



City of Sugar Land

Independent Ethics Review Board Agenda

Sugar Land City Hall
2700 Town Center
Boulevard North
Sugar Land, TX 77479

Wednesday, October 15, 2025
Independent Ethics Review Board Meeting
Cane Room 161
5:30 PM

I. Attention

Members of the City Council, Board and/or Commission may participate in deliberations of posted agenda items through video conferencing means. A quorum of the City Council, Board and/or Commission will be physically present at the above-stated location, and said location is open to the public. Audio/Video of open deliberations will be available for the public to hear/view; and are recorded as per the Texas Open Meetings Act.

The meeting will live stream at <https://youtube.com/live/R-Mbq288wnM?feature=share>.

II. Call to Order

III. Public Comment

Pursuant to Texas Government Code section 551.007, citizens are permitted to address the City Council, Board and/or Commission in person with regard to matters posted for consideration on the agenda. Each speaker must complete a "Request to Speak" form and give it to the City Secretary or designee, prior to the beginning of the meeting.

Each speaker is limited to 3 minutes, speakers requiring a translator will have 6 minutes, regardless of the number of agenda items to be addressed. Comments or discussion by City Council, Board, and/or Commission members, will only be made at the time the subject is scheduled for consideration.

For questions or assistance, please contact the Office of the City Secretary (281) 275-2730.

IV. Minutes

A. MINUTES

Consideration of and action on the minutes of the July 17, 2025 meeting.

Linda Mendenhall, City Clerk

V. Recent Articles of Interest

A. ARTICLES OF INTEREST

Review of and discussion on recent articles of interest.

Krista Stegemiller, Chair

VI. Workshop

A. PROPOSED REVISIONS TO CODE OF ETHICS

Review of and discussion on proposed revisions to the Code of Ethics.

Meredith Riede, City Attorney

VII. Adjournment

The Independent Ethics Review Board reserves the right, upon motion, to suspend the rules to consider business out of the posted order. In addition to any executive session listed above, the independent ethics review board reserves

the right to adjourn into executive session at any time during this meeting for the purpose of consultation with the attorney as authorized by Texas Government Code Sections 551.071 to discuss any of the matters listed above.

If you plan to attend this public meeting and you have a disability that requires special arrangements at the meeting, please contact the City Secretary, (281) 275-2730. Requests for special services must be received 48 hours prior to the meeting time. Reasonable accommodations will be made to assist your needs.

I hereby certify that the above notice was posted on the outside bulletin boards, a place convenient and readily accessible to the general public at all times, City of Sugar Land City Hall, 2700 Town Center Boulevard North, Sugar Land, Fort Bend County, Texas, 77479, and on the [City Website](#) under meeting agendas.

Posted on this 8th day of October, 2025 at 1:00 P.M.



Independent Ethics Review Board Agenda Request

October 15, 2025

Agenda Request No: IV.A.

Agenda of: Independent Ethics Review Board Meeting

Initiated by: Ashley Newsome, Deputy City Clerk

Presented by: Linda Mendenhall, City Clerk

Responsible Department: City Clerk's Office

Agenda Caption:

MINUTES

Consideration of and action on the minutes of the July 17, 2025 meeting.

Recommended Action:

Consideration of and action on the minutes of the July 17, 2025 meeting.

Executive Summary:

Consider the minutes of the July 17, 2025 meeting.

Budget

Expenditure Required: n/a

Current Budget: n/a

Additional Funding: n/a

Funding Source: n/a

Account Number (ORG-OBJ-Project): n/a

Attachments

1. IERB Minutes 07.17.2025



City of Sugar Land

Independent Ethics Review Board Minutes

Sugar Land City Hall
2700 Town Center
Boulevard North
Sugar Land, TX 77479

Thursday, July 17, 2025
Independent Ethics Review Board Meeting
Minutes
City Council Chamber
5:00 PM

I. Attention

Members of the City Council, Board and/or Commission may participate in deliberations of posted agenda items through video conferencing means. A quorum of the City Council, Board and/or Commission will be physically present at the above-stated location, and said location is open to the public. Audio/Video of open deliberations will be available for the public to hear/view; and are recorded as per the Texas Open Meetings Act.

The meeting will live stream at <https://youtube.com/live/7pl4a8rWSfQ?feature=share>.

II. Call to Order

QUORUM PRESENT

Krista Stegemiller, Andrew Wolf, Chris Crosby, Amy Suhl, Marc Martinez, Steve Tralie, and Doug Earle were present. Sarah Calobrisi and Lauren Bowen were absent.

III. Public Comment

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Each speaker is limited to 3 minutes, speakers requiring a translator will have 6 minutes, regardless of the number of agenda items to be addressed. Comments or discussion by City Council, Board, and/or Commission members, will only be made at the time the subject is scheduled for consideration.

For questions or assistance, please contact the Office of the City Secretary (281) 275-2730.

No members of the public addressed the Board

IV. Minutes

A. MINUTES

Consideration of and action on the minutes of the April 7, 2025 meeting.

Linda Mendenhall, City Clerk

A motion to **Approve the April 7, 2025 meeting minutes**, was made by Amy Suhl and seconded by Chris Crosby; the motion **Passed**.

Ayes: Krista Stegemiller, Andrew Wolf, Chris Crosby, Amy Suhl, Marc Martinez, Steve Tralie, and Doug Earle

Absent: Sarah Calobrisi and Lauren Bowen

V. Recent Articles of Interest

A. **ARTICLES OF INTEREST**

Review of and discussion on recent articles of interest.

Krista Stegemiller, Chair

Krista Stegemiller, Chair, led the discussion. The Board discussed the recent articles that appeared in U.S newspapers regarding ethics and local governments.

VI. Adjournment

A motion to **Adjourn at 5:57 p.m.**, was made by Amy Suhl and seconded by Andrew Wolf; the motion **Passed**.

Ayes: Krista Stegemiller, Andrew Wolf, Chris Crosby, Amy Suhl, Marc Martinez, Steve Tralie, and Doug Earle

Absent: Sarah Calobrisi and Lauren Bowen

Metro Council member accused of \$500K demand for rezoning; ethics board schedules hearing

by WZTV

Fri, September 19, 2025 at 10:23 AM

Updated Fri, September 19, 2025 at 5:48 PM

NASHVILLE, Tenn. (WZTV) — A Metro Council member is facing scrutiny after a developer accused her of demanding money for a rezoning effort.

Best Brands CEO Ryan Moses claims Councilmember Joy Kimbrough asked for \$500,000 to advance a warehouse project in her district. Kimbrough denies the allegation.

"I think that's really important to have a uniform understanding of how community benefits work, and how negotiations and back and forth and proposals and counterproposals and all of that work," said Diane Di Ianni, chair of Metro Board of Ethical Conduct

The Board of Ethical Conduct is investigating whether the alleged demand, which was reportedly for community benefit, violates ethics rules. An official hearing is scheduled for Oct. 24.

Both parties have until Oct. 17 to submit evidence and witnesses.

SF Mayoral Candidate Mark Farrell to Pay Largest Ethics Fine in City's History

Sydney Johnson

Nov 4, 2024 Updated 2:43 pm PT

Mayoral candidate Mark Farrell has [agreed to pay the largest campaign finance ethics](#) fine in San Francisco's history over allegations that he double-dipped by using money meant for a city ballot measure campaign.

Farrell, a former interim mayor and supervisor, will pay nearly \$108,000 to settle eight counts of campaign finance violations, according to the San Francisco Ethics Commission. The settlement was announced on the eve of Election Day and comes on the heels of [a tight race](#) that has been studded with ethics complaints against Farrell.

"This record penalty reflects the serious harm that was done to the public's right to have timely and accurate information about how campaigns are funded in San Francisco," Enforcement Director Olabisi Matthews said in a statement. "It also reflects the severity of violating the \$500 contribution limit, which is one of the most basic rules that all candidates have to follow."

For months, Farrell's opponents and critics — [including three former San Francisco mayors](#) — alleged that Farrell's campaign had skirted campaign finance rules by taking advantage of contributions to a political action committee Farrell created to support Proposition D.

Individual campaign contributions to candidates are capped at \$500. However, the same limits don't apply to ballot measures, and [Proposition D](#) — which aims to cut the number of city commissions in half and cap it at 65 — has raked in millions of dollars from billionaires like venture capitalist Michael Moritz.

The commission alleges that Farrell's mayoral campaign took \$93,000 in contributions from his Proposition D PAC without refunding it.

"Investigators calculate the outstanding payments from the Ballot Measure Committee to account for approximately 50% of all staff salary, canvassers, rent, insurance, utility, contractor, and food and drink expenses for the Mayoral Committee between April and September," a letter from the Ethics Commission reads.

Farrell attributed the issue to an accounting error from earlier this summer that was previously resolved.

"We agreed to a settlement for an accounting error that we corrected and publicly disclosed months ago and over a disagreement about staff time allocation during the campaign, which led us to terminate our prior legal counsel for this matter," Farrell said in a statement. "As the person responsible for both campaigns, I take full ownership of these issues — this is the kind of accountability I am modeling for my children."

It's not the first time Farrell, or his leading opponents for mayor, have faced campaign finance questions or fines.

Farrell was similarly fined \$191,000 — which would have been the largest ethics violation fine in the city's history — after being accused of illegally coordinating with a PAC during his campaign for supervisor in 2010. In 2016, he agreed to settle the case and paid \$25,000.

In 2021, incumbent Mayor London Breed paid \$22,000 in fines related to ethics violations for using her official title for personal gain during her tenure. In 2018, Board of Supervisors President Aaron Peskin, now a candidate for mayor, faced an \$8,000 fine for ads placed in Chinese-language newspapers during his 2015 campaign for supervisor.

Farrell, meanwhile, said he is calling on the Ethics Commission to create better guidelines around the issue, saying “the public deserves certainty and transparency.”

Some political watchdogs questioned the timing of the commission's announcement, one day before polls close.

“Since the allegations at issue have been widely reported and the facts and legal issues are complex and contested, it does not appear to me that the Ethics Commission should have expedited this case toward a pre-election announcement, which could influence the voters,” Dan Schnur, former chairman of the California Fair Political Practices Commission, said in a statement.

Matthews disagreed, saying that the Ethics Commission “did everything in its power to publicly resolve this case prior to Election Day so that the public would have information about these violations when it matters most.”

The Ethics Commission will vote on the settlement at its meeting on Friday.



Independent Ethics Review Board Agenda Request

October 15, 2025

Agenda Request No: VI.A.

Agenda of: Independent Ethics Review Board Meeting

Initiated by: Meredith Riede, City Attorney

Presented by: Meredith Riede, City Attorney

Responsible Department: Legal

Agenda Caption:

PROPOSED REVISIONS TO CODE OF ETHICS

Review of and discussion on proposed revisions to the Code of Ethics.

Recommended Action:

Review and discuss proposed revisions to the Code of Ethical Conduct

Executive Summary:

At its meeting on July 17, 2025, the Board reviewed Articles of Interest and considered potential amendments to Sections 2-77(b) and 2-103 of the City's Code of Ethics. To facilitate further discussion, the Board directed staff to provide comparative examples from other municipalities. Accordingly, attached are relevant excerpts from the codes of ethics of San Antonio, Texas, Seattle, Washington, San Francisco, California, Green Bay, Wisconsin and Jourdan, Texas.

Budget

Expenditure Required: none

Current Budget: not applicable

Additional Funding: not applicable

Funding Source: not applicable

Account Number (ORG-OBJ-Project): not applicable

Attachments

1. Draft ethics revisions for Oct 2025 meeting
2. Sample language from other cities
3. Sample language from Seattle, WA ethics code

4. Sample language from City of San Francisco, CA ethics code

Sec. 2-77. Conflicts of interest.

- (a) An official must not use, or attempt to use, their official position or office, or take or fail to take any action, or influence, or attempt to influence, others to take or fail to take any action, in a manner which they know, or have reason to believe, may result in a personal or financial benefit, not shared with a substantial segment of the city's population, for any of the following persons or entities:
- (1) The official;
 - (2) The official's relative, a member of their household, or the employer or business of the relative;
 - (3) A person with which the official has a financial or business relationship, including but not limited to:
 - a. An outside employer or business of the official, or the official's spouse or domestic partner, or someone who works for such outside employer or business; or
 - b. A client or substantial customer; or
 - c. A substantial debtor or creditor of the official or the official's spouse or domestic partner.
 - (4) A publicly traded company if the official or their spouse, parent or child owns the stock or instruments of debt greater than ten percent of the value of the company;
 - (5) Real property if the official or their spouse, parent or child holds an equitable or legal ownership with a fair market value of \$2,500 or more;
 - (6) A nongovernmental civic group, social, charitable, or religious organization of which the official, or the official's spouse or domestic partner, is an officer or director;
 - (7) A public or private business entity for which the official, or their relative serves as a director, general partner, or officer, or in any other policy-making position except when so appointed to the position by the city; or
 - (8) A person or entity from which the official has received an election campaign contribution of more than \$2,500 in the aggregate during the past election cycle (this amount includes contributions from a person's immediate family or business as well as contributions from an entity's owners, directors, or officers).
- (b) An official must file a conflict disclosure statement pursuant to V.T.C.A. Local Government Code ch. 176 with respect to a vendor or consultant if the vendor or consultant has an employment or business relationship with the official or a relative that results in the official or relative receiving taxable income, other than investment income, that exceeds \$2,500 during the twelve-month period preceding the date the city enters into a contract with the vendor. Such conflicts disclosure statement must be filed with the city clerk no later than 5:00 p.m. on the seventh business day after the official becomes aware of the facts that require the filing of a statement.
- (c) It is a violation for an official to, within two years of entering city service, award a contract or participate in a matter benefiting a person or entity that formerly employed the official.

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Sec. 2-103. Sanctions for violations of this article.

If the independent ethics review board determines that a violation has occurred, the independent ethics review board may impose one or more of the following sanctions and post notice on the City's webpage:

- (a) A letter of notification when the violation is clearly unintentional, or when the respondent's conduct complained of was made in reliance on a public written opinion of the city attorney. A letter of notification may advise the respondent of any steps to be taken to avoid future violations;
- (b) A letter of admonition when the violation is minor or may have been unintentional, but calls for a more substantial response than a letter of notification;
- (c) A reprimand when the violation has been committed intentionally or through disregard of this article. A reprimand directed to an official will also be sent to the city council;
- (d) A letter of censure when a serious or repeated violation of this article has been committed intentionally or through culpable disregard of this article by an elected official, former elected official, or candidate. A letter of censure directed to an elected official, former official, or candidate will be transmitted by the independent ethics review board to the city clerk, published by the city clerk in a local newspaper of general circulation, and sent by the independent ethics review board to the city council; ~~or~~
- (e) Up to 50% of economic gains received or sought in violation of this article;
- (f) Up to ~~\$2000~~ _____ maximum fine; or
- (g) - Reimbursement of reasonable legal costs incurred by the City, however such reimbursement shall not exceed the amount of any monetary fine.
- (h) ~~f~~ Appointed Officials. If the independent ethics review board determines that a serious or repeated violation of this article has been committed intentionally or through culpable disregard of this article by an appointed official, the independent ethics review board may recommend to city council the removal from office or suspension from office, including a recommendation for the length of a suspension. The final authority to carry out a recommendation regarding removal of an appointed official is the city council.
- (i) ~~g~~ Elected Officials. If the independent ethics review board determines that a serious or repeated violation of this article has been committed intentionally or through culpable disregard of this article by a current elected official, the independent ethics review board may recommend the recall of the elected official from office. A recommendation regarding the recall of an elected official will be sent to the local newspaper of general circulation. The final authority to carry out a recommendation regarding recall of an elected official rests with the citizens.

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Sample language from other cities' ethics codes:

1. San Antonio, Texas:

Sec. 2-87. Disposition.

(5) *Civil fine.* The ethics review board may impose upon any person, whether or not an official or employee of the city, who violates any provision of this code of ethics a fine not exceeding five hundred dollars (\$500.00). Each day after any filing deadline imposed by division 5 (lobbyists) and division 7 (financial disclosure) or the municipal campaign finance code for which any required statement has not been filed, or for which a statement on file is incorrect, misleading, or incomplete, constitutes a separate offense.

2. Jourdanton, Texas:

§ 1.07.029

(2) Civil fine. The city council may impose on a city official who violates any provision of the code of ethics a fine not exceeding five hundred dollars (\$500.00).

3. Green Bay, Wisconsin:

(7) Possible Penalties and Sanctions- Possible sanctions may include:

- a. An informal censure by the Council, which would only be made as part of a motion in a public meeting. [GBMC 2.06(1)]
- b. A formal censure by the Council, which would be made by motion in a public meeting and then published in the City newspaper. [GBMC 2.06(1)]
- c. Mandatory community service. [Wis. Stat. 62.11(3)(e)]
- d. Attendance at counseling or mediation sessions. [Wis. Stat. 62.11(3)(e)]
- e. Imposition of a dollar fine of up to \$500.00. [Wis. Stat. 62.11(3)(a) & (c)]
- f. Any other sanction available by law.

Seattle, Washington

4.16.100 Action on violation.

The Commission may take one (1) or more of the following actions for violation of any provision of Chapter 4.16:

- B. Impose a monetary fine of up to five thousand dollars (\$5,000) per violation or three (3) times the economic value of anything sought or received in violation of Chapter 4.16, whichever is greater. Fines for a violation of SMC 4.16.070.6.a shall not exceed one thousand dollars (\$1,000). Fines for a violation of SMC 4.16.070.6.b shall not exceed two hundred fifty dollars (\$250);
- C. Require reimbursement for damages of up to ten thousand dollars (\$10,000) sustained by the City that were caused by the violation and were not recovered by the City;
- D. Require reimbursement for costs, including reasonable investigative costs. Such reimbursement shall not exceed the amount of any monetary fine;

(There is no subparagraph (b) in the currently codified code)

4.16.70.6. Before participating in a matter covered by subsection 4.16.070.A.5, the elected official must publicly disclose any financial interest. An elected official must post a written disclosure on the official's webpage and file a copy with the Executive Director and the City Clerk. A Councilmember shall additionally make such a disclosure on the public record at an open public meeting of the Council or one of its committees at which the legislative matter is discussed. The Councilmember shall also, before participating in that legislative matter at any subsequent Council or committee meeting, repeat the oral disclosure on the public record of that meeting.

- a. If a Councilmember is charged with a violation of subsection 4.16.070.A.1 or 4.16.070.A.2, and asserts as an affirmative defense that a disclosure under this subsection 4.16.070.A.6 was made, the burden of proof is on the Councilmember to show that a proper disclosure was made.

Chapter 2. Conflict of Interest and other prohibited activities

SEC. 3.242. PENALTIES AND ENFORCEMENT.

(a) **Criminal Penalties.** Any person who knowingly or willfully violates this Chapter 2 shall be guilty of a misdemeanor and upon conviction thereof shall be punished by a fine of not more than \$10,000 for each violation or by imprisonment in the County jail for a period of not more than one year in jail or by both such fine and imprisonment.

(b) **Civil Penalties.** Any person who intentionally or negligently violates this Chapter 2 shall be liable in a civil action brought by the City Attorney for an amount up to \$5,000 for each violation.

(c) **Injunctive Relief.** The City Attorney or any San Francisco resident may bring a civil action on behalf of the people of San Francisco to enjoin violations of or compel compliance with this Chapter 2.