



July 9, 2026

Memorandum For: JR Pritchard, Manager
Clark Schaefer Hackett

A handwritten signature in blue ink that reads "Todd J. Zinser".

From: Todd J Zinser
Cincinnati Oversight Project

RE: City of Cincinnati Audit Engagement

The purpose of this memorandum is to identify areas that I believe may warrant consideration as part of your risk assessment and evaluation of the City of Cincinnati's internal control environment.

This letter is not to allege that the City's financial statements are materially misstated or that any individual has violated the law. Rather, based on my review of public records, budgets, contracts, audit reports, and City Council proceedings over the past few years, the following observations may inform your audit work.

An overall observation is that the City's control environment appears to be increasingly complex and decentralized, particularly with respect to the City's spending.

Based on our observations, there are legitimate questions as to whether the City's internal controls, governance processes and oversight mechanisms, have sufficiently kept pace with governance complexities in order to sufficiently provide reasonable assurance that City resources are managed appropriately.

Lack of Oversight of External Funding

During the past year, we issued several analyses in connection with the City's grant management and contracting activities. We found that:

- During the period 2020 to 2026, there were 24 external organizations that received grant funding every year, for 7 years, in virtually the same amounts, in what were described by the city as "competitive grants." . The amount of funding received by the those organizations during that period totaled \$86,022,200. That funding history for these external organizations does not appear competitive.
(Exhibit 1)

- In FY 25-26, we found that 7 program-level grant recipients in turn funded 235 grantees and subrecipients totaling \$20,093,667. **(Exhibit 2)**
- We found a fragmented system of 34 different funding programs operated by the City, including 15 “competitive grant programs,” and 19 “Federal Housing/CDBG Programs.” **(Exhibit 3)**
- The City’s Human Services Fund appears particularly complex. The Fund is administered by the United Way. The publicly available documents show funding for 73 “projects” in one year totaling \$7.9 million, in 3 different categories. However, several grantees received funding for more than one project in a single category; several grantees received funding in more than one category; and several grantees also received funding from other leveraged support or programmatic funding from the city. **(Exhibit 4)**

Other than limited audit coverage by the Internal Audit Manager, there is no visible, structured, oversight program concerning the City’s external grant-making. As a result, there is little, if any, transparency and accountability with respect to: 1) How the city funding for external organizations is actually used and 2) whether the grantee performed in a satisfactory way and achieved grant objectives.

Railroad Money

Cincinnati is in its initial years of receiving and deploying “railroad money,” from the sale of the Cincinnati Southern Railway. Given that the Cincinnati Southern Railway Trust Fund is intended to operate in perpetuity, it is important from the outset that the City and the Board of Trustees establish effective rules and procedures consistent with the state law. Those rules and procedures must also be consistent with the public’s expectations with respect to transparency and accountability in the operation of the Trust Fund and how the city accounts for and uses the proceeds it receives from the Trust Fund.

On December 10, 2025, local news media reported that the City had only spent 6% of the funds disbursed to the City from the Trust Fund. As you may know, the annual allotment from the Trust Fund is disbursed to the city in 4 quarterly tranches, whether the City is in a position to deploy the money or not. As a result, the city has already accumulated an estimated \$100 million or more in unspent “railroad money.”

The city’s inability to deploy Trust Fund proceeds in a timely way, raises several immediate issues:

- We have asked the CSRT Board of Trustees to consider implementing a “draw down” system where the City requests the draw down of funds when the City is more reasonably able to spend the money.

The City has opposed this suggestion. In our view, keeping funds in the Trust Fund, instead of the City's investment pool, makes the railroad money more accountable and more transparent. **(Exhibit 5)**

- According to the city's Finance Director, investment earnings represent the city's third highest source of revenue. This may create an unintended incentive to maximize the city's investments using the proceeds from the Trust Fund. The state law does not address the city's use of Trust Fund proceeds for investment purposes. Your examination of the city's practice and whether there exists sufficient policy and legal guidance would benefit the city and the public's confidence that the city's governance and handling of the railroad money complies with the law.
- The City's growing accumulation of unspent railroad money has brought to light potential internal control gaps. As mentioned, the City is depositing unspent railroad money in its investment pool. As with other restricted funds, the city should properly classify earnings from the railroad money in a separate fund, akin to a restricted fund. The railroad money is restricted by state law in terms of its authorized purpose and must be strictly accounted for. In addition, currently, there is a significant lack of transparency in the City's reporting of the amount of railroad money it holds in its accounts.
- After the news reports about its lack of spending of the railroad money, the city reported that it had initiated a method for deploying a greater amount of railroad money. Reportedly, they began transferring railroad funds to older projects that had already been fully funded and then repurposing those original funds, presumably for capital budget purposes. We requested that the city maintain specific accounting documentation for such transfers of railroad money to ensure compliance with the state law with respect to the "existing infrastructure" restriction. This practice should be documented in the city's accounting practices. In addition, there should be documented controls in place to ensure that when railroad money is substituted on existing projects, there is documentation that those projects are eligible for railroad money.

Council-Directed Funding and Earmarks

The City's overall budget process for the FY27 update was structured and emphasized transparency, including approximately 30 budget presentations from the city departments as well as two presentations by the city's bond/credit rating advisors and 3 public hearings.

The same cannot be said about the process for council-directed funding, including funding for specific organizations and projects. There are several mechanisms available to Council members for directing funding to specific recipients, including Council priorities; one-time appropriations; capital subsidies; economic development allocations; and other earmarked spending that lack public transparency.

For example, the process allows the Mayor and the City Council members to seek modifications to the City Manager's recommendation for Leveraged Support grants prior to voting on the budget. **(Exhibit 6)**

The budget modifications for single grantees can amount to tens of thousands of dollars, yet there is no transparency supporting the modifications, i.e., what is the basis for the modification and the cost of the modification? Why was the grant amount proposed by the City Manager for this grantee insufficient? Is there a proper arms' length present in the funding recommendation?

In the wake of the bribery scandal involving multiple sitting members of City Council in the 2019-2020 timeframe, the city commissioned an audit of its economic development policies and practices, including its overall ethics posture. The audit was performed by Crowe LLP. A final report was issued in November 2023. Under Recommendation 3 on page 24, "City Business Conflicts of Interest," Crowe recommended the following,

Document council's involvement in selecting vendors during line-item discretionary appropriations. Establish additional safeguards to limit council's ability to attach money to specific firms without providing sufficient justification over vendor selection. (Exhibit 7)

This recommendation directly applies to the Mayor and City Council's modifications of the City Manager's proposed budget for Leveraged Support. The budget process has not incorporated this recommendation.

We recommended that the City carry out a review of all the anti-corruption recommendations from the Crowe audit as well as the recommendations contained in the July 29, 2021, report of the Economic Development Review Panel. To our knowledge, the City has not taken any action with respect to our recommendation. **(Exhibit 8)**

The City Council Members also submit their budget priorities via memoranda to the Chair of the Budget Committee. There does not seem to be a prescribed format for the budget priorities memoranda. Nor are there standards established for the supporting information and documentation that should accompany the budget priorities. Such standards would help ensure that the public purpose of the proposed budget priority funding is sufficiently established to comply with the law and that there are no conflicts of interest.

For the past two budget cycles, we have made a modest recommendation that the Councilmembers include an attestation on their budget priorities, and other funding recommendations for specific organizations or projects. The attestation would say something to the effect that the Councilmember does not have a conflict of interest with any of the proposed funding recipients they are recommending. None of the memoranda this year or last contained any type of attestation. There may be other

recommendations that could be made to promote greater structure, transparency and integrity in the process used by councilmembers when recommending budget priorities and funding to external organizations. **(Exhibit 9)**

Internal Audit Independence and Municipal Code Compliance

There is a provision in the Cincinnati Municipal Code that is designed to promote the operational independence of the Internal Audit Manager. Article II, Section 15 of the Cincinnati Municipal Code, provides in part,

“The Internal Audit manager shall prepare a proposed and detailed yearly budget of what he or she deems necessary to adequately perform the duties of the internal audit division. **Such budget shall be provided directly to council for consideration as part of the budget and budget update.**” **(Exhibit 10)**

We requested the annual budget submissions prepared by the Internal Audit Manager. In response, the city stated, “Internal Audit (IA) is a division under the City Manager’s Office, (CMO). The IA Manager prepares the budget with the CMO’s budget liaison and the budget analyst. The IA Budget is presented to the City Council as part of the CMO’s budget.” **(Exhibit 11)**

In other words, the City Manager is not in compliance with this provision of the Municipal Code.

This provision essentially requires the Internal Audit Manager to carry out some type of risk assessment to determine the amount of resources necessary to do their job. That sounds like a good exercise, even if it was not required by the Municipal Code.

The provision then requires that the Internal Audit Manager submit his or her budget request directly to the city council, bypassing the City Manager. That is a good way to institutionalize the independence of the Internal Audit Manager. Such provisions provide greater protection to the budget of the internal audit function from negative consequences that could result from critical audit reports about city programs and operations.

Procurement Controls and Moral Obligations

In January 2026, we sent an email to the Mayor, City Council and City Manager concerning “Moral Obligations.” **(Exhibit 12)**

We found that in calendar year 2025, the city council approved 30 moral obligation ordinances and approved 14 “Then and Now Certificates,” totaling \$2.2 million.

The January 20, 2026, agenda alone included a Then and Now Certificate totaling \$136,586.53 and 8 moral obligation payments totaling \$47,651.55.

The concern is not that mistakes happen. The concern is that City Council's routine approval of moral obligation ordinances weakens one of the City's key financial controls by normalizing after-the-fact authorization. It may also indicate a deficiency in the control activities surrounding procurement and expenditures in the Departments, including the lack of contracting and procurement support staff.

Our January 20, 2026, email included 2 recommendations:

1. The council should require a written explanation, for the record, for each moral obligation and The & Now Certificate submitted for their approval.
2. The city should ask its financial statement auditor to examine the issue during their annual audit, i.e. self-disclose.

The dollar amounts involved may not be material but there should be a determination as to whether proper controls are in place to minimize the practice and to prevent fraud, waste and abuse.

Governance and Conflict-of-Interest Controls

On September 23, 2025, we sent a letter to Mayor Pureval and Members of City Council regarding, "Conflict of Interest in Leveraged Support Appropriation to Cintrifuse. (**Exhibit 13**)

We found that Mayor Pureval sat, and may still sit, on the Board of Directors for Cintrifuse, which is an annual grantee of the City. His tenure on the Board predated his election as Mayor and continued at least through 2025 and most likely to this day. Since 2020, Cintrifuse has received \$1.675 million in funding from the city. While the Mayor does not vote on the City's budget, he is responsible for presenting a budget to the Council along with the City Manager. In 2025, the Mayor proposed a \$25,000 increase in the City Manager's proposed grant amount, which was adopted.

Since our September 23, 2025, letter, we found that Mr. Pureval is also a member of the Board of Directors for an organization called Compass. They too are grant recipients of the city. Since 2020, Compass has received \$395,000 in city grants.

Our September 23, 2025, letter included 6 options that could possibly resolve the matter. As far as we know, neither the Mayor nor the City Council have taken any action to publicly resolve the matter.

We also found that while Mr. Pureval disclosed his Board membership for COMPASS on his Financial Disclosure Reports to the Ohio Ethics Commission, he did not disclose his membership on the Board of Directors for Cintrifuse.

The internal control standards promulgated by the Government Accountability Office (GAO) provide that management should establish mechanisms to identify, evaluate, and respond to conflicts of interest. Based on Mr. Pureval's Board memberships for Cintrifuse and Compass, audit steps may be warranted to examine such City mechanisms, if any, to identify, evaluate and respond to conflicts of interest.

Contract Administration and Monitoring

The City's online spending dashboard reports that spending for contractual services during FY 25 and FY 26 combined, totaled approximately \$500 million. Contract reviews during that period revealed significant weaknesses in the city's contracting monitoring and contract compliance.

Two of the contracts were audited by the City's Internal Audit Manager: The Regional Economic Development Initiative (REDI) was audited in April 2025. The Lead Service Line Replacement Program (LSLRP), managed by the Greater Cincinnati Waterworks, was audited in August 2025. In addition, our own examination of a no-bid, professional services contract, identified numerous compliance issues.

Regional Economic Development Initiative (REDI).

During the period 2020 – 2026, REDI received Leveraged Support grants totaling \$1,745,000. The city is one source of REDI's annual funding.

The April 2025 report by the City's Internal Audit Manager contained 4 primary findings:

1. "Contract management review and oversight needs improvements."
2. "The payroll journals contain insufficient information to determine whether contractual terms are upheld."
3. "A third party is unable to verify the terms of the contract."
4. "The contract language should be updated."

These findings essentially conclude that the city's grant/contract with REDI was unauditible and also identified \$14,000 in unsupported claims.

In May 2025, we submitted a letter to the City Council containing our observations about the REDI audit and we recommended that the City and REDI address the audit's recommendations before the City makes any further grant awards to REDI in FY26. The City chose to continue to fund REDI at a usual amount despite no public assurances that REDI had addressed the Internal Audit Manager's recommendations. **(Exhibit 14)**

The Lead Service Line Replacement Program (LSLRP)

An audit of the LSLRP in August 2025 uncovered potential criminal conduct by a member of the “Lead Pipe Crew,” who sold lead scrap from their job sites to one or more unidentified scrappers and kept the money for himself “to pay bills.”

Local media reported the GCWW’s mismanagement of the program and the misconduct. One member of the lead crew who took responsibility was permitted to resign. The other members were reprimanded, although GCWW’s investigative report does not describe the specific misconduct of the other lead crew members.

In order to comply with the federal and state laws and regulations concerning the handling of hazardous material, the GCWW had entered into a contract for the purpose of properly recycling the lead pipe. A dedicated, solid waste container was specifically set up at GCWW headquarters where the lead crew was supposed to deposit the scrap lead from their job sites. However, according to the audit report, the recycling contractor had not been contacted to service the container in the 5 years of the program.

While the Internal Audit Manager should be commended for her audit of the LSLRP, there are numerous details about the matter that remain unanswered even after the GCWW’s internal investigation. Perhaps the most consequential questions surrounds the disposition of the scrap lead.

Subsequent to the audit report and internal investigation, the GCWW met with the Ohio EPA and then sent the Ohio EPA a letter that stated that the scrap lead had been recycled. Neither the Ohio EPA nor the GCWW have responded to our requests for documentation that verifies the recycling of any scrap lead, let alone 5 years of scrap lead from the LSLRP. **(Exhibit 15)**

Without documentation of their recycling of the scrap lead, the GCWW is at possible risk of substantial penalties for its potential lack of compliance with the federal Resource Conservation and Recovery Act, which prescribes requirements for the handling of hazardous material. **(Exhibit16)**

Compliance Issues Concerning No-Bid Contracts

On November 6, 2025, the City approved the third amendment to a 2023 no-bid professional services contract with Iris Roley, LLC. On November 4, the city entered into a new no-bid “services” contract with the Cincinnati Collaborative Foundation. Iris Roley is the principal of both organizations.

We began examining the city’s contract and contract amendments with Iris Roley, LLC in the summer of 2025. On October 6, 2025, we sent a letter to the City Council raising questions about the contracting process and contract management involving the contract with Iris Roley, LLC. The letter identified several non-compliance issues with the City’s procurement regulations. Our letter cites several contract monitoring weaknesses. **(Exhibit 17)**

The City's no-bid contract with the Cincinnati Collaborative Foundation raises similar questions. On May 31, 2026, we sent an additional email to the City Council in which we raise 5 questions about the contracting process and the management of the contracts with Iris Roley, LLC and the Cincinnati Collaborative Foundation. **(Exhibit 18)**

According to the city's procurement regulations, sole source/no-bid contracts should be "extremely rare." Two no-bid contracts with the same principal, for similar, if not overlapping, contract requirements is probably even more rare.

This matter is being brought to your attention as an example of weaknesses in the City's contract management. However, these particular contracts take on added significance because they are managed and monitored in the immediate office of the City Manager by the immediate staff of the City Manager. Also, the contractor reports directly to the City Manager.

Under those circumstances, the City Manager's monitoring of the contract and contract compliance should be of such quality as to serve as a model for the rest of the city administration. However, as outlined in our October 2025 letter and our May 31, 2026, Questions About the City's Administration of the Iris Roley Contracts." There are numerous questions about compliance with the city's procurement regulations.

For example, we obtained invoices submitted by Iris Roley LLC that raise questions about their sufficiency. In August 2025 and again in May 2026, we requested documentation of the deliverables required by the contract and contract amendments but have not received a response to either request. For such issues to exist for a contract managed and monitored by the immediate office of the City Manager raises a red flag about the overall contracting operations of the city.

The city's contracting process and contract monitoring cited here exhibit multiple indicators of elevated risk and potential control deficiencies that warrant independent review.

Conclusion

These observations are respectfully submitted for your consideration as you plan and perform your audit of the City of Cincinnati's financial statements. As stated above, I am not alleging that the City's financial statements are materially misstated or that any laws have been violated. However, I believe these matters warrant appropriate audit consideration in assessing risk and, where applicable, additional audit procedures.

Thank you for your consideration of these matters. I appreciate the important role that independent auditors play in promoting accountability and public confidence in government.

LIST of EXHIBITS

1. Most Frequently Funded External Recipients, March 8, 2026
2. Tentative Analysis of City of Cincinnati Funding of Nonprofit Organizations, March 12, 2026.
3. A Fragmented System: 34 different Funding Programs in Cincinnati, March 21, 2026.
4. City of Cincinnati Human Services Fund, March 10, 2026.
5. Letter to Paul Muething Chairman, CSRT, December 17, 2025.
6. Table IV, Leveraged Support Recipients , FY 2025 Operating Budget Update.
7. Crowe, LLP Audit, Performance Audit of Council Actions, Page 24 Excerpt, November 2023.
8. Email to Mayor Pureval and City Council re: anti-corruption recommendations, June 1, 2025.
9. Email to City Council re: Public Hearing Comments on the budget, March 16, 2026.
10. Municipal Code provisions concerning the Internal Audit Division, 2004.
11. City's Response to a Records Request re: the Internal Audit Division, January 22, 2025.
12. Email to City Council re: Moral Obligations, January 20, 2026.
13. Ethics Letter to Mayor Pureval, September 23, 2025.
14. Letter to City Council re: the REDI audit May 28, 2025.
15. Letter to Ohio EPA re: Hazardous Lead Pipe Scrap, April 7, 2026.
16. Letter from GCWW to Ohio EPA re: LSLRP Audit and Investigation, May 22, 2025.
17. Letter to City Council re: City Contracts with IRIS Roley, LLC, October 6, 2025
18. Questions About the City's Administration of the Iris Roley Contracts, May 31, 2026



Most Frequently Funded External Recipients

Source : City of Cincinnati Budget Documents (FY2020–FY2026)

Organization / Program	Years Funded	Total Funding (Approx.)
City Human Services Fund	7	\$48,904,000
The Port	7	\$5,100,000
Center for Closing the Health Gap	7	\$4,990,000
Keep Cincinnati Beautiful	7	\$3,150,000
Neighborhood Community Councils	7	\$3,114,000
African American Chamber of Commerce	7	\$2,675,000
Shelterhouse	7	\$2,189,000
3CDC – Washington Park / Ziegler Park	7	\$2,700,000
REDI Cincinnati	7	\$1,745,000
CincyTech	7	\$1,725,000
Cintrifuse	7	\$1,675,000
3CDC – Fountain Square	7	\$1,100,000
Needle Exchange Program	7	\$947,000
Neighborhood Business Districts	7	\$837,600
Bethany House	7	\$735,000
GeneroCity 513	7	\$698,500
Center for Addiction Treatment	7	\$650,000
MORTAR	7	\$640,000
Film Commission	7	\$549,000
Green Umbrella	7	\$512,000
Immigrant & Refugee Law Center	7	\$450,000
Invest in Neighborhoods	7	\$398,500
Cincinnati Compass	7	\$349,000
Community Urban Agriculture	7	\$139,600

Total Funding to These Recurring Recipients

≈ \$86,022,200 (FY2020–FY2026)

March 8, 2026



Tentative Analysis of City of Cincinnati Funding of Nonprofit Organizations

Program	No. of Grantees/ Projects	Funding
United Way – Human Services Fund	73	\$8,500,000
Boots on the Ground	38	\$834,620
Green Cincinnati Plan	35	\$500,000 (est.)
Safe & Clean	23	\$410,981
Keep Cincinnati Beautiful	7	\$148,066
Leveraged Support	43	\$4,100,000
Operations & Program Support	<u>16</u>	<u>\$5,600,000</u>
Total	235	\$20,093,667

March 12, 2026



A Fragmented System: 34 Different Funding Programs in Cincinnati

- **Competitive Grant Programs (15)**
- Business Improvement Program
- Neighborhood Catalytic Capital Investment Program
- Neighborhood Business District Improvement Program
- Operating Support for CDCs
- Urban Agriculture
- GCP Seeds of Change Grant
- Quick Strike Acquisition (CDCs)
- Notice of Funding Availability (NOFA)
- Essential Services Program
- Avondale Rehabilitation Pilot
- Boots on the Ground Fund
- Community Preventive Education Grant
- Human Services Fund
- Leveraged Support
- Safe & Clean
- **Federal Housing / CDBG Programs (19)**
- Community Development Block Grant (CDBG)
- HOME Investment Partnerships
- Emergency Solutions Grant (ESG)
- HOPWA Housing Assistance
- American Dream Downpayment Initiative
- Strategic Housing Initiatives Program
- CHDO Development Projects
- CHDO Operating Support
- Fair Housing Services
- Family Re-Housing Assistance
- HARBOR Homeowner Repairs
- Housing Repair Services
- Lead Hazard Testing
- Concentrated Code Enforcement
- Hazard Abatement / Stabilization
- Hand Up Initiative
- Youth & Young Adult Employment
- Emergency Mortgage + Tenant Representation
- Commercial & Industrial Redevelopment

March 21, 2026



City of Cincinnati Human Services Fund

Continuing our examination of the city's outsourcing of government functions to external organizations, the recipient of the greatest amount of annual funding from the city is the United Way of Greater Cincinnati.

Beginning in 2024, "Human Services" funding appears as one large, consolidated item administered through the United Way. For the most recent 3 years, 2024, 2025, and 2026, the city has spent \$26 million on social services through the United Way.

Currently, The city has included an FY26/27 Directory of Human Services funded projects on its Budget Engagement web page: <https://www.cincinnati-oh.gov/sites/budget/assets/Directory-of-funded-projects-FY26-27.pdf>

For FY 26/27, the directory is organized into three funding categories:

- 1, Youth Gun Violence Prevention & Reduction – 25 Projects - \$2,590,682 in funding
2. Workforce Development – 23 projects - \$2,492,682 in funding
3. Supporting, Securing, & Stabilizing Housing for High-Risk Populations – 25 projects - \$2,733,682 in funding

FY26/27 TOTAL: 73 projects - \$7,976,930

Several non-profits receive funding for more than one project in a single category.

Several non-profits receive funding in more than one category of funding.

And several nonprofits receive funding from other leveraged support or programmatic funding from the city.

So, 73 projects does not + 73 grantees.

You should check out the Directory to get a better sense of the projects funded through United Way.

Bottom Line: This is an oversight nightmare.

March 10, 2026

December 17, 2025

Mr. Paul Muething, Chairman,
and Trustees
Cincinnati Southern Railway Trust
PO Box 8039
Cincinnati, OH 45208

Re: Recommendation to Adopt a Draw-Down Model for Trust Distributions

Dear Chairman Muething and Trustees,

I am writing to renew and formalize a concern I raised during the Board's February 11, 2025, meeting, and to offer a practical recommendation that I believe would strengthen the Trust's long-term stewardship.

At that meeting, I expressed concern that the City of Cincinnati was not spending previously allocated trust-related capital funds in a timely manner, and I urged the Board to consider whether the timing and structure of Trust distributions should take into account the City's demonstrated capacity to execute capital projects. Recent public reporting has reinforced that concern.

Public Reporting Confirms a Capacity Issue

A recent Local 12 investigative report found that tens of millions of dollars allocated for infrastructure projects — including street repairs — remain largely unspent, with only a small portion actually deployed. City officials attributed the delays to normal but real constraints, including project planning, procurement and contracting timelines, staffing limitations, and the need to sequence work across neighborhoods.

This reporting does not suggest a lack of commitment by the city. It does, however, confirm that the City's ability to spend capital dollars is limited by execution capacity, not by the availability of funds. That reality has direct implications for how and when Trust funds should be disbursed.

The report can be found at: <https://local12.com/news/local/why-hasnt-cincinnati-spent-over-30-million-allocated-street-repairs-across-city-otr-queen-city-price-hill-fairmount-billions-railroad-sale-money-cost-repair-fix-issues-bridges-infrastructure-cars-traffic-wrecks-pothole-potholes>

Why Timing Matters to the Trust

Under the current approach, Trust funds are expected to be disbursed to the City on a quarterly schedule, regardless of whether previously disbursed funds have been spent.

When Trust funds are transferred to the City before they are needed, they often sit idle in City accounts, while those same funds could otherwise remain invested by the Trust.

Even using conservative assumptions about investment performance, a single \$14 million quarterly tranche kept invested rather than sitting unused could reasonably generate well into six figures of additional earnings over the course of a single quarter. Importantly, this is not a one-time issue. If unspent balances persist, the opportunity cost repeats quarter after quarter and compounds over time.

This raises a reasonable stewardship question for the Board: If funds are not yet ready to be spent, is it in the Trust's best interest to disburse them automatically, or should they remain invested until they can be put to work?

Materiality and Stewardship

Before deciding whether or not quarterly disbursements remain the best approach, I respectfully suggest that the Board ask its investment advisors to quantify the financial impact of disbursing funds before they are needed.

Specifically, the Board could request an estimate of the difference in earnings between:

A quarterly tranche being disbursed to the city and remaining unspent for a typical period, and that same tranche remaining invested within the Trust portfolio.

Even preliminary estimates suggest that the difference may be significant. More importantly, because this issue can recur each quarter, the cumulative impact over time could be much more significant.

Asking the Trust's advisors to calculate this difference would allow the Board to make an informed determination as to whether the impact is **material**. If the Board concludes that it is not material, that conclusion would then be well-grounded. If it is material, it would support consideration of an alternative disbursement approach that better aligns cash flow with actual project readiness.

A Practical and Common-Sense Alternative

I respectfully recommend that the Board consider adopting a draw-down model for Trust distributions. A draw-down model would:

- Preserve the value of Trust assets by keeping funds invested until needed

- Reduce the loss of purchasing power due to inflation
- Align disbursements with the City's demonstrated capacity to execute projects
- Encourage transparency and accountability in capital spending, and
- Avoid the accumulation of large, idle balances that benefit no one

Most importantly, it ensures that **Trust funds are working at all times** — either repairing and maintaining existing infrastructure or earning returns.

This approach is widely used in public infrastructure finance and grant program management. It does not limit the City's access to Trust funds; it simply aligns cash flow with capacity to spend.

Consistent With Voter Expectations and Fiduciary Responsibility

Voters were told the Trust would be managed responsibly and used to support infrastructure improvements over the long term. Ensuring that funds are disbursed when they can actually be deployed, rather than solely based on a calendar schedule, is consistent with that promise.

Just as importantly, explicitly evaluating the materiality of idle funds reflects prudent fiduciary stewardship and strengthens public confidence in the Trust's governance.

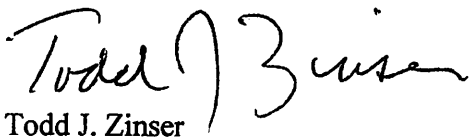
Closing

The Cincinnati Southern Railway Trust represents a once-in-a-generation public asset. Early decisions about how it operates will shape its effectiveness for decades.

For that reason, I respectfully urge the Board to consider whether a draw-down model — informed by a clear assessment of recurring opportunity costs — would better serve the Trust's mission than automatic quarterly distributions.

Thank you for your time and consideration.

Respectfully,



Todd J. Zinser
Cincinnati Oversight Project
4114 Jamestown Street
Cincinnati, OH 45205

cc:

The Honorable **Aftab Pureval**, Mayor, City of Cincinnati
Members, Cincinnati City Council
Sheryl Long, City Manager, City of Cincinnati



Operating Budget Summary FY 2025 Operating Budget Update

Table IV – Leveraged Support Recipients by Category

Leveraged Support Category and Recipients	City Manager Recommended FY 2025 Budget Update	Mayor Adjustments	Council Adjustments	Approved FY 2025 Budget Update
Arts				
Art Opportunities, Inc. (dba ArtWorks)	\$150,000			\$150,000
ArtsWave Black and Brown Artists Fund*	\$0	\$25,000		\$25,000
Cincinnati Institute of Fine Arts (dba ArtsWave)	\$50,000			\$50,000
Q-Kidz	\$50,000			\$50,000
The Children's Theatre of Cincinnati, Inc.	\$50,000			\$50,000
Total Arts	\$300,000	\$25,000	\$0	\$325,000
Economic Development and Neighborhood Support				
All-In Cincinnati Equity Coalition	\$50,000			\$50,000
Cincinnati Compass	\$50,000			\$50,000
CincyTech*	\$100,000	\$125,000	\$25,000	\$250,000
Cintrifuse*	\$200,000	\$25,000		\$225,000
Invest in Neighborhoods*	\$0		\$75,000	\$75,000
Greater Cincinnati & Northern Kentucky Film Commission (dba Film Cincinnati)*	\$50,000		\$75,000	\$125,000
MORTAR Cincinnati*	\$50,000		\$40,000	\$90,000
REDI Cincinnati	\$250,000			\$250,000
Total Economic Development and Neighborhood Support	\$750,000	\$150,000	\$215,000	\$1,115,000
Environment				
Keep Cincinnati Beautiful (KCB)	\$275,000			\$275,000
Adopt-a-Spot (Keep Cincinnati Beautiful (KCB))*			\$60,000	\$60,000
Green Umbrella	\$100,000			\$100,000
Total Environment	\$375,000	\$0	\$60,000	\$435,000
Equity and Inclusion				
Activities Beyond the Classroom*	\$0		\$100,000	\$100,000
Cincinnati Youth Collaborative*	\$0		\$100,000	\$100,000
Greater Cincinnati and Northern Kentucky African American Chamber of Commerce	\$350,000			\$350,000
Joy Outdoor Education Center (dba Camp Joy)	\$75,000			\$75,000
LADD*	\$0		\$25,000	\$25,000
Santa Maria Community Services	\$125,000			\$125,000
The Health Collaborative*	\$0		\$50,000	\$50,000
Total Equity and Inclusion	\$550,000	\$0	\$275,000	\$825,000
Homelessness and Eviction Prevention				
Bethany House Services*	\$100,000	\$25,000	\$40,000	\$165,000
Cincinnati Center City Development (3CDC)	\$75,000			\$75,000
Cincinnati Public Schools (CPS) Project Connect	\$100,000			\$100,000
Cincy Smiles*	\$0		\$25,000	\$25,000
Lighthouse Youth & Family Services, Inc. (dba Lighthouse Youth & Family Services)	\$125,000			\$125,000
Shelterhouse Volunteer Group	\$325,000			\$325,000
St. Vincent de Paul District Council of Cincinnati	\$150,000			\$150,000
Total Homelessness and Eviction Prevention	\$875,000	\$25,000	\$65,000	\$965,000
Human Services and Violence Prevention				
Center for Addiction Treatment	\$100,000			\$100,000
Center for Closing the Health Gap*	\$500,000	\$250,000		\$750,000
Immigrant and Refugee Law Center	\$50,000			\$50,000
Produce Perks Midwest, Inc.	\$75,000			\$75,000
La Soupe, Inc.	\$50,000			\$50,000
Last Mile Food Rescue*	\$0		\$50,000	\$50,000
Urban League of Greater Southwestern Ohio	\$100,000			\$100,000
Total Human Services and Violence Prevention	\$875,000	\$250,000	\$50,000	\$1,175,000
Workforce Programming and Poverty Reduction				
Big Brothers Big Sisters*	\$0		\$50,000	\$50,000
Cincinnati Works, Inc.*	\$175,000	\$50,000		\$225,000
Groundwork Ohio River Valley*	\$0		\$100,000	\$100,000
The Literacy Lab*	\$50,000		\$50,000	\$100,000
YWCA of Greater Cincinnati	\$50,000			\$50,000
Total Workforce Programming and Poverty Reduction	\$275,000	\$50,000	\$200,000	\$525,000
Grand Total	\$4,000,000	\$500,000	\$865,000	\$5,365,000

*Denotes full or partial one-time funding.

6. Recommendations

As part of the performance of our procedures, we identified certain items to improve programs and operations of the processes covered under this audit. These items were not significant to the audit objectives. We recommend that the city of Cincinnati take the following actions:

1. Council Member Recusals

Create a policy that would aid the city in ensuring their council members understand their responsibilities when it comes to abstention or recusal from voting on ordinances, or any other council matters, when a potential conflict of interest is present. This policy should, at a minimum, describe the following:

- How the recusal should be communicated (written or oral)
- What information should be included in the recusal
- To whom the recusal should be communicated
- When the recusal should be submitted (i.e., at least 24 hours in advance)
- That the council member should physically leave the room during the vote

Create a new position or expand on a current city position to review council member OEC financial disclosure statements before a council-related matter is voted upon. This position would notify the council member if a potential conflict of interest is identified based on their review of the financial disclosure statement.

Distinguish, in the ordinance meeting minutes or in the voting record published on the city's website, whether the council member's "absent" vote is due to recusal, abstention, or a physical absence that day unrelated to a conflict of interest.

2. Suspension of Three Readings

Reduce the frequency that council suspends the three-readings requirement to allow for as much public engagement as possible.

Add specific language in an ordinance or in the documentation supporting an ordinance that would allow the public to fully understand why the three-readings requirements was waived, whether by emergency ordinance or outright by council's affirmative vote. The city should include any potential financial, contractual, or reputational risk that could arise if the ordinance is not passed immediately during council's first reading.

✓ 3. City Business Conflicts of Interest

Expand the Scope of "Doing Business": Implementing a ban or limit to campaign contributions for entities doing business with the city could help reduce the risk of a conflict of interest between council members and developers. Crowe recommends that the city adopt a policy similar to New York City, which maintains stringent "pay to play" restrictions on contributions from people doing business with the City.

Expand the "Doing Business" Duration: The current policy established by the city restricts contributions for six months during the legislative review period of the ordinance. After the six months, candidates may accept contributions from these developers, even if the ordinance passes and the developer is removed from the restricted business list. Crowe recommends that the city expand the "doing business" duration from 6 months to 12 months like New York City and Los Angeles.

Document councils' involvement in selecting vendors during line-item discretionary appropriations. Establish additional safeguards to limit councils' ability to attach money to specific firms without providing sufficient justification over vendor selection.

Anti-corruption Op-Ed

From: Todd Zinser (toddzins@ yahoo.com)
To: mayor.aftab@cincinnati-oh.gov; citycouncil@cincinnati-oh.gov
Cc: clerkofcouncil@cincinnati-oh.gov; swartman@enquirer.com
Date: Sunday, June 1, 2025 at 06:56 PM EDT

Dear Mayor and Councilmembers,

I have attached a guest column published by the *Cincinnati Enquirer* on May 31, 2025. It concerns the anti-corruption measures taken by the city in the wake of the corruption scandal and the status of numerous reform recommendations referred to the city council for consideration.

The op-ed includes the following requests for the council and the mayor.

1. The Council: Adopt a motion directing the administration to 1) compile a list of recommendations included in the July 21, 2021 report of the Economic Development Reform Panel and the November 2023 report from Crowe, LLP, "City of Cincinnati, Performance Audit of Council Actions;" and 2) provide a status report on the implementation of those recommendations or an explanation for any recommendations that have not yet been implemented.
2. The Mayor: Publicly identify the members of the steering committee for Build Cincinnati's Future and demand that Build Cincinnati's Future and SKDK provide a detailed accounting for the \$6 million donated by Norfolk Southern to the political action committee.

With respect to Build Cincinnati's Future, SKDK and Norfolk Southern, just because the campaign finance rules are insufficient for ballot issues concerning the sale of a public asset, does not mean that the city is not obligated, on behalf of its citizens, to do what it can to demand greater transparency on the money and influence involved in the sale of the Cincinnati Southern Railway.

Thank you for your consideration.

Todd Zinser



Cincinnati falls short in response to corruption scandal _ Opinion.pdf
156.1 KB

Follow up to public comments

From: Todd Zinser (toddzinser@yahoo.com)

To: citycouncil@cincinnati-oh.gov; clerkofcouncil@cincinnati-oh.gov

Cc: mayor.aftab@cincinnati-oh.gov; citymanager@cincinnati-oh.gov

Date: Monday, March 16, 2026 at 10:01 PM EDT

This is to follow up on my public comments at today's meeting of the Budget, Finance and Governance Committee and my public comments this evening at the Budget hearing in Sayler Park.


During my comments at the Committee meeting this afternoon, I identified 3 "known unknowns," about the city grant programs.

1. How many external organizations, such as non-profits, receive funding grants from the city?
2. What is the total amount distributed to these organizations?
3. Which organizations received funding from multiple city programs?

As far as I know there is no structured oversight effort concerning the city's various grant programs. This is a risk to the city's operations and reputation should there be a scandal involving any of the city's grant recipients. The city should establish some type of oversight structure for their grant programs that is transparent and promotes accountability. Such an oversight effort would necessarily begin with answering those three unknowns.

I also spoke about an analysis that I conducted of Leveraged Support recipients over the last 7 years and found that among all the recipients, there are 24 organizations that have received Leveraged Support funding over the past 7 years totaling \$86 million. In my view, that does not reflect competitive awards. I have attached that analysis.

At this evening's budget hearing in Sayler Park, I repeated two suggestions I made during last year's budget process:

- 
1. The city should determine two numbers concerning the city's budget: 1) the mandatory costs the city must pay for; and 2) discretionary spending. This would allow the public, the council members and grant applicants to understand how much discretionary money the city is working with.
 2. When city council members submit memos requesting adjustments to the city manager's recommendations for Leveraged Support funding, the members should sign an attestation on those memos that they do not have any conflicts of interests with the organizations on their lists. I have attached suggested language that could be used in making such an attestation.
 3. This year, I added that the suggestion that the city council should include a requirement in the budget that the city manager conduct a risk assessment of city operations and governance.

Please let me know if I can answer any questions or provide any assistance in addressing any of these suggestions.

Respectfully submitted



Most Frequently Funded External Recipients 3.8.26.pdf
149.4 kB



Leveregd Support Attestation.docx
76 kB

Sec. 15. - Internal Audit Division.

There is hereby established within the office of the city manager an internal audit division to be administered by an internal audit manager appointed by, and under the supervision of, the city manager. The internal audit division shall have such assistance and employees as are necessary to perform its responsibilities. The independent internal auditor shall be appointed by the city manager but shall report his or her findings directly and simultaneously to an internal audit committee and the city manager.

Internal Audit Manager. The internal audit manager shall supervise the internal audit division and conduct operational audits, within generally accepted government auditing standards, to examine and evaluate the effectiveness and efficiency of management controls, including but not limited to financial controls, in all city departments, independent boards and commissions, and organizations under contract with the city to perform quasi-governmental functions. The internal audit manager shall make recommendations to assist all members of management in strengthening management controls, including but not limited to financial controls, and shall provide all completed reports and audits directly and simultaneously to the internal audit committee and the city manager. The internal audit manager shall establish follow-up procedures to ascertain that appropriate action is taken on operational audit recommendations. The internal audit manager shall prepare a proposed and detailed yearly budget of what he or she deems necessary to adequately perform the duties of the internal audit division. Such budget shall be provided directly to council for consideration as part of the budget and budget update. The internal audit division shall identify and recommend to appropriate units of management relevant opportunities to reduce cost, improve performance, and increase productivity of personnel and assets. City department heads are encouraged to use the resources of the internal audit division.

In carrying out its duties, the internal audit division is authorized to have access to all city functions, records, property and personnel relevant to the performance of operational audits.

The internal audit manager shall coordinate operational audit efforts with appropriate city, state, and federal officials to achieve desired audit coverage without duplication.

Internal Audit Committee. Council shall appoint one member of each political party represented on Council to serve on the committee. A majority of the internal audit committee shall be independent of the City of Cincinnati's management and administration. The mayor shall nominate independent members in such number that is equal to the number of political parties represented on council plus one. These nominations shall be subject to the approval of council. The city manager shall appoint a member of the city administration to act as an ex officio member of the committee. The committee shall select a chairperson from its membership and promulgate rules for its own operation. Under the supervision of the city manager, the internal audit manager shall prepare an annual internal audit plan to be followed by the internal audit manager and the internal audit division, which shall be presented to the internal audit committee. The internal audit committee shall review the annual audit plan, and at its discretion, shall

approve or modify the plan. Any such modification shall be done in consultation with the city manager. The internal audit work plan shall serve as a means to enhance the performance of city departments, and city departments are encouraged to utilize the resources of the internal audit division.

Neither the city manager nor any member of the city administration shall interfere with any audit conducted by the internal audit division or substantially amend or edit any report or conclusion issued by the internal audit manager or division.

(Ordained by Ord. No. 50-1982, eff. Feb. 18, 1982; a. Ord. No. 99-2004, eff. April 23, 2004)

Public Records Request – Todd Zinser

- 1. All annual budgets prepared by the Internal Audit Manager and submitted to the City Council as required per Section II, Article 15 of the City Administrative Code, including any revisions of the Internal Audit Manager's submissions.***

Internal Audit (IA) is a division under the City Manager's Office (CMO). The IA Manager prepares the budget with the CMO's budget liaison and the budget analyst. The IA budget is presented to the City Council as part of the CMO's budget.

- 2. All annual work plans for Internal Audit as required per Section II, Article 15 of the City Administrative Code, including any updates and revisions made during the annual period. This also includes any documents pertaining to the process for revising the annual Internal Audit workplan and evaluating requests for audits.***

The IA Manager works with the ACM (reports to Billy Weber) to create the work plan. Audits are selected from various departments to ensure adequate safeguards are in place citywide. There is a balance of audit work that once complete, will result in improving the overall operations of the City by strengthening management controls, improving accountability, and enhancing efficiency and effectiveness of municipal services. The Internal Audit Committee is responsible for approving the work plan.

IA provided the past 3 bi-annual Work Plans (FY21 – FY26), including updates and revisions.

- 3. All documented requests for Internal Audit from city department officials, including any documented responses concerning the disposition of the request.***

All requests for Internal Audit have been documented in the Audit Work Plan.

- 4. All risk assessments prepared by Internal Audit.***

IA conducted a citywide risk assessment in 2014. Due to limited resources, a citywide risk assessment is not conducted yearly. Please see response to question 2 on the process of creating the Audit Work Plan.

IA provided the 2014 citywide risk assessment.

5. *All peer reviews concerning the City of Cincinnati's Internal Audit office.*

Due to limited resources, a peer review has not been conducted. Per Generally Accepted Government Auditing Standards (GAGAS), IA discloses this in every audit report.

6. *All documents concerning follow-up procedures required per Article II, Section 15 of the City Administrative Code. This request also includes any such follow-up audits, reviews, or other actions conducted by Internal Audit pursuant to the Administrative Code.*

The Internal Audit Division will follow up with the audited entity 6 months after the final report is issued. The primary objective is to determine the status of the solutions to the findings, and the steps taken by the department to follow through on the response. An internal status update memo of the progress is drafted and submitted to the City Manager, Internal Audit Committee and Director of the entity audited.

IA provided 2 years of follow up memos. Also, Administrative Regulation #19 discusses the process.

7. *All complaints, questions, statements, or other information submitted to the city via the "Fraud, Waste and Abuse Online Form" found on the website of Internal Audit. This request includes any documents pertaining to the action taken in response to submissions of the online form, if any, and the final disposition of the submission. This request does not include information that would tend to identify the individual(s) making the submission, if named, or that would tend to identify the person or persons who are otherwise named in any submission of the online form. Such identifying information is not part of this request and should be redacted as appropriate.*

The Fraud, Waste and Abuse Hotline was moved to the Law Department on March 28th, 2022 to include Ethics. Most web links were removed from the IA website, but one might still exist.

Moral Obligations and Then & Now Certificates

From: Todd Zinser (toddzins@yahoo.com)

To: citycouncil@cincinnati-oh.gov; clerkofcouncil@cincinnati-oh.gov

Cc: citymanager@cincinnati-oh.gov; mayor.aftab@cincinnati-oh.gov

Date: Tuesday, January 20, 2026 at 10:44 PM EST

This is to follow up on my remarks during today's public comment period for the Budget, Finance and Governance Committee meeting.

I raised concerns about the council's routine approval of payments referred to in the agenda as Moral Obligations and Then & Now Certificates. For example, today's agenda included one Then & Now Certificate in the amount of \$136,586.53 and 8 moral obligation payments totaling \$47,651.55.

I appreciate the Chairman's request of Dr. Dudas, during the meeting, to explain the two terms and also the explanation from Dr. Dudas about the internal control failures with respect to those transactions.

In calendar year 2025, by my count, the city council approved 30 moral obligations and 14 Then & Now Certificates totaling \$2,270,062. As I mentioned in my remarks today, each one of those represents non-compliance with the rules.

The council's routine approval of moral obligations and Then & Now Certificates could signal to the administration, not to mention the people who do business with the city, that adherence to the city's procurement rules and to the Ohio code, is not a focus of this council.

It also points to a staffing problem in the procurement and finance operations of the city and its key departments. Those staffs are probably overworked, which leads to cutting corners with the public's money. There may also be a training need.

Most importantly, in my view, lax adherence to procurement rules creates a greater risk of fraud, waste and abuse in the city's operations.

Two overall recommendations:

1. The council should require a written explanation, for the record, for each moral obligation and Then & Now Certificate submitted for their approval.
2. The city should ask its financial statement auditor to examine the issue during their annual audit, i.e., self-disclose.

Please let me know if you have any questions

Todd Zinser
Cincinnati Oversight Project.

EX 12

Todd J. Zinser
4114 Jamestown St.
Cincinnati, OH 45205
September 23, 2025

The Honorable Aftab Pureval, and
Members of Cincinnati City Council
801 Plum Street
Cincinnati, OH 45202

Via email

Re: Conflict of Interest in Leveraged Support Appropriation to Cintrifuse

Dear Mayor Pureval and Members of City Council,

The integrity of the city's leveraged support process requires strict avoidance of conflicts of interest. My ongoing review has identified a concern involving Mayor Pureval and Cintrifuse that is problematic, possibly a violation of Ohio ethics law, and requires corrective action.

Summary of Facts:

- **Board Membership:** On September 3, 2025, I inquired with the Cintrifuse CEO about Mayor Pureval's role on the Cintrifuse board, copying the mayor on my inquiry. In response, on September 4th, Cintrifuse's CEO confirmed that Mayor Pureval is a current member of its Board of Directors. The exchange with the Cintrifuse CEO is attached.
- **Funding Decisions:** During Mayor Pureval's term, Cintrifuse has received more than 1 million dollars in leveraged support funding from the City. During the 2025 budget process, the mayor specifically increased Cintrifuse's allocation by \$25,000 beyond the City Manager's recommendation.
- **Applicable Ohio Law:**
 - *R.C. 102.03(D)* prohibits public officials from using their position to secure a benefit for entities where they hold a fiduciary duty.
 - *R.C. 2921.42(A)(1)* prohibits officials from authorizing or using public funds in connection with contracts in which they have an interest.
 - Serving on a nonprofit board creates a fiduciary duty of loyalty and care to that organization.

Taken together, these facts raise serious concerns under Ohio's ethics laws.

Background

Each year, Council allocates millions of dollars in leveraged support and other funding to an estimated 200 nonprofits. Oversight of these appropriations is minimal, and recent audits have highlighted risks of waste and little accountability.

Earlier this year, Council debated whether its members should serve on nonprofit boards of recipient organizations. A January 8, 2025, memo from the City Manager warned against this practice due to ethical complications, and Council dropped the idea. At no point did the mayor disclose his ongoing Cintrifuse board membership.

In April 2025, I requested disclosure documents (“ethics agreements”) for elected officials. The City acknowledged an ethics questionnaire exists but withheld the completed forms, leaving unclear whether Mayor Pureval ever disclosed his Cintrifuse role.

These facts and circumstances underscore the need for reform of the leveraged support process to prevent conflicts of interest and strengthen accountability.

Corrective Actions

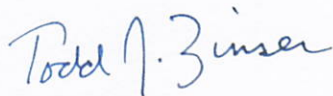
To resolve this matter constructively, I urge Council and the Mayor to consider the following steps:

1. **Referral:** Either through a self-referral by the mayor or action by Council, request review by the Ohio Ethics Commission for a determination or advisory opinion. *This should be the first step taken.*
2. **City Solicitor Opinion:** Seek a public opinion from the Solicitor on whether the mayor’s conduct complied with Ohio law.
3. **Retroactive Approval:** Consider retroactively approving the mayor’s service on Cintrifuse’s board as a formal City appointment, though this would conflict with the City Manager’s January memo.
4. **Resignation:** The mayor could resign from the Cintrifuse board, removing the ongoing conflict.
5. **Sanctions / Censure:** If corrective action is not taken, Council could pursue sanctions to reinforce ethical standards.
6. **Policy Reform:** Adopt rules requiring elected officials to specifically disclose and recuse themselves from leveraged support decisions affecting nonprofits where they serve as fiduciaries.

While the dollar amounts in question may be relatively small compared to the city’s overall leveraged support funding, the principle is significant. If the City’s highest-ranking official modifies funding for an organization whose board he serves on, it creates the very type of conflict the law is designed to prevent and undermines public confidence in the integrity of the City’s funding decisions.

I respectfully urge you to address this matter openly and as a priority. As I have previously recommended in public comments, at the very least officials should certify that they have no conflicts when modifying leveraged support appropriations. This case illustrates exactly why such reforms are needed.

Sincerely,



Todd J. Zinser

cc: City Manager Sheryl Long

Attachments

Zinser letter to Cintrifuse dated September 3, 2025
Cintrifuse email response dated September 4, 2025

September 3, 2025

Mr. J.B. Kropp, Chief Executive Officer
Cintrifuse
1311 Vine St.
Cincinnati, OH 45202

via: info@cintrifuse.com

Dear Mr. Kropp,

I am writing to request clarification regarding Mayor Aftab Pureval's past or current service on the Board of Directors of Cintrifuse. Public records indicate that the City of Cincinnati has appropriated more than \$1 million to Cintrifuse since Fiscal Year 2022. At the same time, it has been publicly reported that Mayor Pureval served on Cintrifuse's Board during the early years of his current mayoral term.

To clarify the public record, I respectfully ask:

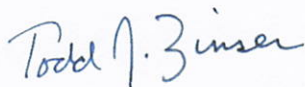
1. Is Mayor Aftab Pureval currently serving as a member of the Cintrifuse Board of Directors?
2. If not, on what date did his membership on the Board conclude?
3. Are there any publicly available records (such as annual reports or board rosters) that document his period of service?

My interest in this matter stems from the overlapping obligations that exist when a public official serves on the board of an organization that receives city appropriations. The city manager discussed these types of issues in a memorandum to the mayor and members of city council on January 8, 2025.

As a board member of a nonprofit, Mayor Pureval would have had a fiduciary duty to act in the best interests of Cintrifuse. At the same time, as Mayor, he owes a duty to act in the best interests of the city and its taxpayers. Even if managed with integrity, these dual obligations create the appearance of conflicting responsibilities during budget deliberations that involve Cintrifuse funding.

I believe that clear disclosure of the timeline of the mayor's board service will help citizens evaluate these issues fairly and reinforce confidence in the integrity of both Cintrifuse and City Hall. Thank you for your attention to this matter. I look forward to your response, which you may provide by letter or email.

Sincerely,



Todd J. Zinser
4114 Jamestown St.
Cincinnati, OH 45205
toddzinser@yahoo.com

cc: Hon. Aftab Pureval, Mayor, City of Cincinnati

Re: Inquiry re: Mayor Pureval's past or current membership on Cintrifuse's Board of Directors

From: J.B. Kropp (jb@cintrifuse.com)
To: toddzinser@yahoo.com
Date: Friday, September 5, 2025 at 04:27 PM EDT

Mr. Zinser,

Thank you for your letter. I can confirm that Mayor Pureval currently serves on the Cintrifuse Board of Directors, and has been a member of the board since he was appointed in 2022.

In response to your letter, I would also note that Cintrifuse maintains a Conflict of Interest Policy that applies to all board members. I believe you reviewed that document with Nikki Boehmker earlier this year.

Please let me know if you have further questions.

Sincerely,

JB

J.B. Kropp
CEO, Cintrifuse
Managing Director, Cintrifuse Capital

m 513.520.9300
e jb@cintrifuse.com
w cintrifuse.com
q Union Hall, 1311 Vine Street, Cincinnati, OH 45202



cintrifuse

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----- Forwarded message -----

From: **Todd Zinser** <toddzinser@yahoo.com>
Date: Wed, Sep 3, 2025 at 2:19 PM
Subject: Inquiry re: Mayor Pureval's past or current membership on Cintrifuse's Board of Directors
To: info@cintrifuse.com <info@cintrifuse.com>
Cc: mayor.aftab@cincinnati-oh.gov <mayor.aftab@cincinnati-oh.gov>

To: Mr. Kropp,

Please accept the attached letter of inquiry concerning Mayor Pureval's past or current membership on the Board of Directors for Cintrifuse.

Your prompt attention to this request for information would be greatly appreciated.

Please let me know if you have any questions.

Sincerely,

Todd Zinser

May 28, 2025

The Cincinnati City Council
801 Plum Street
Cincinnati, OH 45202

Dear Members of Cincinnati City Council,

During public comments at yesterday's meeting of the Budget and Finance Committee, the council was informed about an audit of a Leveraged Support recipient conducted by the city's Internal Audit Manager. A copy of the report is attached.

Given the results of the audit, the city council should withhold city funding from this recipient for any outstanding claims and withhold funding in the FY 2026-2027 Biennial Budget until:

1) the Department of Community and Economic Development as well as the recipient have demonstrated sufficient implementation of the auditor's recommendations; and

2) the recipient provides an expanded audit by an outside certified public accountant concerning the salary reimbursements claimed by the recipient, which the audit report concluded were not sufficiently documented. **As noted below this situation creates the risk of contract mischarging.** The expanded audit should also determine the disposition of the \$14,000 in claims by the recipient that reportedly lacked any documentation.

The audit firm should be selected by the city and should report to the city, but the cost of the audit should be borne by the recipient.

The Internal Audit Manager's report was issued just last month. It covered the period 2024 and 2025. So, the findings are current. They are summarized below:

1. *"Contract management review and oversight needs improvements."*

The report indicates the following: the recipient sought reimbursement for one 6-month period that was greater than the amount allocated under the contract. For FY 2024, the file omitted required documentation: the workers compensation and liability insurance document was missing; one receipt submitted contained dates outside the contract period for FY2024; and one missing invoice for each of the FY 2024 and FY 2025 documents, totaling more than \$14,000.

2. *"The payroll journals contain insufficient information to determine whether contractual terms are upheld."*

By contract, the city reimburses the recipient 22.5% of the salaries for 10 employees but the audit report indicates that the documentation submitted by the recipient was

not sufficient to establish that the employees devoted 22.5% of their time to work under the contract.

The audit does not use the term, but the situation described by the auditor is a risk of contract mischarging. This occurs when a contractor charges one party, e.g., Cincinnati, for work performed for a different party under a different contract. Given that the recipient has received \$250,000 a year for the past 10 years (\$2.5 million), the loss to the city as a result of contract mischarging could be substantial.

3. *"A third party is unable to verify the terms of the contract."*

By contract, the recipient is required to meet with the Department of Community and Economic Development twice a month to update the progress of the recipient's contract performance. The auditor was told that the meetings occur, but no agendas or meeting minutes were maintained. This essentially means that the recipient's performance under the contract is un-auditable. This increases the risk of mischarging.

4. *"The contract language should be updated."*

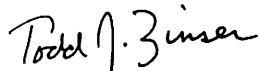
According to the audit report, the contract provides that "a representative of the City may join recipient on both a domestic and international business development mission." However, the auditor reported that the contract is silent about which party pays for the travel.

The city should include in the scope of an expanded audit, an accounting of all travel conducted under the contract, including which party incurred the costs of any travel and an assessment of the compliance with the regulations that applied to the travel.

At current count, the city provides funding to more than 200 outside organizations ranging from hundreds of dollars to hundreds of thousands of dollars amounting to millions of dollars every year. As fiduciaries, city council members are obligated to ensure that public funds are used properly. In addition to requiring an audit paid for by the recipient in this case, at a minimum, the council should direct the city manager to audit a reasonable number of additional recipients in order to determine the extent to which a more robust oversight program of outside organizations is necessary.

Please let me know if I can answer any questions or if you would like to further discuss.

Sincerely,



Todd J Zinser
4114 Jamestown St.
Cincinnati, OH 45205

Attachment



April 7, 2026

Mr. John Logue, Director
Ohio Environmental Protection Agency
50 W. Town Street, Suite 700
Columbus, Ohio 43215

Via email to: robin.burmeister@epa.ohio.gov

Re: Greater Cincinnati Water Works – Lead Service Line Replacement Scrap Handling and May 20, 2025, Disclosure

Dear Director Logue,

I am writing to request clarification regarding the Ohio EPA's evaluation and disposition of issues disclosed by the Greater Cincinnati Water Works (GCWW) concerning the handling and recycling of lead service line materials.

Through public records requests, I obtained a letter dated May 20, 2025, from GCWW to the Ohio EPA, in which GCWW reported significant irregularities in its handling of lead service line scrap. A copy is attached. As described in that correspondence, GCWW identified that:

- Lead service line materials were not consistently processed through its contracted recycling vendor;
- No records could be produced to document recycling of certain scrap lead materials; and
- At least one employee diverted lead materials outside of official processes.

Subsequent records provided by GCWW indicate that, despite these findings, GCWW concluded that the materials were likely recycled and not improperly disposed, although no contemporaneous documentation appears to support that conclusion.

Given the potential applicability of federal and state hazardous waste regulations, including the Resource Conservation and Recovery Act (RCRA) and corresponding Ohio Administrative Code provisions, I am seeking to understand how the Ohio EPA evaluated this matter.

Specifically, I respectfully request information regarding:

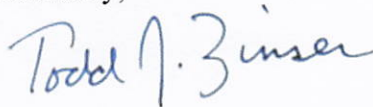
1. Whether the Ohio EPA made a formal determination as to GCWW's compliance with applicable solid and hazardous waste regulations in connection with these events;
2. Whether a Notice of Violation, enforcement action, or other formal or informal resolution was considered or issued;
3. Whether GCWW provided documentation sufficient to support application of the "scrap metal" recycling exclusion under applicable regulations;
4. Whether any internal memoranda, meeting notes, or correspondence exist reflecting the Ohio EPA's evaluation or disposition of this matter; and
5. Whether the matter is considered closed, and if so, the basis for that determination.

This request is made for the purpose of understanding how the regulatory framework was applied to the facts disclosed by GCWW, particularly in light of the acknowledged absence of documentation and breakdown in chain-of-custody controls.

If responsive records exist, I would appreciate their production pursuant to Ohio's Public Records Act. If no formal determination or documentation exists, a written explanation of how the matter was resolved would be helpful.

Thank you for your time and consideration. Please feel free to contact me if additional clarification is needed.

Sincerely,



Todd J. Zinser, Founder
Cincinnati Oversight Project
4114 Jamestown Street
Cincinnati, OH 45205
toddzinser@yahoo.com

Attachment

cc: Amy Klei, Chief, Division of Drinking and Groundwater, Ohio EPA
Bonnie Buthker, Southwest District Environmental Administrator, Ohio EPA
Andrea E. Yang, Executive Director, GCWW



A Service of The City of Cincinnati

**GREATER CINCINNATI
WATER WORKS**

Andrea Yang, Interim Executive Director

May 22, 2025

Via Email

Ms. Amy Klei, Chief
Division of Drinking and Ground Water
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43216-1049

Ms. Bonnie Buthker, Chief
Southwest District Office
Ohio Environmental Protection Agency
401 East Fifth Street
Dayton, Ohio 45402

Re: GCWW Lead Service Line Replacement (LSLR) Program Audit

Dear Amy and Bonnie,

As we discussed yesterday, during a voluntary self-evaluation (audit) by City of Cincinnati ("City") of the Greater Cincinnati Water Works ("GCWW") lead service line replacement ("LSLR") program, the City discovered discrepancies in the handling of lead scrap metal. GCWW procedure calls for placement of lead pipes in a roll-off container for pickup by Cohen Brothers, Inc. (the City's scrap metal recycling contractor). The City determined that the lead pipes were not going to Cohen Recycling. Upon further investigation that City has now determined that lead pipes have been taken (impermissibly) by at least one GCWW employee and recycled for their own profit.

While we are disappointed that a GCWW employee would misappropriate City property, we are relieved to report that it appears the lead pipes have been recycled and are not being improperly disposed. The remainder of this letter provides background on our continuing investigation, preliminary improvements to the LSLR program, and confirmation of the GCWW's commitment to excellence and continued partnership with the Ohio EPA.

Internal Audit of the GCWW LSLR Program

As authorized by Article II, Section 15 of Cincinnati's Administrative Code, the City's Internal Audits ("IA") group performs periodic, independent audits of City programs. These audits examine the efficiency of internal controls, and identify



opportunities to ensure compliance, reduce cost, improve performance, and increase productivity of personnel and assets. On April 16, 2025, the IA group initiated an audit of GCWW's LSLR program. During the course of the audit, a discrepancy was identified in how lead pipes removed during LSLR projects were being handled.

Under GCWW procedure, lead pipes are supposed to be placed into a roll-off container designated for scrap lead recycling. When the roll-off is full, a maintenance supervisor (not part of the LSLR crews) contacts Cohen Brothers for pickup of the roll-off for recycling. Cohen Brothers has a City-wide contract for recycling a variety of scrap metals at various City-owned facilities with a portion of the proceeds from recycling returned to the City. When City auditors requested confirmation of the amount of proceeds from lead recycling, no records could be produced evidencing recycle of scrap lead metal by Cohen Brothers.

Initially, when asked about this discrepancy the GCWW lead service line crew members said that the lead pipes had been sent for disposal at a local non-hazardous waste landfill ("Rumpke") instead of being recycled. Further investigation by the City found this was not true. A tip from one GCWW employee suggested that another GCWW employee was taking the lead pipes to recycle for their own personal profit. Review of available security footage confirmed the unauthorized removal of lead pipes by the GCWW employee in a GCWW vehicle. On the date in question, no receipts were recorded for waste disposal by GCWW at Rumpke.

During follow-up interviews, when confronted with the evidence from security footage, GCWW lead service line crew members changed their story and confirmed that lead was being removed by a GCWW employee. During a follow-up interview with the employee in question, the employee admitted that during the entire course of the LSLR program he has been removing lead and recycling it for his own profit. The City is proceeding with disciplinary review of GCWW employees, which may result in termination of one or more employees.

Improvements to the LSLR Program

Based on lessons learned from the IA audit, GCWW is implementing improvements to its LSLR program. These include review and updating of internal procedures, replacement of supervisory staff, and retraining employees to ensure that lead handling and recycling procedures are followed. In addition, GCWW is instituting tracking protocols to document the quantity of lead pipe removed from each LSLR project and provide a mechanism to cross-walk the estimated weight of lead pipes removed for regular comparison with receipts from its metal recycling vendor.

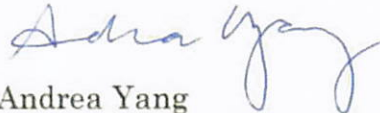
GCWW's Commitment to Excellence

GCWW takes seriously its commitment to provide a plentiful supply of high-quality water, support environmental sustainability, and deliver excellent services in a financially responsible manner. While GCWW relies heavily on its employees to deliver on that commitment, they are human creatures and from time to time fall short of perfection. Thankfully, in addition to its own internal controls, GCWW is able to utilize resources from other City departments, such as the Internal Audits group, to perform self-critical analysis and identify areas for improvement. GCWW also values its external partners, like the Ohio EPA, who play a critical role in ensuring that GCWW customers have confidence in their drinking water utility. Perfection may not be possible, but we are committed to the pursuit of excellence.

At present the internal audit has not identified any conditions that indicate that any violation of environmental laws has, or may have, occurred. As the audit wraps up and the City completes its disciplinary actions with its GCWW employees, we will contact the Ohio EPA if we learn of any new information that changes that understanding.

Do not hesitate to contact me at (513) 591-7968 should you have any questions.

Sincerely,



Andrea Yang
Interim Executive Director, GCWW

- c: Emily Smart-Woerner, City Solicitor
Cathy Bailey, Interim Assistant City Manager

October 6, 2025

The Honorable Jan Michele Kearney, Vice-Mayor,
And Members of the City Council
801 Plum Street
Cincinnati, Ohio 45202

Via Email.

Dear Vice-Mayor Kearney and Members of City Council,

This is to provide an assessment of available contracting documents concerning Iris Roley LLC. The documents were received in a response from the city on September 3, 2025. The response was characterized as a “partial” response.

Summary

Based on significant non-compliance in the contracting process, the city’s contract with Iris Roley LLC constitutes an *unauthorized commitment* by the city manager.¹ The contract and its two amendments were all noncompetitive, sole-source contracts, including the November 2024 amendment valued at \$285,000 and the April 2025 amendment valued at \$570,000. However, the city’s justification for the sole-source contracts is deficient.

According to the city’s procurement manual, “*Due to the requirement that the vendor be the one and only source, a sole source purchase is extremely rare.*” The authority to award a sole-source contract relies on a sufficient justification that the contractor is the “only” source able to provide the service. However, the city’s justification memorandum for its contracts with Iris Roley LLC does not address the reason Iris Roley LLC is the “only” provider qualified to provide the service.

The justification memorandum asserts that Iris Roley LLC is “uniquely qualified,” which does not support that the vendor is the “only” source. For example, the city has not produced a statement of work and a statement of qualifications to justify why it did not undertake a competitive contracting process. Nor does it explain why it discontinued recruitment efforts for the vacant civil service position, “Collaborative Agreement Sustainability Manager.” Prior to COVID, the city classified and then successfully recruited candidates for the position.

According to a February 15, 2022, memorandum to the city council from the Interim City Manager, the 2022 contract requires Iris Roley, LLC to “*Provide a series of dedicated on-boarding sessions for City of Cincinnati’s newly hired Collaborative Agreement Sustainability Manager.*” That means that in 2022, the city still intended to again recruit a full time city

¹ In government contracting, an unauthorized commitment occurs when someone without proper contracting authority, or *acting beyond their authority*, agrees to obtain goods or services on behalf of the government.

employee for the position and hired Iris Roley LLC, in part, to help them do that. But in 2023, the city instead decided to award a two-year sole-source consulting contract valued at \$210,000 for that function by claiming that Iris Roley LLC was the “only” source that could possibly provide services necessary to sustain the Collaborative Agreement. Without reconciling that discrepancy and further explaining why Iris Roley LLC is the “only” possible source, the justification for the 2023 sole-source contract and the subsequent amendments is seriously deficient requiring corrective actions by the city.

Corrective Actions

In government contracting, unauthorized commitments are considered serious abuses of the contracting process. For example, in the federal government a documented, unauthorized commitment triggers a mandatory disciplinary action under the Federal Acquisition Regulations.²

Since the city manager and the Chief Procurement Officer are responsible for the unauthorized commitments, only the city council is in a position to effect necessary corrective action. The contract between the city and Iris Roley LLC should be promptly canceled. The city council will then have to determine whether the unauthorized commitments can be legally ratified by the council and if so, whether it wants to do that.³

In addition, the unauthorized commitments should be disclosed to the city’s financial statement auditors and to the Ohio Auditor of State, who has the authority to investigate.

The total picture of the city’s contract with Iris Roley LLC looks like a contract but more closely resembles a political appointment. The city manager has the authority to make unclassified appointments, which would have increased accountability but that is not what the city manager did. In essence, the city manager instead abused the contracting process in order to contract with a favored individual.

The deficiencies and irregularities in the contracting actions by the city manager with respect to Iris Roley LLC are outlined as follows:

1. The contracts are “Unauthorized Commitments,” for lack of sufficient justification.
2. There is no evidence that the contract terms obtained best value for the taxpayer.
3. The Government Square Initiative (GSI) should be a separate, competitive contract.
4. Under the procurement rules, Iris Roley LLC is disqualified from the GSI contract.
5. There are gaps in the invoices and a lack of documentation and timekeeping.

² FAR1.602-3(b)(3): “Agencies should take appropriate disciplinary action against individuals who make unauthorized commitments.”

³ A ratification is necessary to cure the unauthorized commitment, i.e., make the contract legally binding.

Details

1 The contracts are “Unauthorized Commitments,” for lack of sufficient justification.

The city used the same seriously deficient memo to justify all of the sole-source, non-competitive contracting actions with Iris Roley LLC, including an out-of-scope amendment in November 2024 valued at \$285,000. The April 2025 contract is valued at \$570,000.

The justification memorandum is attached. It does not explain why the contract must be a sole-source, non-competitive contract. While the justification states that Iris Roley LLC is “uniquely qualified,” it does not establish that Iris Roley LLC is the “only” qualified party able to deliver the service.

The city manager erred by not inviting bids for the contract or conducting a survey of potential providers. Without a competitive contracting process, the city cannot determine whether the contract achieves the best value for the public. There are many options available to government officials to obtain best value for the government through competition and thus fulfil the officials’ fiduciary obligations to the citizens. That is why sole source contracts are considered an “exception” in government contracting. They are very difficult to justify in good faith and risk reputational damage to the city and even citizen lawsuits. Such sole-source noncompetitive contracts are often viewed by the public as “sweetheart deals.”⁴

According to the city’s procurement manual, “*Due to the requirement that the vendor be the one and only source, a sole source purchase is extremely rare.*” The city’s sole-source justification does not establish that Iris Roley LLC is the “only” source. That assertion is further undermined by the fact that the city had already established a civil service position, “Collaborative Agreement Sustainability Manager.” The position is now vacant but was filled by a city employee based on an open competition prior to COVID. It is generally considered improper to use a contractor to perform the duties of a classified civil service position. In some cases, it may violate collective bargaining agreements. But that appears to be what the city manager has done with the Iris Roley LLC contracts.

⁴ Google AI explains a sweetheart deal as follows:

“A sweetheart deal is an agreement that is unfair because it gives unusually favorable terms to one party due to a personal or business connection, influence, or collusion, often at the expense of others or the public.

In addition, there are obvious irregularities in the justification memo which add to questions about the justification's authenticity and sufficiency. Specifically, the justification memo is dated March 2022, but the approval signatures are dated March 2023. A year-old justification should, by itself, be considered stale and insufficient.

It is also obvious that the justification memo does not contain the original signature of the Chief Procurement Officer. It is a digital facsimile. Given the "extremely rare" nature of sole source contracts, you would expect the Chief Procurement Officer would take time to closely review the contract and its justification. If the contract file does not contain explanatory documentation, that discrepancy, along with the year-long gap in the sole source approval, warrant interviews with the city manager, the chief procurement officer, and a member of the city manager's staff to gain a better understanding of those discrepancies. There should be entries in the contract file to explain these unusual discrepancies, but the documents produced by the city so far do not contain any such explanation.

2 There is no evidence of best value for the taxpayer.

In government contracting, officials are obligated to obtain the best possible value for the taxpayer. That is generally accomplished through a rigorous, transparent contracting process. In this case, the process should have produced important documents such as the government's statement of work, a market survey of consultant fees, a documented offer from the contractor, documentation of contract negotiations and who participated in the negotiations. None of that type of documentation has been produced by the city with respect to the contracts with Iris Roley LLC, which raises questions as to whether they even exist.

For example, what explains the 5% increase in the monthly fee paid to Iris Roley LLC from the 2022 contract (\$8333/mo.) to the 2023 contract (\$8750/mo.)? Similarly, how was the amount of the monthly payment for the 4 individuals employed for the Government Square Initiative determined (\$4400/ea)? The contract file should include that documentation, but none was included in the city's response to my records request.

It is important to know who negotiated the contract and the amendments so that the public can be assured that the negotiations were sufficiently arm's length to get best value for the taxpayer. In the case of a sole-source contract, it is especially important to

make every effort to avoid claims by the public of favoritism, whether actual or perceived. Otherwise, the contract takes on the appearance of a “backroom deal.”⁵

3 The Government Square Initiative (GSI) Required a Separate Contract

The city improperly amended the 2023 contract to authorize and commit the city to operate and fund the Government Square Initiative. The amendment was an “out of scope modification” of the original contract, which is improper. Since the original contract was for “consulting” services, the operation of a new city program such as the GSI under the same consulting contract, with a separate budget and subcontractors, is not within the scope of the original consulting contract. The work on GSI should have been subject to a separate competitive contracting process.

Alternatively, instead of a sole-source amendment to an existing consultant contract or even a new competitive contract, the city may have been able to implement the GSI through an existing anti-violence program, for example, under Act for Cincy, the city’s holistic anti-violence umbrella program. Act for Cincy included \$3.2 million in funding and numerous providers that may have been able to carry out the operation of GSI.

As is, the funds spent on the Government Square Initiative represent an unauthorized commitment, as discussed earlier, because the sole source noncompetitive contract amendment was an out of scope modification and was not sufficiently justified by the city as a sole-source contract, which, again, is a serious abuse of the contracting process.

4 Iris Roley LLC Should Have Been Disqualified from the GSI Contract

The city’s procurement manual includes provisions concerning “Unfair Competitive Advantage.”⁶ Under these rules, without a written exception to the rules by the city manager, Iris Roley LLC is disqualified from the contract amendment for the Government Square Initiative.

⁵ Google AI explains backroom deals as follows:

“Backroom deals” refer to secret agreements or decisions made behind closed doors, often in a dishonest or dishonest manner, without public transparency or scrutiny. These deals typically involve powerful individuals, such as politicians or government officials, making arrangements with industry or other powerful entities in a way that excludes public input and keeps important information hidden from residents. The term carries a negative connotation, as it suggests a lack of accountability and a betrayal of public trust.

⁶ Pursuant to Administrative Regulation No. 62, “a firm, and each of its affiliates, hired to provide services for the preparation or implementation of a project shall be disqualified from any subsequent procurement solicitation to provide goods, works, or services resulting from or directly related to the firm’s services for such preparation or implementation, unless an exception is made by the City Manager in writing.”

To promote fairness, the rule disqualifies contractors from bidding on contracts for programs they designed. Without documenting the required exception to the rule, the city manager will have improperly disregarded that rule. Iris Roley LLC submitted invoices for the “strategy” and “design” of the Government Square Initiative over the course of several months preceding the November 8, 2024, amendment. Then apparently, despite the rules, Iris Roley LLC was subsequently awarded a two-year, sole-source contract valued at \$285,000, in part, to carry out the program it had designed.

As early as April 2024 invoices submitted by Iris Roley LLC indicate “weekly meetings w/ ACM & staff to **develop strategy on Government Square.**” (emphasis added). An identical entry is included on the invoice for May 2024. The July 2024 invoice includes an entry, “**Designing Public transit sites safety guides.**” (emphasis added). On the November 2024 invoice, one entry includes, “weekly meetings w/ACM & Staff to **develop strategy on of [sic] Government Square designing response to violence for new school year.**” (emphasis added).

The records produced to date show that the city manager circumvented the rule against “Unfair Competitive Advantage,” by awarding the Government Square Initiative work to Iris Roley LLC without specifically making a written exception to the rule when the contract should have been competitively awarded.

5. There are gaps in the invoices and a lack of supporting documentation.

In response to my records request, the city produced 31 monthly invoices for consulting services in 2022, 2023, 2024, and 2025 and 3 invoices for the GSI for October, November, and December 2024. Four invoices were produced for 2025 that include combined claims for consulting and claims for GSI.

Without a better understanding of whether the records provided by the city represent the complete set of invoices and supporting documentation, only preliminary observations about the invoices submitted by Iris Roley, LLC are possible.

The most significant observation indicating that the invoices may not be sufficient is that each contract and each amendment require, “monthly invoices with detailed timekeeping and activity logs.” None of the 31 invoices covering a 4 year period contain any timekeeping and activity logs.

In 2023 and 2024, there are several months where the descriptions of the work performed are identical, meaning word-for-word duplicates, misspellings included, except the dates covered by the invoices were updated.

In 2023, five of the nine invoices provided by the city have identical descriptions of the work performed during the month by Iris Roley LLC. A sixth invoice is identical except the description includes a meeting not included on the other 5 identical invoices. In 2024 there were two sets of two invoices that were identical.

The invoices merely list general descriptions of activities in brief phrases. The invoices contain no substantive description of the work performed or how much time was devoted to each activity. In reality, there is no way to determine, from the invoices, how much time was devoted to the contract during any monthly period.

Unlike the typical consultant contract, where a consultant has an hourly rate and claims payment based on the number of hours worked, Iris Roley is paid a flat monthly payment similar to an employee paycheck but without any taxes being withheld.

Each invoice contains the initials of someone, presumably individuals on the city manager's staff. But based on the cryptic descriptions of activity, it is not clear how the city manager's office validated the entries in order to approve payment, unless there is additional supporting documents for the invoices that have not yet been disclosed.

Without a complete set of invoices and supporting documents, it is not possible to determine whether all the activities engaged in by Iris Roley LLC are within the contracts' scope of services and eligible for payment. For example, were the incidents where Iris Roley is caught on video inserting herself into encounters between the police and a member of the public within the scope of services under the contract? Given that the contract with Iris Roley LLC provides for a flat monthly payment, without any compliance with the contractual requirement to provide "detailed timekeeping and activity logs, it would be difficult to answer that question without additional fact finding.

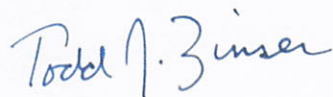
In another example, there is an entry on the May 2024 invoice for, "Working on Police Accountability Conference with CLC/city and other Partners." It is not obvious that such activity is within the scope of services under the contract and may not be an allowable claim. But the way the contracts are being administered by the city, it appears that Iris Roley LLC has free rein to carry out activities without complying with internal controls such as the requirement for "detailed timekeeping and activity logs." That is not proper contract management. The city cannot legally pay for work that is outside of the scope of services called for under the contract.

The contract requires deliverables and certain invoices reference work products but so far, none have been provided except a 1 and ½ page report appended to the December 2024 GSI invoice describing, "Collaborative Community Care Work for the Month December 2024."

To the extent that additional documents may be forthcoming concerning Iris Roley LLC's contracts, this assessment is not final, but it does identify corrective actions the city council should take to address areas of noncompliance with the city's procurement rules and areas where better contract management and oversight are necessary.

Please let me know if you have any questions or would like to discuss this matter.

Sincerely,

A handwritten signature in blue ink that reads "Todd J. Zinser". The signature is written in a cursive style with a large initial "T".

Todd J Zinser

Attachment

cc: The Honorable Aftab Pureval
City Manager Sheryl Long

EXHIBIT C
WAIVER OF ADMINISTRATIVE REGULATION NO. 23



March 10, 2022

TO: Bobbi Hageman, Chief Procurement Officer
FROM: Angie Wright, Chief of Staff ^{AW}
SUBJECT: Request for Waiver of Administrative Regulation No. 23 for Professional Services to be provided by Iris Roley

The City Manager's Office requests your approval to waive the professional services procurement requirements outlined in Administrative Regulations No. 23 in order to enter into a direct award professional services contract with Iris Roley as a Collaborative Agreement Sustainability Consultant.

Ms. Roley will assist City staff with effective engagement with community stakeholders on the Collaborative Agreement and provide recommendations on key problem-solving initiatives centered around violence prevention and community perspectives. Ms. Roley will provide consultation and training services for the general operation of the Manager's Advisory Group (MAG). Ms. Roley will also assist City staff with SARA problem-solving trainings for community stakeholders.

This professional services contract will not exceed \$105,000 annually. The initial term will be one year from the date of contract execution with an optional one-year renewal.

Ms. Roley is uniquely qualified to provide consultation services for the Collaborative Agreement. Ms. Roley has been actively and intricately involved with the Collaborative Agreement since its formation in 2001. Ms. Roley has significant community relationships and will be an invaluable asset for community engagement with the Collaborative Agreement, SARA problem-solving training and the Manager's Advisory Group.

To accomplish these functions, we are asking for waiver of the professional services procurement requirements outline in Administrative Regulations No. 23.

If there are any questions or further information needed, please contact me directly. Thank you.

Approved:	<u>Bobbi Hageman</u> Bobbi Hageman, Chief Procurement Officer	<u>03/13/23</u> Date
Approved:	<u>Sheryl M.M. Long</u> Sheryl M.M. Long, City Manager	<u>3/10/22</u> Date



Questions About the City's Administration of the Iris Roley Contracts

The following are 5 lines of inquiry about the city's lack of care in compliance with standard contracting practices and the lack of a proper record of its contracting decision-making.

Normally, the higher up in an organization, the more exacting compliance you can expect to find and where greater care is taken of the organization's reputation. Apparently not in this case. The city has already acknowledged errors concerning subcontractors. But there are more.

City officials negotiated the contracts; six city officials signed off on each of them; the contracts appear to have been administered from the City Manager's direct office, including examination of invoices, approval of payments, and ensuring contract compliance. So why are there so many questions?

1. Why are important contracting documents absent from the contracting files? For example, why has the city not produced a Request for Qualifications; or Statement of Contractor Qualifications; or a market survey of compensation levels for comparable positions?
2. Since the public record does not appear to contain a market survey, compensation analysis, independent estimate, or other documentation to establish that the compensation paid under these contracts was fair and reasonable. Exactly how were the compensation levels determined and who negotiated them on behalf of the City?
3. The contracts provide that the contractor reports directly to the City Manager. Contract correspondence, invoice processing, and program oversight appear to have been concentrated within the City Manager's direct office. Which City officials were responsible for ensuring compliance with contract requirements and approving invoices for payment?
4. The contracts required subcontractor approval requests to be submitted prior to commencement of work. That was not followed and the city stated that it waived the requirement. How was the waiver done? Who approved the waiver? Also, the city's spokesperson responded to a question about payments to subcontractors. She stated that, "We would not maintain that information." In fact, the contract requires that reports of all payments to subcontractors be filed with the city by the 15th of each month?
5. The Iris Roley LLC contract (dated 11.6.25) and the Cincinnati Collaborative Foundation contract (dated 11.4.26) involve substantial overlap and apparent duplication. Why is the city contracting in this unusual way and how will the city ensure that invoices and payments do not also overlap and duplicate?

Follow up to recent media reports

From: Todd Zinser (toddzinser@yahoo.com)

To: citycouncil@cincinnati-oh.gov; clerkofcouncil@cincinnati-oh.gov

Cc: mayor.atab@cincinnati-oh.gov; citymanager@cincinnati-oh.gov

Date: Sunday, May 31, 2026 at 10:52 PM EDT

I have attached a brief list of questions concerning the city's handling of its contracting actions with Iris Roley, LLC and with the Cincinnati Collaborative Foundation. In the interest of government transparency and accountability, in my opinion, it would not be unreasonable to ask the administration to respond to these or any other questions raised by the public.

Thank you for your consideration. Please let me know if I can provide any further information or answer any questions.

Todd Zinser



Questions for the city administration.docx
42.6 kB