



Ethical Practices Board

Annual Report 2025



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Section I: Introduction

Chapter 15 of the Minneapolis Code of Ordinances (“Code of Ethics”) was designed to promote high ethical standards and conduct throughout the City of Minneapolis government. The Code of Ethics achieves this through defining levels of conduct in which no local official or employee can fall below without being subject to disciplinary action.

The Ethical Practices Board (“Board”) was created in 2003 to assist the City of Minneapolis with accountability of the standards provided in the Code of Ethics. Sections 15.210 and 15.240 of the Code of Ethics outline the Board’s power and duties, which include providing advisory opinions and reviewing ethics complaints against elected officials, department heads, and non-employee appointed local officials.

In addition to the duties outlined above, section 15.210(f) of the Code of Ethics states:

The ethical practices board shall prepare and submit an annual report to the mayor and the city council detailing the ethics activities of the board and the city during the prior year. The format of the report must be designed to maximize public and private understanding of the board and city ethics activities. The report may recommend changes to the text or administration of this Code. The city clerk shall take reasonable steps to ensure wide dissemination and availability of the annual report of the ethical practices board and other ethics information reported by the board.

In response to this requirement, the Board respectfully submits this annual report detailing the ethics activities of the Board and the City of Minneapolis government for 2025 to Mayor Jacob Frey and the Minneapolis City Council.

Section II: Ethical Practices Board Overview

A. Board Members

The Ethical Practices Board is composed of three members appointed by an appointing committee comprised of the Chief Judge of Hennepin County District Court, the Dean of the University of Minnesota Law School, and the Dean of the University of St. Thomas School of Law.

Board members serve three-year terms and may not be a current local official or city employee, related person of a current local official or current city employee, a candidate for elected public office, a former elected local official or former city employee during the five-year period after leaving city office or employment, a person who, for compensation, represents the private interests of others before the Minneapolis City Council or Mayor, or a paid campaign worker or political consultant of a current local official.

At the Board’s first meeting of each calendar year, the Board members elect a Chair and Vice Chair. In 2025, the following individuals served on the Board:

- **Mark Wagner, Board Chair.** Mr. Wagner was appointed in January 2024 to serve a term expiring on January 2, 2027.
- **Daniel Le, Board Vice Chair.** Mr. Le was appointed in January 2024 to serve a term expiring on January 3, 2027.
- **Anthony Thompson, Board Member.** Mr. Thompson was appointed in January 2023 to serve a term expiring on January 2, 2026.

B. Board Staff

The Code of Ethics requires the Minneapolis City Attorney to designate an assistant city attorney as the City of Minneapolis’ Ethics Officer. One of the duties of the Ethics Officer under the Code is to serve as staff to the Ethical Practices Board. Dan Abelson, Deputy City Attorney – Civil Division, served as the designated Ethics Officer for 2025. However, transition of the Ethics Officer role to Cumah Blake, Assistant City Attorney, began in September 2025.

C. Board Mission

The mission of the Board is to promote high ethical standards in the City of Minneapolis government through providing services as set forth in the Code of Ethics that create accountability and foster compliance with the letter and the spirit of the Code.

D. Bylaws and Rules of Procedures

The Code of Ethics grants the Board the power to establish, amend and repeal rules and procedures governing its own internal organization and operations in a manner and form consistent with the Code. The Board’s “Bylaws and Rules of Procedure” govern its internal organization and operations and can be found on the Board’s website.

E. Board Meetings

Under its “Bylaws and Rules of Procedure,” the Board holds regular meetings at 3:00 on the third Tuesday of each odd-numbered month. In addition, the Board Chair may call a special meeting as needed. For 2025, the Board held the following meetings:

- Regular Meeting on January 21, 2025. [[Agenda](#)] [[Minutes](#)]
- Regular Meeting on March 25, 2025. [[Agenda](#)] [[Minutes](#)]
- Regular Meeting on May 20, 2025. [[Agenda](#)] [[Minutes](#)]
- Regular Meeting on July 15, 2025. [[Agenda](#)] [[Minutes](#)]
- Regular Meeting on September 16, 2025. [[Agenda](#)] [[Minutes](#)]
- Regular Meeting on November 18, 2025. [[Agenda](#)] [[Minutes](#)]

Section III: 2025 Ethics Activities

A. Ethics Education Training

1. Requirements of the Code of Ethics

The Code of Ethics requires new local officials and employees to attend an ethics education seminar within six months of beginning their term or employment, respectively. A local official must attend the seminar every four years thereafter while employees must attend every three years. The Code of Ethics states that the education seminars are to be designed and implemented by the Human Resources Department with the purpose of educating local officials and employees about their ethical duties and responsibilities. Department heads are responsible for ensuring that all their employees attend the required ethics education seminars.

2. Boards, Commissions, and Advisory Committees Ethics Education

The City of Minneapolis currently has 40 boards, commissions, and advisory committees (collectively “boards”) to which residents are appointed. Board members training is a web-based training module that permits the board members to participate in the training at their own convenience. The Office of City Clerk communicates the ethics education requirement to newly appointed members and members must complete the training to be seated.

The Ethics Officer created updated training for board members in 2025, and the City Clerk’s office will implement that training early in 2026 before the March board recruitment.

3. Employee Ethics Education

New employees, excluding elected officials, must complete ethics training in the City of Minneapolis’ COMET Leadership and Development Portal except for new employees with the Police Department and Fire Department who receive in-person training. Employees, excluding elected officials, then must complete refresher training in COMET every three years.

Elected officials may complete initial and refresher ethics training in the City of Minneapolis’ COMET Leadership and Development Portal or receive in-person training.

In 2025, the Ethics Officer, or designee, conducted 9 in-person training sessions for new employees with the Police Department.

As of December 31, 2025, COMET and in-person training records show 93.4% of employees, regular and seasonal, are compliant with the required Code of Ethics education. The percentage of employees in compliance decreased slightly from 94.4% in compliance in 2024 but slightly above the 92.6% compliant in 2023.

A ten-minute political activity electronic training module is active in COMET and employees who want to engage in political activity are encouraged to watch the video. COMET records indicate that 46 people completed the political activity training in 2025.

The following Table depicts the Ethics Code education status of the employees of each department according to COMET and in-person training records.

**Employee Ethics Education Status by Department
As of December 31, 2025**

Department	Number of Employees	Employees in Compliance	Employees Out of Compliance
Office of City Attorney	111	108	3
Office of City Auditor	9	9	0
Office of City Clerk*	101	97	4
Office of Community Safety	11	10	1
Office of Mayor	16	15	1
Office of Public Service	10	10	0
Estimate & Taxation	4	2	2
311 Service Center	37	37	0
911/Minneapolis Emergency Communication Center	63	62	1
Arts & Cultural Affairs Department	6	6	0
Assessing Department	34	34	0
City Council*	13	13	0
Civil Rights Department	46	44	2
Communications Department	12	10	2
Community Planning & Economic Development Department	225	225	0
Emergency Management Department	6	6	0
Finance and Property Services Department	266	240	26
Fire Department	398	352	46
Health Department	167	157	10
Human Resources Department	64	60	4
Information Technology Department	97	94	3
Intergovernmental Relations Department	6	6	0
Minneapolis Convention Center	162	137	25
Performance Management & Innovation Department	7	7	0
Police Department	873	823	50
Public Works Department	1012	933	79
Neighborhood & Community Relations Department	22	22	0
Neighborhood Safety Department	16	16	0
Racial Equity, Inclusion & Belonging Department	5	5	0
Regulatory Services Department	172	168	4
Totals	3971	3708	263

* The ethics education status for the Office of City Clerk includes City Council staff. The ethics education status for City Council consists of thirteen Council Members.

B. Ethics Inquiries

1. Requirements of the Code of Ethics

The Code of Ethics requires both the Board and the Ethics Officer to respond to local officials' and employees' questions about the Code and give opinions on the interpretation of the Code.

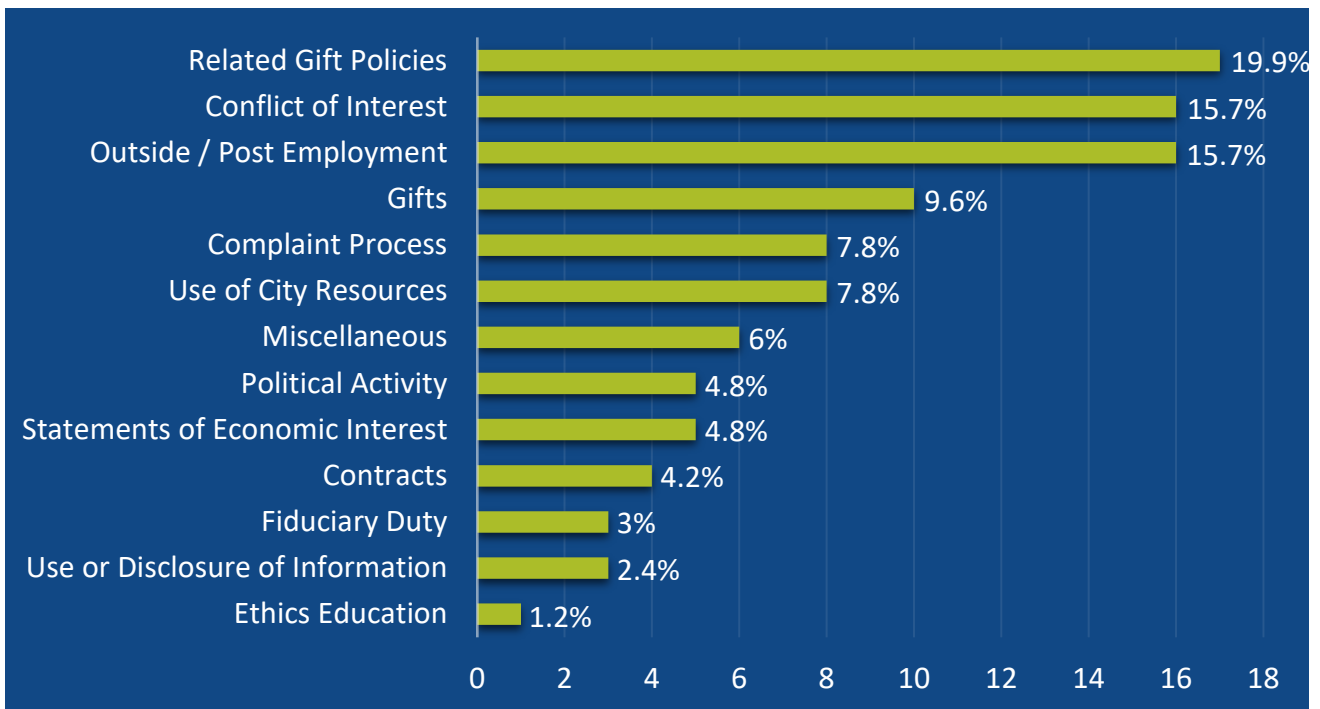
2. Board Inquiries

For 2025, the Board did not receive any questions about the Code of Ethics from local officials or employees or requests for advisory opinions.

3. Ethics Officer Inquiries

From January 1, 2025, through December 31, 2025, the Ethics Officer answered 166 telephone and email inquiries regarding ethics. Conflict of interest was the leading inquiry category of the year for the Code of Ethics inquiries, followed by outside employment. The number of inquiries is down from the 179 inquiries in 2024 and the 244 inquiries in 2023. The Board finds it encouraging that so many employees are mindful of the ethical issues and seek guidance when these issues arise in the workplace. The substantive topics of 2025 inquiries were as follows:

**Ethics Inquiries
As of December 31, 2025**



The Table below depicts the changes over the years in ethics inquiries:

Ethics Inquiries – Historical

Category, Code of Ethics Section	Percentage Inquiries 2022	Percentage Inquiries 2023	Percentage Inquiries 2024	Percentage Inquiries 2025
Aspirations, 15.10,15.20,15.130 & 15.180	0.0%	0.0%	0.0%	0.0%
Fiduciary Duty, 15.30	1.1%	0.0%	0.5%	3.0%
Conflict of Interest, 15.40	11.6%	6.2%	9.9%	15.7%
Lobbyists, 15.40(b)(4)	0.0%	0.4%	0.0%	0.0%
Gifts, 15.50	13.7%	19.4%	8.2%	9.6%
Outside Employment, 15.60	11.2%	10.7%	20.4%	15.1%
Post-employment, 15.90	2.5%	0.8%	1.1%	0.6%
Use of Official Position, 15.70	4.0%	3.3%	6.6%	0.0%
Statements of Economic Interest, 15.80	11.2%	8.3%	8.8%	4.8%
Use of City Resources, 15.100	10.1%	9.5%	10.4%	7.8%
Political Activity, 15.110	4.3%	4.6%	2.2%	4.8%
Loans, 15.120	0.0%	0.0%	0.0%	0.0%
Required Reporting, 15.140	0.4%	0.4%	0.0%	0.0%
Discrimination / Harassment, 15.150	0.0%	0.0%	0.5%	0.0%
Nepotism, 15.160	0.7%	0.4%	0.5%	0.0%
Use/disclosure of Information, 15.170	0.7%	0.4%	0.0%	2.4%
Bias/Favoritism, 15.190	0.4%	2.5%	0.5%	0.0%
Inappropriate Influence, 15.200	0.0%	0.8%	0.5%	0.0%
Ethical Practices Board, 15.210	1.1%	1.7%	0.5%	0.0%
Complaint Process, 15.230	13.7%	12.8%	9.3%	7.8%
Contracts, 15.250	0.4%	0.0%	0.5%	4.2%
Ethics Education, 15.260	6.1%	4.1%	4.9%	1.2%
Related Policies - Solicitation of Gifts to the City, Gifts between Employees & Charitable Organizations	4.3%	10.8%	4.4%	16.9%
Miscellaneous	2.5%	2.9%	5.5%	6.0%

C. Ethics Complaints

1. Requirements of the Code of Ethics

Local officials and employees are required to report any conduct by other local officials or employees that they believe violate the Code of Ethics.

For complaints against non-appointed and appointed employees, the department with jurisdiction of the complaint must notify the Ethics Officer of its report and resolution once the complaint is resolved.

For complaints against elected officials, department heads, and non-employee appointed local officials, the Board to reviews the allegations and reports the following once its review is complete:

- Sustained findings and any recommendations for discipline regarding an elected official to the Minneapolis Mayor, the assigned committee, and the Minneapolis City Council consistent with the Minnesota Government Data Practices Act and open meeting law.
- Sustained findings regarding a department head and non-employee appointed local officials to the appropriate appointing authority consistent with the Minnesota Government Data Practices Act and open meeting law.

2. Reporting Potential Ethics Violations

Maintaining a confidential reporting line for employees to make anonymous reports of their concerns is a well-established best practice. The City of Minneapolis' confidential reporting line, Employee Report Line, has been operational since 2008. Reports of potential ethics violations can also be made to the Ethics Officer using a fillable web form on the City of Minneapolis' website.

3. Employee Ethics Complaints

The City of Minneapolis uses Ethico, ethics and compliance software, to track all employee-related complaints, including those the Ethics Officer receives directly. Complaints received from the Employee Report Line and the fillable web form are available to the Ethics Officer, the Human Resources Investigative Unit, the City Auditor, and the Office of City Attorney's Labor and Employment Division.

Once received, the complaints are triaged and assigned for handling. For matters requiring an investigation, the Human Resources Investigative Unit, or an outside investigator if appropriate, will handle the investigation. For other concerns, the Human Resources Department's Business Solution Partner for the applicable department is usually assigned. These complaints are handled in the same manner as all other potential employee misconduct matters.

4. Local Official Ethics Complaints

For 2025, the Board reviewed 16 ethics complaints falling within its jurisdiction. The following is an overview of the Board's actions on these complaints:

- The Board determined that there was probable cause to believe that there had been a violation of the Code of Ethics on two ethics complaints. These two complaints are pending further review after providing the subject of the complaints with an opportunity to respond.
- The Board dismissed one complaint based on a no probably cause determination that there had been a material violation of the Code of Ethics.

- The Board dismissed seven ethics complaints based on the complaints failing to provide a sufficient basis to reasonably believe that the Code of Ethics may have been violated.

- The Board dismissed two ethics complaints based on the appointing authority having already taken action on the alleged facts of the complaint.

- The Board dismissed four ethics complaints based on the complaint’s factual allegations, even if confirmed as true after an investigation, would not lead to the conclusion that the Code of Ethics was violated.

Section IV: Proposed Code of Ethics Amendments

The Board does not propose any amendments to the Code of Ethics at the time of this report. However, a priority of the Board is to conduct a comprehensive review of the Code of Ethics with the assistance of the Ethics Officer as detailed in the work plans for 2026. The review will include identifying any potential gaps in the Code and any opportunities to strengthen the provisions within the Code. The Board will propose recommendations for any needed amendments to the Code of Ethics in its annual report for 2026.

Section V: Work Plan for 2026

The tasks and activities outlined below will facilitate the Board fulfilling its mission in 2026 and are predicated on the availability of City of Minneapolis staff to complete tasks that require staff assistance.

1. Bylaws and Rules of Procedure. The Board will conduct a comprehensive review of the Ethical Practices Board’s Bylaws and Rules of Procedure with the assistance of the Ethics Officer. The purpose of this task is to ensure the bylaws and rules governing the Board’s organization and operations are drafted in a manner that is consistent with the Code of Ethics and provide clear guidelines for issuing advisory opinions and reviewing complaints under its jurisdiction. The members of the Board and the Ethics Officer will propose any needed amendments to the bylaws and rules for consideration no later than March 17, 2026, the Board’s scheduled regular meeting.

2. Code of Ethics. The Board will conduct a comprehensive review of the Code of Ethics with the assistance of the Ethics Officer. The review will include identifying any potential gaps in the Code of Ethics and any opportunities to strengthen the provisions within the Code. The purpose of this task is to ensure the City of Minneapolis government maintains the highest standards. The Board will propose recommendations of any needed amendments to the Code of Ethics in its annual report to the mayor and city council for 2026 or earlier.

3. Ethics Complaints. The Board will review complaints against elected officials and appointed local officials (as defined in subsection (3) or (4) of the local official definition in the Code of Ethics,

Section 15.280) alleging violation of the Code of Ethics in accordance with the Code and the Board's Bylaws and Rules of Procedure. The Board will report sustained findings and any recommendations for discipline regarding an elected official to the mayor, the assigned committee, and city council, and report sustained findings regarding an appointed local official to the appropriate appointing authority.

4. Advisory Opinions. The Board will provide local officials and employees with advisory opinions on the interpretation of the Code of Ethics as requested in accordance with the Code and the Ethical Practices Board's Bylaws and Rules of Procedure.

5. Annual Report. The Board will conduct a review of past annual reports with the assistance of the Ethics Officer. The purpose of this task is to ensure the format of the annual report is designed to maximize public and private understanding of ethics activities within the City of Minneapolis government and maximize transparency while complying with the Minnesota Government Data Practices Act. The members of the Board and the Ethics Officer will propose any changes needed to the annual report format for consideration at the Board's regular meeting scheduled for September 15, 2026.

Promoting high ethical standards and conduct and fostering a healthy ethical culture in Minneapolis government.