



Southeastern Pennsylvania Transportation Authority

Office of Inspector General

1234 Market Street • 11th Floor • Philadelphia, PA 19107



December 9, 2024

Via Email

Honorable Scott A. Walker, Council Chairman, Division B

swalker@jeffparish.gov

Honorable Jennifer Van Vrancken, Councilwoman Division A

jennvanv@jeffparish.gov

Honorable Marion F. Edwards, Councilman District 1

marionedwards@jeffparish.gov

Honorable Deano Bonano, Vice-Chairman, Councilman, District 2

dbonano@jeffparish.gov

Honorable Byron Lee, Councilman District 3

byronlee@jeffparish.gov

Honorable Arita Bohannon, Councilwoman District 4

abohannon@jeffparish.gov

Honorable Hans Liljeberg, Councilman District 5

hliljeberg@jeffparish.gov

Re: Proposed Ordinance Amendment – Summary No. 25376; Ordinance No. 25930

Dear Honorable Members of the Jefferson Parish Council,

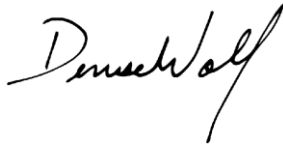
I have served as the Inspector General for the Southeastern Pennsylvania Transportation Authority (SEPTA) for the past three years. Prior to this appointment, I was a federal prosecutor, culminating as the Criminal Chief for the Eastern District of Pennsylvania. Like many public servants dedicated to oversight, I take accountability and independence most seriously. Also, the role of the Inspector General is to provide transparency on how government operates. These guiding principles are the hallmark of a strong government working for the people.

Some parts of the Proposed Amendment are woefully inconsistent with these core principles. Upon completion and issuance of a public letter or report of an audit, investigation or review, an Inspector General has an obligation to share the contents therein with the public they serve, as well as make any relevant comments. Indeed, this approach informed my years as a prosecutor where our indictments were often accompanied by press releases, social media posts, and sometimes press conferences, where court filings were matters of public record, and where we directly addressed the media post-verdict.

Legislation such as the Proposed Amendment that limits an Inspector General's reporting to the public causes distrust and creates an impression that the government is hiding information. The public deserves to know and see how their taxpayer dollars are stewarded.

The Proposed Amendment represents government at its worst – it seeks to cancel the watchdog's public reveal of their findings, effectively immunizing public officials from scrutiny of their constituents. Such circumstances breed suspicion, fraud and corruption. The Parish Council must do better.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Wolf", written in a cursive style.

Denise S. Wolf, Esq.
Inspector General
(215) 834-6576

cc: Kim Raines Chatelain, Inspector General, Jefferson Parrish



CHICAGO HOUSING AUTHORITY
OFFICE OF THE INSPECTOR GENERAL
INSPECTOR GENERAL KATHRYN B. RICHARDS
60 E. VAN BUREN, 7th FLOOR, CHICAGO, IL 60605

December 9, 2024

RE: Ordinance No. 25930

To the Members of the Jefferson Parish Council:

I am writing to express my concern regarding proposed amendments to the ordinance establishing the Jefferson Parish Office of Inspector General (OIG), specifically those amendments that purport to limit the OIG's ability to speak publicly about its work.

I am a licensed attorney, currently serving as the Inspector General of the Chicago Housing Authority, as well as the President of the Illinois Chapter of the Association of Inspectors General. I previously worked in the legal department of the City of Chicago OIG for nearly 10 years. In my entire career in this field, I have never seen a similar legislative provision attempting to limit the specific statements of an IG. The amendments would make Jefferson Parish an outlier in this area and reflect a clear effort to weaken its own government oversight.

Councilmembers should be particularly concerned that the proposed amendments are contrary to the Principles and Standards for Offices of Inspector General promulgated by the national Association of Inspectors General. While the proposed amendments appear to model the American Bar Association's ethical guidelines for Prosecution Function, Standard 3-10.10 Relationship with Media, which are designed to protect individual rights in criminal matters, an inspector general's role is fundamentally different from that of a prosecutor. Most OIG enabling legislation expressly provides for public reporting to hold government agencies accountable to the people they serve.

Additionally, the draft language introduces fundamentally subjective standards that may be used to attack the OIG purely in retaliation for doing its job. Confidentiality regarding complaints and investigative records is a core IG principle and standard, already established in Jefferson Parish code, and needs no additional amendments.

I urge you to take additional time to reconsider these amendments.

Sincerely,

Kathryn Richards
Inspector General
Chicago Housing Authority

cc: Jefferson Parish Inspector General Kim Raines Chatelain

December 9, 2024

Honorable Scott A. Walker, Council Chairman, Division B
swalker@jeffparish.gov

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jennvanv@jeffparish.gov

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Honorable Arita Bohannan, Councilwoman District 4
abohannan@jeffparish.gov

Honorable Hans Liljeberg, Councilman District 5
hliljeberg@jeffparish.gov

Dear Chairman Walker and Honorable Members of the Jefferson Parish Council:

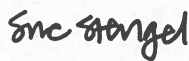
I am writing to urge you to reject the proposed amendments to the Ordinance for the Jefferson Parish Office of Inspector General (OIG). A critical role for an oversight agency involves communicating findings to and with the public. Communicating information to the public about the efficacy of their government and the efficient use of taxpayer dollars is fundamental to the role of an office of inspector general. An OIG is the steward of the public's trust. Our role is to prevent, detect and deter fraud, waste and abuse. Creating barriers to transparency and communication directly impacts the public's perception and knowledge of the integrity (or lack thereof) with which the government operates. The public has a right to know about the inner workings of their government and whether government officials and employees are acting within their best interest. Limiting an OIG's ability to independently communicate with the taxpayer and provide critical information about the use of their dollars is a direct infringement on the important role of an inspector general. Effective change is brought about with the force of knowledgeable public opinion behind it.

Although I am writing as an individual, and not in my official capacity, to express my personal opinion and not that of my employer, I wish to put my opinion in context. I am

the Inspector General for the Los Angeles Unified School District, the nation's second largest school district serving half a million students, and whose annual budget is \$19 billion. Previously, I served in oversight roles for three of the nation's largest and most influential public safety agencies; the Los Angeles City Fire Department, the Los Angeles Police Department, and the California Department of Corrections and Rehabilitation.

Stifling dialog and placing limits on the flow of information to the public does not lead to good governing or good government. I urge you to reject these amendments.

Sincerely,



Digitally signed by Sue Stengel
DN: cn=Sue Stengel, o=OIG, ou=OIG,
email=susan.stengel1@lausd.net, c=US
Date: 2024.12.09 12:06:44 -08'00'

Sue Stengel

Inspector General, Los Angeles Unified School District*

*For identification purposes only.

Cc: Kim Chatelain, Inspector General, Jefferson Parish

Montreal, December 10th, 2024

To: Jefferson Parish Council

Object: Proposed amendments to ordinance by Jefferson Parish Council.

Members of the Council,


The primary mission of the Inspector General is to be the watchdog of the integrity of public bodies. This guardian of integrity assures and reassures elected officials and the public that the public funds of Jefferson Parish are managed free of any corruption.

Given this particular mission, the Green Book of the Association of Inspectors General teaches us that the Inspector General must be able to act independently. This independence is reflected in several elements, not only in terms of the criteria for his/her appointment or in the execution of his/her duties, but also in their ability to publicly denounce the shortcomings and also the good deeds observed.

The proposed amendments to the ordinance by the Jefferson Parish Council restricts the Inspector general in the very essence of her duties by prohibiting her from communicating with the public. This is a direct attack and will have heavy consequences on the public opinion of Parish government. The people have the right to know where their money is going, how elected officials spend their taxes, who is going to receive public contracts and whether the processes awarding these public contracts are respected. The beginning of a corrupt regime starts with the prohibition of denunciation which goes against the First Amendment.

Muzzling one's watchdog prevents her from playing her role. A watchdog that cannot bark becomes a simple domestic dog.

Sincerely Yours,



Brigitte Bishop,
Former Inspector General for the City of Montreal



BART Office of Inspector General
2150 Webster Street, 4th Floor Oakland, CA 94612
T: 510-464-6141
E: inspectorgeneral@bart.gov
W: www.bartoig.org

December 10, 2024

Jefferson Parish Council
Joseph S. Yenni Building
1221 Elmwood Park Boulevard
Jefferson, LA 70123

Honorable Parish Council President and Members:

I write to you today to encourage you to withdrawal proposed ordinance amendment Summary No. 26443 from consideration. The proposed amendment includes changes that would affect the Jefferson Parish Office of the Inspector General's (OIG) ability to maintain its independence in accordance with its professional standards. Specifically, proposed changes restrict the OIG's ability to discuss reports in a manner that supports good governance and public transparency, and could lead to misinterpretation resulting in severe limitations on what the Inspector General may say, to whom, and when. Likewise, any negative statement made by the Inspector General or a member of their staff could be construed as in violation of the ordinance even when they are facts of an audit or investigation supported by evidence.

Those amendments directly conflict with the OIG's establishing legislation that states the OIG is to be "operationally independent," which is defined to mean "neither the parish council, the parish president, nor any employee of the parish shall prevent, impair, or prohibit the inspector general from initiating, carrying out, or completing any audit, investigation, inspection or performance review."

More concerning is that the amendments limit the public's right to a transparent and accountable government, which are key to maintaining public trust in democracy. The public is best served by an independent OIG that considers its prime duty as serving the public interest and is given the independence to do so.

In closing, I urge you to consider that the public expectation for transparency and accountability is best served by an OIG that is free from restrictions, such as those proposed in Summary No. 26443, so that it may maintain its integrity, objectively, confidentiality, and, most important, its independence.

Respectfully,

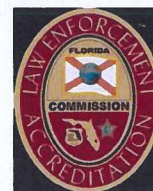
A handwritten signature in blue ink that reads "Claudette Biemeret".

Claudette Biemeret
Inspector General



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



Inspector General
Accredited

December 9, 2024

Jefferson Parish Council
1221 Elmwood Park Blvd.
Jefferson, LA 70123

Dear Council Members,

I am the inspector General of Palm Beach County, Florida. My office has jurisdiction over the county government, 39 municipalities, and two taxing districts. I have served in the inspector general community for 34 years. I was the United States Marine Corps Deputy Inspector General, the Deputy Inspector General for Director of National Intelligence, and then the Inspector General for the Defense Intelligence Agency, prior to my current position.

I understand you will be considering amending the Jefferson Parish Inspector General ordinance to prevent Inspector General from speaking at civic association meetings and to the media about the work of the office and its reports. I strongly urge you to reconsider this proposal. I believe such a restriction is what our national Association of Inspectors General professional standards would be a threat to the office's independence and its ability to exercise transparency. It would negatively impact the Office of Inspector General in its ability to conduct efficient and independent operations.

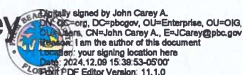
Supreme Court Justice Louis Brandeis said, "Sunlight is said to be the best of disinfectants." Transparency is a key tool of an Inspector General to serve you in promoting integrity in accountability in government. It ultimately enhances public trust in government.

Please feel free to contact me if you wish to discuss this matter further.

Sincerely,

John Carey
A.

John Carey
Inspector General
Palm Beach County



"Enhancing Public Trust in Government"

PO Box 16568, West Palm Beach, FL 33416-6568
Email: inspector@pbcgov Website: <http://www.pbcgov.com/oig/>
Office: (561) 233-2350 Hotline: (877) OIG-TIPS Fax: (561) 233-2370



Deborah Witzburg | Inspector General
City of Chicago
Office of Inspector General
231 S. LaSalle Street, 12th Floor
Chicago, IL 60604
Phone: (773) 478-7799

December 10, 2024

To Whom It May Concern:

I write to express my views on the importance of clear public communication from an Office of Inspector General regarding its work. While different Offices of Inspector General operate within varying rule regimes, etc., there are a few principles of transparency, deterrence, and public trust which transcend those differences.

The work of an Inspector General is only as impactful as that IG is in talking about it. While hewing carefully to any and all confidentiality obligations, an Inspector General ought to clearly and publicly communicate about their work wherever possible. Transparency work cannot be done in secret, and accountability means very little if no one knows about it. Without compromising confidential or legally protected information, an IG ought to take every opportunity to make it known that people who abuse the public trust are held accountable for doing so; telling these stories, even in de-identified summary form, fosters public trust by demonstrating consequences for those who break the rules, and should be expected to have a deterrent effect upon those who might be tempted to break the rules if they believed there would be no consequence for doing so.

In addition to and alongside our investigative accountability work, we are also active in the service of our transparency mandate. Information about the government belongs to the governed, and it is a vital responsibility of an oversight body to render information meaningfully publicly accessible. This can only be meaningfully accomplished through thoughtful, well-calibrated public communications.

I am an active member of the oversight community, and I have regularly provided trainings on Office of Inspector General communications, including the use of social and traditional media to raise awareness of our work. I am firmly of the view that an Office of Inspector General whose ability to communicate thoughtfully and appropriately with the public is curtailed is one whose effectiveness has been critically undermined.

Thank you for your attention. I would be happy to discuss this matter further as helpful.

Respectfully,

Deborah Witzburg
Inspector General
City of Chicago

December 10, 2024

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swalker@jeffparish.gov

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Honorable Hans Liljeberg
Councilman, District 5
hliljeberg@jeffparish.gov

Re: Jefferson Parish Office of Inspector General

Dear Members of the Jefferson Parish Council:

Good day.

You have pending before you proposed language regarding the Jefferson Parish Inspector General's communications with the public. I write because the proposed language is at odds with the core principles of an Inspector General's Office as articulated by the Association of Inspector's General and the models followed across the country.

You may be aware that jurisdictions around the country continue to create Inspectors General offices as an acknowledgement of the important work such offices play in preventing and detecting fraud, waste, and abuse of government funds and in promoting the quality, integrity, and efficiency of government operations.

It is central to the efficacy of such work that Inspectors General communicate their findings to the public to ensure transparency and confidence in government. Due to the nature of their work, Inspectors General communications in this regard are different in nature than that of prosecuting attorneys. For that reason, the proposed language, which mirrors the American Bar Association's Model Rule 3-10, will have the effect of preventing the necessary transparency about the conduct of government resulting in less confidence in government.

I hope that this letter provides you with a helpful perspective.

Sincerely,



Jeffrey S. Shapiro, Esq., CIG
Inspector General
Commonwealth of Massachusetts

cc (by email):

Kim Chatelain, Inspector General, Jefferson Parish OIG

RE: Summary NO. 26443 (Restrictions on Jefferson Parish Office of Inspector General)

Dear Councilperson,

I am writing to express my concerns regarding agenda item 23, summary No. 26443 "amending Chapter 2 of the Code of Ordinances, Article V, relative to amending Section 2-155.10, regarding appointment, authority and investigative powers of the Jefferson Parish Office of Inspector General."

After reviewing the proposed changes to the ordinance, I personally believe it would significantly hamper the independence of the OIG in its ability to fully serve the people of your parish. I have been part of the Inspector General community for 27 years and have seen the positive impact an IG has at all levels of government, specifically at the local and state levels. This impact is rooted in an IG's ability to be independent and to conduct their work, including all communications, free from interference and undue influence.

Reducing the IG's independence in any form will significantly handcuff the IG's ability to deliver independent and objective fact-based audits and investigations directly to the residents of Jefferson Parish.

I respectfully urge you to **vote no** on the proposed ordinance.

Thank you for considering my perspective.

Sincerely,



Kristofer B. Sullivan, CIG, CIA, CFE, CISA