

CAUSE NO. \_\_\_\_\_

STATE OF TEXAS, JEFF HAUSCHILD, and MATT TRAMMELL, <i>Plaintiffs,</i>	§	IN THE DISTRICT COURT OF
v.	§	DALLAS COUNTY, TEXAS
CITY OF DALLAS, KIMBERLY BIZOR TOLBERT, in her official capacity as the City Manager of the City of Dallas, and JACK IRELAND JR., in his official capacity as Chief Financial Officer of the City of Dallas, <i>Defendants.</i>	§	_____ JUDICIAL DISTRICT

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**PLAINTIFFS' ORIGINAL PETITION AND APPLICATION FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

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When they passed Proposition U in 2024, the voters spoke with a clear voice – the City of Dallas must fund critical public safety priorities. However, city leadership chooses to ignore the will of the voters.

Defendants, the City of Dallas; Kimberly Bizer Tolbert, the City Manager of the City of Dallas; and Jack W. Ireland, Jr., Chief Financial Officer of the City of Dallas, refuse to properly fund voter-mandated public safety priorities in violation of the Dallas City Charter. This unlawful refusal undermines the democratic process and places Dallas residents in danger from rampant crime.

Plaintiffs, the State of Texas, through Ken Paxton, Attorney General of Texas; and Jeff Hauschild and Matt Trammell, residents of Dallas, file this Original Petition seeking declaratory and injunctive relief to stop Defendants from violating their own

charter. The Dallas City Charter leaves Defendants no discretion. They must protect the public by properly funding the police. Their failure to do so is a failure to perform a ministerial act which constitutes an *ultra vires* violation and the basis of this lawsuit. In support thereof, Plaintiffs would respectfully show the Court as follows:

### **I. DISCOVERY CONTROL PLAN**

1. The parties will conduct discovery under Level 2. Tex. R. Civ. P. 190.3. This matter is not subject to expedited discovery rules because Plaintiffs seek only non-monetary relief, including injunctive relief.

### **II. PARTIES**

2. Plaintiffs include the State of Texas, through Ken Paxton, the Attorney General of Texas, which seeks to stop Defendants from violating caselaw of this state.

3. Plaintiffs also include Jeff Hauschild and Matt Trammell, Dallas residents. In this suit, they seek to require the City of Dallas to comply with its own charter.

4. Defendant City of Dallas is a political subdivision of the state of Texas. Defendant may be served with process by serving the Dallas City Secretary, Belierae Johnson, 1500 Marilla Street, Room 5D South, Dallas, Texas 75201, in accordance with Tex. Civ. Prac. & Rem. Code § 17.024(b).

5. Defendant Kimberly Bizer Tolbert is an official of the City of Dallas, a political subdivision of the state of Texas. Defendant may be personally served at Dallas City Hall, 1500 Marilla Street, Room 4EN, Dallas, Texas 75201, or wherever found.

6. Defendant Jack W. Ireland is an official of the City of Dallas, a political subdivision of the state of Texas. Defendant may be personally served at Dallas City

Hall, 1500 Marilla Street, Room 4EN, Dallas, Texas 75201, or wherever found.

### **III. JURISDICTION AND VENUE**

7. Plaintiffs seek non-monetary relief. Tex. R. Civ. P. 47. The relief sought is within the jurisdiction of this court. Tex. Const. art. V, § 8, Tex. Gov't Code §§ 24.007, 24.008, and 24.011, Tex. Civ. Prac. & Rem. Code § 37.003, and Tex. Civ. Prac. & Rem. Code § 65.021(a).

8. The State seeks to enjoin the *ultra vires* acts of Defendants Ireland and Bazor Tolbert. Political subdivisions and their officials sometimes benefit from the state's sovereign immunity. However, municipal officials in their official capacities do not have sovereign immunity arising from their *ultra vires* acts. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372-73 (Tex. 2009). *Ultra vires* claims do not implicate sovereign immunity because they are not claims against the government. *Id.* Rather, they are against the official acting without authority. *Id.* This is not a suit against the government, but an attempt to reassert control over a government official. *Id.* "Governmental immunity does not bar a suit that seeks to bring local government officials into compliance with state law." *State by & Through Office of Att'y Gen. of Tex. v. City of San Marcos*, 714 S.W.3d 224, 239 (Tex. App. [15th Dist.] 2025).

9. The acts of a political subdivision and its officers, "must be grounded ultimately in the constitution or statutes." *Guynes v. Galveston Cnty.*, 861 S.W.2d 861, 863 (Tex. 1993). Political subdivisions "possess only such powers and privileges as have been expressly or impliedly conferred upon them." *Wasson Ints., Ltd. v. City of Jacksonville*, 489 S.W.3d 427, 430 (Tex. 2016). Those powers and privileges may

include “all the powers of the state not inconsistent with the Constitution, the general laws, or the city’s charter.” *Proctor v. Andrews*, 972 S.W.2d 729, 733 (Tex. 1998) (citing Tex. Const. art. XI, § 5); *accord Sw. Tel. & Tel. Co. v. City of Dallas*, 134 S.W. 321, 323 (Tex. 1911) (“A municipal corporation possesses no power not derived from its charter.”). Thus, a political subdivision and its officials may not violate their own charter.

10. “As a sovereign entity, the State has an intrinsic right to enact, interpret, and enforce its own laws.” *State v. Hollins*, 620 S.W.3d 400, 410 (Tex. 2020); *State v. Naylor*, 466 S.W.3d 783, 790 (Tex. 2015). The State is not required to show any “particularized harm arising from a local official’s specific unauthorized actions.” *State v. Hollins*, 620 S.W.3d 400, 410 (Tex. 2020). Nonetheless, here, the State is experiencing harm when Defendants violate the Dallas City Charter by underfunding police, because the State must step in to provide resources for the safety of Dallas residents that should have been provided for by Defendants.

11. Jeff Hauschild and Matt Trammell seek injunctive and declaratory relief that Defendants must include all revenue required by the charter in the calculation of excess revenue and seek an order that Defendants must hire a third-party firm to conduct a police salary survey. *See* Dallas City Charter ch. XI, § 15(d), (e). The charter waives the city’s immunity in suits by residents. *Id.*, ch. XXV, § 1. A resident is “any person who resides in the City of Dallas, and any firm, corporation, limited liability company, joint venture, trust, estate, nonprofit, or association which is physically located in or otherwise conducts business in the City of Dallas.” *Id.* XXV, § 1(e). Any

resident may sue to require the city to comply with the provisions of the charter. *Id.* XXV, § 1(a). The resident may obtain declaratory relief, injunctive relief, and costs and attorneys' fees. *Id.* XXV, § 1(b)(1)-(2). The Charter contains a notice provision. *Id.* XXV, § 1(d). Counsel for Mr. Hauschild and Mr. Trammell has previously provided notice of claims related to the Charter provisions at issue in this suit on March 31, 2025, and April 11, 2025. Defendants also had actual notice of these issues on August 12, 2025, when Defendant Ireland briefed the city council regarding Proposition U and he acknowledged the controversy. He again acknowledged the controversy in writing on September 5, 2025. Counsel for Mr. Hauschild and Mr. Trammell sent additional notice by email to the City Secretary and City Attorney on February 6, 2026. Thus, all conditions precedent for this claim have been satisfied.

12. Venue is proper in Dallas County, Texas, because the events and omissions that give rise to these claims occurred in Dallas County. Tex. Civ. Prac. & Rem. Code § 15.002(a)(1). Venue is also proper in Dallas County as this is the county where the defendants have their principal offices. Tex. Civ. Prac. & Rem. Code § 15.002(a)(3).

#### **IV. EXHIBITS**

13. The Following Exhibits are incorporated as if set forth fully herein:

Exhibit 1 – City of Dallas Withdrawal Letter of December 23, 2024, to the Attorney General.

Exhibit 2 – City of Dallas Letter of April 28, 2025.

Exhibit 3 – Jack Ireland's Memorandum of September 5, 2025.

#### **V. FACTUAL BACKGROUND**

14. In 2024, fed up with the rampant crime tolerated by city officials, Dallas voters

approved Proposition U. This proposition amended the city charter by adding section 15 to chapter XI. *See Dallas City Charter, ch. XI, § 15.* Section 15 directs the city to protect the public by using excess revenues to fund public safety priorities. *Id.*

15. “Revenue” is defined, in part, as “all revenue collected by the city that’s [sic] use is not restricted to a limited purpose under state or federal law. . . .” *Id.*, ch. XI, § 15(e). If the current year’s projected revenue exceeds last year’s revenue, then half of the excess must be spent on the police and firefighter pension fund up to an amount directed by the State Pension Review Board. *Id.*, ch. XI, § 15(a). Any remaining excess funds must then be used to increase the starting salary and non-pension benefits of police officers so that the average Dallas Police Department starting salaries are within the top five of all police departments within the Dallas-Fort Worth area. *Id.* ch. XI, § 15(b)(1). To determine those rankings, the city “on an annual basis, shall hire a third-party firm to conduct a survey to calculate the starting combined salary and non-pension benefits, excluding sign-on bonuses, of the full-time police officers of all cities in Dallas, Collin, Tarrant, Denton, and Rockwall Counties with a population over 50,000, on a per officer basis, and report the findings to city council.” *Id.* ch. XI, § 15(d). After adjusting the starting salaries and non-pension benefits, if money remains, the remainder must be used to increase the number of police officers to a minimum of 4,000. *Id.* ch. XI, § 15(b)(2).

16. Counsel for Mr. Hauschild and Mr. Trammell requested information related to Defendant’s third-party survey through a public information request. Defendant City of Dallas at first requested an Attorney General decision, indicating it wished to

withhold the information from disclosure, but the City of Dallas later represented in writing to the Open Records Division of the Office of the Attorney General that it would release the information. Ex. 1. Defendant City of Dallas then told counsel that it had no responsive information regarding the third-party survey.

17. Compared to 2024-25, the projected excess revenue of the city's budget in 2025-26 is approximately \$220 million. However, Defendant Ireland reported to the city council that the amount of excess revenue would only be approximately \$61 million. Counsel for Mr. Hauschild and Mr. Trammell notified Defendant City of Dallas that it was violating Proposition U by letters on March 31 and April 11, 2025. Defendant City of Dallas acknowledged the letters and refused to answer any of counsel's questions "because you have threatened litigation." Ex. 2.

18. Later, at a city council meeting, Defendant Ireland attempted to explain why he chose the \$61 million figure. *See* City of Dallas, Aug. 12, 2025 Council Briefing, <https://dallastx.new.swagit.com/videos/352281>. Rather than including all funds in the comparison that meet section 15's definition of "revenue," he only compared the year-on-year revenues of the city's general fund. *Id.* at 11:45-14:23. In his explanation, Defendant Ireland failed to identify any state or federal law that restricted the use of the other funds to justify not including those funds in his excess revenue calculation. *Id.*; *see* Dallas City Charter ch. XI, §15(a), (e). Since that briefing, Defendants have refused to apply the correct definition of revenue.

19. Residents, and even other city officials, immediately spoke out against the Defendants' refusal to use the correct definition of revenue to calculate excess revenue

and notified Defendants that they were violating Proposition U. For example, on August 14, 2025, City Councilmember Cara Mendelsohn wrote a letter to “express serious concern” that the budget would not fund the voter-mandated public safety objectives. Cara Mendelsohn, *We have a public safety budget problem*, FACEBOOK (August 16, 2025), <https://www.facebook.com/Cara4Dallas/posts/we-have-a-public-safety-budget-problem/1211880017411221/>. Dallas Police Association President Jaime Castro also spoke at a city council meeting, directly notifying the council that over a dozen other cities pay police officers more than Dallas does. This pay discrepancy has consequences: “over 40% of our [new] officers are leaving.” Dallas HERO, X / TWITTER (August 20, 2025), [https://x.com/dallas\\_hero\\_/status/1958187043038593148](https://x.com/dallas_hero_/status/1958187043038593148).

20. In response, Defendant Ireland wrote a memorandum attempting to explain why he relied on the \$ 61 million figure. Ex. 3. However, again, he did not identify any state or federal laws that restrict the use of funds that he excluded from his calculation. In a chart titled “Table A,” Defendant Ireland labels every other city fund listed as “Restricted,” but he fails to cite any state or federal law that restricts the use of those funds. *Id.* at 4.

21. This deliberate miscalculation reduces the number of police available to protect the public. And that causes real harm. Neighborhoods are turned into “apocalyptic scenes” with littering, defecation, theft, drugs, and robberies – right on people’s front porches. *See e.g.*, *Victim Profile: Matt Trammell* (December 22, 2025), <https://dallashero.org/victim-profile-matt-trammell/>. At train stations, tourists are

knocked unconscious in broad daylight by known violent offenders. *See e.g., Victim Profile: Kristin Dailey* (Sept. 9, 2025), <https://dallashero.org/victim-profile-kristindailey/>. Young women in town for events are senselessly gunned down. Amelia Mugavero, *Family mourns 28-year-old killed for being at the “wrong place, wrong time”*, CBS TEXAS (Apr. 27, 2025), <https://www.cbsnews.com/texas/news/family-mourns-28-year-old-killed-wrong-time-wrong-place-downtown-dallas/>. Even Dallas children have suffered. In one incident, an impaired driver struck two children riding their bicycles on the sidewalk. *Victim Profile: Jeff Hauschild* (Sept. 17, 2025), <https://dallashero.org/victim-profile-jeff-hauschild/>. It took Dallas Police almost five hours to respond. *Id.* Dallas needs more police officers. And the voters gave Defendants the responsibility to hire them.

**VI. CAUSE OF ACTION 1 – ULTRA VIRES VIOLATION OF THE CITY CHARTER,  
CHAPTER XI, SECTION 15(A)**

22. An official must comply with constitutional, statutory, and other legal responsibilities. *Heinrich*, 284 S.W.3d at 372. An *ultra vires* claim must show that the official acted without legal authority or failed to perform a ministerial act. *Id.* Any relief afforded to cure an *ultra vires* act must not change existing policy but merely enforce it. *Id.*

23. Chapter XI, section 15 of the charter states in part that, “If at any time the total actual, accruing or estimated annual revenue of the city exceeds the total actual annual revenue of the prior fiscal year, city council shall appropriate no less than 50 percent of such excess amount, in compliance with Section 1 of Chapter XI of the Charter, to fund the Dallas Police and Fire Pension System - Combined Plan, in the

amount directed by the State Pension Review Board and/or city council, whichever is higher. Any monies remaining shall be appropriated to the public safety objectives described below in Subsection (b).” Charter, ch. XI, § 15(a).

24. Section 15, subsection (e), defines revenue as, “. . . all revenue collected by the city that’s use is not restricted to a limited purpose under state or federal law, including, but not limited to ad valorem property tax, sales tax, beverage taxes, asset forfeiture funds, bingo fees, cemetery taxes, impact fees, interlocal agreements, internet payment and access fees, investments, court fees, open records fees, municipal development corporation sales taxes, municipal development district taxes, pro rata fees, public improvement district assessments, right-of-way fees, special improvement district fund taxes, street assessments, time warrants, user fees, venue taxes, donations, coin-operated machine taxes, drainage fees, hotel taxes, parking fees, franchise fees, enterprise funds, charges for services, admission fees, fines and forfeitures, operating transfers from municipally controlled entities, municipal enterprises, municipally owned utilities, municipally controlled districts, licenses and permits, and interest, but shall not include any debt proceeds taken on by the city, or any grants, appropriations or other revenue received from other governmental or non-profit entities (that weren’t directly or indirectly initially provided to such other governmental or non-profit entities by the city).”

25. Defendants Ireland and Bazor Tolbert, in their capacity as Chief Financial Officer and City Manager, failed to include all revenues that meet the subsection (e) definition in the calculation of the excess revenue. This violates chapter XI, section

15(a). Defendants must perform the ministerial act of including all funds which meet the definition of revenue in a calculation of excess revenue. They do not have any discretion to do otherwise. Thus, their failure to include all funds in the calculation was *ultra vires*.

26. Unless enjoined, Defendant Ireland and Bazor Tolbert will continue to act without legal authority and fail to perform purely ministerial acts. This relief would not alter the city's policy but merely enforce its existing policy. *Heinrich*, 284 S.W.3d at 372.

**VII. CAUSE OF ACTION 2 – ULTRA VIRES VIOLATION OF THE CITY CHARTER, CHAPTER XI, SECTION 15(D)**

27. An official must comply with constitutional, statutory, and other legal responsibilities. *Heinrich*, 284 S.W.3d at 372. An *ultra vires* claim must show that the official acted without legal authority or failed to perform a ministerial act. *Id.* Any relief afforded to cure an *ultra vires* act must not change existing policy but merely enforce it. *Id.*

28. Chapter XI, section 15 of the charter states in part that, "The city, on an annual basis, shall hire a third-party firm to conduct a survey to calculate the starting combined salary and non-pension benefits, excluding sign-on bonuses, of the full-time police officers of all cities in Dallas, Collin, Tarrant, Denton, and Rockwall Counties with a population over 50,000, on a per officer basis, and report the findings to city council. Charter, ch. XI, § 15(d).

29. Through public information requests, residents and attorneys on residents' behalf have requested the third-party survey conducted for Defendant City of Dallas.

But the city responded that it had no responsive information. Plainly, this means that — despite what the voters required in Proposition U — Defendants did not hire a third-party firm to conduct the survey. Hiring a third-party firm to conduct the survey is a ministerial task for which Defendants have no discretion, and their failure to do so is an *ultra vires* act.

30. Unless enjoined, Defendants Ireland and Bazor Tolbert will continue to act without legal authority and fail to perform purely ministerial acts, including hiring the third-party firm to conduct the survey. This relief would not alter the city's own policy but merely enforce its existing policy. *Heinrich*, 284 S.W.3d at 372.

### **VIII. INJUNCTIVE RELIEF**

31. To establish a right to a temporary injunction, the State must show that it has a cause of action, a probable right to relief, and irreparable harm. *Hollins*, 620 S.W.3d 400.

32. The State has a viable *ultra vires* cause of action and has a probable right to relief – in the form of a permanent injunction. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 376 (Tex. 2009) (A claimant who successfully proves an *ultra vires* claim is entitled to prospective injunctive relief.”). Additionally, the State is not required to show any “particularized harm arising from a local official’s specific unauthorized actions.” *State v. Hollins*, 620 S.W.3d 400, 410 (Tex. 2020). It can merely show that Defendants are violating state law. *Id.* Defendants Ireland and Bazor Tolbert violate state law when they violate the Dallas City Charter. Tex. Const. art. XI, § 5; *Proctor*, 972 S.W.2d at 733; *Sw. Tel. & Tel. Co.*, 134 S.W. at 323. And the State is experiencing

harm when Defendants Ireland and Bizer Tolbert violate the Dallas City Charter by underfunding police, because the State must step in to provide resources for the safety of Dallas residents that should have been provided for by Defendants.

33. A Dallas resident is entitled to injunctive relief to require Defendants to follow state law and the charter. Dallas City Charter, ch. XXV, § 1(a)-(b). Thus, Plaintiffs Hauschild and Trammell are entitled to temporary and permanent injunctive relief. Specifically:

- a. A temporary injunction prohibiting Defendants Ireland, Bizer Tolbert, and City of Dallas, their employees, and agents from failing to include all revenues, including those listed in charter chapter XI, section 15(e), and those the use of which is not restricted by a state or federal law, in a calculation of the city's excess revenues; and
- b. A permanent injunction prohibiting Defendants Ireland, Bizer Tolbert, and City of Dallas, their employees, and agents from failing to include all revenues, including those listed in Charter chapter XI, section 15(e), and those the use of which is not restricted by a state or federal law, in a calculation of the city's excess revenues.
- c. A permanent injunction ordering Defendants Ireland, Bizer Tolbert, and City of Dallas, their employees, and agents to hire a third-party firm to conduct a survey to calculate the starting combined salary and non-pension benefits, excluding sign-on bonuses, of the full-time police officers of all cities in the Dallas, Collin, Tarrant, Denton, and Rockwall

Counties with a population over 50,000, on a per officer basis, and report the findings to the city council.

## **IX. DECLARATORY RELIEF**

34. Plaintiffs Jeff Hauschild and Matt Trammel seek a declaration under Chapter 37 of the Texas Civil Practice and Remedies Code. A justiciable controversy exists between Plaintiffs and Defendant City of Dallas concerning the proper calculation of the city's excess revenue under the charter. The Court should issue a declaration that under Dallas City Charter chapter XI, section 15, Defendant City of Dallas must include all revenue not restricted by state or federal law in a calculation of excess revenue. Specifically, when calculating excess revenue, Defendant City of Dallas must include all funds described by chapter XI, section 15(e) unless it cites a state or federal law that restricts the use of each fund it excludes from the calculation.

## **X. COSTS AND ATTORNEY'S FEES**

35. A resident may recover costs and reasonable attorney's fees if the court orders either injunctive or declaratory relief. Dallas City Charter, ch. XXV, § 1(b)(2). Jeff Hauschild and Matt Trammell request that the Court order Defendant City of Dallas to pay costs and reasonable attorney's fees.

## **XI. PRAYER FOR RELIEF**

36. The State of Texas, Jeff Hauschild, and Matt Trammell seek:

- a. A temporary injunction prohibiting Defendants Ireland, Bazor Tolbert, and City of Dallas, their employees, and agents from failing to include all revenues, including those listed in charter chapter XI, section 15(e),

and those the use of which is not restricted by a state or federal law, in a calculation of the city's excess revenues; and

- b. A permanent injunction prohibiting Defendants Ireland, Bazor Tolbert, and City of Dallas, their employees, and their agents from failing to include all revenues, including those listed in Charter chapter XI, section 15(e), and those the use of which is not restricted by a state or federal law, in a calculation of the city's excess revenues.
- c. A permanent injunction ordering Defendants Ireland, Bazor Tolbert, and City of Dallas, their employees, and agents to hire a third-party firm to conduct a survey to calculate the starting combined salary and non-pension benefits, excluding sign-on bonuses, of the full-time police officers of all cities in the Dallas, Collin, Tarrant, Denton, and Rockwall Counties with a population over 50,000, on a per officer basis, and report the findings to the city council.

37. Additionally, Jeff Hauschild and Matt Trammell seek:

- a. A Court declaration that Defendant City of Dallas, its employees, and its agents must include all revenues, including those listed in charter chapter XI, section 15(e), and those the use of which are not restricted by a state or federal law, in a calculation of the city's excess revenues; and
- b. Costs and attorneys' fees paid by Defendant City of Dallas.

38. Lastly, Plaintiffs seek any other relief to which they may be justly entitled.

Respectfully submitted,

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Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

RALPH MOLINA  
Deputy First Assistant Attorney General

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*Attorneys for Plaintiffs Jeff Hauschild  
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CAUSE NO. \_\_\_\_\_

STATE OF TEXAS, JEFF  
HAUSCHILD and MATT  
TRAMMELL,

*Plaintiffs,*

v.

CITY OF DALLAS, and JACK  
IRELAND JR., in his official capacity  
as Chief Financial Officer of the City  
of Dallas,

*Defendants.*

§ IN THE DISTRICT COURT OF

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DALLAS COUNTY, TEXAS

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\_\_\_\_ JUDICIAL DISTRICT

**Unsworn Declaration of Alexandre Louis Dubeau**

My name is Alexandre Louis Dubeau, and I am an employee / investigator of the Office of the Attorney General, Administrative Law Division, located at 300 W. 15<sup>th</sup> Street, Austin, Texas 78701. I am executing this declaration as part of my assigned duties and responsibilities. I declare under penalty of perjury that the foregoing factual statements in the Plaintiffs' Original Petition are within my personal knowledge and are true and correct.

Executed in Travis County, Texas on this the 9th day of February 2026.



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Alexandre Louis Dubeau

# Exhibit 1



CITY OF DALLAS

April 28, 2025

**Via email: art@mdv.law**

Art Martinez de Vara  
THE MARTINEZ DE VARA LAW FIRM  
P.O. Box 377  
13940 Benton City Rd.  
Von Ormy, Texas 78073

Dear Counsel:

This letter responds to your April 11, 2025, letter containing multiple questions about various City practices and processes. Because you have threatened litigation related to those specific matters—both privately and publicly—the City declines to provide any information at this time.

We do, however, invite you to explore the City's Financial Transparency webpage [here](#), which provides extensive access to the City's financial documents and data.

Sincerely,

*/s/ J. Cheves Ligon*

J. Cheves Ligon  
Senior Assistant City Attorney

# Exhibit 2



CITY OF DALLAS

December 23, 2024

Office of the Attorney General  
Open Records Division  
P.O. Box 12548  
Austin, Texas 78711-2548

Re: Withdrawal of Request for an Open Records Decision

Dear Open Records Division:

By letter (Exhibit A) dated December 16, 2024, the city of Dallas (“city”) requested an opinion on whether information requested by Art Martinez should be withheld from mandatory disclosure under the Public Information Act, Chapter 552, Texas Government Code. We have determined the information requested by Art Martinez is releasable, we are withdrawing our request for an open records decision on this matter. GovQA C012379-120224

If you have any questions regarding this request for an open records decision, please contact me at 214-670-4029.

Respectfully submitted,

Nancy Gonzalez  
Open Records Coordinator  
City Secretary’s Office

Attachments

cc: Parris Long



December 16, 2024

Office of the Attorney General  
Open Records Division  
P.O. Box 12548  
Austin, Texas 78711-2548

Re: Public Information Act Request(s) received by the City of Dallas from Art Martinez on December 2, 2024 GovQA No. C012379-120224

Dear Open Records Division:

Attached as Exhibit A is a request(s) for information received by the City of Dallas (the “City”). The City believes that some or all of the requested information is exempt from disclosure under the Public Information Act, Chapter 552, Texas Government Code (the “Act”). The City anticipates that one or more discretionary and/or mandatory exceptions apply to the responsive information. At this time, the City invokes all of the exceptions provided by, and the exceptions incorporated into, Sections 552.101 through 552.162 of the Act. See Tex. Gov’t Code §§ 552.101 – 552.162.

The requestor has been notified by copy of this letter that the City is seeking a determination regarding whether the responsive information is excepted from disclosure. The City will supplement this letter with the comments stating the reasons why the Act excepts the requested information from disclosure, along with copies of the requested information (or samples if voluminous) within fifteen (15) days of the City’s receipt of the written request, as required by Section 552.301(e) of the Act.

If you have any questions regarding this request for an open records decision, please contact me at 214-670-4029.

Respectfully submitted,



**Nancy Gonzalez**  
*Open Records Manager*  
**City of Dallas | DallasCityNews.net**  
City Secretary's Office  
1500 Marilla Street, Room 5DS  
Dallas, TX 75201  
O: (214)670-4029  
[nancy.gonzalez@dallascityhall.com](mailto:nancy.gonzalez@dallascityhall.com)



#### Attachments

c: Parris Long

Art Martinez

Via GovQA

[art@mdv.law](mailto:art@mdv.law)

# **EXHIBIT A**

# Art Martinez (Open Records Request #C012379-120224)

## ▼ Records Request Details/Disclaimers

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## ▼ Records Request Details

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Please be as specific as possible, including dates, names, numbers, or other identifiers that will assist in locating the information you seek. Examples: "I hereby request the following documents [document name/type] on [event, project, incident, etc.]". "I need Report [number], dated [date], and involving [description and date]". "I am requesting a certificate of occupancy for [X address]."

Describe the document(s) you are requesting, i.e., Stolen Vehicle, Robbery, Assault, etc.:

Dear Open Records Manager,  
I hereby make the following request for public information pursuant to the Texas Public Information Act. Tex. Gov't Code §552:

1. Article 7, Section 2 of the current Meet and Confer Agreement between Dallas and its Police and Firefighters states that a "pay subcommittee" shall meet each January to "perform a salary survey of each rank in the police and fire departments, based upon salary information for comparable ranks from the Comparable Cities." I am requesting a copy of the salary survey for the last two years of the subcommittee (2023 and 2024) and any minutes, reports or presentations produced by the 2023 and 2024 pay subcommittees.

2. I request the contact of any third party vendor(s) that was contracted to conduct the salary survey (noted above in request 1), or gather the data used by the pay subcommittee to conduct the salary survey for the years 2023 and 2024.

Preferred Method to Receive Documents:

Digital via Dallas Open Records Center - (Please note: All records may not be available electronically)

Do you agree to the redaction of information that is subject to mandatory exceptions, provided such redactions are clearly labeled on the information you receive?:

Do you agree to the redaction of information that is subject to discretionary exceptions, provided such redactions are clearly labeled on the information you receive?:

Were the redaction fields above no completed internally?:

## ➤ Department with Record(s)

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## ➤ Office Use Only

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## ➤ Child Request Creation

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## ➤ Notes

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## ▼ Message History

Date

On 12/2/2024 5:22:17 PM, LaTrice Smith wrote:  
**Subject:** Open Records Request :: C012379-120224  
**Body:**

A portion of your request has been forwarded to the Dallas Police Department. You may contact them:  
In Person - 1400 Botham Jean Blvd., Dallas, TX, 75215

By Phone - 214-671-3148

Our values of service are:

Empathy | Ethics | Excellence | Engagement | Equity

On 12/2/2024 5:04:16 PM, System Generated Message:

Message sent to: **Art Martinez**

**Subject:** Referred to DPD

**Body:**

Your request has been forwarded to the Dallas Police Department Open Record Unit. For a status inquiry about your open record request, please contact them:

In Person - 1400 Botham Jean Blvd., Dallas, TX, 75215

By Phone - 214-671-3148

Please log in to the [Records Center](#) to check the status of your open record request.

Our values of service are:

Empathy | Ethics | Excellence | Engagement | Equity

Date

On 12/2/2024 12:47:03 PM, System Generated Message:

**Subject:** Open Records Request :: C012379-120224

**Body:**

Dear Art Martinez:

Thank you for your interest in public records of the City of Dallas. Your request has been received and is being processed in accordance with Chapter 552 of Texas Government Code, the Public Information Act. Your request was received in this office on 12/2/2024 and given the reference number: C012379-120224 for tracking purposes.

Records Requested: Dear Open Records Manager, I hereby make the following request for public information pursuant to the Texas Public Information Act. Tex. Gov't Code §552: 1. Article 7, Section 2 of the current Meet and Confer Agreement between Dallas and its Police and Firefighters states that a "pay subcommittee" shall meet each January to "perform a salary survey of each rank in the police and fire departments, based upon salary information for comparable ranks from the Comparable Cities." I am requesting a copy of the salary survey for the last two years of the subcommittee (2023 and 2024) and any minutes, reports or presentations produced by the 2023 and 2024 pay subcommittees. 2. I request the contact of any third party vendor(s) that was contracted to conduct the salary survey (noted above in request 1), or gather the data used by the pay subcommittee to conduct the salary survey for the years 2023 and 2024.

Your request will be sent to the relevant City department(s) to locate the information and determine any costs that may be due. You will receive an email when your request has been completed. If your request is received on the weekend or after business hours, it will be processed the next business day.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Again, thank you for using the Public Records Center.

To monitor the progress or update this request please log into the [Public Records Center](#).

City of Dallas

Our values of service are:

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Track the issue status and respond at: <https://dallastx.govqa.us/WEBAPP//rs/RequestEdit.aspx?rid=403432>

On 12/2/2024 12:47:02 PM, LaTrice Smith wrote:

Request was created by staff

## ▼ Request Details

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Reference No: C012379-120224

Created By: LaTrice Smith

Create Date: 12/2/2024 12:47 PM

Update Date: 12/16/2024 4:00 PM

Completed/Closed: No

Required Completion Date: 12/16/2024

Status: Processing/Partial DPD Referral

Priority: Medium

Assigned Dept: City Secretary's Office

Assigned Staff: Nancy Gonzalez

Customer Name: Art Martinez

Email Address: art@mdv.law

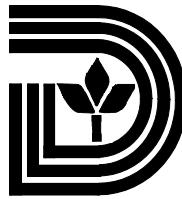
Phone: 2106220323

Group: City

Source: Email

# Exhibit 3

# Memorandum



DATE September 5, 2025

CITY OF DALLAS

TO Honorable Mayor and Members of the City Council

SUBJECT **Responses to Questions Regarding Proposition U, Meet and Confer, and Police/Fire Pay (Third Set of Budget Responses)**

Thank you for your continued engagement regarding the City Manager's proposed budget for FY26 and FY27 presented to you on Tuesday, August 12. Below are additional responses to questions that you have asked about the budget.

## **1. Does the City Manager's recommended budget for FY26 comply with the requirements of Proposition U?**

**Yes.** As required by Proposition U, 50% of the year-over-year growth in unrestricted revenues for FY26 is projected to be \$30.8 million and is being allocated to fund the FY26 contribution to Dallas Police and Fire Pension System – Combined Plan which is budgeted for FY26 and included in the City Manager's proposed budget to be \$225.67 million.

**Anything included in the budget for public safety objectives to increase starting pay and hire additional police officers is above and beyond the requirements of Proposition U.**

More information is provided below as a response to additional questions regarding Meet and Confer, Proposition U, and police/fire pay.

## **2. How is police and fire starting pay addressed in the current Meet and Confer agreement?**

On October 26, 2022, the Dallas City Council authorized the current Meet and Confer agreement for the period October 1, 2022, through September 30, 2025, which among other things, set forth the pay philosophy for the uniform employees of the Dallas Police Department and the Dallas Fire-Rescue Department. The current contractual agreement states in Article 7, Section 1:

*"Subject to the terms of this Article and Agreement, it is the intent of the City to have a "market-based" pay philosophy to strive to maintain the average pay of the comparable cities identified below for Police Officers and Firefighters while at the same time meeting other financial needs of the City."*

The agreed upon 17 comparable cities in the Meet and Confer agreement include: Allen, Arlington, Austin, Carrollton, Denton, Fort Worth, Frisco, Garland, Grand Prairie, Houston, Irving, Lewisville, McKinney, Mesquite, Plano, Richardson, and San Antonio. The Meet and Confer agreement specifies that the salary survey shall be completed **by March 31** of each year during the term of the agreement.

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Starting base pay is determined by calculating the average of (1) the average starting base pay for the police officer rank for the 17 comparable cities and (2) the average starting base pay for the fire-rescue officer rank for the 17 comparable cities.

Based on the Meet and Confer agreement, starting pay would increase from the FY25 starting pay of \$75,397 to \$78,924 for FY26, an increase of 4.68%. However, the City Manager recommended to increase the starting pay in FY26 to \$81,232 or 7.74%. Again, this increase is above the market-pay requirement in the current Meet and Confer agreement and is above and beyond the requirements of Proposition U.

Additional information regarding the City Manager's recommendation to increase starting pay to \$81,232 is provided below.

The City Manager's Office is currently in the process of negotiating with representatives of police and fire associations on a new Meet and Confer agreement.

The Meet and Confer agreement including police/fire pay is not negotiated outside of the established Meet and Confer process and negotiations committee.

### 3. What does Proposition U require?

On November 5, 2024, voters approved Proposition U by a vote of 50.43% for and 49.57% against, a difference of 3,792 votes. Proposition U added Section 15, **Priority of Excess Revenue** to the Dallas City Charter, Chapter XI, The Budget and Financial Procedure Relating Thereto. Below is the text of this section in its entirety.

#### SEC. 15. Priority of Excess Revenue.

(a) *If at any time the total actual, accruing or estimated annual revenue of the city exceeds the total actual annual revenue of the prior fiscal year, city council shall appropriate no less than 50 percent of such excess amount, in compliance with Section 1 of Chapter XI of the Charter, to fund the Dallas Police and Fire Pension System - Combined Plan, in the amount directed by the State Pension Review Board and/or city council, whichever is higher. Any monies remaining shall be appropriated to the public safety objectives described below in Subsection (b).*

(b) *Public safety objectives.*

(1) *The starting combined salary and non-pension benefits, excluding sign-on bonuses, of the police officers of the Dallas Police Department are within the top five of all city police departments (as compared to the starting combined salary and non-pension benefits) in Dallas, Collin, Tarrant, Denton, and Rockwall Counties with a population over 50,000, on a per officer basis; and*

(2) *The total number of full-time sworn police officers of the police department of the City of Dallas is increased to at least 4,000 and the ratio established of 4,000 officers to Dallas city residents as of the date of the passage of this charter amendment is maintained or increased going forward.*

(A) *Any monies appropriated to this public safety objective but not spent within the fiscal year shall be transferred to a sinking fund to fund this Public Safety Objective in the subsequent fiscal year.*

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(c) Any monies remaining after all public safety objectives defined in this section have been met may be reappropriated by city council.

(d) The city, on an annual basis, shall hire a third-party firm to conduct a survey to calculate the starting combined salary and non-pension benefits, excluding sign-on bonuses, of the full-time police officers of all cities in Dallas, Collin, Tarrant, Denton, and Rockwall Counties with a population over 50,000, on a per officer basis, and report the findings to city council. The third-party firm will be required to certify in writing to the city that it used its best efforts to include responses from each city in Dallas, Collin, Tarrant, Denton, and Rockwall Counties in the annual survey, and the failure or unwillingness of any city to participate in the survey shall have no impact on either:

(1) the city's and the third-party firm's obligations to complete and deliver the survey required by this Section on an annual basis; or

(2) the city's obligations under this chapter.

(e) As used in this section, "revenue" shall mean all revenue collected by the city that's use is not restricted to a limited purpose under state or federal law, including, but not limited to ad valorem property tax, sales tax, beverage taxes, asset forfeiture funds, bingo fees, cemetery taxes, impact fees, interlocal agreements, internet payment and access fees, investments, court fees, open records fees, municipal development corporation sales taxes, municipal development district taxes, pro rata fees, public improvement district assessments, right-of-way fees, special improvement district fund taxes, street assessments, time warrants, user fees, venue taxes, donations, coin-operated machine taxes, drainage fees, hotel taxes, parking fees, franchise fees, enterprise funds, charges for services, admission fees, fines and forfeitures, operating transfers from municipally controlled entities, municipal enterprises, municipally owned utilities, municipally controlled districts, licenses and permits, and interest, but shall not include any debt proceeds taken on by the city, or any grants, appropriations or other revenue received from other governmental or non-profit entities (that weren't directly or indirectly initially provided to such other governmental or non-profit entities by the city).

(f) If any section, paragraph, clause, or provision of this section is for any reason held to be invalid or unenforceable, the invalidity or unenforceability of that section, paragraph, clause, or provision shall not affect any of the remaining provisions of this section, and to this end, the provisions of this section are declared to be severable. This section shall supersede the Dallas City Code to the extent there are any conflicts. (Amend. of 11-5-24)

Section 15, Priority of Excess Revenue now requires the following:

*"If at any time the total actual, accruing or estimated annual revenue of the city exceeds the total actual annual revenue of the prior fiscal year, City Council shall appropriate no less than 50% of such excess amount, in compliance with Section 1 of Chapter XI of the Charter, to fund the Dallas Police and Fire Pension System – Combined Plan, in the amount directed by the State Pension Review Board and/or city council, whichever is higher. Any monies remaining shall be appropriated to the public safety objectives described below in Subsection (b)."*

Subsection (b) goes on to explain that any monies remaining out of the 50% of growth in year-over-year unrestricted revenues after paying Dallas Police and Fire Pension System – Combined Plan will be used to (1) increase police officer starting combined salary and non-pension benefits and (2) increase the total number of full-time sworn police officers.

Section 15 further explains in Subsection (e),

*“As used in the section, “revenue” shall mean all revenue collected by the city that’s use is not restricted to a limited purpose under state or federal law, including, but not limited to ad valorem property tax, sales tax, beverage taxes, asset forfeiture funds, bingo fees, cemetery taxes, impact fees, interlocal agreements,....but shall not include any debt proceeds taken on by the city, or any grants, appropriations or other revenue received from other governmental or non-profit entities....”*

Of the City Manager’s \$5.2 billion recommended budget for FY26, most city revenues have restricted use under state or federal law. The table below shows the FY26 recommended budget and identifies that the General Fund is mostly unrestricted, however, even within the General Fund certain revenues such as charges for service are restricted.

**Table A:**

	FY 2024-25 Budget	FY 2025-26 Budget	Restricted or Unrestricted
General Fund	1,903,410,750	1,965,019,000	Mostly Unrestricted
Aviation	208,098,739	208,704,381	Restricted
Convention & Event Services	137,358,763	131,535,243	Restricted
Dallas Water Utilities	826,863,664	880,895,629	Restricted
DWU - Stormwater Drainage Management	85,852,114	90,573,980	Restricted
Planning & Development	60,418,651	52,482,137	Restricted
Municipal Radio	451,077	473,114	Restricted
Sanitation Services	163,192,313	165,548,703	Restricted
Transportation Regulation	519,534	729,332	Restricted
Debt Service	485,754,134	491,015,332	Restricted
Additional Resources	188,972,948	264,014,138	Restricted
<b>Total Operating Budget</b>	<b>4,060,892,687</b>	<b>4,250,990,990</b>	
General Purpose Capital	479,645,432	514,799,272	Restricted
Enterprise Capital	432,628,500	437,858,265	Restricted
<b>Total Capital Budget</b>	<b>912,273,932</b>	<b>952,657,537</b>	
<b>Total Budget</b>	<b>4,973,166,619</b>	<b>5,203,648,527</b>	

**The General Fund is projected to grow \$61.6 million from \$1.903 billion to \$1.965 billion. 50% of \$61.6 million is \$30.8 million. Therefore, for the purpose of this section of the City Charter, 50% of the year-over-year growth in unrestricted revenue is projected to be \$30.8 million.**

According to the Charter (as amended by Section 15 on November 5, 2024), \$30.8 million must be used to pay the City’s contribution to the Dallas Police and Fire Pension System – Combined Plan. The funding plan for the Dallas Police and Fire Pension System – Combined Plan approved by the Dallas City Council on September 11, 2024, requires a FY26 budget allocation of \$225.67 million. The FY26 contribution to the pension system (\$225.67 million) not only exceeds 50% of the year-over-year growth in unrestricted revenue (\$30.8 million), but it also exceeds 100% of the year-over-year growth in unrestricted revenue (\$61.6 million).

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After funding the required contribution to the Dallas Police and Fire Pension System – Combined Plan, there is no remaining amount available to be allocated to the additional public safety objectives outlined in Section 15 of the Charter.

**Therefore, by funding the FY26 required contribution to the Dallas Police and Fire Pension System – Combined Plan, the City Manager's budget meets the requirements of Proposition U.**

Based on Proposition U written requirements articulated in Section 15, there is no mandate or requirement to increase police officer starting pay and there is no mandate or requirement to increase the total number of full-time sworn police officers since all of the 50% of year-over-year growth in unrestricted revenue is used to fund the required pension contributions of \$225.67 million in FY26.

However, the City Manager acknowledges and fully supports public safety, being a priority of residents and the City Council. It is for that reason that the City Manager's recommended budget goes beyond what is required by Proposition U and includes increasing not only police officer starting pay but also fire fighter starting pay and also increasing the hiring of additional full-time sworn police officers.

**4. Provide the results of the survey completed for comparison to the police peer group outlined in Charter Proposition U.**

Dallas City Charter, Chapter XI, Section 15, Priority of Excess Revenue (November 2024 Proposition U) says,

*"Any monies remaining shall be appropriated to the public safety objectives described below in Subsection (b). (b) Public safety objectives. (1) The starting combined salary and non-pension benefits, excluding sign-on bonuses, of the police officers of the Dallas Police Department are within the top five of all city police departments (as compared to the starting combined salary and non-pension benefits) in Dallas, Collin, Tarrant, Denton and Rockwall Counties with a population over 50,000, on a per officer basis".*

It is important to note that the reference to "any monies remaining" refers to whether or not funds remain after taking 50% of the year-over-year growth in unrestricted revenues and funding the Dallas Police and Fire Pension System – Combined Plan, in the amount directed by the State Pension Review Board and/or city council, whichever is higher. **As noted above, 50% of the year-over-year growth in unrestricted revenues for FY26 is projected to be \$30.8 million and the FY26 contribution to the pension plan is budgeted to be \$225.67 million.** Therefore, there are no "monies remaining" to address the additional components of this section of the Charter.

However, it was a priority for the City Manager to increase starting pay as part of the proposed FY26 budget. It is for this reason that the City Manager recommended increasing not only police officer starting pay but also fire fighter starting pay from \$75,397 to \$81,232. This goes beyond the amount needed for alignment with the Meet and Confer agreement.

The table below shows Dallas FY25 starting pay and FY26 recommended starting pay compared to the other cities identified in the five-county region. This comparison is based on data collected in March 2025. Proposition U did not specify when the data should be collected, therefore for consistency, the data was collected according to the timeline agreed to in the Meet and Confer agreement. You will notice that based on starting pay only, Dallas' rank is 12<sup>th</sup>. However, when non-pension benefits including education pay, bi-lingual pay, and shift/assignment pay are considered, **Dallas' ranks 3<sup>rd</sup> in the comparison which aligns with Proposition U written language that includes “starting combined salary and non-pension benefits”**.

**Table B:**

City	County	Police Officer Salary Minimum	Rank of Police Officer Salary Minimum	Non-Pension Benefit (Bachelor, Education + Bi-Lingual + Shift, Assignment)	Rank of Non-Pension Benefits	Police Officer Salary Minimum + Non-Pension Benefit	Rank of Police Officer Salary Minimum + Non-Pension Benefits
Allen	Collin	\$93,786	1	\$3,720	6	\$97,506	1
Frisco	Collin	\$89,198	2	\$3,900	5	\$93,098	2
<b>Dallas (FY26)</b>	<b>Dallas</b>	<b>\$81,232</b>	<b>12</b>	<b>\$10,680</b>	<b>1</b>	<b>\$91,912</b>	<b>3</b>
Garland	Dallas	\$87,513	3	\$4,300	4	\$91,813	4
Denton	Denton	\$84,724	6	\$6,000	3	\$90,724	5
McKinney	Collin	\$85,925	5	\$1,800	16	\$87,725	6
Plano	Collin	\$86,922	4	\$0	21	\$86,922	7
Richardson	Dallas	\$82,565	10	\$3,300	8	\$85,865	8
<b>Dallas (FY25)</b>	<b>Dallas</b>	<b>\$75,397</b>		<b>\$10,301</b>		<b>\$85,698</b>	
Lewisville	Denton	\$83,682	7	\$1,800	16	\$85,482	9
Fort Worth	Tarrant	\$76,066	23	\$8,772	2	\$84,838	10
Rockwall	Rockwall	\$82,784	8	\$1,401	19	\$84,185	11
Irving	Dallas	\$82,308	11	\$1,560	18	\$83,868	12
Arlington	Tarrant	\$81,229	13	\$2,612	11	\$83,841	13
Rowlett	Dallas	\$80,050	15	\$3,600	7	\$83,650	14
Grand Prairie	Dallas	\$81,070	14	\$2,460	12	\$83,530	15
North Richland Hills	Tarrant	\$82,620	9	\$0	21	\$82,620	16
Mesquite	Dallas	\$77,548	20	\$3,240	9	\$80,788	17
Carrollton	Dallas	\$77,813	18	\$2,400	13	\$80,213	18
Celina	Collin	\$77,667	19	\$2,400	13	\$80,067	19
Little Elm	Denton	\$76,894	21	\$2,400	13	\$79,294	20
DeSoto	Dallas	\$78,030	17	\$1,200	20	\$79,230	21
Euless	Tarrant	\$75,904	24	\$3,000	10	\$78,904	22
Grapevine	Tarrant	\$78,561	16	\$0	21	\$78,561	23
Wylie	Collin	\$76,369	22	\$0	21	\$76,369	24

**5. How does Dallas compare to regional peer cities for General Fund expenditures for police and fire departments?**

The table below shows Dallas compared to cities with a population of more than 50,000 in Dallas, Collin, Denton, Tarrant and Rockwall counties. Dallas' General Fund budget for FY26 includes \$1.2 billion for the police and fire departments. **This represents 62% of the proposed FY26 General Fund budget and places Dallas third out of 24 cities behind Little Elm (71%) and Arlington (64%).**

When comparing the police department allocation only, Dallas police department budget is 39% of the total General Fund and places Dallas tied for second along with Little Elm (39%), and behind only Arlington (42%).

**Table C:**

City	County	FY26 Proposed General Fund	FY26 Police	FY26 Fire	Total Police and Fire	Police % of Total GF	Police + Fire % of Total GF
Arlington	Tarrant	343,066,796	142,391,010	77,877,852	220,268,862	42%	64%
Little Elm	Denton	61,307,118	23,771,319	19,875,774	43,647,093	39%	71%
<b>Dallas</b>	<b>Dallas</b>	<b>1,965,019,000</b>	<b>758,494,793</b>	<b>453,477,457</b>	<b>1,211,972,250</b>	<b>39%</b>	<b>62%</b>
Rockwall	Rockwall	54,397,600	19,527,300	10,111,600	29,638,900	36%	54%
Grand Prairie	Dallas	197,515,585	68,485,369	52,044,674	120,530,043	35%	61%
North Richland Hills	Tarrant	66,958,658	20,664,430	18,019,452	38,683,882	31%	58%
Garland	Dallas	257,213,477	78,575,421	47,620,061	126,195,482	31%	49%
Irving	Dallas	322,870,722	98,252,072	75,144,966	173,397,038	30%	54%
Rowlett	Dallas	70,384,837	21,286,157	18,365,642	39,651,799	30%	56%
Fort Worth	Tarrant	1,105,359,750	329,817,092	226,791,357	556,608,449	30%	50%
Mesquite	Dallas	185,070,972	54,493,836	44,889,324	99,383,160	29%	54%
Allen	Collin	149,915,652	41,887,619	28,518,065	70,405,684	28%	47%
Lewisville	Denton	142,933,171	39,801,513	30,509,314	70,310,827	28%	49%
Carrollton	Dallas	144,213,740	40,047,459	36,822,972	76,870,431	28%	53%
Euless	Tarrant	72,173,644	20,011,069	14,884,211	34,895,280	28%	48%
Frisco	Collin	306,363,690	79,871,269	61,532,891	141,404,160	26%	46%
McKinney	Collin	232,196,912	60,072,275	50,270,563	110,342,838	26%	48%
Wylie	Collin	69,649,582	17,712,934	15,231,932	32,944,866	25%	47%
Denton	Denton	218,824,966	54,946,337	49,812,987	104,759,324	25%	48%
Plano	Collin	412,018,825	101,339,382	89,014,887	190,354,269	25%	46%
Celina	Collin	63,071,195	14,803,730	14,529,651	29,333,381	23%	47%
Richardson	Dallas	181,551,620	40,375,389	32,838,230	73,213,619	22%	40%
DeSoto	Dallas	71,501,997	13,155,515	20,366,042	33,521,557	18%	47%
Grapevine	Tarrant	87,686,948	5,411,108	19,061,810	24,472,918	6%	28%

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In summary, the data in Table B and Table C show the following:

Table B – Comparison of Starting Combined Salary and Non-Pension Benefits	Table C – Comparison of General Fund Budgets
Dallas starting pay ranks 12 <sup>th</sup> out of 24 peer cities	Dallas spends more than all cities in this peer group for police and fire departments
Dallas offers the highest amount of non-pension benefits and ranks 1 <sup>st</sup> for this component	Dallas spends 62% of our General Fund on police and fire departments ranking 3 <sup>rd</sup> behind Little Elm (71%) and Arlington (64%)
Dallas ranks 3 <sup>rd</sup> out of 24 when both starting pay and non-pension benefits are factored as written in Proposition U	Dallas spends 39% of our General Fund on the police department tied with Little Elm (39%) for 2 <sup>nd</sup> , and only behind Arlington (42%)

We will continue to provide responses to budget questions over the next few weeks. Please contact me or Janette Weedon, Director of Budget & Management Services, if you need additional information.



Jack Ireland  
Chief Financial Officer

c: Mayor and City Council  
Kimberly Bizer Tolbert, City Manager  
Tammy Palomino, City Attorney  
Mark Swann, City Auditor  
Bilierae Johnson, City Secretary  
Preston Robinson, Administrative Judge  
Dominique Artis, Chief of Public Safety

Dev Rastogi, Assistant City Manager  
M. Elizabeth (Liz) Cedillo-Pereira, Assistant City Manager  
Alina Ciocan, Assistant City Manager  
Donzell Gipson, Assistant City Manager  
Robin Bentley, Assistant City Manager  
Ahmad Goree, Chief of Staff to the City Manager