

**BEFORE THE CITY OF ATLANTA  
ETHICS OFFICE**

In the matter of:

Tracy Harrison  
Respondent

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Case No. CO-23-003

**Final Decision**

**Summary**

Tracy Harrison, a City of Atlanta employee with the Department of Aviation, violated Sections 2-811, 2-812 and 2-813 of the City’s Code of Ethics/Standards of Conduct (Code of Ethics) by using city property and her city position to facilitate the hiring of her son, Juwan Coates, by City of Atlanta vendor, MTI Limousine and Shuttle Services, Inc., and failing to disclose her son’s employment with MTI to the City while overseeing and managing MTI’s city contract. Specifically, MTI’s city contract was monitored, appraised, and managed directly by Harrison while she was actively seeking employment with MTI for her son and after he was hired by MTI.

**Findings of Fact**

- 1) Tracy Harrison (Harrison) is the Airport Director of Transportation for the City’s Department of Aviation (DOA). In this role, Harrison manages the day-to-day operations of the Ground Transportation division at the Hartsfield-Jackson Atlanta International Airport (the “Airport”), serving as the primary liaison for ground transportation services and representative for public and city vendors. Harrison was hired by the City on July 24, 2001, as an Aviation Grounds and Parking Assistant Manager, and served as an Airport Assistant Manager and Airport Manager until November 5, 2015, when she was promoted to her current position.
- 2) City records show that Harrison completed mandatory city-wide ethics training on November 16, 2015, shortly after her promotion to Airport Director of Transportation.
- 3) City records also show that Harrison completed mandatory city-wide ethics training and signed the ethics pledge on March 1, 2022.
- 4) MTI Limousine and Shuttle Services, Inc. /dba/ Front Row Parking (MTI), is one of the City’s curbside management providers. On February 28, 2019, pursuant to Resolution 18-R-4064, MTI was awarded contract FC-101300 to manage *and staff* a ground transportation Curbside Management Program at the Airport’s domestic and international terminals. MTI’s contract included a three-year initial term from February 28, 2019, to February 27, 2022, with two, 2-year renewal options.

- 5) Harrison was assigned as the City's authorized representative for MTI's contract and responsible for completing MTI's contract performance reports.
- 6) During a conversation with Cameron Ijames (Ijames), Director of Operations for MTI, regarding MTI staffing matters, Harrison mentioned, that her son, Juwan Coates, was seeking employment opportunities. Harrison lists Coates as her child in the City's Oracle HR Management system and they share the same residential address.
- 7) On August 7, 2019, Ijames sent Harrison an MTI employment application and job description for a "Curbside Supervisor" with MTI to Harrison's City of Atlanta email account.
- 8) On August 28, 2019, Harrison forwarded the MTI employment application and job description to Coates from her City of Atlanta email account.
- 9) On September 16, 2019, MTI hired Coates as an employee and assigned him to the Atlanta Airport. Coates worked for MTI during the evaluation by Harrison of MTI's contract performance review and during the awarding of MTI's contract renewal.
- 10) On February 7, 2022, MTI was awarded a two-year contract renewal pursuant to the terms of FC-10300. Harrison managed the renewal process on behalf of the Department of Aviation. The contract is currently in the first two-year renewal period that began on February 28, 2022, and ends on February 27, 2024.
- 11) Harrison failed to disclose to the City that Coates was employed by MTI while she was actively managing and reviewing MTI's performance under contract FC-10300, which included participating in the negotiation and decision-making process regarding the exercise of MTI's first two-year renewal period. The Ethics Office's review of city records did not show that Harrison filed a Conflict-of-Interest Disclosure form with the Ethics Office or that Harrison informed her superiors at DOA of her son's employment with MTI.

### **Conclusions of Law**

- 12) Section 2-812 of the Code of Ethics states in relevant part that "no... employee, including but not limited to those identified in section 2-813 (b), shall participate directly or indirectly through decision making, approval, disapproval, recommendation, the preparation of any part of specifications or requests for proposal, influencing the content of any specification or contract standard when the official or employee knows or with reasonable investigation should know that there is a financial or personal interest possessed by: (1) The... employee; (2) One or more members of the immediate family of the... employee; (3) A business other than a public agency in which the official or employee, or a member of the official's or employee's immediate family, serves as an... employee..." See *Atlanta, Ga. Code § 2-812*.
- 13) Section 2-813 (a) states in relevant part that "every... employee listed in paragraph (b) of this section who knows or with reasonable investigation should know that the official or employee has a financial interest or personal interest, direct or indirect, in any

proposed legislation or in any decision pending before that... employee or the agency of which the... employee is a member or employee shall not vote for or against, discuss, decide, in any way participate in considering the matter or seek to influence the votes or decisions of others on such matter...(3) Further, the... employee must complete an online Disclosure of Conflicts of Interest form... maintained by the City of Atlanta Ethics Officer, immediately upon his or her recognition of said conflict.” See *Atlanta, Ga. Code § 2-813*.

- 14) Pursuant to Section 2-813 (b)(9), “the... employees covered by this section” include “bureau directors, assistant bureau directors and managers.” *Id.*
- 15) Section 2-801 defines a personal interest, in relevant part, as “any interest arising from relationships with immediate family..., whether or not any financial interest is involved.” See *Atlanta, Ga. Code § 2-801*.
- 16) Section 2-801 defines a financial interest, in relevant part, as “any interest which shall yield, directly or indirectly, a monetary or other material benefit... to the official's or employee's immediate family.” *Id.*
- 17) Immediate family includes “the... natural or adopted children of an... employee.” *Id.*
- 18) Coates’ employment with MTI created a personal and financial interest in MTI for Harrison pursuant to Section 2-801 of the Code of Ethics.
- 19) Harrison was aware that her son Coates was an active employee of MTI, yet improperly exercised her decision-making authority as the director of a city department. Harrison’s actions directly impacted MTI’s city contract when she recommended that DOA exercise the two-year contract renewal and four percent increase of MTI’s contracted amount, in violation of Section 2-812 of the Code of Ethics.
- 20) Harrison also did not disclose her personal or financial interest in MTI to the City. Harrison failed to submit a Conflict of Disclosure of Interest form to the Ethics Office or notify her superiors at DOA when Coates was hired by MTI. Nonetheless, she continued to exercise her oversight and decision-making authority over MTI’s contract, in violation of section 2-813 of the Code of Ethics.
- 21) Section 2-811 states in the relevant part that “no official or employee shall ...use... any publicly owned or publicly supported property... for the private advantage of such official or employee or any other person or private entity...” Publicly supported property includes the official city email addresses issued to city employees to be used for city business purposes only.
- 22) On two occasions, Harrison used her city email address to facilitate the hiring of her son Coates by MTI, in violation of Section 2-811 of the Code of Ethics.

- 23) Although the Code of Ethics does not explicitly regulate the “appearance of impropriety,” it is important for city... employees... to carefully evaluate whether the role, action, conduct, or activity in question creates the appearance of a conflict or impropriety or whether such activity may cause the public to question whether the... employee is acting in his or her own interests or in the best interest of the city. See *Board of Ethics Formal Advisory Opinion 2017-1 – Appearances of Impropriety*.
- 24) Harrison’s actions also raised ethical concerns because both Harrison and James admitted to engaging in conversations regarding Coates’ disciplinary and performance issues during work hours.


### **Sanctions and Recommendations**

- 25) In proposing sanctions in this matter, the Ethics Office considered aggravating and mitigating circumstances, including consideration of Harrison’s cooperation with the Office’s investigation of this matter. That said, Harrison’s actions in this case raised serious ethical concerns due to her city role and influence over the city vendor. Harrison knowingly facilitated and directly participated in the employment of her son, Coates, with MTI, a city vendor, whose contracts are overseen and managed by Harrison. Coates’ subsequent employment with MTI created an ongoing conflict of interest for Harrison which required immediate disclosure to the City.
- 26) The Ethics Office recommends an administrative sanction of \$750 for violating Sections 2-812 of the Code of Ethics, \$750 for violating Section 2-813, and \$500 for violating Section 2-811. The Office also requests that the Department of Human Resources include a copy of this Decision in Harrison’s personnel file.
- 27) The Ethics Office thereby orders Harrison to pay a total administrative sanction of **\$2000** for the violations of Sections 2-812, 2-813, and 2-811 of the Code of Ethics.
- 28) Further, in order to resolve Harrison’s ongoing conflict of interest involving MTI as outlined above, the Ethics Office recommends that either 1) Harrison’s son, Coates, immediately resigns from their employment with MTI, or 2) Harrison is removed from a decision-making/oversight role over MTI’s city contract for the duration of Coates employment with MTI.
- 29) Failure to comply with this Decision may result in additional sanctions or referral of this matter to the City Solicitor’s Office for prosecution.

Respondent has the right to appeal this Decision to the Governing Board of the Office of the Inspector General and the Ethics Office within 14 days of the date of receipt of this Decision. See Atlanta, Ga., Charter §8-103(a).

So ordered this 31st day of October 2023.

For the City of Atlanta Ethics Office

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a series of loops and a long horizontal stroke extending to the right.

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Carlos R. Santiago  
Deputy Ethics Officer

Case Number: CO-\_\_\_\_-\_\_\_\_\_



**CITY OF ATLANTA ETHICS OFFICE  
APPEAL OF FINAL DECISION**

**Notice of Appeal to the Governing Board of the Office of the  
Inspector General and the Ethics Office**

I appeal the Ethics Officer's final administrative decision imposing penalties on me for violating the City's Standards of Conduct (Code of Ethics). I understand that I must file this appeal within **14 days** of the date of that decision.

Name: Tracy Harrison

Department or Board: Aviation

Home mailing address: 5080 Bouldercrest Road, Ellenwood, GA 30294

Telephone: (404) 382-2405

E-mail address: tracy.harrison@atl.com

I disagree with the following findings of fact and conclusions of law in the final administrative decision:  
I respectfully disagree with the financial sanction levied against me.

The Governing Board of the Office of the Inspector General and the Ethics Office should reverse the final administrative decision of the Ethics Officer for these reasons:

1) There was no malicious attempt to defraud the City of Atlanta in my role; 2) Mr. Juwan Coates is no longer an employee of MTI, as he was terminated from his employment as of August 28, 2023; 3) Mr. Coates position as an hourly curbside agent had no influence or impact on my decision making concerning this contract at any time.

Relief that I seek: Reduction and/or elimination of sanction fees (payment plan of sanction fee reduction consideration)

Date of the final administrative decision: October 31, 2023

I request a hearing before the Governing Board.  Yes  No

**I declare under penalty of perjury that I am filing this notice of appeal within 14 days of the administrative decision and to the best of my knowledge this appeal is based on true and accurate facts.**

DocuSigned by:  
Tracy Harrison  
FFB50E80C46145E...

11/14/2023

Signature

Date

Filing Instructions: Appeals of Final Decisions issued by the Ethics Officer to the Governing Board of the Office of the Inspector General and the Ethics Office must be in writing and filed within 14 days of the Decision date by (1) mailing this completed form to City of Atlanta Ethics Office, 68 Mitchell St., SW, Suite 1100, Atlanta, GA 30303; or (2) send as an email attachment to [ethicsofficer@atlantaga.gov](mailto:ethicsofficer@atlantaga.gov).

**CITY OF ATLANTA  
GOVERNING BOARD OF THE OFFICE OF INSPECTOR GENERAL  
AND THE ETHICS OFFICE**

In the matter of:	)	
	)	
Tracy Harrison,	)	Ethics Office Case No. CO-23-003
	)	
Appellant	)	

**ORDER AFFIRMING THE FINAL DECISION OF THE CITY OF ATLANTA ETHICS  
OFFICE**

The above styled matter came before the Governing Board of the Office of the Inspector General and the Ethics Office (Governing Board) on Appellant Tracy Harrison’s appeal of the October 23, 2023 *Final Decision* of the City of Atlanta’s Ethics Office (Ethics Office). The Governing Board held a hearing on February 15, 2024 where Appellant Harrison appeared self-represented. Deputy Ethics Officer Carlos Santiago (Ethics Officer) appeared for the Ethics Office. The Governing Board considered arguments and facts presented by the Ethics Officer and Appellant Harrison as well as the record and applicable law, and issued its *Findings of Facts and Order* affirming the *Final Decision* of the Ethics Office on March 1, 2024. The Governing Board amends its prior decision and finds the following:

After completing an investigation, on October 31, 2023, the Ethics Office found Appellant Harrison in violation of Sections 2-812, 2-813, and 2-811 of the City’s Code of Ethics. *Final Decision* 25-26. The Ethics Office ordered Appellant Harrison to pay a total administrative sanction of \$2,000: \$750 for violating Section 2-812; \$750 for violating Section 2-813, and \$500 for violating Section 2-811. In her timely filed Notice of Appeal, Appellant Harrison explicitly noted that she did not request a hearing before the Governing Board and sought “reduction and/or elimination of sanction fees (payment plan of sanction fee reduction consideration).”

Appellant Harrison emphasized that at the time of the violations, nothing prompted her concern and that she did not fully understand the potential impropriety or gravity of her actions. Of note to the Governing Board were the disciplinary/performance communications regarding Appellant Harrison’s son between Appellant Harrison and the vendor whose contract she oversaw. Whether explicitly articulated or implied, and regardless of Appellant Harrison’s intentions, the vendor sensed pressure or influence to retain Appellant Harrison’s son for employment.

The Governing Board’s authority over appeals is found in Section 8-103 of the Code of Ordinances and states:

[The Governing Board shall] Hear all appeals that may be filed from any adverse decision issued by the Office of Inspector General or the Ethics Office.. Any decisions of the Governing Board of the Office of Inspector General and the Ethics Office on an

appeal...shall be either to affirm or overturn the decision of the Office of Inspector General or the Ethics Office...The Board shall use the “preponderance of evidence standard” as the standard of proof for all decisions.

Considering Appellant Harrison did not materially refute any of the factual findings of the Ethics Office’s *Final Decision*, the Governing Board adopts in full the Findings of Fact as set forth in the Ethics Office’s *Final Decision* and incorporates those Findings of Fact into this Order as if set forth fully herein. *Final Decision* 1-11.

As none of the Findings of Fact of the Ethics Office were materially refuted by the Appellant, the Governing Board adopts in full the Conclusions of Law as set forth in the Ethics Office’s *Final Decision* and incorporates those Conclusions of Law into this Order as if set forth fully herein. *Final Decision* 12-24.

At the hearing, Appellant Harrison reiterated that the focus of her appeal was the financial sanction, that said sanction would present a financial hardship and expressed her inability to pay the sanction, requesting that the Governing Board modify or reduce the sanction. There exists no authority either in the Code or the Governing Board’s Bylaws for the reduction or modification of the financial sanction. The Governing Board suggests Appellant Harrison contact the Ethics Office regarding a potential payment plan<sup>1</sup>.

In consideration of the above, the Governing Board hereby **AFFIRMS** the *Final Decision* of the Ethics Office.

IT IS SO ORDERED this 14th day of March, 2024.

  
Nichola Hines, Chair  
Governing Board of the Office of  
Inspector General and Ethics Office

Signed with express permission:  
Todd Gray, Vice Chair  
Rebecca Burbaker  
Lisa Lang  
Natalie Lewis  
Terri Simmons  
Richard Taylor  
Cecily Welch

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<sup>1</sup> The Ethics Officer indicated on the record that their office was feasible to installment plan/payment plan arrangements for financial sanctions.



**BEFORE THE CITY OF ATLANTA  
ETHICS OFFICE**

In the Matter of: )  
 )  
 Tracy Harrison ) Case No. CO-23-003  
 )  
 Respondent )  
 )

**PAYMENT AGREEMENT**

This fine payment agreement is between Carlos R. Santiago, Deputy Ethics Officer on behalf of the City of Atlanta, Ethics Office, and Tracy Harrison (Respondent), a city employee charged on October 31, 2023, with violating Sections 2-811, 2-812, and 2-813 of the City’s Code of Ethics/Standards of Conduct (Code of Ethics).

The parties agree and consent to the following in order to resolve this matter:

**FINDINGS OF FACT**

1. Respondent is a current City of Atlanta employee with the Department of Aviation who is subject to the City’s Code of Ethics/Standards of Conduct (Code of Conduct) found in section 2-801 to 2-825 of the City’s Code of Ordinances<sup>1</sup>.
2. On October 31, 2023, the Ethics Office issued a Final Administrative Decision finding that the Respondent violated Sections 2-811, 2-812 and 2-813 of the Code of Ethics and ordered the Respondent to pay a total administrative sanction of \$2000.<sup>2</sup>
3. On November 14, 2023, the Respondent appealed the Ethics Office’s Decision to the Governing Board of the Office of the Inspector General and the Ethics Office (the “Board”) and an appeal hearing in this matter was held before the Board and attended by the Respondent on February 15, 2024.
4. On March 14, 2024, the Board issued an order affirming the Ethics Office’s Decision and suggested that the Respondent contact the Ethics Office regarding a potential payment plan to resolve the fine in this matter<sup>3</sup>.

**AGREEMENT**

5. Respondent acknowledges they violated the City’s ethical standards as outlined in the Final Decision of the Ethics Office.

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<sup>1</sup> See Atlanta, Georgia, Code of Ordinances, Chapter 2 – Administration, Article VII – Officers and Employees, Division 2. Code of Ethics/Standards of Conduct (January 5, 2024) et seq.

<sup>2</sup> See Final Decision in CO-23-003 in the Matter of Tracy Harrison (October 31, 2023).

<sup>3</sup> See Order of the Governing Board of the Office of the Inspector General and the Ethics Office affirming the final decision of the Ethics Office in CO-23-003 in the Matter of Tracy Harrison (March 14, 2024).

6. Respondent agrees to pay the City of Atlanta a civil penalty of **\$2,000**. Respondent may pay the fine in full at any time to resolve this matter or must pay a minimum of **\$250 per month over (8) months beginning on April 1, 2023**. The assessed fine must be paid in full by November 30, 2024.
7. Respondent agrees to abide by the City's ethical standards, including compliance with city laws regarding the use of city property, disclosure of outside personal and financial interests, and incompatible interests.
8. Respondent acknowledges that this agreement is not binding on any other law enforcement or governmental agency and does not preclude the Ethics Office from referring this matter to, cooperating with, or assisting any other law enforcement or government agency on this or any other related matter.
9. **The failure of Respondent to comply with this agreement may result in additional sanctions by the Ethics Office or referral to the City Solicitor for prosecution for violation of its terms.**

DocuSigned by:

*Tracy - Harrison*

3/28/2024

Tracy Harrison  
Respondent

Date

DocuSigned by:

*Carlos Santiago*

3/28/2024

Carlos R. Santiago  
Deputy Ethics Officer

Date