

October 13, 2025

City Clerk Keshia McCullough  
City of East Point  
2757 East Point Street  
East Point, GA 30344

VIA EMAIL: kmccullough@eastpointcity.org

*Re: Ethics Complaint against CM Sharon Shropshire, 10/6/2025*

Dear Madam Clerk:

Pursuant to the Ethics Policy Sec. 2-4022, this letter serves as my acknowledgment of the above-referenced complaint on October 7, 2025. I further acknowledge that the complainant does sufficiently identify (1) the specific provision(s) of the Charter and/or Code of Ordinances alleged to have been violated; and (2) sufficiently identify facts alleged to constitute a violation.

**Allegations**

In summary, the complaint against CM Shropshire alleges that she:

1. Misused the City's robo-call system for personal and campaign use;
2. Improperly received a financial benefit of free City utilities due to nonpayment;
3. Failed to disclose a conflict of interest to City Council from her benefit of non-payment for City utilities during certain discussions during Council meetings.

The cited sections are:

- Charter, Article II, Part 2, Chapter 5, Section 2-502 through 2-504;
- Code of Ordinances, Part II, Chapter 4, Section 4-2017; and
- Code of Ordinances, Part II, Chapter 4, Section 2-4012.

**Findings and Analysis**

Upon review, I determine that the alleged conduct—as purported in the complaint—does, in part, sufficiently rise to the level of alleging a violation under the Charter and Code of Ordinances. My findings are based on the following:

1. Misuse of City's robo-call system

Code of Ordinances, Part II, Chapter 4, Section 4-2017 expressly prohibits the use of City property for private purposes:

- (a) It shall be unlawful for city funds, *property* or services of personnel to be used when or where it is primarily for the benefit of any private person as distinguished from the public.... (b) ... [I]f the offender be an officer or

employee of the city, the officer or employee shall, in addition to other penalties imposed, be subject to suspension, definite or indefinite, demotion, removal or discharge in the discretion of the city council. §4-2017. *(emphasis added)*

In addition, Chapter 2 of the Ethics Policy further addresses the circumstances that involve an elected official's misuse of the City's property. Specifically, Section 2-504 states:

No elected official, appointed officer, or employee of the city or any agency or entity to which this charter applies shall use property owned by such governmental entity for personal benefit, convenience, or profit except in accordance with policies promulgated by the city council or the governing body of such agency or entity. § 2-504.

Accordingly, if it is true that CM Shropshire utilized the City's robo-call system to disseminate a personal message, then, pursuant to § 4-2017, the complaint sets forth a sufficient allegation of a potential violation to warrant investigation by the Ethics Panel into the circumstances surrounding this alleged use, including the manner in which the message was authorized and transmitted by CM Shropshire.

2. Utility Bill Responsibility

The complaint references an outstanding utility bill but expressly acknowledges that the account is not in CM Shropshire's name and is, instead, in the name of her mother or other family members. Although CM Shropshire resides at the same address, this fact alone does not establish legal responsibility or liability for the bill. Additionally, the complaint references CM Shropshire's public explanation—disseminated through the City's robo-call system—that the high charges were the result of undetected water leaks. Addressing the credibility and resolving such matters falls squarely within the jurisdiction of the utility provider, not the Ethics Panel.

3. Failed to disclose a conflict of interest

The complaint alleges that CM Shropshire, by virtue of an unpaid utility bill, received a financial benefit and failed to disclose a conflict of interest in violation of the City's Ethics Policy. Before determining whether this allegation sufficiently identifies an ethical violation, the analysis must begin with the plain language and definitions set forth in the applicable policies and ordinances.

*Relevant Definitions*

Pursuant to the Ethics Policy, an "interest" is defined as:

Any personal benefit accruing to a public servant or the public servant's partner in interest, whether in the public servant's own name or the name of any person or business from which the public servant is entitled to receive any personal benefit, as a result of a matter which is or which is expected to become the subject of an official action by or with the city. § 2-4003.

A "benefit" is defined as:

1. Anything, regardless of its monetary value, perceived or intended by either the one who offers it or the one to whom it is offered to be sufficient in value to influence a public servant in the performance or non-performance of an official action; or
2. Anything, regardless of its monetary value, which, under the circumstances, a reasonably prudent person in the position of the public servant to whom the thing is or may be offered would recognize as being likely to be intended to influence the public servant in the performance or non-performance of an official action; and
3. The term includes, but is not limited to, a valuable act, advance, award, contract, compensation, contribution, deposit, emolument, employment, favor, fee, forbearance, fringe benefit, gift, gratuity, honorarium, loan, offer, payment, perquisite, privilege, promise, reward, remuneration, service, subscription, or the promise that any of these things will be conferred in the future. *Id.*

The term "conflict of interest" encompasses not only a personal interest, as defined above, but also professional or non-pecuniary interests. *Id.*

#### *Disclosure and Conflict of Interest Requirements*

Section 2-502 of the City Charter defines conduct giving rise to a conflict of interest:

No elected official, appointed officer, or employee of the city or any board, commission, or authority to which this charter applies shall knowingly: ... (6) vote or otherwise participate in the negotiation or in the making of any contract with any business or entity in which the official has financial interest. § 2-502.

Section 2-503 further provides:

Any elected official, appointed officer, or employee who shall have any financial interest, directly or indirectly, in any contract or matter pending before or within any department of the city shall disclose such interest to the city council. The mayor or any councilmember who has a financial interest in any matter pending before the city council shall disclose such interest, and such disclosure shall be entered on the records of the city council, and that official shall disqualify himself or herself from participating in any decision or vote relating thereto. Any elected official, appointed officer, or employee of the city or of any board, commission, or agency to which this charter applies who shall have any financial interest, directly or indirectly, in any contract or matter pending before or within such entity shall disclose such interest to the governing body of such agency or entity and refrain from participation in any decision or vote relating thereto. § 2-503.

Sections 2-4011 and 2-4012 of the Ethics Policy likewise require disclosure and recusal where an official has a financial interest in a matter pending decision by the City Council. These provisions address circumstances involving actual or potential conflicts related to contracts and formal decision-making.

*Application to the Allegation*

Although elected officials are fiduciaries of the City and must act in a manner that cultivates public trust (see § 2-501), the mere avoidance of a utility payment or disconnection does not constitute a "financial interest" within the meaning of §§ 2-4003 or 2-503. Instead, the policies set forth in the Charter and Ethics Policy contemplate a direct or indirect pecuniary interest in a contract or a matter pending before the City—such as a tangible financial stake, contractual right, or similar economic benefit—not a personal inconvenience or incidental advantage.

**Here, absent any allegation that CM Shropshire engaged in an official action in which she held a financial interest or received a benefit as defined by the City Charter and Ethics Policy, the complaint does not sufficiently identify a violation. Merely continuing to receive utility service without disconnection—without evidence of a contractual or financial stake in a matter pending before the City Council—does not rise to the level of a disclosable or disqualifying interest under the applicable provisions. In short, the Ethics Policy contemplates a direct or indirect pecuniary interest tied to official action, not the incidental or indirect benefit of avoided utility disconnection. Accordingly, the allegation, as presented, does not meet the threshold necessary to warrant further ethics proceedings.**

**Conclusion**

Because Councilmember Shropshire is a public servant subject to the Ethics Policy (see § 2-4005), and because the complaint has been filed by a person qualified to do so under § 2-4021, the merits of the alleged conduct concerning the use of the City's robo-call system—and any related or potential ethical violations that may be uncovered—should be further investigated to evaluate the credibility and veracity of the allegations.

**Accordingly, and in compliance with Sec. 2-4022, I am requesting that a selected Ethics Panel is notified to set a date for a hearing and that said complaint is simultaneously forwarded to the accused, the City Attorney, and to the members of the City Council.**

Please let me know if there are any questions or concerns.

Very truly yours,



Kimberly Bourroughs Debrow, Esq.  
STRICKLAND DEBROW LLP

encl: Complaint with attachments

Re: *Teresa Nelson's Complaint against CM Shropshire*, 10/6/2025  
October 13, 2025, p. 5

cc: **Ms. Teresa Nelson, c/o City Clerk Keshia McCullough**  
**Councilmember Sharon Shropshire (City Council Ward A at-large), c/o City Clerk**  
**Keshia McCullough**  
**City Attorney L'Erin Wiggins, Esq. (lewiggins@EastPointCity.org)**  
**City Council, c/o City Clerk Keshia McCullough:**

- **Mayor Deana Holiday Ingraham**
- **Councilmember Eric Friedly, City Council Ward A**
- **Councilmember Sean L. Atkins, City Council Ward B at-large**
- **Councilmember Carrie Ziegler, City Council Ward B**
- **Councilmember T. Starr Cummings, City Council C at-large**
- **Councilmember Tremayne Mitchell, City Council Ward C**
- **Councilmember Joshua B. Butler, IV, City Council Ward D at-large**
- **Councilmember LaTonya Martin Rogers, City Council Ward D**