



2020  
**ANNUAL  
REPORT**



**ETHICS DIVISION**

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Office of the Inspector General

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# A Message From the Ethics Officer



Greetings:

2020 was a year that surprised and challenged us in many ways and our work is as critical and relevant as ever.

In early 2020, our office experienced a major restructuring with the creation of the Office of the Inspector General (OIG.) The OIG will house three divisions: Ethics, Compliance, and Independent Procurement Review Office (IPRO.) The Ethics Division, led by the Ethics Officer, will continue to provide ethics training, and promote a culture of ethics at all levels of city government; investigate ethics matters; issue advice and advisory opinions; administer the City's financial disclosure process and audit disclosure statements for accuracy. IPRO will continue its work of reviewing contracts valued at more than one million dollars, and the Compliance Division will focus on deterrence and investigation of potential fraud, waste, and abuse. The IPRO and Compliance divisions will be overseen by the new Inspector General.

Change is never easy, and the restructuring brought its share of challenges. The creation of an entirely new office while merging existing city functions took place while we were adjusting to the remote workplace. Nonetheless, the Ethics team, ever resilient and flexible, is embracing the new structure, thriving with some of the changes, and assisting with the establishment of the new office.

We continue to receive requests for advice and guidance as officials and employees stay connected and engaged with our office to make sure that they are complying with ethics rules within the changing work environment. We have also observed an uptick in potential issues related to outside employment and potential conflicts of interests. To that end, we will be launching an ethics e-learning course to educate and inform officials and employees, as well as mitigate many of the ethical risks of a remote workplace. We may have found ourselves moved into a virtual world, yet we remain committed to building a strong, ethical culture in the City of Atlanta.

*Jabu M. Sengova*

Jabu M. Sengova  
City Ethics Officer

# ABOUT THE ETHICS DIVISION

## WHO WE ARE

The Ethics Division is an independent office within the Office of the Inspector General headed by the City Ethics Officer. The City Ethics Officer is appointed by the Governing Board of the Office of the Inspector General for a period of five years, subject to confirmation by the City Council and approval by the Mayor.

## WHAT WE DO

The Ethics Division provides general and targeted ethics training to city officials, employees, and contractors on the City's Code of Ethics, provides written and oral ethics advice to city officials and employees, investigates complaints falling under the jurisdiction of the Code of Ethics, prosecutes violations of the Code of Ethics, coordinates the City's ethics and compliance hotline (Integrity Hotline), and manages the City's financial disclosure system.

# 2020 HIGHLIGHTS BY THE NUMBERS

## ADVICE

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- Provided timely ethics advice in approximately \* **107** requests for written and verbal advice and responded to requests for general information on ethics.
- Responded to **100** percent of all requests for advice within seven days

## OPERATIONS

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- Held **six** regular board meetings and **one** board retreat. Utilized Zoom platform for five meetings.
- **Two** new board members appointed by the Mayor and City Council

## PUBLIC EDUCATION AND OUTREACH

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- Distributed Holiday Gift Reminder newsletter
- Published Ethics in Action newsletter
- Sent out city-wide email blasts throughout the year to promote ethics awareness

\*NUMBERS LOWER THAN PAST YEARS DUE TO COVID-19 EPIDEMIC

# 2020 HIGHLIGHTS BY THE NUMBERS

## FINANCIAL DISCLOSURE

Recorded **161** financial disclosure cases involving delinquent or late filers for which enforcement was pursued. Of **80** late filers, administrative decisions were written in each case imposing a \$500 fine.

**\$53,500**

### ASSESSED IN FINANCIAL DISCLOSURE PENALTIES

Collected \$1,400 in payments to-date

**87%**

### TIMELY FILING RATE

96 percent overall to date

**3,480**

### REQUIRED FILERS





# 2020 HIGHLIGHTS BY THE NUMBERS

## INVESTIGATIONS AND ENFORCEMENT

Continued investigation and enforcement of 11 open ethics matters; opened 12 preliminary investigations; closed 16 matters.

**112**

**INTEGRITY LINE REPORTS  
RECEIVED**

**43**

**INTEGRITY LINE REPORTS  
REFERRED TO OTHER  
AGENCIES/DEPARTMENTS**

**\$3,982.82**

**ASSESSED IN RESTITUTION  
TO THE CITY**



# 2020 HIGHLIGHTS BY THE NUMBERS

## TRAINING

The Ethics Division provided ethics training to city officials, employees, board members, vendors, and contractors.

**212**

**INDIVIDUALS  
TRAINED**

**57**

**ETHICS PLEDGES  
RECEIVED**

**2,279**

**RECEIVED VIEWS**

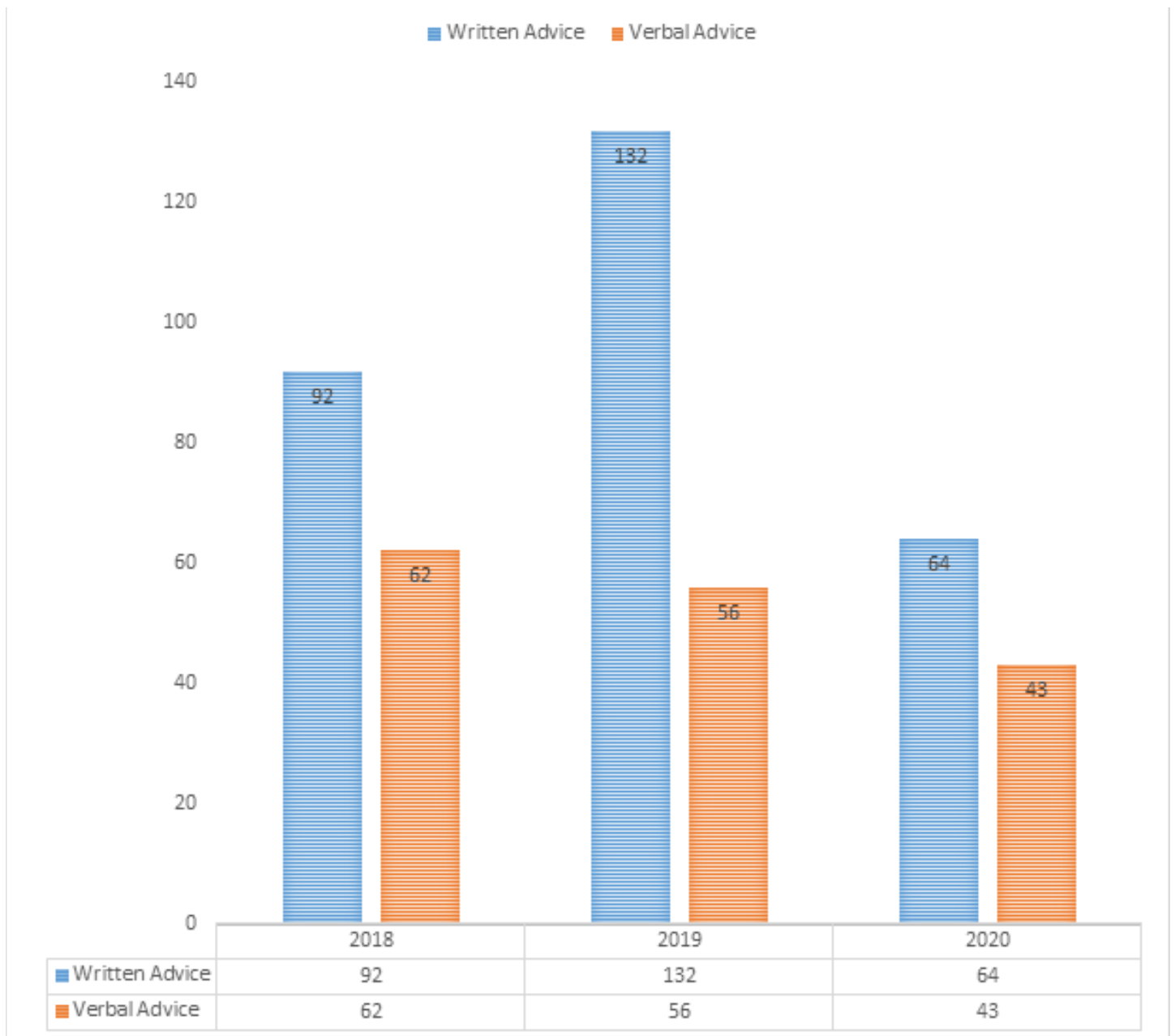
Via online ethics modules and training videos for city employees and officials provided via the Division's website and through ethics awareness email blasts





# Report on Ethics Advice

## WRITTEN VS. VERBAL ADVICE: 2018 - 2020

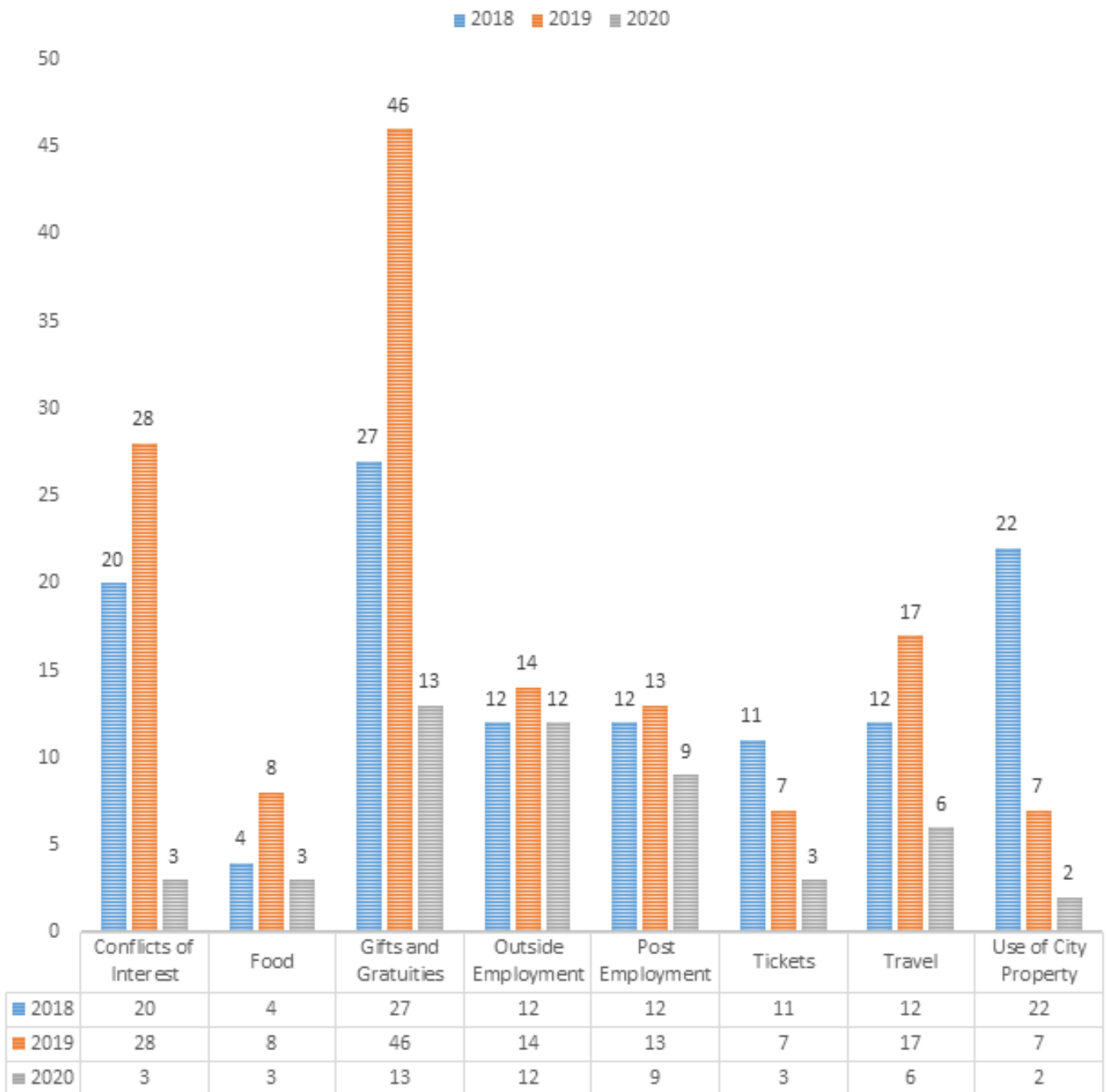


NOTE: WRITTEN ADVICE INCLUDES BOTH FORMAL AND INFORMAL ADVISORY OPINIONS.

\*2020 NUMBERS LOWER THAN PAST YEARS DUE TO THE COVID-19 EPIDEMIC

# Report on Ethics Advice

## TOP SUBJECTS FOR WRITTEN ADVICE: 2018 - 2020



NOTE: WRITTEN ADVICE INCLUDES BOTH FORMAL AND INFORMAL ADVISORY OPINIONS.

\*2020 NUMBERS LOWER THAN PAST YEARS DUE TO THE COVID-19 EPIDEMIC

# AUDITING OF CITY FINANCIAL DISCLOSURE STATEMENTS

The Ethics Division is in its second full year of auditing City Financial Disclosure statements. The Division is currently reviewing statements filed in 2019.

The purpose of the annual audit is to review compliance with Section 2-814 of the City's Standards of Conduct (Code of Ethics) which regulates the Disclosure of Income and Financial Interests. During an audit, the Ethics Division administers tests to a selection of submitted statements. The tests include reviewing statements for completeness, comparing current and prior statements for consistency, and conducting public records searches for potential errors and omissions.

Similar to the 2018 audit, 2019 tests show that some filers are still not properly disclosing outside businesses interests as required by the Code. Where discrepancies are found, steps are taken by the Ethics Division to ensure the accuracy of a given statement by way of clarification, amendment, and, if necessary, investigate potential violations of the Code.



Based on these recent audits, the Ethics Division continues to assist filers to better understand the terms “business” and “employment,” as defined by the Code. The Code defines a business as any entity formed for the purpose of generating a profit, including self-employed individuals and nonprofit organizations. Employment is defined as persons rendering services for financial consideration including lawyers, accountants, consultants, public relations representatives, and other persons.

Our division will continue to assist employees and officials during the filing season with questions related to the various sections of the City Financial Disclosure Statement. The audit process provides an opportunity for the Ethics Division to continue to improve the annual filing experience and to provide the public with most accurate reporting possible pursuant to the Code of Ethics and in the spirit of transparency.

## **CITY CREATES OFFICE OF INSPECTOR GENERAL**

In February of this year, the City approved Ordinance 19-O-1729 creating a new Office of the Inspector General in the City of Atlanta Charter. The Ordinance, which incorporated many of the recommendations of the Mayor's Task Force for the Promotion of Public Trust, further established an independent Governing Board of the Office of the Inspector General. Comprised of nine volunteer members, the Board is poised to continue the work of prior city Ethics Boards toward increased transparency, compliance and ethics, and the prevention of fraud, waste, and abuse in city government.

Under the direction of the Ethics Officer, the Ethics Division (Ethics Office) will continue to educate and promote a culture of ethics at all levels of city government, investigate ethics matters, issue advice and advisory opinions, administer the City's financial disclosure process and audit statements for accuracy.

Led by the new Inspector General, the Compliance Division will focus on deterrence and investigation of potential fraud, waste, and abuse. The Independent Procurement Review Division (IPRO) will continue its work under the Inspector General reviewing contracts valued at more than one million dollars, also overseen by the Inspector General.



# Report On The Integrity Line

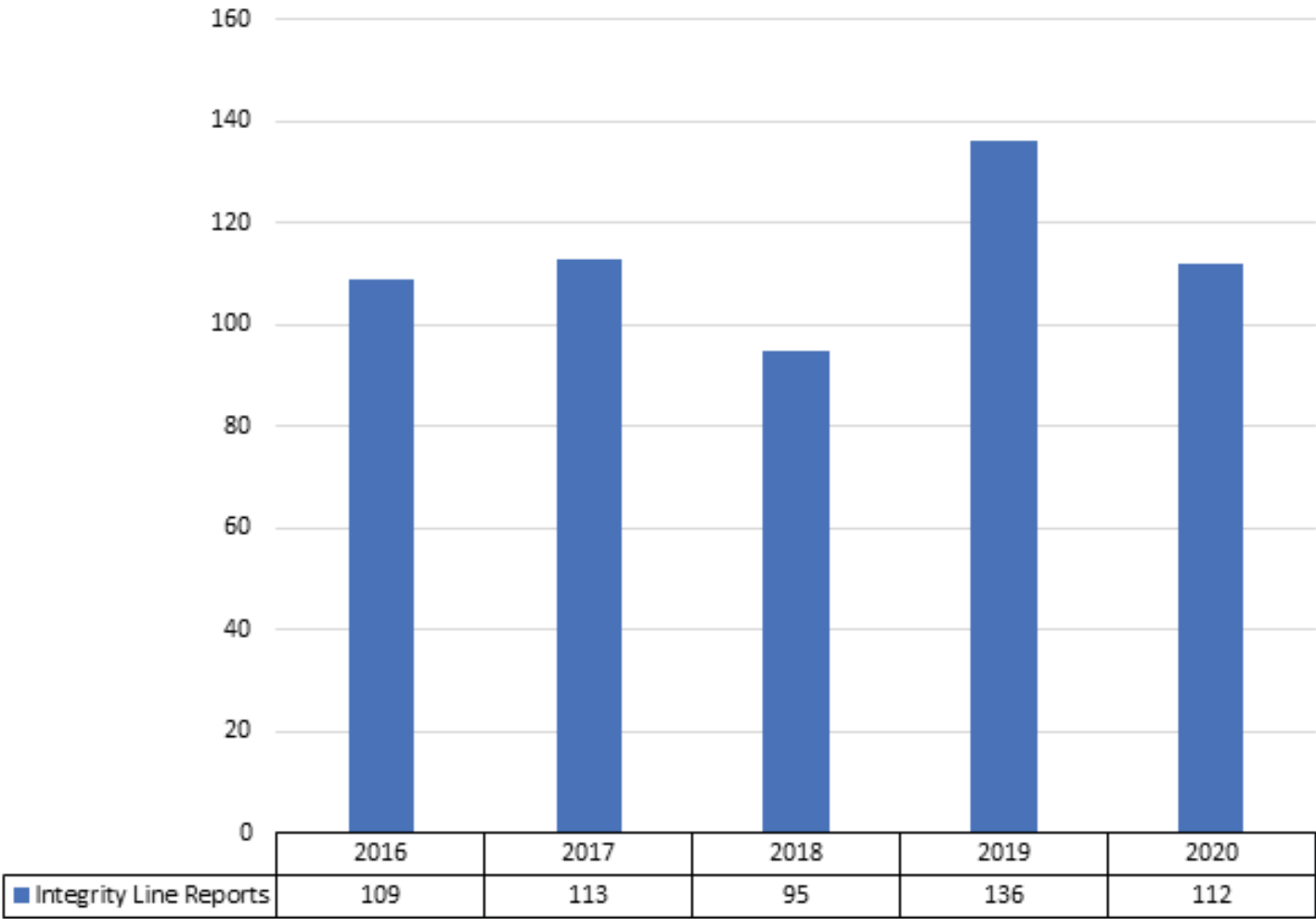
The City's Integrity Hotline was established in 2006 as a vehicle to report unethical, fraudulent, or illegal activity through an independently run third party telephone and online reporting system routed to the Integrity Line Steering Committee, which includes representatives from the Ethics Division, City Auditor's Office, and the Department of Law.

With 112 Integrity Line reports received, 2020 saw a reporting volume for the Integrity Line consistent with past five years' average report load despite disruptions to in-person operations due to COVID-19. The continued efforts of the Integrity Line Committee and other city departments to promote hotline awareness to the City's workforce, especially considering the challenges many departments faced while adapting to the work from home environment, likely contributed to the reporting volume remaining at the level expected under normal circumstances.

There were 112 Integrity Line Reports received by the Integrity Line Committee in 2020.

This chart reflects the overall change in reporting volume for the past five years.

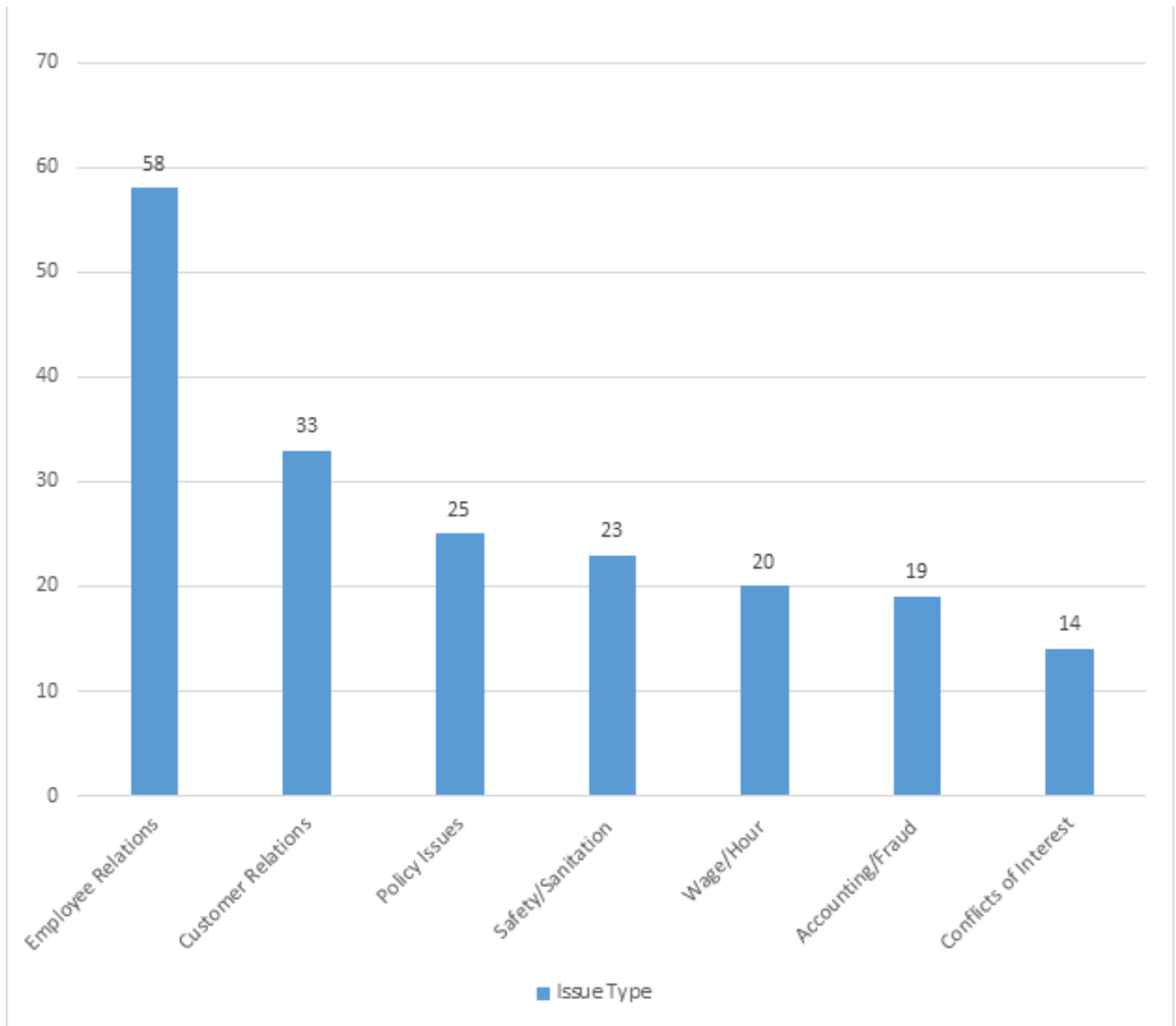
### INTEGRITY LINE REPORT 2016 - 2020





This chart reflects the number of Integrity Line Reports received by report category.

### TOP REPORTING CATEGORIES: 2019 - 2020



*Note: Only the top seven overall Integrity Line reporting categories are included in the above chart.*

# Ethics In Action



## Contact Us

404.330.6286 | [www.atlantaethics.org](http://www.atlantaethics.org) | [Ethicsofficer@atlantaga.gov](mailto:Ethicsofficer@atlantaga.gov)

Twitter: @CoaEthics