

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 amending Chapter 12A, “Code of Ethics,” related to persons doing business with the city [Office of the Inspector General], Item A.

SUBJECT

Introduction and Next Step

This memorandum provides a brief overview of the process, the history behind the recommendations, and a high-level categorization of the proposed changes. I am available to meet beforehand to answer any questions about the process or the recommendations.

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. Ideally, this recommendation would be considered by Council at its June 24, 2026 meeting.

Process to Date: Persons Doing Business with the City and Correction Ordinance

This committee has already begun consideration of Chapter 12A recommendations that were developed and recommended by the Ethics Advisory Commission to strengthen how the Code of Ethics incorporates persons doing business in the city.

Overview of the recommendations

The persons-doing-business recommendations arose from a practical enforcement concern. Although Chapter 12A indicates that persons doing business with the City are covered by the Code, the Code does not clearly and effectively incorporate them into several operative provisions. These recommendations are intended to make the Code more enforceable by clarifying how certain duties, restrictions, cooperation requirements, confidentiality rules, public-resource limitations, and contracting consequences apply to vendors, contractors, subcontractors, and others doing business with the City.

At the last committee meeting, several questions arose that needed to be addressed before consideration continued. Those questions are addressed as follows:

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1. If a subcontractor is found to have violated the Code, is the prime contractor subject to sanction as well?

Yes, but only if the Ethics Advisory Commission substantiates a finding that the prime contractor knowingly violated the Code of Ethics in some way. In those cases, the City Council would be responsible for determining the appropriate sanction.

2. How does a Council Member know if they are speaking with a subcontractor connected to another contractor's bid or project?

There are three practical options. The Council Member or staff may ask, the subcontractor may disclose the relationship, or the City may maintain a list. Because maintaining a complete and current list could be challenging from a process standpoint, the best practice is to ask consistently when the issue arises.

3. Could a minimum term of debarment be added?

Yes. A minimum term is not included in the current recommendation, but it could be added by amendment. Debarment is one of several possible sanctions that can be applied under the Code of Ethics.

Respectfully submitted,



Inspector General (I)

c: Kimberly Bizzor Tolbert, City Manager
Bertram Vandenberg, City Attorney (I)
Mamatha Sparks, City Auditor (I)
Biliera 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

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