

City of Richmond Office of the Inspector General: Investigative Report

OIG CASE #: 27-0003-I
INSPECTOR GENERAL FOSTER CURTISS

Executive Summary

The City of Richmond (COR) Office of the Inspector General (OIG) initiated an investigation on June 25, 2026, after receiving an anonymous complaint alleging the Department of Human Resources (HR) Director committed acts of nepotism and abuse of authority. The complainant stated that the Director hired a classified employee due to nepotism, and that other candidates for the classified position were intentionally disparaged by the Director during the interview process. It was further alleged that a separate HR employee had received promotions on an annual basis due to their personal interactions with the Director on social media.

Additionally, on the week of August 16, 2026, the OIG received two letters from an anonymous HR employee with further complaints of alleged policy violations by the Director. The first letter alleged that the Director suggested opening meetings with prayer, vocalized religious interjections like "amen" and frequently quoted bible scripture, in violation of Administrative Regulation (AR) 5.11: Religious Activities in the Workplace. The second letter alleged that the Director appointed an HR employee to a classified position in violation of AR 5.16: Recruitment and Hiring Policy.

Background

On June 18, 2026, the Office of the Inspector General (OIG) received an anonymous complaint alleging that the COR Department of Human Resources (HR) Director hired a classified employee due to nepotism, and intentionally disparaged other candidates interviewing for the position. It was further alleged that a separate Human Resources (HR) employee had received annual promotions due to their personal interactions with the Director on social media.

Human Resources Department (HR)

The Human Resources Department recruits and develops top talent, administers competitive compensation and performance systems, provides employee and labor relations support, and advances organizational development, training, and wellness initiatives. By focusing on employee experience, accountability, and operational excellence, HR ensures the workforce is equipped, engaged, and aligned to deliver high-quality services to the community.¹

In support of these efforts, the Director began working for the COR in January of 2026. Upon arrival, the Director identified deficiencies within the department. Included in the HR deficiencies were employees lacking knowledge specific to their positions; leading to conflicting guidance being provided by HR staff. Correction of these deficiencies necessitated the hiring of subject matter experts capable of training personnel in the performance of their duties.

¹ Human Resources | Richmond | <https://www.rva.gov/human-resources>

Applicable Policies / Definitions

Administrative Regulation 5.16: Recruitment and Hiring Policy

A classified employee is any employee in classified service. Section II.A. of this policy states “Positions in the classified service shall not be filled by appointment; internal and/or external recruitment is required.”²

Section III of this policy outlines hiring procedures. within the procedures it states, “After reviewing application package(s) referred to the department by HR, the appointing authority or designee shall conduct interviews as desired.”

Administrative Regulation 5.11: Religious Activities in the Workplace

This policy states “The City has no desire to mandate or interfere with one’s religious beliefs or non-beliefs and freedom to practice such beliefs. The city is not required, nor will it allow its employees time in the workplace or on the workplace premises to impose their beliefs (or non-beliefs) on others.”³

Examples of common religious practices included in this policy are observance of a Sabbath or religious holiday, prayer or meditation, following strict or dietary requirements, and practices relating to dress and/or personal grooming.

Note: The Civil Rights Act of 1964 is the authority for this policy. Further clarification of both acceptable and unacceptable religious activities in the workplace can be found on the website for the [US Equal Employment Opportunity Commission](#)

Nepotism

State and local laws, as well as county ordinances, allow employees to have prior acquaintances with applicants or coworkers, provided the individuals are not family members as defined by applicable statutes and policies. Prior acquaintances are not classified as nepotism under these requirements.

Administrative Regulation 5.29: Employee Referral Incentive

Policy permits and encourages employees to refer qualified candidates for employment. The existence of a referral or prior acquaintance does not alter the hiring procedures established by county policy, and all applicants are subject to the same selection processes.

² Human Resources | Richmond | [Administrative Regulation 5.16](#)

³ Human Resources | Richmond | [Administrative Regulation 5.11](#)

Allegations and Recommendations

Allegation (COR/OIG): A report or claim of potential fraud, waste, or abuse involving the COR. Allegations may be **received** by **OIG** from the public, the COR employees, contractors, or other sources, or **initiated** by **OIG** through proactive reviews.

Classification after OIG inquiry/investigation:

- **Substantiated:** Evidence meets the applicable standard of proof (e.g., **preponderance of the evidence**) and indicates the alleged conduct likely occurred.
- **Unsubstantiated:** Evidence does **not** meet that standard. This classification does **not** state the claim is false; it reflects insufficient evidence to prove it.

Note: “Preponderance of the evidence” means **more likely than not**. If OIG policy uses additional outcomes (e.g., **partially substantiated, inconclusive**), those may be applied as appropriate.

To assess the allegations, the OIG conducted subject and witness interviews with members of HR staff, reviewed state and local laws, and examined relevant City of Richmond (COR) policies governing hiring, promotions, nepotism, and conflicts of interest. The OIG also reviewed an anonymous grievance letter received on July 16, 2026, that reiterated concerns related to perceived favoritism within HR.

The investigative efforts focused on determining whether HR leadership’s actions constituted nepotism, abuse of authority, or violated COR policies.

Allegation 1: An HR employee with insufficient experience was hired based on their relationship to the Director. The Director intentionally disparaged other interviewees, ensuring that the individual would be selected.

Finding: The classified employee is of no relation to the Director as defined in the COR [Employment of Relatives Policy](#). HR conducted interviews for the classified position as established in Section III of AR 5.16.

Allegation 2: An HR employee has been promoted annually since working for the city and is now in a leadership position due to their personal interactions with the Director on social media. The jobs that they are given have not been posted. They are always "reclassified" and given more pay.

Finding: The HR employee received promotions in accordance with the COR [Reassignment, Transfer, Separation, and Reinstatement Policy](#).

Allegation 3: The Director violated AR 5.11 by frequently quoting bible scripture, vocalizing religious interjections like "amen" and suggesting opening meetings with prayer.

Finding: The Director is protected under The Civil Rights Act of 1964. which is cited as the authority for AR 5.11.

After conducting interviews, it was determined that no one was imposed upon to participate in the religious prayer, which does not violate AR. 5.11 policy – “The City has no desire to mandate or interfere with one’s religious beliefs or non-beliefs and freedom to practice such beliefs. The city is not required, nor will it allow its employees time in the workplace or on the workplace premises to *impose* their beliefs (or non-beliefs) on others.”

Allegation 4: A new position was created for a Management Analyst, Principal. An HR employee was then hired to this classified position by appointment, in violation AR 5.16.

Finding: The position as a Management Analyst, Principal, was an administrative error following the hiring of this employee. Recruitment files were reviewed for the position the employee applied for; interviews with qualified applicants were conducted and this employee was found to be the best fit for the position.

Throughout the investigation, it was determined that the concerns reported to investigators had not been submitted through established HR complaint channels, including to the Director of Human Resources, despite prior guidance to utilize those processes. As a result, no formal documentation existed to support timely review or resolution of the concerns.

It is recommended that the Department of Human Resources revise the [Investigation \(Complaint\) Policy](#) to include clear procedures that allow HR personnel to file complaints involving individuals within their own department through a process free from actual or perceived conflicts of interest. Establishing alternative reporting pathways will help ensure impartiality and strengthen trust in the complaint process.

Based on the investigative findings, the OIG determined that the allegations that Director engaged in nepotism, abused their authority, and violated COR policies are all *unsubstantiated*.

Foster Curtiss

Foster Curtiss, Inspector General