

SUMMARY OF RECOMMENDATIONS PROPOSED FOR PURPOSES OF  
7.9.21 PUBLIC HEARING

- with TB comments

**I. BEHAVIORAL EXPECTATIONS AND TRAINING**

**A. With Respect to Conduct Expectations and Training, the EDRP recommends that Elected officials:**

1. establish rules/ expectations that govern their interactions, and those of their staff, with city administration, city employees and with lobbyists/developers/city contractors and those who act on their behalf.
2. sign a pledge of behavior/code of ethics at their first meeting.
3. require their own and staff's participation and training with respect to these and all legal and administrative requirements.

**B. With Respect to Conduct Expectations and Training, the EDRP recommends that the City Manager's office:**

1. maintain conduct expectations for city employees, as well as developers, contractors and lobbyists, and those who act on their behalf.
2. Reinforce and regularly articulate behavioral, legal and administrative expectations in both written form.
3. regularly provide training and information about these expectations as well as mechanisms for reporting improper behavior and whistleblower protection. Review and enforcement shall be by the City Manager or the City Manager's designee.

**II. CONFIDENTIAL WHISTLEBLOWER HOTLINE**

**A. With Respect to a Confidential Hotline, the EDRP recommends that the City/ City Manager should:**

1. maintain and expand a confidential whistleblower hotline for any person to report any unethical or illegal conduct, conduct, violations of city of council behavioral or administrative codes and any inappropriate request or demand from any public servant, elected or otherwise.
2. change the name of the current "Fraud, Waste and Abuse Hotline" to one that reflects the scope of the reports it is available to receive and so as to encourage reporting.
3. make clear to callers the applicability of city and state whistleblower protections afforded them.
4. The existence and availability of the hotline should be promoted, encouraged and well publicized.

### III. LINK BETWEEN CAMPAIGN CONTRIBUTIONS AND DEVELOPMENT PROJECTS.

#### With Respect To The Charge To The EDRP to Study The Link Between Campaign Contributions And Approval Of Development Projects, The EDRP

- A. Notes that by Ordinance No. 216-201 City Council passed, and the Mayor approved, funding for a forensic audit of City Council ordinances that passed related to economic development between January 1, 2018 and December 31, 2020.
- B. Recommends that upon completion of the forensic audit of three years of development project is completed, City Council should examine whether any additional review is needed to study possible links between campaign contributions and development contracts and budget accordingly.

### IV. SOLICITATION, RECEIPT AND REPORTING OF CAMPAIGN CONTRIBUTIONS.

#### A. From AG:

The EDRP recommends that City Council adopt an ordinance that prohibits the mayor and councilmembers from soliciting or accepting, and a developer from making, any contributions from the time a matter involving the developer is transmitted to the Clerk of Council until the matter is disposed of by final action of Council and the Mayor. Final action will vary with the circumstances, but generally occurs upon the end of the exercise of Council and mayoral authority over the legislative matter (e.g., upon passage of legislation by Council signed by the Mayor, upon conclusion the veto process, or upon failure of an item in Council).

- B. With respect to reporting contributions, the EDRP recommends that City Council adopt an ordinance that requires the Mayor, Councilmembers and candidates for those offices:
  - 1. file with the Cincinnati Elections Commission copies of all campaign finance reports of other campaign accounts or committees over which they have control. This is in addition to the requirements of Article XIII of the City Charter.
  - 2. provide such reports to the Commission within 48 hours of their filing with whatever body with which they were otherwise required to be filed. Compliance with this requirement may be satisfied by the officer holder or candidate providing a statement to the Commission that identifies all other campaign accounts or committees which they control in addition to their Mayoral or Council Campaign Committee by providing the name of any such account or committee, the name of its treasurer, the location where the original reports of such account or committee are filed and an internet link to those reports on a searchable data base. If no such internet link is available, the candidate or office holder shall fill a complete copy of such filings to the Commission. The City shall

post such information on its website along with the filings of each office holder or candidates required by Article XIII of the City Charter. **How much detail here in this section?**

3. For purposes of this section, the definition of Candidate for is governed by ORC 3517, which the Cincinnati Elections Commission incorporates.

4.

#### **V. DEVELOPMENT PROCESS .....TBD**

**OTHER?**