Grand Jury Recommendation and Staff Initial Responses

1. Ronald Ramsingh – Although no longer employed with the City, it should be noted that we unanimously concluded that Ronald Ramsingh should have been immediately terminated for cause. Ronald Ramsingh should also be barred from future government employment, whether with the City of Key West or Monroe County.

   Ronald Ramsingh's employment contract was terminated on April 24th, 2025, by the City Commission via Resolution 25-085.

2. James Young – Although no longer employed with the City, it should be noted that we unanimously concluded that James Young should have been immediately terminated for cause. James Young should be barred from future government employment whether with the City of Key West or Monroe County.

   James Young retired from the City of Key West effective April 4th, 2025.

3. James Young – Complete an audit of all work done on his property at 902 Thomas Street by Strykker-Avery/Rajinhdar Ramsingh shall be thoroughly inspected at his cost under, and after-the-fact permit.

   On June 4, 2025, the City Commission passed resolution 25-145 directing the City Manager to procure independent planning and engineering firm to review all permits issued for the years 2020 through 2025. Staff is obtaining estimates prior to initiating the audit. However, the building department is reviewing permits for several properties in advance of the audit.

4. Rajinhdar Ramsingh - Although no longer employed with the City, it should be noted that we unanimously concluded that Rajinhdar Ramsingh should have been immediately terminated for cause. Rajinhdar Ramsingh should be barred from future government employment, whether with the City of Key West or Monroe County.

   Rajinhdar Ramsingh is still a current employee but has been suspended without pay. Staff is preparing a pre-determination hearing for the City Manager.

5. Rajinhdar Ramsingh – Immediately complete an audit of all work done on his property at 2827 Harris Avenue, which is currently up for sale. Notification shall be made to the real estate company listing his house that an audit of all work as well as a comprehensive inspection of all prior permits will be immediately conducted under an after-the-fact permit at his expense. Additionally, the Monroe County Property Appraiser's Office should be contacted to ensure that all prior permits and accurate data have been received, which is used to calculate valuation and ad valorem tax purposes.

   On June 12, 2025, All Aspects completed an evaluation of corrective steps to obtain final inspection approvals and issuance of a legitimate certificate of occupancy at 2827 Harris Avenue. The City Manager has authorized the building department to reach out to the homeowner to provide the letter with corrective actions.

6. Rajinhdar Ramsingh – Immediately complete an audit in the TRAKiT system to identify all properties either Strykker-Avery and/or Rajinhdar Ramsingh is listed as either the applicant, contractor or otherwise associated with a permit, other than as CBO. For all properties that Strykker-Avery or Rajinhdar Ramsingh performed the work and there are no inspections or CO, notification shall be made to the property owner.

   On June 4, 2025, the City Commission passed resolution 25-145 directing the City Manager to procure independent planning and engineering firm to review all permits issued for the years 2020 through 2025. Staff is obtaining estimates prior to initiating the audit.

7. Lissette Carey – While not charged with any criminal violations by this Grand Jury, the testimony and evidence of her actions and inactions raised many concerns in her decision-making and, more importantly, her ability to serve the city in the capacity as a commissioner. Whether it is a lack of understanding the role, duties and responsibilities the position of a City Commissioner entails, she has not demonstrated the wherewithal and convictions needed to serve in this capacity. Although having had a positive impact while in her prior role with the Housing Authority, the Grand Jury concludes and recommends that, in the interest of integrity and betterment of the city, Lissette Carey resign from her position as City Commissioner.

   Article III – Legislative of the City's Charter outlines the powers, qualifications, roles, and responsibilities of the City's elected officials. There are no provisions in the City Charter giving the City Manager the authority over the removal of an elected official.

8. Todd Stoughton – Todd Stoughton was the individual charged with working with the Building and Planning Departments to resolve the ongoing conflicts. Testimony and evidence received by the Grand Jury revealed that Todd Stoughton's close relationship with Ronald Ramsingh, Rajinhdar Ramsingh and Jim Young, the three indicted defendants, skewed his ability to think and act objectively, instead prioritizing the relationships over implementing real change. Whether by choice or unduly influenced by the professional and personal relationship with the three indicted defendants, Todd Stoughton's inability to do his job impartially when it came to addressing issues with CBO Ramsingh was a contributing factor to the ongoing toxic environment created with the permitting process. Despite the removal of the three indicted defendants, his prior conduct raises serious concerns about his ability to execute his current responsibilities and serve in a management/supervisory role to the betterment of those under him and the much-needed advancement of the city and its residents. The Grand Jury concludes and recommends that Todd Stoughton resign from his current position as Assistant City Manager.

   As a result of the Corradino Report, and the recent release of the Grand Jury Report the Building Department, Planning Department, Code Enforcement Department, and Housing Departments have all been moved in the City's Organization Chart under Growth Management which falls under the purview of ACM Delostrinos. HR is being moved to report Directly to the City Manager. This leaves mostly technical departments, except for Community Services, falling under ACM Stoughton. Alternative actions include reprogramming of the Assistant City Manager position held by ACM Stoughton into a non-supervisory role.

ORGANIZATIONAL, STRUCTURAL & PROCEDURAL

9. Establish a robust Whistleblower Protection policy and procedure to encourage city employees, residents and vendors to come forward without fear of losing their employment or face intimidation, threats or retaliation.

   Legal will work with HR to develop a whistleblower protection policy and procedure. The City can implement a Whistleblower Protection Policy by developing a clear, legally compliant policy that encourages employees, residents, and vendors to report misconduct without fear of retaliation. This involves establishing multiple confidential reporting channels, defining procedures for investigating complaints, and including strong anti-retaliation safeguards. The policy should be supported by citywide training, legal review, and ongoing oversight. Implementing such a policy will promote

transparency, protect whistleblowers, and enhance public trust in City operations. An ordinance has been suggested by Commissioner Kaufman. HR and legal will work together to determine the best route, ordinance or policy, and present reasoning and how it will be implemented.

10. Implement strict anti-corruption policies and require the Human Resources Department to keep all formal performance evaluations in employees' files.

    City of Key West Human Resources has drafted a major update to the City Policies and Procedures Manual, currently in DRAFT. The updated manual will cover Standards of Conduct, corrective actions, and internal investigations. City of Key West evaluations are submitted on an HRF-7 Evaluation for merit increases upon approval, they are filed in Oracle HCM and personnel files for payroll audit.

11. Adopt an ordinance that requires each city employee to undertake ethics training that includes a review of the Conflict-of-Interest Code of Ethics Ordinance and Florida's Public Records Law. A minimum of eight (8) hours yearly for all city employees and a minimum of sixteen (16) for all Elected, Chartered Officials and Department heads.

    The City of Key West Human Resources Department implemented Oracle HCM in December 2024 with an online training option. Monroe County provided Harassment Training, Workplace Bullying, Workplace Discrimination, and Ethics in a regulated environment training that are in a test phase for Management. HR will assign this journey to all active employees. Hours recommended exceed all requirements and practices of other municipalities; City will research for recommendation.

12. Codify procedures allowing for the immediate temporary suspension with pay of charter employees arrested for a criminal offense, and in the case of the filing of formal criminal charges, allow for the suspension to be without pay.

    This would require a charter amendment, which can be accomplished through referendum. However, the quickest way to implement this provision would be to include it in the Contracts of the Charter Employees. Additionally, any suspension of charter employees would need to be done with pay, until the special meeting is held by the commission. The City would not be able to suspend without pay without a formal hearing as this would be a due process violation and could subject the city to retroactive pay and other potential exposure.

13. Restructure the City of Key West organizational chart with respect to the Human Resources Department and make an independent or a charter position. Based upon the information received by the Grand Jury, there have been breakdowns/nonactions and, in some cases, retaliation when employees with concerns or issues with their supervisor or department head report issues following the Chain of Command, due in part to the current organizational structure of human resources reporting to the assistant city manager. Any employee should be able to take any issue with any other employee, regardless of their position, and feel safe, and that it will be handled by someone outside of any chain of command.

    Staff is updating the organization chart to reflect the HR Director as a direct report to the City Manager. Human Resources has experienced challenges with the organizational structure and influence from reporting chain bias regarding complaints. We recommend the following; A direct and secure communication line between employees and HR (such as an anonymous hotline or digital reporting system); Regular training sessions for all staff on reporting processes, ensuring employees feel comfortable voicing concerns; A streamlined complaint escalation procedure, preventing unnecessary delays by setting expectations for response timelines at each level; Defined roles for leadership, clarifying how HR collaborates with the City Manager, Mayor, and Commissioners in addressing issues while maintaining confidentiality.

14. For the next fiscal year, the City of Key West should budget for an Internal Auditor who is a licensed CPA. The duties would be to conduct efficiency and performance audits of the city government and its officials with written reports submitted to the City Manager, Mayor and City Commission. The Internal Auditor would report directly to the City Manager and have free and unrestricted access to government employees, officials, records and reports where appropriate and to require all branches, departments and officials of city government to produce documents, files and other records. This will assist the city in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the organization's risk management, controls and governance processes.

    The Government Finance Officers Association (GFOA) defines an "internal auditor" as an audit professional who works directly for management, and whose primary responsibility is helping management to fulfill its oversight and internal control duties as effectively and as efficiently as possible. GFOA recommends that the internal audit function be established by charter, code or an enabling resolution which should include

the qualifications, the scope of work, the power of, who the internal auditor reports to, submission of an annual audit plan and annual report, and what auditing standards to follow. The internal auditor should follow the professional standards contained in the U.S. General Accounting Office's publication Government Auditing Standards and should possess a college degree and appropriate relevant experience. It also is highly desirable that the head of the internal audit function hold some appropriate form of professional certification (e.g., certified internal auditor, certified public accountant).
An Internal Auditor component has been discussed in the past between Finance and HR; however, implementation was put on hold due to funding constraints. While the initial thought was to have a contract with an outside auditing vendor and use the service on an as needed basis, with the support of the Commission, Finance and HR can move forward with the implementation of an Internal Auditor position.
City staff is currently drafting an Ordinance to establish an internal audit component as well as a job description for the same. We will add the position to the requested personnel additions for FY2025-2026.

LEGISLATIVE, EXECUTIVE & ADMINISTRATIVE

15. City Commissioners – Through the evidence and testimony received by the Grand Jury, we learned that several Commissioners failed or chose not to read or follow up on reports that were commissioned/sanctioned regarding the city and were paid for with city funds. There needs to be a system in place to assure that each Commissioner fulfills their duty to the citizens of Key West to read and sign off that they have reviewed any reports commissioned/sanctioned regarding the city, whether or not city funds were expended on a particular report or review. In situations where the Commissioners will be called to act upon or vote on a matter, require that a certification of document review be executed by each Commissioner before the meeting/vote.

    The recommendation emphasizes the critical responsibility of City Commissioners to be fully informed on matters affecting city governance, particularly those supported by reports commissioned or sanctioned by the City. While Commissioners are independently elected officials and cannot be compelled to take specific legislative actions, it is both reasonable and appropriate to establish a formal process that encourages accountability and transparency. To that end, the City can adopt a policy or procedural rule requiring that Commissioners acknowledge receipt and review of substantive reports—especially those that inform future Commission decisions. A standardized certification or acknowledgment form could be incorporated into the agenda process for items requiring Commission action. This approach preserves each

Commissioner's discretion while reinforcing the public's expectation that elected officials are fully engaged and informed prior to casting votes or making policy decisions. This would need to be researched more on implementation.

16. City Attorney – The City Attorney should only be involved when there is a legal question involved. This individual should not have unlimited influence on other city employees in the execution of their duties. The City Attorney is instrumental in guiding the City Commission and Administration in the development and implementation of policies and procedures. The Grand Jury learned that the City Attorney was requiring attendance at all meetings the City Manager would conduct, be it with Commissioners, Department Heads, or employees. This led to the City Attorney being able to exercise their influence and impose their will on the individuals, preventing an open and free discussion. We would like to emphasize that the City Attorney need not attend every meeting among Commissioners, City Managers, Department Heads, and employees unless legal counsel is required and/or an agreement with all the parties for the City Attorney's presence.

    The City Attorney's office recognizes and respects the importance of maintaining appropriate boundaries between legal counsel and administrative operations. The role of the City Attorney is to provide legal advice and ensure that City actions remain within the boundaries of applicable law, particularly in areas involving contracts, employment matters, land use, procurement, and ethics. It is not the City Attorney's role to manage staff or influence operational decisions outside the legal context. The presence of the City Attorney in meetings is not intended to impose control, but to ensure compliance, consistency, and legal protection for both the City and its personnel.
    In response to the concerns raised, the City Attorney's office with the support of Management is committed to clarifying internal protocols to ensure that the City Attorney attends meetings by request or agreement, or where legal counsel is necessary, not as a matter of routine. The City Attorney's Office supports open communication and collaborative decision-making and affirms its commitment to transparency, respect for professional boundaries, and service in a purely advisory capacity unless otherwise required.

17. City Attorney – Procurement of Legal Services. We strongly recommend that Sec 2-797(4) a be revised and change the amount the City Attorney can expend without notification to the City Manager and the Commissioners from $50,000 to $2,500:

Sec. 2-797 – Exemptions

(4) Exempt contractual services and commodities. Exempt contractual services and commodities not subject to the competitive procurement requirement are as follows:

a. Legal services including paralegal, expert witnesses, appraisal services and court reporters. Prior to engaging legal services estimated to have a cost in excess of $50,000.00, the City Attorney shall notify the City Manager and the City Commission.

The monetary amount associated with legal exemptions should not be changed, as it reflects the necessary flexibility required to ensure timely and effective legal representation, particularly in matters that involve litigation, labor, land use, or other areas where responsiveness is critical. Legal services often require prompt engagement of outside counsel to protect the City's interests, and altering the monetary threshold could impede that ability.

To enhance oversight, the City is currently pursuing an ordinance amendment that will require all outside counsel contracts to be in writing, clearly stating the defined scope of services and requiring delivery to City management for recordkeeping and administrative awareness. This measure will ensure consistency, accountability, and improved internal controls.

In addition, the City Attorney's Office is prepared to implement a monthly reporting procedure as part of the City Attorney's report on the City commission meeting agenda, which will include a list of contracts and related expenditures incurred during the prior month. This regular reporting will provide the Commission and the public with greater visibility into legal spending and serve as a tool for ongoing transparency and fiscal stewardship.

18. Chief Building Officer – The discovery that the CBO was operating a construction company (Strykker-Avery Homes, LLC) within the City and possibly performing inspections within the City's jurisdiction, while the acting CBO, is totally abhorrent. The CBO's employment contract and job description should include the following stipulations as a condition of employment:

    The building official shall not perform, operate, or lend his/her license to any Private Provider inspection services within the City's jurisdiction.

    A. The building official shall not perform any construction contracting operations or have any association, monetary or otherwise with any construction contracting within the City's jurisdiction.
    B. The building official shall update all licensure information to list the City of Key West so that all notifications regarding licensure are sent to the City of Key West.

C. The building official shall keep current and all licensures necessary to serve as the building official and shall be subject to discipline, including suspension without pay, in the event a license becomes delinquent/inactive/disabled/suspended.

Plans reviewers and inspectors are required to 'request' outside employment approval which will be reviewed by legal and opined on by The State of Florida Commission on Ethics if required. Human Resources is working with Growth Management and the new organizational structure to include conflict of interest requirements/acknowledgements in the job description. HR will work to create administrative monitoring at the department level to monitor all licenses of employees under the DBPR as it pertains to expiration date, continuing education requirements and notifications to the City for failure to maintain a certification.

19. Chief Building Officer – We strongly recommend that Sec. 90-301 – Enforcement Authority be revised to be consistent with Fl. Stat. 468.604:

Sec. 90-301. - Enforcement authority.
(a)The Chief Building Official, under the supervision of the city manager, shall administer and enforce the Florida Building Code as adopted and required by Florida Statute. The Building Official may be provided with the assistance of such other city officers and employees as the city manager may direct but in no case shall assign an unlicensed staff member to perform duties that require licensure. The Building Official shall administer the building permitting process such that all City Departments responsible for specific application reviews and/or inspections may collaborate efficiently. This shall include such departments responsible for reviewing application criteria for Fire Prevention and Life Safety, Floodplain Management, BPAS, Zoning, Land Development Regulations, Historic District Development, Utilities, Parking, Urban Forestry, Roadways and traffic. land development regulations.

Staff agrees and will update the ordinance.

20. The City Planner – We strongly recommend that Sec. 90-301 – Enforcement Authority be revised as follows:

Sec. 90-301. - Enforcement authority.
(b) The City Planner, under the supervision of the City Manager, shall have the administrative responsibility to interpret the land development regulations. Such

interpretations shall be in writing and accompanied by review and written consent by the city attorney.

The intent of the interpretation being signed by the City Attorney is that City Planner interpretations are often appealed, and it is in the best interest of the City to have the City Planner and City Attorney in lock step. This language should not be viewed as the City Attorney having the power to City Planner interpretation, but more as two-person integrity into complex decision making. The requirement for the City Attorney's review and written consent in all interpretations of the land development regulations serves as a critical legal safeguard for the City. Land development regulations directly affect private property rights, land use entitlements, and the City's regulatory authority. Any misinterpretation or inconsistency could lead to significant legal challenges, claims of unequal treatment, or exposure to liability. The City Attorney's involvement ensures that each interpretation is not only consistent with the language and intent of the code, but also legally defensible under state law, case precedent, and constitutional protections. Additionally, the attorney's review helps maintain consistency in how the code is applied across various properties and projects, reducing the risk of arbitrary or conflicting decisions. This collaborative process between planning and legal ensures that the City's regulatory actions are both professionally sound and legally secure. Staff recommends no changes to Sec. 90-301.

21. The City Code Official - We strongly recommend that Sec. 90-301 – Enforcement Authority be revised and the following subsection be added:

    Sec. 90-301. - Enforcement authority.
    (c) The City Code Official, under the supervision of the City Manager, shall enforce the City Ordinances, which include the Florida Building Code by reference and the land development regulations with the collaborative assistance of the Planning and Building staff.
    Staff agrees and will update the ordinance.

22. Establish a Citizen Advisory Committee to provide recommendations on specifically identified building permit-related matters and city proposals. This advisory board would provide input and recommendations on proposed projects, ensuring community participation and transparency in the decision-making process. The Committee would review project details, listen to public feedback, and offer suggestions in the form of a report to city officials based on what is gathered through public comment or meetings

held. The ultimate decision-making still falls within the authority of the commission, however, this would allow for more citizen input than the 3-minute comment period at a commission hearing, after only 2-3 days to review the agenda item along with the data and analysis. This will provide a structural way for residents to engage in the decision-making process as well as help prevent conflicts and delays in project implementation.

Staff recommends further discussion with the City Commission.

BUIDING PERMIT PROCESSES

23. TRAKiT is the current system the City uses for permitting, code and project development. We learned that there is a way the program can be set up so that a permit application can automatically be sent to all the different departments for review and approval, taking the human factor out of the process. Additionally, a Building Permit Check List by Job or Trade could be put together, as was previously done by former Historic Preservation Manager Enid Torregrosa-Silva, to provide guidance for the appropriate departments that need to review permits received.

    The City is in the process of converting software from eTRAKiT through CENTRALSQUARE to GovBuilt through MCCi and frontloading the system with increased automation and less manual process. The Licensing division has already implemented the software with Building, Planning, Code Enforcement, HARC, and Urban Forestry currently training and reviewing the new software for implementation late this summer.

24. In order to prevent circumvention of any necessary reviews or variance requirements, it is recommended that when a variance is denied, there be some type of 'red flag' entered in the system under the property's address. In the event another permit is applied for, the previous application and the denial can be reviewed to ensure the new application is processed appropriately.

    Staff agrees with the recommendation. This will be achieved through the new GovBuilt through MCCi software and will be frontloaded by Planning and Building for Development Approval notification to include variances.

25. Complete an audit for all expired permits. The CBO is to create a matrix with the categories of permits that may qualify for 'Administrative Closure" with no final inspection. Permits that should not qualify for closure without a final inspection should be for minor work and not involve any life-safety impacts, i.e. nothing structural,

electrical, fuel, gas, egress, change of use, or commercial.

Staff agrees with recommendation. This action can take place as soon as a permanent Chief Building Official and Building Department Manager/Deputy are hired. Tasking our contracted Building Services on this task would not be cost efficient for the City.

26. Establish a process that notifies permit holders when a permit will expire without an approved inspection within 60 days. Upon the expiration of the permit, a code visit should be scheduled and/or the property owner contacted for them to provide the status of the work completed or notify that it has been cancelled. All of which is to be documented within TRAKiT. Establish a fee/penalty schedule for expired permits based upon the length of time the permit was expired to be assessed prior to a Certificate of Occupancy (CO) being issued.

    Staff recommends adding the notification recommendation to the new software system if available. The recent amendment to s. 468.609, F.S., revises timelines and fee scheduling, including fee reductions for not reviewing in a timely manner.

27. Those properties/projects that fall under the jurisdiction of HARC and need to be inspected shall be inspected by a HARC inspector, unless there is a written agreement/permission by HARC (noted in the system by a HARC representative, not the CBO or building inspector) for a building inspector to complete the inspection.

    Staff has completed. The HARC Inspector has been added back into the permit review process and both HARC and Building Permits have been reintegrated into a single permit. Unless approved by HARC staff, all Certificate of Appropriateness inspections will be completed by the HARC inspector.