



# CITY OF MANITOWOC

WISCONSIN, USA

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February 10, 2026

To: Members of the Common Council

From: Eric Nycz, City Attorney

**Re: Proposed Revision of Ethics Code; MMC 3.800**

I was asked to prepare a revision to our ethics code, updating the code consistent with best practices and to eliminate any areas of the code where the appearance of corruption arguably exists. The following is an explanation of the most significant proposed changes:

#### **Subsection 4: Ethics Board**

The composition of the Ethics Board needed an overhaul. As it stands, the Mayor has complete control over the makeup of the Board and it is desirable to bifurcate that responsibility between the Mayor and the rest of the Common Council. Best practice for terms has been followed, as the rotation of a new member each year will preserve continuity while also creating a Board that hasn't been nominated by any single dominant Alder year-over-year.

#### **Subsection 6: Ethics Violations Complaints**

This section was added to provide a framework for filing and investigating complaints. If and when an ethics violation is alleged, it is important to have a transparent framework so that the process can be repeated for every complaint, regardless of the status of the alleged ethics violator. All complaints should be handled consistently.

#### **Subsection 7: Hearing Procedure**

This section was added to provide a framework for determining whether a violation occurred. It provides due process for the accused as well as requiring that the Board complete a process (which ensures that the complainant has "their day in court.")

#### **Subsection 9: Findings and Recommendations**

The section provides a detailed list of options that the Board may take following an ethics complaint determination. Notably, it increases the forfeiture amount by providing a range up to the statutory amount of \$1,000.00.

Thank you for your consideration.

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