

# MICHIGAN ELECTORATE

## Washtenaw County Sheriff's Office Contract Inspection

August 2024

### Summary

Private citizens requested a review of Washtenaw County Sheriff Office (WCSO) [contracts](#)<sup>1</sup> produced in response to a Freedom of Information Act (FOIA) request.

This paper documents our process and discoveries.

### Background

WCSO contracts are signed by the Sheriff. Many contracts are with private consultants. For decades, Sheriff [Jerry Clayton](#) worked simultaneously as both a public law enforcement officer and a private consultant to law enforcement.<sup>2</sup>

In 2013, while Sheriff Clayton was “Vice President of Training” for Lamberth Consulting, Governor Rick Snyder appointed him to the Michigan Commission on Law Enforcement Standards ([MCOLES](#)).<sup>3</sup> MCOLES is Michigan’s public body tasked to [define training requirements](#) for Michigan law enforcement officers.<sup>4</sup>

In 2015, while serving as MCOLES Chair and Vice President of Training for Lamberth Consulting, Sheriff Clayton founded [the Cardinal Group II](#),<sup>5</sup> a private consulting firm which provides law enforcement training. Clayton hired his WCSO Deputies as consulting staff, including the [Training Manager](#)<sup>6</sup> and the Deputy he [endorsed](#)<sup>7</sup> to succeed him as Sheriff in the 2024 county election, Derrick Jackson.

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<sup>1</sup>[a2docs.org/search?query=wcs](https://a2docs.org/search?query=wcs)o

<sup>2</sup>[www.linkedin.com/in/jerry-clayton-65154739/](https://www.linkedin.com/in/jerry-clayton-65154739/)

<sup>3</sup>[www.michigan.gov/-/media/Project/Websites/mcoles/Commission-Information/Annual-Report/mcoles.ar13\\_cs5.pdf](https://www.michigan.gov/-/media/Project/Websites/mcoles/Commission-Information/Annual-Report/mcoles.ar13_cs5.pdf)

<sup>4</sup>[www.michigan.gov/-/media/Project/Websites/mcoles/Commission-Information/statutes\\_and\\_rules/microsoft\\_word\\_-\\_final\\_st\\_rules\\_all\\_7\\_parts\\_filed\\_ogs\\_4-24-08.pdf](https://www.michigan.gov/-/media/Project/Websites/mcoles/Commission-Information/statutes_and_rules/microsoft_word_-_final_st_rules_all_7_parts_filed_ogs_4-24-08.pdf)

<sup>5</sup>[thecardinalgrou2.com/about/](https://thecardinalgrou2.com/about/)

<sup>6</sup>[web.archive.org/web/20180829202729/https://www.thecardinalgrou2.com/](https://web.archive.org/web/20180829202729/https://www.thecardinalgrou2.com/)

<sup>7</sup>[web.archive.org/web/20231004072734/https://jackson4sheriff.azurewebsites.net/endorsements](https://web.archive.org/web/20231004072734/https://jackson4sheriff.azurewebsites.net/endorsements)

## Process and Conclusions

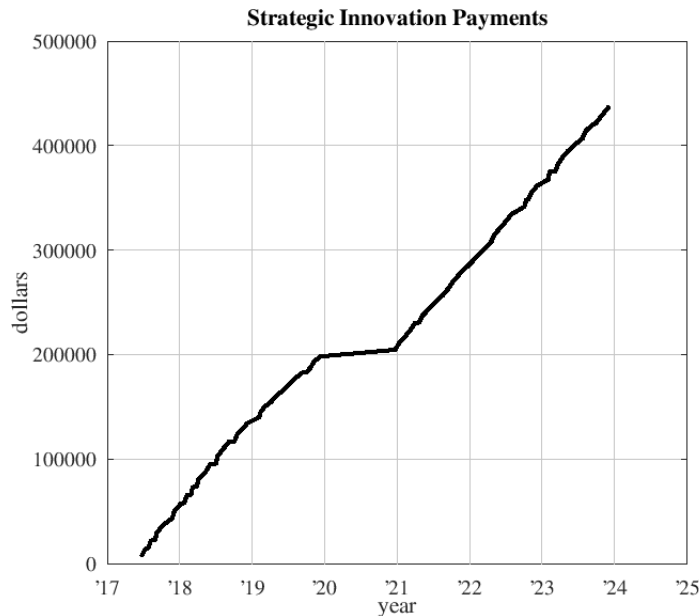
We reviewed and categorized each contract, and then correlated contracts to payments in the Washtenaw County Treasurer's public [check registers](#).<sup>8</sup> We noted three instances of potential [public fraud](#),<sup>9</sup> detailed on the following pages:

1. a bid rigging scheme
2. instances of self-dealing
3. a procurement fraud

We also noted payments to one consultant, Strategic Innovations LLC, for whom no contract had been provided. We used FOIA to request this consultant's [contract](#),<sup>10</sup> and found the contractual deliverables included:

- *Continue to build leadership capacity and competency for succession planning throughout the organization*
- *Support the transition of leadership in the organization*

The county paid Strategic Innovations nearly \$500,000 over a six year period:



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<sup>8</sup><https://www.washtenaw.org/Archive.aspx?AMID=117>

<sup>9</sup>[www.legislature.mi.gov/Laws/MCL?objectName=mcl-15-322](http://www.legislature.mi.gov/Laws/MCL?objectName=mcl-15-322)

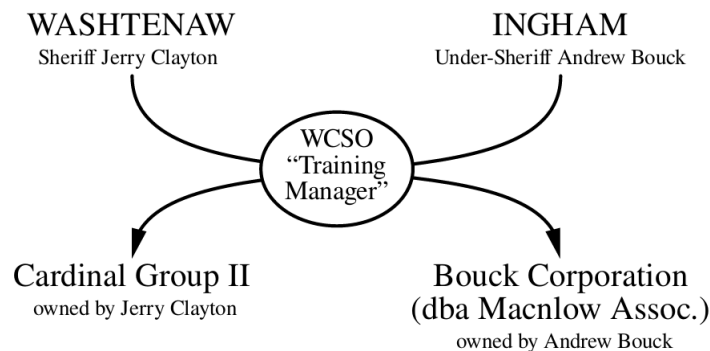
<sup>10</sup>[www.mi-electorate.org/Aug2024Washtenaw/CR52675.1.pdf](http://www.mi-electorate.org/Aug2024Washtenaw/CR52675.1.pdf)

## Bid Rigging

The Washtenaw County Sheriff and Ingham County Undersheriff each run private consulting firms providing 911 dispatch training for law enforcement officers. Both firms employ WCSO’s Training Manager. The two counties swapped contracts between their respective private consulting firms, as follows:

1. Sheriff Clayton’s consulting firm, [the Cardinal Group II](#),<sup>11</sup> offers 911 training,
2. as does Undersheriff Bouck’s consulting firm, [Macnlow Associates](#).<sup>12</sup>
3. Washtenaw County [hired Macnlow Associates for 911 training](#),<sup>13</sup> and
4. Ingham County [hired the Cardinal Group II for 911 training](#),<sup>14</sup> and
5. the WCSO Deputy “Training Manager” is a 911 dispatch trainer at both [the Cardinal Group II](#)<sup>15</sup> and [Macnlow Associates](#)<sup>16</sup>

This coordination appears to be an instance of “[bid rigging](#).”<sup>17</sup>



We note Ingham County [hired Bouck’s private consulting firm](#)<sup>18</sup> to train Undersheriff Bouck’s own deputies.

<sup>11</sup>[thecardinalgrou2.com/about/](http://thecardinalgrou2.com/about/)

<sup>12</sup>[www.macnlow.com/history.php](http://www.macnlow.com/history.php)

<sup>13</sup>[www.washtenaw.org/Archive.aspx?AMID=129](http://www.washtenaw.org/Archive.aspx?AMID=129)

<sup>14</sup>[bc.ingham.org/Portals/BC/2022 Resolutions/22-196.doc](http://bc.ingham.org/Portals/BC/2022%20Resolutions/22-196.doc)

<sup>15</sup>[thecardinalgrou2.com/about/](http://thecardinalgrou2.com/about/)

<sup>16</sup>[www.macnlow.com/faculty.php](http://www.macnlow.com/faculty.php)

<sup>17</sup>[www.ftc.gov/advice-guidance/competition-guidance/guide-antitrust-laws/dealings-competitors/bid-rigging](http://www.ftc.gov/advice-guidance/competition-guidance/guide-antitrust-laws/dealings-competitors/bid-rigging)

<sup>18</sup>[www.lansingcitypulse.com/stories/undersheriff-s-quos-company-nabs-another-33k-county-contract,71](http://www.lansingcitypulse.com/stories/undersheriff-s-quos-company-nabs-another-33k-county-contract,71)

## Self-Dealing

In 2020 and 2021, the WCSO Training Manager [charged his county-issued credit card](#) to pay Macnlow Associates (which is owned by [the Bouck Corporation](#)<sup>19</sup>) for 911 dispatch training - training which, as a Macnlow employee, [he himself provides](#).<sup>20</sup>

SHERIFF	JONATHAN WADDELL	12/21/2021	\$275.00	IN *BOUCK CORPORATION/WCSO Metro Dispatch Ti
SHERIFF	JONATHAN WADDELL	12/16/2020	\$699.00	IN *BOUCK CORPORATION/WCSO Training Metro Dispatch
SHERIFF	JONATHAN WADDELL	12/16/2020	\$699.00	IN *BOUCK CORPORATION/WCSO Training Metro Dispatch
SHERIFF	JONATHAN WADDELL	1/6/2021	\$699.00	IN *BOUCK CORPORATION/Macnlow 40hr Metro Training Dis
SHERIFF'S OFFICE	JONATHAN E WADDELL	12/17/2020		699 IN *BOUCK CORPORATION
SHERIFF'S OFFICE	JONATHAN E WADDELL	12/17/2020		699 IN *BOUCK CORPORATION
SHERIFF'S OFFICE	JONATHAN E WADDELL	08/28/2020		699 IN *BOUCK CORPORATION

These credit card charges appear to be instances of [public corruption](#).<sup>21</sup>

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<sup>19</sup>[resolutions.ingham.org/storage/Portals/BC/2019%20Resolutions/19-073.doc](https://resolutions.ingham.org/storage/Portals/BC/2019%20Resolutions/19-073.doc)

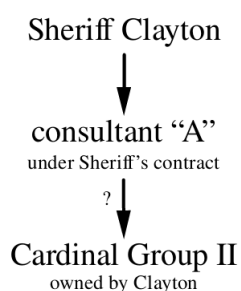
<sup>20</sup>[www.macnlow.com/faculty.php](http://www.macnlow.com/faculty.php)

<sup>21</sup>[www.justice.gov/usao-ndfl/programs/public-corruption](https://www.justice.gov/usao-ndfl/programs/public-corruption)

## Procurement Fraud

In 2019, Sheriff Clayton [required his consultant, Wellpath,](#)<sup>22</sup> receive “Strategic Inmate Management” training at the county’s expense. Clayton’s own private consulting firm [provides Strategic Inmate Management training.](#)<sup>23</sup> A public search showed few alternative vendors for this specific training.

It appears the Sheriff may have indirectly paid his own private company out of public funds, through a WCSO contract that he wrote to an intermediate consultant. If so, this is an example of vendor favoritism and appears to be a [procurement fraud.](#)<sup>24</sup>



We note that, although private companies typically do not publish itemized expenditures, any concerns can be resolved through available county-level authority:

- the county commission can inspect consultant finances
- the commission chair can compel testimony under oath

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<sup>22</sup>[a2docs.org/file/603/CT-44547.3.pdf](https://a2docs.org/file/603/CT-44547.3.pdf)

<sup>23</sup>[www.linkedin.com/company/the-cardinal-group-ii](https://www.linkedin.com/company/the-cardinal-group-ii)

<sup>24</sup>[purchasing.utah.gov/wp-content/uploads/Procurement-Fraud.pptx](https://purchasing.utah.gov/wp-content/uploads/Procurement-Fraud.pptx)