there is so much to consider here, these recommendations would ideally be set for Council briefing in August.

## Process to Date: Ethics Advisory Commission Recommendations

Section 12A-64 requires the City Council to review the Dallas Code of Ethics each January of even-numbered years. To support that review, the Office of Inspector General coordinated a recommendation process through the Ethics Advisory Commission.

The Ethics Advisory Commission formed a Working Group chaired by Tom Perkins. The Working Group members were Andy Villarreal, Jennifer Stobaugh, and Grant Schmidt. Laura Morrison participated on behalf of the City Attorney’s Office. Baron Eliason and Laura Phelan participated on behalf of the OIG.

At the first Working Group meeting, Interim Inspector General Baron Eliason presented 25 proposed recommendations for additions, corrections, and deletions to Chapter 12A. Additional input was solicited from City Council members, city officials, city employees, and the public. Four public meetings were held over a three-week period, and a public survey received 81 responses. The single survey response from one OIG staff member who is also a Dallas resident was not included in the responses considered.

The Working Group considered and discussed the proposed changes over three meetings. That process resulted in 16 recommended changes and three additional items

DATE June 1, 2026

SUBJECT **12A Recommendations from the Ethics Advisory Commission**

the Working Group believed warranted discussion by the full Ethics Advisory Commission.

The Ethics Advisory Commission then considered the recommendations and now forwards 19 recommended changes for committee consideration. A separate document in the packet identifies recommendations that were considered by the Ethics Advisory Commission but not recommended.

### **Purpose of the Recommendations**

The recommendations are intended to make Chapter 12A clearer, more practical, and more effective. Broadly, they address six areas:

1. **Definitions and consistency** — clarifying terms and harmonizing language across Chapter 12A and related City rules.
2. **Corrections and cleanup** — correcting existing provisions so the Code better reflects Council's intended meaning.
3. **Ethics training and guidance** — strengthening recurring ethics education for City officials and employees.
4. **Transparency and disclosure** — improving clarity around lobbying, representation, reporting, and public-facing obligations.
5. **OIG authority, process, and accountability** — clarifying investigative procedures, adding Management Alerts and Management Advisories as tools for addressing risk, and refining enforcement mechanisms.

Respectfully submitted,



Inspector General (I)

c: Kimberly Bizer Tolbert, City Manager  
Bertram Vandenberg, City Attorney (I)  
Mamatha Sparks, City Auditor (I)  
Billierae Johnson, City Secretary  
Preston Robinson, Administrative Judge  
Baron Eliason, Inspector General (I)  
Dominique Artis, Chief of Public Safety  
Dev Rastogi, Assistant City Manager

M. Elizabeth (Liz) Cedillo-Pereira, Assistant City Manager  
Alina Ciocan, Assistant City Manager  
Robin Bentley, Assistant City Manager  
Jack Ireland, Chief Financial Officer  
Ahmad Goree, Chief of Staff to the City Manager  
John Johnson, Chief of Real Estate  
Directors and Assistant Directors

DATE June 1, 2026

SUBJECT **12A Recommendations from the Ethics Advisory Commission**