

May 1, 2024

Attorney General

CC: Mayor, City Attorney & Personnel Committee

1200 Market Street

St. Louis, MO 63103

Dear Attorney General:

This is a formal written request of action to be taken regarding the violations of the “Sunshine Law,” “City of St. Louis Employee Code of Conduct,” and “Ordinance 71607”. Specifically, Director Ingrassia completed the following actions:

- **Employee Code of Conduct:** Demanded a point of order 3x during a public commission meeting without being recognized by the chair which was not on the agenda and was not germane to the issue being addressed per Robert’s Rule of Order, the Rules of Order and Procedure or the scope of her responsibilities outlined in the Ordinance for this commission.
- **Sunshine Law Violation:** Falsely promoting and publicly distributing employee misconduct matters during the 4.15.24 commission meeting. She identified and demanded the communication of a conflict of interest related to the marriage of Director Gray and Reverand Gray.
- **Sunshine Law Violation:** Conducting commission business with commissioners outside of public meetings to gather concerns regarding possible, potential or opiated perspectives of a conflict of interest pertaining to ex-officio members.
- **Ordinance 71607:** Taking actions to deny the motion, 2nd and approval of voting members during public meetings related to political matters outside of the scope of her appointment to the commission.
- **Employee Code of Conduct:** Not being held accountable by the city for insisting on chasing a resident of the City of St. Louis by car resulting in the death of a 15 year old by way contributing to an overwhelming amount of citizens asking for a Department of Transportation and internal public counsel be added to the Charter.

The above actions and realities are a direct violation of the Missouri’s Sunshine Law per the following:

- In Section 610.021 of the Sunshine Law it states that except to the extent disclosure is otherwise required by law, a public governmental body is authorized to close meetings, records and votes, to the extent they relate to the following:
 - Legal actions, causes of action or litigation involving a public governmental body and any confidential or privileged communication between a public governmental body or its representatives and its attorneys.
 - Hiring, firing, disciplining, or promoting of particular employees by a public governmental body when personal information about the employee is discussed or recorded.
 - As used in this subdivision, the term “personal information” means information relating to the performance or merit of individual employees;

The above actions and realities are a direct violation of the City's Employee Code of Conduct per the following:

- These unique responsibilities require each of us to act with honor, faithfulness, loyalty, fairness and due diligence in conducting our job duties; and require us to report improper, unethical or unlawful behavior. City employees must, at all times, comply with all applicable laws and regulations. Failure to comply with all applicable laws and regulations or unethical behavior in connection with the performance of an employee's duties will not be condoned or permitted. The City does not permit any activity that fails to stand the closest possible public scrutiny.
- Implementing and abiding by this Code of Conduct
- Providing a workplace environment that encourages open communication, free of fear of reprisal, in the belief that respectful honesty is the surest way to identify problem areas, address them and resolve them.
- Ensuring that their own actions are not illegal, unethical, or in violation of the rules and regulations of the City of St. Louis
- Reporting alleged violations of this Code of Conduct to their supervisor, appointing authority, or the Department of Personnel
- Employees shall be held accountable for following all such established work rules, in addition to the standards of behavior outlined in this Code of Conduct.
- The City of St. Louis prohibits discrimination and/or harassment on the basis of race, color, national origin, ancestry, age (40 years and older), disability, religion, sex, sexual orientation, gender identity or expression, marital status and genetic information and prohibits retaliation for filing a complaint or cooperating or participating in an investigation of a complaint of discrimination or harassment.
- As a part of an employee's job, he/she may have access to confidential information and records. This information should not be disclosed to fellow employees who do not have a business need to know or to non-employees for any reason, except in accordance with established procedures. Questions regarding the confidentiality of information should be directed to an employee's supervisor, the custodian of records for his/her department/division or the City Counselor's Office.
- In order to avoid impropriety – or giving the appearance of impropriety – employees should alert their supervisors immediately of such conflicting situations. If the employee and the supervisor are unclear about the appropriate path to follow, the matter should be promptly referred to the City Counselor's Office.
- Ordinance 71607 Violations: Page 7 of 11: In addition to the Charter Commission, described in subsection 2, the Charter Commission shall include the following six non-voting ex-officio members who shall not count for the purposes of quorum, and who shall present information and expertise to the Charter Commission upon request; the Chairperson of the Board of Alderman designee charged with hearing bills and issues related to intergovernmental affairs.

During the November 2023 and April 15th 2024 Public Meetings, Christine Ingrassia gave unsolicited, unrequested, nongermane, outside of the scope of her designation per the ordinance and otherwise harmful communication to/about the efforts of the Charter Commission.

Such poor conduct and misrepresentation of the city's expectation to serve the public cannot continue to be tolerated. As specified in the St. Louis City's Employee Code of Conduct, the City of St. Louis has zero tolerance for unethical, inappropriate, improper, unlawful or unfair behavior that negatively impacts the public, appointed officials, or representatives of other agencies. Given the fact that Christine Ingrassia has grossly neglected to comply with the city's Code of Conduct, it is my request that the following occur:

- Removal from the Charter Commission as a designee
- Be provided a cease and desist from further communication with the Charter Commission
- Be fined up to \$5,000 for each Sunshine Law violation.
- Be suspended from employment with the City of St. Louis to include termination if she is found to have participated in the tragic death of a St. Louis City child via vehicle.

It is my wish that the City upholds its Charter, ordinances and code of conduct as it reflects the service of the citizens of the City of St. Louis. Please let me know if I can assist you in taking the necessary actions towards continuing the successful work of the Charter Commission while ensuring the safety of the public.

Sincerely,

Chair Dr. Jazzmine Nolan-Echols