

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL 20 25

Quarterly Report: Second Quarter 2025 July 15, 2025

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To the Mayor, City Council, City Clerk, City Treasurer, and Community Members of the City of Chicago:

Enclosed for your review is the public report on the operations of the City of Chicago Office of Inspector General (OIG) during the second quarter of 2025, filed with City Council pursuant to Section 2-56-120 of the Municipal Code of Chicago (MCC).

As we enter the second half of 2025, OIG continues our efforts in the service of our mission—to promote economy, effectiveness, efficiency, and integrity in the operation of City government. We generally do our work in three channels; we conduct administrative and criminal investigations into allegations of misconduct; we do program and policy work, looking at whether the City is operating in a way which is efficient and effective; and we do transparency work, animated by the principle that information about the government belongs to the governed.

The work reported here, completed in the second quarter of 2025, demonstrates OIG's efforts across all three of those channels. Among the sustained misconduct investigations reported herein are ones in which we found:

- a Department of Water Management (DWM) hoisting engineer was clocking into work and then returning home on City time;
- a business compliance investigator with the Department of Business Affairs and Consumer Protection was arrested for driving while their driver's license was suspended as the result of a Driving Under the Influence arrest, and tried to use their City position to avoid arrest and charging;
- a former assistant commissioner with the Department of Housing and a Chicago Police Department member fraudulently obtained pandemic-era Payroll Protection Program loans;
- an airport operations supervisor with the Chicago Department of Aviation fraudulently obtained 14 identification cards from several states outside of Illinois;
- a Department of Finance auditor sold cocaine and misused City sick time to testify in federal court; and
- a DWM plumber illegally possessed a loaded firearm while on the clock and travelling between City worksites.

We also report here on three investigations into current and former OIG employees conducted pursuant to OIG's long-standing policy on internal investigations; we report those and their outcomes here alongside our reports on investigations into employees of other City departments in recognition of the importance of holding ourselves to at least as high a standard as we ask of other City departments.

Our program and policy work reported this quarter includes a report from our Public Safety section on the implementation and enforcement of the City's Gun Offender Registration Ordinance and an audit of the Department of Human Resources' administration of the City's civilian Employee Assistance Program.

Our transparency work continues as well, as we continued our work in this quarter to improve and build upon our Information Portal (informationportal.igchicago.org), where we make City data meaningfully accessible to the public to which it belongs.

I am, as always, grateful to serve alongside my colleagues at OIG, and I look forward to continuing our work.

Respectfully,

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Deborah Witzburg Inspector General City of Chicago

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This quarterly report provides an overview of the operations of OIG from April 1, 2025, through June 30, 2025, and includes information required by the MCC.

I | Mission of the Office of Inspector General

OIG's mission is to promote economy, effectiveness, efficiency, and integrity in the administration of programs and the operation of City government.¹ OIG accomplishes its mission through administrative and criminal investigations; program and policy work on effectiveness, efficiency, and equity; and transparency initiatives.

When OIG investigates and sustains allegations of misconduct, it issues summary reports of investigations to the appropriate authority, City management officials, and/or the Office of the Mayor, with investigative findings and recommendations for corrective action and discipline. Narrative summaries of sustained administrative investigations, i.e., those typically involving violations of the City's Personnel Rules, Debarment Rules, and Ethics Ordinance—and the resulting department or agency actions—are released in quarterly reports. OIG's investigations resulting in criminal sanctions or civil recovery actions are summarized in quarterly reports following public action (e.g., indictment) and updated in ensuing quarterly reports as court developments warrant.

OIG's performance audits, programmatic inquiries, advisories, and other reports are directed to the appropriate agency for comment and response, and are then <u>published on the OIG website</u>. From time to time, OIG also issues notifications to a City department for attention and comment; those notifications are summarized, along with any response, in the ensuing quarterly report.

OIG's data analysis and visualization work is available on its Information Portal.

Finally, OIG issues reports as required by the City's hiring and employment plans and policies and as otherwise necessary to carry out its functions in overseeing hiring and promotion processes across the City.

¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 2,551 intakes this quarter. The following chart shows the various reporting methods by which those intakes were received.

Intakes Chart 1: Intakes by Reporting Method



In determining whether to open an inquiry into issues raised during intake, among other factors, OIG evaluates the nature of the issue raised; which of OIG's sections might be best equipped to address the issue; and, if an intake alleges misconduct, the potential magnitude or significance of the allegations.² Following this review, OIG may open an investigative or non-investigative inquiry, decline an intake, or refer it to another agency or City department. The following information outlines the actions OIG has taken in response to intakes received this quarter.

In Q2 2025, OIG made 286³ intake referrals to City departments⁴ or other agencies.⁵ The total number of referrals (see chart below) may be greater than the number of OIG referred intakes, as a single OIG intake may be referred to more than one agency.

² As further described below, some intakes are discontinued when, after review in OIG's intake process, they are determined to be not amenable to further consideration.

³ OIG referred 275 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 286 referrals.

⁴ OIG refers intakes to other City departments under limited circumstances. These circumstances include, but are not necessarily limited to, intakes involving CPD members which are referred pursuant to the consent decree entered in *Illinois v. Chicago*, intakes involving allegations of violations of the City's Diversity and Equal Employment Opportunity Policy, and intakes which provide notification of publicly available information on an arrest of a City employee.

⁵ Pursuant to MCC § 2-56-120, OIG does not report here referred intakes in which "(i) the complaint addresses potential criminal conduct and has been referred to a state or federal law enforcement agency, and (ii) the investigation of the conduct at issue is ongoing, and (iii) in the judgment of the inspector general, public disclosure of the referral would compromise the effectiveness of the investigation."

Table 1: Referred Intakes

Referred Agency	Number of Referrals
Chicago Police Department	159
Chicago Civilian Office of Police Accountability	36
Chicago Department of Streets and Sanitation	12
Chicago Department of Human Resources	11
Chicago Fire Department	10
Illinois Office of Executive Inspector General	7
Chicago Department of Water Management	6
Chicago Public Schools Office of Inspector General	5
Chicago Housing Authority Office of Inspector General	4
Chicago Office of Emergency Management and Communications	4
Chicago Department of Transportation	3
Illinois Office of Attorney General	3
Cook County Sheriff's Office of Professional Review	2
Illinois Department of Human Services Office of Inspector General	2
Muskogee Police Department	2
U.S. Secret Service	2
Bensenville Police Department	1
Chicago Department of Aviation	1
Chicago Department of Family and Support Services	1
Chicago Heights Police Department	1
Chicago Park District Office of Inspector General	1
Chicago Public Library	1
City Colleges of Chicago Office of Inspector General	1
Cook County Office of Independent Inspector General	1
Des Plaines Police Department	1
Glenview Police Department	1
Illinois Department of Children and Family Services Office of Inspector General	1
Las Vegas Metropolitan Police Department	1
Morgan County Sheriff's Office	1
National Center for Missing and Exploited Children	1
U.S. Customs and Border Protection	1
U.S. Department of Health and Human Services Office of Inspector General	1
U.S. Department of Housing and Urban Development Office of Inspector General	1
U.S. Department of Justice Office of Inspector General	1
Total	286

OIG may discontinue intakes that are, for a variety of reasons, not amenable to further consideration. Specifically, if after review, an intake is determined to lack sufficient information or clarity in describing the alleged misconduct, waste, or inefficiency to provide a basis for investigative follow-up, or is incoherent, incomprehensible, or factually impossible, it is designated

as "Do Not Process" and is discontinued. If a communication received and cataloged as an intake is determined to be an automated, accidental, irrelevant, or inappropriate electronic message, it is designated as "Spam" and discontinued. Finally, if a communication received and cataloged as an intake is determined to be a question or request for information that is directly answered by OIG, it is designated as an "Inquiry" and discontinued.

In Q2 2025, OIG discontinued 1,490 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do Not Process	688
Inquiries	410
Spam	392
Total	1,490

Pursuant to MCC § 2-56-050(b), if OIG receives an intake that constitutes a complaint alleging a violation of the Governmental Ethics Ordinance (GEO), MCC § 2-156, by any elected or appointed City officer, City employee, or any other person subject to the GEO, OIG may only: (i) decline to open an investigation if OIG determines that the complaint lacks foundation or does not relate to a violation of MCC § 2-156; (ii) refer the matter to the appropriate authority if OIG determines that the potential violation is minor and can be resolved internally as a personnel matter; or (iii) open an investigation.

In Q2 2025, OIG declined 21 complaints alleging violations of the GEO.

Table 3: Ethics Complaints Declined

Category of Declined Ethics Complaints	Number of Declined Ethics Complaints
Failure to Allege a Violation of MCC § 2-156	12
Complaint Lacks Foundation	6
Complaint of the Same Conduct Already Received	3
Total	21

III | Investigations

OIG's Investigations section conducts both criminal and administrative investigations into the conduct of City officers, employees, and other entities, including contractors, subcontractors, and lobbyists. OIG may initiate an investigation either in response to a complaint or on its own initiative.

The information to follow provides an overview of OIG's investigative work this quarter and fulfills the reporting requirements set out in §§ 2-56-080 and -120 of the MCC, as well as the Intergovernmental Agreement between the Public Building Commission (PBC)⁶ of Chicago and OIG.

A | Misconduct Investigations

1 | Investigative Activity This Quarter

As of the close of this quarter, OIG has 318 active investigations. During Q2 2025, OIG initiated 45 investigations, of which 32 were self-initiated, and concluded 14 investigations.

2 | Open Matters

OIG's 318 currently active misconduct investigations involve a range of subjects and types of alleged misconduct.

Table 4: Subject of Investigations

Subject of Investigations	Number of Investigations ⁷
City Employees	264
Elected Officials	26
Contractors, Subcontractors, and Persons Seeking Contracts	20
Licensees	1
Appointed Officials	1
Other	6
Total	318

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	316
Ineffectiveness	1
Waste/Inefficiency	1
Total	318

⁶ Created by state legislation in 1956, PBC is responsible for planning, designing, and constructing municipal buildings, including schools, libraries, fieldhouses, and fire stations. See: <u>https://pbcchicago.com/</u>.

⁷ Counted here are the number of open investigations, not the number of unique subjects; that is, the same individual or entity may be the subject of more than one separate investigation.

a | *Illinois v. Chicago*, Consent Decree Paragraph 481 Investigations

Under collective bargaining agreements between the City of Chicago and certain members of the Chicago Police Department (CPD), OIG may only investigate allegations of misconduct concerning an incident or event which occurred more than five years prior to the date of the complaint or allegation with written authorization from CPD's superintendent. Pursuant to Paragraph 481 of the consent decree entered in *Illinois v. Chicago*, if OIG requests the superintendent's authorization to open such an investigation, the superintendent must respond within 30 days.

During this quarter, OIG did not request the Superintendent's authorization to open any investigation relevant to or reportable pursuant to Paragraph 481.

b | Investigations Open Over Twelve Months

As required by MCC § 2-56-080, OIG reports each quarter on active investigations which have been open for more than 12 months. Of OIG's 318 pending investigations, 126 have been open for more than 12 months. Most cases remain pending because (1) they are complex or resource-intensive investigations that may require resolution of legal issues or involve multiple subjects; (2) they involve allegations that may be the subject of criminal investigation being conducted jointly with law enforcement investigative or prosecutorial partners at the federal, state, or local level; or (3) they were extended to allocate resources to higher risk, more time-sensitive investigations. Where other explanations are relevant for cases remaining open beyond 12 months, they are noted in the table below.

Case ID ⁸	Legacy ID	General Nature of Allegations	
C2022-000041000	20-1335	Unauthorized outside employment/residency violation	
C2022-000041038	20-1375	Criminal investigation	
C2022-000041039	20-1376	False statements/violation of department rules	
C2022-000041245	20-1589	Criminal investigation	
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine	
C2022-000041581	21-0220	Criminal investigation	
C2022-000042145	21-0820	False records submitted to City	
C2022-000043912	N/A	Ethics violation	
C2022-000043865	N/A	Fraud	
C2022-000043921	N/A	Secondary employment violation	
C2022-000043925	N/A	Procurement fraud	
C2022-000043944	N/A	Duty disability fraud	
C2022-000043961	N/A	Ethics violation	
C2022-000044042	N/A	Paycheck Protection Program (PPP) fraud	

Table 6: Investigations Open Over Twelve Months, Q2 2025

⁸In early 2022, OIG launched a new case management system, which accounts for the new case number format.

Case ID ⁸	Legacy ID	General Nature of Allegations
C2022-000044045	N/A	Ethics violation
C2022-000044046	N/A	Official misconduct
C2022-000044065	N/A	False statements
C2022-000044078	N/A	Time falsification
C2022-000044086	N/A	Ethics violation
C2022-000044091	N/A	Residency violation
C2022-000044093	N/A	Official misconduct
C2022-000044099	N/A	Retaliation
C2022-000044122	N/A	Criminal investigation
C2023-000000010	N/A	Official misconduct
C2023-000000026	N/A	Criminal investigation
C2023-000000027	N/A	Criminal investigation
C2023-000000028	N/A	Official misconduct
C2023-00000032	N/A	Official misconduct
C2023-000000038	N/A	Ethics violation
C2023-000000049	N/A	Ethics violation
C2023-000000053	N/A	Official misconduct
C2023-000000054	N/A	Official misconduct
C2023-000000061	N/A	Fraud
C2023-000000093	N/A	Retaliation
C2023-000000109	N/A	Conduct unbecoming
C2023-000000118	N/A	EEO violation
C2023-000000121	N/A	Duty disability fraud
C2023-000000128	N/A	Criminal investigation
C2023-000000152	N/A	Criminal investigation
C2023-000000155	N/A	Secondary employment violation
C2023-000000158	N/A	Personnel rules violation
C2023-000000164	N/A	Conduct unbecoming
C2023-000000166	N/A	Criminal investigation
C2023-000000177	N/A	Ethics violation
C2023-000000178	N/A	Criminal investigation
C2023-000000179	N/A	Retaliation
C2023-000000180	N/A	Ethics violation
C2023-000000183	N/A	Fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
C2023-000000189	N/A	Theft
C2023-000000199	N/A	Ethics violation
C2023-000000207	N/A	Fraud
C2023-000000215	N/A	PPP fraud
C2023-000000223	N/A	PPP fraud
C2023-000000224	N/A	Residency violation
C2023-000000232	N/A	Personnel rule violation
C2023-000000260	N/A	Ethics violation
C2023-000000264	N/A	PPP fraud
C2023-000000267	N/A	PPP fraud
C2023-000000268	N/A	PPP fraud
C2023-000000270	N/A	PPP fraud
C2023-000000271	N/A	PPP fraud
C2023-000000272	N/A	PPP fraud
C2023-000000274	N/A	PPP fraud
C2023-000000276	N/A	PPP fraud
C2023-000000277	N/A	PPP fraud
C2023-000000278	N/A	PPP fraud
C2023-000000279	N/A	PPP fraud
C2023-000000281	N/A	Criminal investigation
C2023-000000282	N/A	Criminal investigation
C2023-000000298	N/A	Bribery
C2023-000000324	N/A	Ethics violation
C2023-000000332	N/A	PPP fraud
C2023-000000335	N/A	Time theft
C2023-000000336	N/A	Residency violation
C2023-000000339	N/A	Ethics violation
C2023-000000344	N/A	Firearms in workplace violation
C2023-000000346	N/A	Ethics violation
C2023-000000347	N/A	Ethics violation
C2023-000000348	N/A	Ethics violation
C2023-000000358	N/A	Ethics violation
C2023-000000359	N/A	Violence in the workplace violation
C2023-000000360	N/A	Residency violation

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000006	N/A	Unlawful eavesdropping
C2024-000000007	N/A	Ethics violation
C2024-000000013	N/A	Residency violation
C2024-000000014	N/A	Ethics violation
C2024-000000015	N/A	False statements
C2024-000000017	N/A	Personnel violation
C2024-000000024	N/A	PPP fraud
C2024-000000025	N/A	Duty disability fraud
C2024-000000047	N/A	Obstruction
C2024-000000053	N/A	PPP fraud
C2024-000000057	N/A	Bribery
C2024-000000059	N/A	Theft
C2024-000000064	N/A	Criminal violation
C2024-000000067	N/A	Ethics violation
C2024-000000068	N/A	Ethics violation
C2024-000000072	N/A	EEO violation
C2024-000000081	N/A	Personnel rule violation
C2024-00000082	N/A	Personnel rule violation
C2024-00000083	N/A	Criminal violation
C2024-000000099	N/A	Retaliation
C2024-000000102	N/A	Theft
C2024-000000110	N/A	PPP fraud
C2024-000000116	N/A	Obstruction
C2024-000000119	N/A	Residency violation
C2024-000000120	N/A	Personnel rule violation
C2024-000000121	N/A	Personnel rule violation
C2024-000000122	N/A	Criminal violation
C2024-000000134	N/A	Ethics violation
C2024-000000143	N/A	Ethics violation
C2024-000000369	N/A	Theft
C2024-000000372	N/A	Fraud
C2024-000000378	N/A	Residency violation
C2024-000000379	N/A	WBE fraud
C2024-000000385	N/A	Sexual harassment

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000391	N/A	Personnel violation
C2024-000000392	N/A	Bribery
C2024-00000393	N/A	Ethics violation
C2024-000000407	N/A	MWBE fraud
C2024-000000408	N/A	Theft
C2024-000000409	N/A	Residency violation
C2024-000000412	N/A	Ethics violation
C2024-000000430	N/A	PPP fraud
C2024-000000431	N/A	Theft
C2024-000000432	N/A	PPP fraud

3 | Public Building Commission Complaints and Investigations

MCC § 2-56-030 empowers OIG to exercise its powers and duties with respect to any sister agency pursuant to an intergovernmental agreement with that agency, and it does so with respect to PBC.

In Q2 2025, OIG received no new complaints related to PBC.

B | Sustained Administrative Investigations

OIG investigations may result in administrative sanctions, criminal charges, or both. Investigations leading to administrative sanctions involve violations of City rules, policies or procedures, and/or waste or inefficiency. For sustained administrative cases, OIG produces summary reports of investigation—a summary and analysis of the evidence and recommendations for disciplinary or other corrective action. OIG sends these reports to the appropriate authority as prescribed in the MCC, including the Office of the Mayor and affected City departments.

Below (Table 7) is an overview of sustained investigative matters and, pursuant to MCC § 2-56-110, deidentified synopses of administrative investigations completed and eligible to be reported as sustained investigative matters. A matter is not eligible for reporting until, pursuant to the MCC, the relevant City department has had 30 days (with the potential for an extension of an additional 30 days) to respond to OIG's findings and recommendations,⁹ and to inform OIG of what action(s) the department intends to take. Departments must follow strict protocols set forth in the City's Personnel Rules, Procurement Rules, and/or applicable collective bargaining agreements, prior to imposing discipline or other corrective action.¹⁰

⁹ PBC has 60 days to respond to a summary report of investigation by stating a description of any disciplinary or administrative action taken by the Commission. If PBC chooses not to take action or takes an action different from that recommended by OIG, PBC must describe that action and explain the reasons for that action.

¹⁰ In some instances, OIG may defer the reporting of a matter against an individual until the conclusion of an investigation of other individuals connected to the same misconduct, so as to preserve investigative equities and to assure that the administrative due process rights of those subject to the continuing investigation are protected.

In addition to OIG's findings, each synopsis includes the action taken by the department in response to OIG's recommendations. These synopses are intended to illustrate the general nature and outcome of the cases for public reporting purposes and thus may not contain all allegations and/or findings for each case.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022- 000043889	Department of Water Management	Impose discipline against the subjects, commensurate with the gravity of their violations, past disciplinary records, and any other relevant considerations.	The Department of Water Management (DWM) requested that the Department of Law (DOL) prepare discharge charges for one subject. DWM issued a seven-day suspension to the other subject.
C2022- 000043899	Office of Emergency Management and Communications	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	The Office of Emergency Management and Communications (OEMC) issued a three-day suspension to the subject.
C2023- 000000040	Department of Business Affairs and Consumer Protection	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR).	The Department of Business Affairs and Consumer Protection (BACP) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2023- 00000050	Department of Public Health	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Chicago Department of Public Health (CDPH) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

Table '	7. Overview	of Cases (Completed	and Reported	as Sustained Matters
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OIG	Department	OIG	Department
Case Number	or Agency	Recommendation	or Agency Action
C2023- 000000103	Department of Public Health	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	CDPH issued an oral warning to the subject.
C2023- 000000104	Office of Public Safety Administration	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	The Office of Public Safety Administration (OPSA) verbally counseled the subject.
C2023- 000000105	Office of Public Safety Administration	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	OPSA verbally counseled the subject.
C2023- 000000120	Department of Water Management	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	DWM preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2023- 000000175	Department of Housing	Make a formal determination on the violations and refer the subject for placement on the ineligible for rehire list maintained by DHR.	The Department of Housing (DOH) referred the subject for placement on the ineligible for rehire list maintained by DHR.
C2023- 000000193	Department of Aviation	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Chicago Department of Aviation (CDA) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

OIG	Department	OIG	Department
Case Number	or Agency	Recommendation	or Agency Action
C2023- 000000212	Chicago Police Department	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	CPD preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2023- 000000213	Department of Transportation	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	The Department of Transportation (CDOT) issued a written reprimand to the subject.
C2023- 000000248	Department of Water Management	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	DWM disagreed with the recommendation, and the subject retired prior to DWM issuing discipline.
C2023- 000000328	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	The Board of Ethics (BOE) found probable cause to believe that the subject violated the GEO.
C2024- 000000046	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	BOE found probable cause to believe that the subject violated the GEO.
C2024- 000000071	Department of Water Management	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	DWM disagreed with the recommendation and issued a written reprimand and three- day suspension to the subject.
C2024- 000000091	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	BOE found probable cause to believe that the subject violated the GEO.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2024- 000000142	Department of Family and Support Services	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Family and Support Services (DFSS) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2024- 000000163	Office of Emergency Management and Communication	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	OEMC issued a fifteen- day suspension to the subject.
C2024- 000000189	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	BOE found probable cause to believe that the subject violated the GEO.
C2024- 000000210	Office of Inspector General	(Conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel)	OIG issued a written reprimand to the subject.

1 | Falsification of Attendance Records; Absence Without Leave (C2022-000043889)

An OIG investigation established that a DWM hoisting engineer was falsifying time by returning to their personal residence while on City time. In particular, on three separate occasions when OIG was conducting surveillance, the hoisting engineer was observed returning to his house for two hours and 16 minutes on the first occasion, one hour and 49 minutes on the second occasion, and two hours and six minutes on the third occasion.

OIG found that the hoisting engineer violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 1 (Absence without leave), Subsection 2 (leaving the department, office, or work site without proper authorization), and Subsection 11 (falsification of any attendance or other employment records).

OIG found that the hoisting engineer's supervisor, a DWM foreman of water pipe construction, failed to adequately supervise the hoisting engineer because they were unaware the hoisting engineer was spending significant amounts of work time at his personal residence. This violated

City of Chicago Personnel Rule XVIII, Section 1, Subsection 39 (incompetence or inefficiency in the performance of the duties of a position).

OIG recommended that DWM impose discipline against both the hoisting engineer and the foreman of water pipe construction, commensurate with the gravity of their violations, past disciplinary records, and any other relevant considerations. In response, DWM found the conduct warranted discharge of the hoisting engineer and referred them for placement on the ineligible for rehire list maintained by DHR. DWM requested DOL prepare discharge charges for the employee.

Regarding the foreman of water pipe construction, DWM agreed with OIG's recommendation and issued a seven-day suspension. The supervisor appealed, and their suspension was reduced to 3 days.

2 | Dangerous Driving in a City Vehicle (C2022-0000443899)

An OIG investigation established that a then-OEMC senior emergency management coordinator activated the emergency equipment of an unmarked OEMC vehicle and disregarded a red light to avoid being late to a training, not for any permissible reason relating to an emergency response. That vehicle was involved in a traffic collision that resulted in property damage and personal injury to the subject and their passenger, a fellow OEMC senior emergency management coordinator.

OIG found the subject's conduct violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 15 (Engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes), Subsection 35 (acting negligently or willfully in the course of employment so as to damage public or private property or cause injury to any person), and Subsection 48 (violating any departmental regulations, rules or procedures).

OIG recommended that OEMC impose discipline commensurate with the gravity of the violations, past disciplinary record, and any other relevant considerations. In response, OEMC issued a three-day suspension to the subject, who is now a manager of emergency management services.

3 | Driving a City Vehicle with a Suspended License; Conduct Unbecoming of a Public Employee (C2023-00000040)

An OIG investigation established that a BACP business compliance investigator drove a City vehicle on four separate days while their license was suspended for a pending Driving Under the Influence (DUI) charge. OIG also established that during their DUI arrest, the subject made their City employment known in an attempt to avoid arrest and criminal charges. In particular, body worn camera of the investigator's arrest showed that after the subject was told to get out of their car to perform field sobriety tests, the subject told the police officer "Take care of me, bro. I am a City of Chicago inspector." After their arrest, the subject repeatedly brought up their City position while in the CPD station lockup. The subject told the police officer that they are an investigator for the City of Chicago and conduct undercover investigations and said, "Come on bro, have some heart and compassion. I am enforcement, too, bro." They continued on later in the video, saying "I am a City investigator for the City of Chicago. We all enforcement. Have some compassion for what we do."

OIG found that the subject violated the City of Chicago Vehicle and Equipment Policy Section I, City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable

laws of other states, or federal statutes), Subsection 28 (loss of professional or other license or failing to attain prerequisites necessary to obtain or renew professional or other license when such a license is required to meet the standards of the position), and Subsection 50 (conduct unbecoming of an officer or public employee).

OIG recommended that BACP terminate the subject's employment and refer them for placement on the ineligible for rehire list maintained by DHR. In response, BACP preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

4 | Residency Violation; Providing False Statements (C2023-00000050)

An OIG investigation has established that a CDPH public health administrator II did not reside in the City in violation of the City's residency requirement for employees, but instead lived in Berwyn. In an effort to maintain their City employment, the subject provided false statements on a "Change of Address Form" they provided to CDPH in August 2022, which stated they were moving to an address in the City, when, in fact, they were residing in Berwyn. The subject also signed a false residency affidavit that attested to living in the City, when, in fact, they lived in Berwyn.

The subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 6 (providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City), Subsection 15 (engaging in conduct prohibited by the Municipal Code of Chicago), and Subsection 41 (failure to be an actual resident of the City of Chicago).

OIG accordingly recommended that CDPH discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CDPH preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

5 | Failure to Timely Disclose Conflict (C2023-000000103)

An OIG investigation, conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel,¹¹ established that a former OIG employee and current CDPH director of administration I violated OIG's Conflict of Interest and Recusal policy by failing to timely disclose that they had applied for employment with CDPH. To avoid even the appearance of a conflict, OIG personnel who wish to pursue an employment opportunity with another City department or entity within OIG's jurisdiction must disclose the intended application to OIG's ethics officer prior to applying for the employment opportunity, allowing OIG to take any appropriate steps to prevent an impairment to independence.

OIG found that the director of administration I's conduct violated OIG Administrative Policies & Procedures 1.3 (Conflict of Interest and Recusal) and City Personnel Rule XVIII, Section 1, Subsection 48 (violating any departmental regulations, rules or procedures) by making a late disclosure. However, OIG's investigation did not establish any actual impairment to OIG's independence or harm to OIG's work. The subject's supervisor did not recall the subject attending OIG intake meetings, project meetings, or case finding meetings such that they would have been able to influence ongoing OIG work. Further, the subject's job duties did not usually involve contact with City departments and did not involve decision-making input on OIG cases, projects, or audits. Nevertheless, the subject's failure to disclose numerous job applications to City departments while

¹¹ See <u>https://igchicago.org/wp-content/uploads/2023/07/Internal-Investigations-Policy.pdf</u>.

working as an OIG employee violated an OIG policy that exists to protect the independence of OIG's work.

OIG recommended that the CDPH impose discipline against the subject, commensurate with the gravity of their violation, past disciplinary record, and any other relevant considerations. In response, CDPH agreed with OIG's findings regarding the policy and rule violated, and issued an oral warning to the subject.

6 | Failure to Timely Disclose Conflict (C2023-00000104)

An OIG investigation, conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel, established that a former OIG employee and current OPSA project manager violated OIG's Conflict of Interest and Recusal policy by failing to timely disclose that they had applied for employment with OPSA.

OIG found that the project manager's conduct violated OIG Administrative Policies & Procedures 1.3 (Conflict of Interest and Recusal) and City Personnel Rule XVIII, Section 1, Subsection 48 (Violating any departmental regulations, rules or procedures) by making a late disclosure. The evidence gathered in this investigation did not establish actual harm or impairment to OIG's work resulting from the subject's failure to disclose that they had applied to a job with OPSA. While the subject was assigned to several projects related to OPSA at the time of their application, those projects were in various stages of report drafting. The subject was not involved in information gathering regarding those projects while their application was pending, mitigating against the risk that the subject's pending application might influence the manner in which they gathered information. Additionally, the subject was not involved in any final determinations regarding the content of the respective products at the time their OPSA application was pending; multiple layers of review regarding the final content of the reports would still follow the report drafting stage. Nevertheless, the subject's failure to disclose their application to OPSA violated OIG policy that exists to protect the independence of OIG's work.

OIG recommended that the OPSA impose discipline against the subject, commensurate with the gravity of their violation, past disciplinary record, and any other relevant considerations. In response, OPSA agreed with OIG's findings regarding the policy and rule violated, and verbally counseled the subject.

7 | Failure to Timely Disclose Conflict (C2023-00000105)

An OIG investigation, conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel, established that a former OIG employee and current OPSA director of human resources violated OIG's Conflict of Interest and Recusal policy by failing to timely disclose that they had applied for employment with OPSA.

OIG found that the subject's conduct violated OIG Administrative Policies & Procedures 1.3 (Conflict of Interest and Recusal) and City Personnel Rule XVIII, Section 1, Subsection 48 (violating any departmental regulations, rules or procedures). However, the evidence does not indicate actual harm or impairment to OIG's work resulting from the subject's belated disclosure that they were pursuing a position with OPSA. This was due, at least in part, to the fact that the subject disclosed shortly after their application was submitted. This allowed OIG to institute the necessary checks and recusals to ensure no independence impairments very soon after the application was actually submitted. Nonetheless, the subject's failure to timely disclose that they intended to pursue

a position with OPSA—an agency with which they had frequent contact in their role at OIG violated OIG policy that exists to protect the independence of OIG's work.

OIG recommended that the OPSA impose discipline against the subject, commensurate with the gravity of their violation, past disciplinary record, and any other relevant considerations. In response, OPSA agreed with OIG's findings regarding the policy and rule violated, and verbally counseled the subject.

8 | Residency Violation (C2023-00000120)

An OIG investigation established that a DWM hoisting engineer does not reside in the City in violation of the City's residency requirement for employees.

OIG found that the subject violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 6 (providing a false or misleading answer to any question in any application, questionnaire, information form, or other document provided by the City), Subsection 15 (engaging in conduct prohibited by the Municipal Code of Chicago), and Subsection 41 (failure to be an actual resident of the city of Chicago).

OIG recommended that DWM discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DWM preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

9 | PPP Loan Fraud; Conduct Unbecoming of a Public Employee (C2023-00000175)

An OIG investigation established that a former DOH assistant commissioner illegally obtained funds from the federal Paycheck Protection (PPP) Loan program in violation of federal law. Specifically, the subject received two separate PPP loans totaling over \$33,264 and applied for forgiveness of the total amount by claiming they had an "administrative services" business. However, OIG did not find evidence that the subject ever had such a business. Moreover, despite substantial efforts to contact the subject and interview them regarding this allegation, the subject never contacted OIG to set up a time for an interview.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (Engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes, specifically 18 U.S.C. § 641, 18 U.S.C. § 1001, and 18 U.S.C. § 1343) and Subsection 50 (conduct unbecoming of a public employee).

The subject resigned before the completion of OIG's investigation. OIG recommended that DOH make a formal determination on the violations and refer the subject for placement on the ineligible for rehire list maintained by DHR. DOH followed OIG's recommendation.

10 | Identity Theft; Conduct Unbecoming of a Public Employee (C2023-000000193)

An OIG investigation established that a CDA airport operations supervisor fraudulently procured 14 identification cards or state identification cards from several states outside Illinois, committing identity theft and fraud.

OIG found that the subject violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes, specifically Illinois statute 720 ILCS 5/16-30, Arkansas statute, A.C.A. § 5-37-227(b)(3), Indiana Code § 3.5(a), Iowa statute ICA § 715A.8 1.a(2), Kentucky statute § 514.160(1)(b), Ohio statute 2913.49, Oklahoma statute 21 Kol. St. Ann. § 1533.1 (B), Missouri statute 570.223)) and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that CDA discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. Additionally, OIG recommended CDA terminate the subject's access to secure areas.

CDA preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject. CDA also agreed with OIG's recommendation to revoke the subject's access to secure areas.

11 | PPP Loan Fraud; False Statements (C2023-00000212)

An OIG investigation has established that a CPD Police Officer illegally obtained PPP loan funds in violation of federal law. Specifically, the subject received over \$18,000 in PPP loan funds for an insurance agency business that OIG's investigation revealed not to exist. Moreover, the subject submitted several Economic Injury Disaster Loan (EIDL) applications to the Small Business Administration falsely claiming to have businesses that required these loans. In fact, OIG's investigation showed that the subject did not have any such businesses. Finally, the subject made false statements in order to obstruct OIG's investigation when they claimed they did not submit the EIDL applications.

OIG found that the subject violated CPD Rule 1 (violation of any law or ordinance, specifically 18 U.S.C. § 641, 18 U.S.C. § 1001, 18 U.S.C. § 1014, and 18 U.S.C. § 1343, MCC § 1-21-010 (false statements) and MCC § 2-56-140 (obstructing or interfering with OIG investigations)), Rule 2 (any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department), and Rule 14 (making a false report, written or oral).

OIG recommended that CPD discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. CPD preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

12 | Unauthorized Secondary Employment; Performing Work Without a Required License (C2023-000000213)

An OIG investigation has established that a CDOT cement finisher engaged in unauthorized secondary employment and in the course of that secondary employment, performed masonry work without the legally required mason contractor license.

OIG found that the subject violated the City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes, specifically MCC § 4-376-100) and Subsection 43 (failure to comply with the requirements of secondary employment as delineated in Personnel Rule XX, Section 3), and Personnel Rule XX, Section 3 (any employee desiring to perform outside employment shall first file a request in writing with her or his department head for permission to engage in outside employment).

OIG recommended that CDOT impose discipline commensurate with the gravity of the subject's violations, past disciplinary record, and any other relevant considerations. CDOT agreed with OIG's recommendation and issued the subject a written reprimand.

13 | Falsification of Attendance Records (C2023-00000248)

An OIG investigation has established that a DWM house drain inspector was absent without leave on three occasions when the house drain inspector clocked into work and then returned to their residence. OIG's investigation also established that the subject falsified mileage reimbursement forms when they reported that they left for their first worksite from a City facility, when, in fact, they left for that worksite from their residence.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 11 (falsification of any attendance or other employment records).

OIG recommended that DWM discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. DWM agreed with OIG's finding, but disagreed with the disciplinary recommendation, stating that it believed "discharge [was] excessive and that progressive discipline is appropriate for this case." However, the subject retired before discipline could be issued.

14 | Misuse of City Title (C2023-00000328)

An OIG investigation has established that an Alderperson repeatedly invoked their official City title to demand expedited service from a private business rather than waiting in line with other patrons. OIG's investigation also established that when the employees of that business declined the subject's demands for service, the subject threatened to send City inspectors to the location.

OIG determined that the subject's conduct constituted a misuse of their City title and position in violation of the GEO, and recommended that BOE find probable cause to believe the Alderperson violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject had violated the GEO.

15 | Post-Employment Revolving Door Violation (C2024-00000046)

An OIG investigation established that a former Department of Assets, Information and Services (DAIS) laborer, within one year after their resignation from City employment, assisted their new employer in a business transaction involving the City and that the subject had participated personally and substantially in the subject matter of the transaction during their term of City employment. Specifically, the subject, while working for a non-profit organization, was involved in handling logistics for an event for which they had previously handled logistics while working for the City.

OIG found that the subject's conduct violated the City's Revolving Door Policy as established in the GEO, and recommended that BOE find probable cause to believe the former laborer violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO.

16 | Unlawful Possession of a Firearm; Falsification of Attendance Record (C2024-000000071)

An OIG investigation established that a DWM plumber possessed a loaded firearm, while on the clock and traveling between City work sites, without a valid Concealed Carry License. The subject's possession of the firearm was in violation of Illinois law and the City of Chicago Firearms in the Workplace Policy. Moreover, OIG's investigation established that the subject was paid for a full

day's work while in police custody and falsified their daily time report in violation of City Personnel Rules.

OIG found that the subject's conduct violated the City of Chicago Firearms in the Workplace Policy, and City of Chicago Personnel Rule XVIII, Section 1, Subsection 1 (absence without leave), and Subsection 11 (falsification of attendance records), Subsection 15 (engaging in conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes, specifically 430 ILCS 66/1 and 720 ILCS 5/24-1.6 (a)(1)(3)(A-5))), Subsection 48 (violating departmental rules).

OIG recommended that DWM discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DWM agreed with OIG's findings on the violations but disagreed with the recommendation; DWM issued a written reprimand and a three-day suspension to the employee. In its response to OIG, DWM wrote that "[DWM] does not believe that discharge is warranted in this case." DWM wrote that "the firearm was kept inside the employee's personal vehicle – not in a City-owned vehicle." Further, DWM wrote that "at no point did the employee bring the firearm onto a jobsite" and noted that there was not "any indication that the subject's falsification of time was "an isolated incident" that "did not show a pattern of the employee engaging in falsification of time."

17 | Improper Gift (C2024-00000091)

An OIG investigation established that a business owner in the City of Chicago attempted to give cash gifts to a Department of Buildings (DOB) electrical inspector and a DOB plumbing inspector. Specifically, the business owner dropped an unknown amount of money into the lap of the electrical inspector following an inspection. The electrical inspector did not accept the money and promptly reported the incident to their supervisors, resulting in its being reported to OIG.

OIG found that the business owner's conduct violated the GEO's gift ban. OIG recommended that BOE find probable cause to believe the business owner violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe the business owner violated the GEO.

18 | Distribution of a Controlled Substance; Misuse of Sick Leave (C2024-00000142)

An OIG investigation has established that a former Department of Finance auditor and current DFSS auditor II distributed and delivered a controlled substance and misused sick leave to appear in court. Specifically, while employed by DOF, the subject sold large quantities of cocaine, potentially more than 20 kilograms worth. After being arrested, the subject testified for the federal government in a federal criminal trial in 2022. The subject used sick time during their appearance in court.

OIG found that that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 13 (use of sick leave in an unauthorized manner for purposes other than allowed under City rules and regulations), Subsection 14 (Involvement in the illegal sale, delivery, receipt, possession or use of any controlled substance either on or off the job site during hours of employment or non-working time), Subsection 15 (engaging in any act or conduct prohibited by the Illinois Compiled Statutes, applicable laws of other states, or federal statutes, specifically 21 U.S.C. § 841 (distribution or possession with the intent to distribute) and 720 ILCS 570/401 (delivery or possession with the intent to deliver a controlled substance)), Subsection 48 (violating any departmental regulations, rules or procedures) and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that DFSS discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. DFSS preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

19 | Discourteous Treatment (C2024-000000163)

An OIG investigation has established that an OEMC traffic control aide threw a traffic cone at a bus while on duty.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 23 (discourteous treatment, including verbal abuse, of any other City employee or member of the public), Subsection 32 (treating discourteously any member of the public where such person can reasonably believe that the employee is acting within the scope of her or his employment), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that OEMC impose discipline against the subject commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. In response, OEMC issued a fifteen-day suspension to the subject.

20 | Failure to Provide Information on Statements of Financial Interest (C2024-000000189)

An OIG investigation has established that a former City Council aldermanic aide twice included false information in their statements of financial interest (SOFIs) by failing to report outside income from 2022 and 2023. Specifically, the subject failed to report more than \$10,000 of income received while working for political campaigns.

OIG found that the subject's conduct violated the GEO. OIG recommended that BOE find probable cause to believe the subject violated the GEO, impose appropriate sanctions, and require the former employee to file corrected SOFIs. In response, BOE found probable cause to believe that the former employee violated the GEO.

21 | Failure to Timely Disclose Conflict (C2024-00000210)

An OIG investigation, conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel, established that an OIG employee violated OIG's Conflict of Interest and Recusal policy by failing to timely disclose that they had applied for employment with the Civilian Office of Police Accountability (COPA). The employee stated that they did not timely make the disclosure because they were unaware that COPA was a City department that would trigger a disclosure obligation under OIG's policy.

OIG found that the individual's conduct violated OIG Administrative Policies & Procedures 1.3 (Conflict of Interest and Recusal) and City Personnel Rule XVIII, Section 1, Subsection 39 (incompetence), because the employee stated they were unaware that COPA was another City department, and Subsection 48 (violating any departmental regulations, rules or procedures). Evidence gathered in this investigation did not establish actual harm or impairment to OIG's work resulting from the subject's failure to timely disclose their application to COPA. In particular, the subject was not assigned to any projects relating to COPA or its employees during the time that their application was pending with COPA, mitigating against the risk of actual harm or impairment to any OIG work. Nevertheless, the subject's failure to disclose their application to COPA violated OIG policy that exists to protect the independence of OIG's work.

OIG issued the subject a written reprimand.

C | Synopses of and Developments in Charged Criminal Cases

OIG's criminal investigations may uncover violations of local, state, or federal criminal laws, which may be prosecuted by the U.S. Attorney's Office, Illinois Attorney General's Office, or Cook County State's Attorney's Office, as appropriate. For the purposes of OIG quarterly summaries, criminal cases are considered concluded when the subject(s) of the case is publicly charged by complaint, information, or indictment.

This quarter, OIG has one update regarding criminal cases related to an OIG investigation.

1 | United States of America v. Kenneth Ford, 22 CR 454 (Northern District of Illinois)

OIG previously reported in its <u>Fourth Quarter 2022</u> report on the indictment of Kenneth Ford. Ford, the Executive Director of Public Image Partnership (PIP), a former grant recipient of the City, was indicted for making a false statement to the FBI regarding payments that PIP made to an individual who did not perform any work for PIP. OIG assisted in this investigation.

On May 2, 2025, Ford pleaded guilty to one count of making a false statement to the FBI in violation of 18 U.S.C. § 1001(a)(2). Ford is scheduled to be sentenced at a hearing on August 20, 2025.

D | Synopses and Results Of Administrative Appeals, Grievances, or Other Actions

In administrative cases, a City employee may be entitled to appeal or grieve a departmental disciplinary action, depending on the type of corrective action taken, and the employee's classification under City Personnel Rules and/or applicable collective bargaining agreements. OIG monitors the results of administrative appeals before the Human Resources Board and grievance arbitrations concerning OIG's disciplinary recommendations. Other updates, status changes, or derivative actions resulting from OIG's investigations may also be reported here.

E | Special Investigations

In addition to its reactive investigative work in response to complaints, OIG engages in certain proactive investigative projects.

1 | Campaign Finance Investigations

The MCC bans City vendors, lobbyists, and those seeking to do business with the City from contributing more than \$1,500 each year to any elected City official or candidate's political campaign. Moreover, lobbyists and entities in which a lobbyist has an ownership interest in excess of 7.5% are restricted from contributing any amount to the Mayor. Other rules and regulations, such as Executive Order 2011-4, place further restrictions on donations.¹²

¹² Executive Order 2011-4 places a restriction on the mayor and City contractors by prohibiting City contractors, owners of City contractors, spouses or domestic partners of owners of City contractors, subcontractors to a City contractor on a City contract, owners of subcontractors to a City contractor on a City contract, and spouses or domestic partners of owners of subcontractors to a City contractor on a City contract from making contributions of any amount to the mayor. Any contract negotiated, entered into, or performed in violation of any of the provisions of this Order shall be terminable by the City.

Campaign contributions that potentially violate the MCC are sometimes identified through complaints; OIG also, however, engages in proactive monitoring and analysis of campaign contribution data to identify and examine potential violations. In particular, OIG's Center for Information Technology and Analytics has developed an automated data process to identify potentially improper contributions made to elected City officials or candidates by restricted contributors. In this effort, OIG has integrated and matched data from a variety of sources, including City contracts and records of payments made by the City to individuals and entities.

Pursuant to MCC § 2-156-445, "[a]ny person who solicits, accepts, offers or makes a financial contribution that violates the limits set forth in this section...shall not be deemed in violation of this section if such person returns or requests in writing the return of such financial contribution within ten calendar days of the recipient's or contributor's knowledge of the violation." Accordingly, once a potential violation is identified, OIG notifies the donor and the donation recipient of the violation and provides the individual or entity ten days to challenge the determination or cure the violation by returning the excess donation.¹³ If the excess donation is returned in a timely manner, or it is determined that a violation did not occur, OIG closes the matter as not sustained. In the event the matter is not cured or successfully challenged, OIG will sustain an investigation and deliver the case to the BOE for adjudication.

This quarter, OIG resolved three campaign finance matters, resulting in the return of \$5,220 in improper contributions. Details are provided in the table below.

Case #	Aggregate Donation Amount (Year)	Donation Source	Donation Recipient	Amount of Returned Funds
C2024-000000209	\$3,000 (2022); \$2,500 (2024)	Entity doing business with the City	Elected City official	\$2,500
C2024-000000262	\$2,500 (2022); \$2,500 (2023)	Entity doing business with the City	Elected City official	\$2,000
C2024-000000340	\$2,220 (2022)	Entity doing business with the City	Elected City official	\$720

Table 8: Campaign Finance Activity

¹³ If the donor and/or recipient was already aware that the excess donation was a violation at the time the donation was made, then they may not be entitled to notice and opportunity to cure the violation and avoid a fine.

2 | O'Hare 21

OIG provides oversight for major construction initiatives across the City. Specifically, OIG has worked with the CDA to oversee the multi-billion-dollar expansion project at O'Hare International Airport, commonly known as O'Hare 21.

OIG manages the work of Integrity Monitors (IMs), professional services contractors charged with investigating, auditing, and testing various processes and contracts associated with O'Hare 21. The IMs are given full access to contractor records and personnel. They monitor contractors' compliance with laws, policies and procedures, and various contractual requirements, and report to an Integrity Monitoring Committee; that committee is constituted of representatives of the Department of Procurement Services (DPS), CDA, and OIG.

Working with the IMs, OIG receives information, leads, and complaints regarding potential misconduct on the project. Participating with CDA and DPS on the monitoring committee, OIG works in concert with partner departments to develop strategies and approaches to problems considering shared interests and perspectives.

OIG has developed an <u>O'Hare 21-specific tipline</u> and <u>email address</u> to enable members of the public, employees, and contractors to more easily raise concerns about O'Hare 21 to OIG.

F | Fines and Recoveries

In this quarter, BOE reached no new settlements on fines with the subjects of certain OIG investigations in which BOE found probable cause to believe that the subjects had violated the GEO. <u>All BOE settlement agreements are available to the public on the City's website.</u>

IV | Public Safety

Pursuant to the separate powers and duties enumerated in MCC § 2-56-230, the Public Safety section supports OIG's mission of promoting economy, effectiveness, efficiency, and integrity by conducting independent, objective evaluations and reviews of CPD, COPA, and the Police Board, as well as inspections of closed disciplinary investigations conducted by COPA and the Bureau of Internal Affairs (BIA).

A | Evaluations and Reviews

The Public Safety section conducts program and systems-focused evaluations and reviews of CPD, COPA, and the Police Board. Based on the findings of these inquiries, OIG makes recommendations to improve the policies, procedures, and practices of those entities. The following summarizes the Public Safety section reports released this quarter.

1 | The City of Chicago's Implementation and Enforcement of the Gun Offender Registry Ordinance¹⁴

The Public Safety section conducted an inquiry into the City of Chicago's implementation and enforcement of the Gun Offender Registration Ordinance (the Ordinance). Initially passed in 2010 and amended in 2013, the Ordinance requires all Chicago residents who have been convicted of specific gun-related offenses to register with CPD. Per the Ordinance, CPD is responsible for notifying qualifying offenders of their duty to register, maintaining the public Gun Offender Registry, and enforcing registration requirements. The objectives of this inquiry were to describe the demographic profile and qualifying criminal offenses of the registrants on the Gun Offender Registry and to assess how effectively CPD and other involved agencies are fulfilling the mandates outlined in the Ordinance and provisions outlined in CPD policies, including providing notice to offenders and enforcing registration obligations.

As a result of this inquiry, OIG identified areas of concern regarding the current implementation and enforcement of the Gun Offender Registration Ordinance. First, CPD is unable to ensure that all qualifying individuals are provided written notice of their duty to register due to CPD's lack of procedural controls with partnering custodial institutions and broad offender eligibility criteria under the Ordinance. In fact, CPD has no way of ascertaining or subsequently providing notice of the duty to register to the full universe of qualifying gun offenders under the Ordinance. OIG also found that CPD's gun offender registration processes may have hampered efficient registration. The Ordinance requires individuals to register in person with CPD within five days of receiving notice to register, and re-register annually for a total period of four years. However, CPD and the City have provided inconsistent and conflicting information on where and when to register. In addition, limited registration sites and operational hours have created barriers in the registration process for the large volume of registrants in Chicago. In response to the recommendations in this inquiry, CPD reported to OIG that since the time of analysis, it has taken actions to improve the experience for individuals waiting to register with CPD, such as by providing indoor waiting areas (see Management Response, Recommendation 10).

¹⁴ Published June 3, 2025. See <u>https://igchicago.org/publications/gun-offender-registration/</u>.

OIG additionally found that, despite processes outlined in CPD policy to conduct routine residency verification and proactive missions to register non-compliant individuals, CPD is not conducting either of these actions. Moreover, OIG found that CPD does not systematically ensure the accuracy or validity of registrant information and allows individuals to remain on the registry past their required four-year registration period, undermining the registry's overall usefulness and accuracy. Finally, OIG determined that the City is declining to pursue registration violations to the full extent allowed under the Ordinance, as DOL rarely seeks penalties for violators, instead dismissing charges should the individual come into compliance with the Gun Offender Registration Ordinance.

Supporters of the Ordinance have argued that the Gun Offender Registry can serve as a public safety tool, a resource for law enforcement, and a deterrent to crime. However, little evidence exists suggesting that the Ordinance or the registry has fulfilled these intended goals. In this report, OIG discusses the gaps that exist for notifying individuals of the registration requirement, inefficiencies in CPD's registration practices and lack of enforcement of the Ordinance, and makes recommendations to address the identified deficiencies—if, in fact, the City determines that the benefits that might be anticipated from robust enforcement of the Ordinance outweigh its costs.

In response to this inquiry, the Mayor's Office committed to "evaluate the existing ordinance," "define collectable metrics," and "determine whether and to what extent additional resources are necessary" (see Recommendations 1-3). CPD largely accepted OIG's recommendations to improve its enforcement of the Ordinance (see Recommendations 4-15) and reported that it has begun reviewing relevant Department policies and public-facing information regarding the Gun Offender Registration Ordinance and is seeking to implement new software to be used as a registrant management tool.

2 | Public Safety Section 2024 Annual Report¹⁵

The MCC requires the Public Safety section to publish an annual report summarizing its reports, recommendations, and analyses from the prior year. In its Annual Report, published this quarter, the Public Safety section detailed work conducted during 2024 in each of its three primary channels: audit-based inquiries; inspection of individual closed disciplinary cases; and collection and analysis of data from CPD and City sources on many aspects of policing, public safety operations, and the police disciplinary system.

The 2024 Annual Report included summaries of the following: Processing the Backlog of Background Investigations for Chicago Police Department Applicants (April 2024); Follow-Up Inquiry on the Chicago Police Department's Preparedness for Mass Gatherings (May 2024); Staffing: Sworn Chicago Police Department Members with Patrol Duties (July 2024); and Follow-Up Evaluation of Chicago Police Department's Post-Firearm Discharge Policy (December 2024).

The 2024 Annual Report further included summaries of a published advisory regarding CPD member affiliations with anti-government and extremist groups, and information on the Public Safety section's screening of 1,316 closed disciplinary investigations conducted by BIA and COPA, and its in-depth review of 100 of those investigations, including investigations mandated for review by the consent decree. Of the closed investigations selected for in-depth review in 2024, OIG recommended that 7 investigations conducted by BIA and 15 investigations conducted by COPA

¹⁵ Published June 25, 2025. See <u>https://igchicago.org/publications/public-safety-annual-report-2024/</u>.

be reopened to correct deficiencies materially affecting their outcomes. The results of OIG's 22 recommendations to reopen are detailed in the 2024 Annual Report.

Finally, in fulfillment of the Public Safety section's obligations pursuant to the MCC to conduct data and trend analysis in certain subject areas, the 2024 Annual Report contained data and analysis on public safety operations, including 911 calls for service, arrests, misconduct complaints, investigatory stops, and use of force reporting.

B | Review of Closed Disciplinary Investigations

Pursuant to its obligations under the MCC, the Public Safety section reviews individual closed disciplinary investigations conducted by COPA and BIA. OIG may make recommendations to inform and improve future investigations and, if it finds that a specific investigation was deficient such that its outcome was materially affected, may recommend that it be reopened. Closed investigations are selected for in-depth review based on several criteria, including, but not limited to, the nature and circumstances of the alleged misconduct and its impact on the quality of police-community relationships; the apparent integrity of the investigation; and the frequency of an occurrence or allegation. The closed investigations are then reviewed in a process guided by the standards for peer review of closed cases developed by the Council of Inspectors General on Integrity and Efficiency. OIG assesses sufficiency across several categories, including timeliness, professional standard of care, interviews, evidence collection and analysis, internal oversight, and case disposition.

This quarter, the Public Safety section's Investigative Analysis unit examined 306 closed disciplinary cases and opened 41 for in-depth review. OIG found six BIA and nine COPA investigations that contained deficiencies materially affecting their outcomes.

Agency	Cases Screened	Cases Opened
BIA	200	17
СОРА	106	24
Total	306	41

Table 9: Disciplinary Cases Reviewed

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent seven letters of recommendation to reopen investigations to BIA and eight letters of recommendation to reopen investigations to COPA. BIA accepted two and declined one of OIG's recommendations; four responses are pending. COPA accepted three and declined one of OIG's recommendations; four responses are pending. OIG also sent one notification letter to COPA of an error with its final summary reports. COPA made the necessary corrections.

Additionally, by the end of this quarter, OIG received responses from BIA on two recommendations to reopen made in the fourth quarter of 2024 and two made in the first quarter of 2025. BIA declined OIG's recommendations to reopen the four investigations. OIG also received a response from BIA on a notification made in the fourth quarter of 2024. OIG received responses from COPA on two recommendations to reopen made in the first quarter of 2025. COPA declined OIG's recommendations to reopen the two investigations.

Below are summaries of investigations that have reached a final disciplinary decision. Once BIA or COPA has responded to an OIG recommendation to reopen an investigation, and the underlying investigation has reached a final disciplinary decision, OIG's recommendation letters and the agencies' responses will be published on OIG's website. In these procedural postures, OIG's recommendations to reopen and the agencies' responses have been available and, from time to time, released pursuant to MCC § 2-56-250 and the Illinois Freedom of Information Act. Accordingly, the summaries contained in this section of the quarterly report will include the names of involved CPD members. These recommendations to reopen, issued pursuant to MCC § 2-56-230(c), are separate from OIG's own confidential investigative work, which is governed by the confidentiality provisions set out in MCC § 2-56-110.

a | Recommendation to Reopen to Resolve Discrepancies (C2022-000043891)

BIA investigated allegations that CPD member Gregory Young, Star #3546, failed to report the theft of their duty weapon in a timely manner, and allegations that CPD members Rashida Young, Star #9277, and Angelica Corvera, Star #18598, who found the weapon, failed to make a proper notification to CPD. BIA sustained the allegation that Officer Gregory Young failed to report the theft in a timely manner and recommended a ten-day suspension. BIA also sustained the allegation against Officer Rashida Young for failing to notify CPD when the firearm was recovered and recommended a five-day suspension.

During its review, OIG learned that Officer Rashida Young, sister to Officer Gregory Young, recovered the weapon and returned it to Officer Gregory Young. Shortly thereafter, CPD took possession of the weapon from Officer Gregory Young and placed it into inventory. CPD conducted a forensic test of the weapon and documented its findings on a Firearms Receipt and Worksheet. OIG found that the amount of ammunition counted from the weapon during the forensic test did not align with CPD Directive U04-02(II)(H).

BIA also included Officer Gregory Young's weapons qualification record in its investigative file. The weapons qualification record indicated that Officer Gregory Young qualified with the weapon at a time when the weapon was inventoried for an active investigation. BIA did not address the discrepancies with the forensic test or weapons qualification records during its investigation.

OIG recommended that BIA reopen the investigation to resolve the discrepancy surrounding the amount of ammunition in Officer Gregory Young's weapon, and to investigate how Officer Gregory Young qualified with a weapon that appears to have been inventoried for an active investigation and determine whether it would be appropriate to bring additional allegations against Officer Gregory Young or any other CPD member.

In response to OIG's recommendations, BIA accepted OIG's recommendation and reopened the investigation. BIA reviewed additional documentation related to Officer Gregory Young's weapons qualification and learned that Officer Gregory Young qualified with a borrowed weapon from CPD. BIA also learned that Officer Phillip Singto, Star #7353, entered the information into a portal showing Officer Gregory Young qualified with their registered duty weapon, instead of the borrowed weapon. BIA attempted to contact retired Officer Singto for an interview, but received no response.

BIA conducted an additional interview with Officer Gregory Young regarding Officer Young's failure to fully load their duty weapon. Officer Gregory Young did not provide any additional statements

related to this allegation. BIA sustained the allegation that Officer Gregory Young failed to have their duty weapon loaded to capacity. Officer Gregory Young's recommended suspension remained at ten days.

b | Recommendation to Reopen to Address All Appropriate Allegations (C2024-00000096)

COPA investigated allegations that CPD members Nicholas Pocius, Star #11106, and Brandon McDonald, Star #19423, entered and searched a residence without justification, used excessive force, and did not activate their body worn cameras (BWC) in a timely manner. It was also alleged that Officer McDonald used oleoresin capsicum (OC) spray in an unauthorized manner. COPA administratively closed the investigation under its Timeliness Initiative, placed the investigation in a Non-Disciplinary Closure (NDC) status, and recommended retraining on CPD's de-escalation and BWC policies for both officers.¹⁶

In its NDC Memorandum, COPA's pre-determined lists of disqualifying criteria include "potentially viable allegations" concerning unjustified uses of force against a restrained individual as among those that would disqualify an investigation for NDC. COPA's website further clarifies, "Although not an absolute disqualification, Review Staff also considered whether potentially viable allegations involved vulnerable individuals, including juveniles, the elderly, and disabled individuals."¹⁷

During its review, OIG identified that COPA closed this investigation under its Timeliness Initiative despite the incident involving allegations of excessive force against a restrained individual, specifically a juvenile. OIG recommended that COPA reopen the investigation to address the allegations involving excessive force against a restrained juvenile.

In response to OIG's recommendations, COPA agreed to reopen the investigation. After further review, COPA again closed the investigation without serving allegations, stating in its Non-Final Summary Report that "the incident occurred over five years ago, and COPA lacks sufficient objective verifiable evidence of misconduct to support a request to the Superintendent of Police permitting COPA to proceed with the investigation." COPA cited the Illinois Municipal Code 65 ILCS 5/10-1-18.1 that prohibits disciplinary charges based upon allegations of unreasonable force by a police officer due to the five-year statute of limitations.

c | Recommendation to Reopen to Address All Appropriate Allegations (C2024-000000230)

COPA conducted a preliminary investigation concerning allegations that Officer Fidel Legorreta, Star #5902, used excessive force by kneeing a subject in the leg or stomach area without justification and directed profanity toward the subject. COPA determined that this investigation met its criteria under its Timeliness Initiative and placed the investigation in an NDC status without any training recommendations for Officer Legorreta. In its NDC Memorandum, COPA's pre-determined

¹⁶ Per COPA's website, the Timeliness Initiative Project is a "comprehensive initiative... to review investigations 18 months or older to determine if an alternative approach...is warranted in order to expedite the closure of certain investigations." "After a comprehensive review process, COPA will expedite and conclude eligible misconduct complaints by requesting additional training for Chicago Police Department (CPD) members or through other remedial recommendations if allegations are sustained."

¹⁷ COPA's Timeliness Initiative, Accessed April 17, 2024, https://www.chicagocopa.org/investigations/timeliness-initiative/

lists of disqualifying criteria include, "potentially viable allegations" concerning unjustified uses of force against a restrained individual as among those that would disqualify an investigation for NDC. During its review, OIG determined that COPA did not address the BWC video that shows several CPD members restraining the arms of the subject behind the subject's back when Officer Legorreta allegedly used excessive force. OIG recommended that COPA reopen the investigation to address the excessive force allegation and close the matter in accordance with its policy.

In response to OIG's recommendations, COPA reopened the investigation, sustained the allegations that Officer Legorreta used excessive force and directed profanity at the subject, and recommended a suspension of up to 30 days.

d | Recommendation to Reopen to Ensure Analysis and Findings Align (C2024-000000347)

OIG reviewed a COPA investigation concerning allegations that three CPD members Steven Sreniawski, Star #2878, Bret Hon, Star #6214, and Michael Tanon, Star #6300, improperly detained, handcuffed, and failed to provide the complainant with an Investigatory Stop Report (ISR); Officer Hon searched the complainant without justification; Officers Sreniawski and Hon inappropriately searched the complainant's groin area; and Officer Sreniawski pushed the complainant into a fence and stated, "I said fucking stop." COPA reached findings of Sustained on all the allegations brought against the accused CPD members.

During its review, OIG identified a discrepancy between COPA's findings and the written analysis in COPA's Final Summary Report (FSR). In the FSR, COPA noted, "Officer Sreniawski admitted that a search of the crotch area was generally impermissible under CPD policy and, moreover, that the search in this case extended into [complainant's] crotch area. Officer Hon denied that he searched complainant's genital area but described a search of complainant's right leg below the waistline, indicating that firearms in these situations tend to slip down the leg." COPA also wrote, "While, BWC footage shows Officer Hon searching [complainant's] outer pants area, the footage does not clearly show that Officer Hon searched in [complainant's] groin area or searched inside of [complainant's] pants. BWC footage captures Officer Sreniawski searching [complainant] further after he had placed his hands in [complainant's] front pocket, but the angle of the BWC footage does not depict exactly where Sreniawski subsequently searched."

OIG recommended that COPA reopen the investigation to ensure that its analysis aligned with its findings, and that its findings are adequately supported by its analysis of the evidence.

In response to OIG's recommendations, COPA reopened its investigation and corrected its finding to Not Sustained for the allegations that the Officers Sreniawski and Hon conducted an inappropriate pat down search and improperly searched the complainant's groin area without justification.

e | Recommendation to Reopen to Consider All Available Evidence and Fully Address the Allegations (C2024-00000500)

COPA conducted a preliminary investigation concerning allegations that unknown CPD members used excessive force by improperly pulling the complainant's hair and carrying them by their arms and legs. COPA determined that due to a lack of cooperation from the complainant and a lack of

sufficient evidence of misconduct, no CPD member would be served allegations, and the investigation was administratively closed.

In the notes section of CPD's case management system (CMS), COPA wrote, "Obtained and uploaded BWC from both witness officers. BWC did not capture incident." However, OIG's review of the same video footage found that a CPD member's BWC did capture the incident. OIG recommended that COPA reopen the investigation to identify the unknown CPD member and address the excessive force allegations to include the pulling of the complainant's hair.

In response to OIG's recommendations, COPA reopened the investigation, interviewed the witness CPD members, who "could not identify [the] unknown accused officer," and closed the investigation, citing insufficient evidence to serve allegations.

f | Recommendation to Reopen to Conduct Additional Analysis (C2025-00000082)

COPA investigated allegations stemming from a traffic stop that CPD members Tyler Alexander, Star #17587, Dexter Calhoun, Star #17364, Thomas Spanos, Star #3110, Patrick Aziz, Star #16188, stopped, detained, and handcuffed the complainant without justification, among other allegations, and Officer Spanos directed verbal abuse at the complainant. COPA also investigated allegations that Detention Aide (DA) Andrew McGuire, Employee #109719, held the complainant down on the floor by the back of their neck. COPA sustained the allegations against Officer Spanos for verbal abuse and sustained the allegation that DA McGuire held the complainant down by the back of their neck. COPA recommended a three-day suspension for Officer Spanos and a 30-day suspension for DA McGuire.

During its review, OIG identified that Officer Alexander performed what may have been an unlawful search of the complainant's person, potentially in violation of the Fourth Amendment of the United States Constitution. Additionally, OIG identified video evidence that was material to the lawfulness of the traffic stop, and that Officers Alexander and Calhoun's statements may conflict with video evidence potentially violating CPD's Rules of Conduct, specifically Rule 14.

OIG recommended that COPA reopen the investigation to conduct an analysis of whether Officer Alexander's search of the complainant's person was justified, whether the video evidence refutes Officers Alexander and Calhoun's reason for the traffic stop, and whether they violated Rule 14 during their interviews with COPA.

In response to OIG's recommendations, COPA declined to reopen the investigation. COPA stated that the video evidence did not satisfy the burden to demonstrate that Officers Alexander and Calhoun willfully made a false statement, and that serving allegations against Officer Alexander for an incident that occurred over 18 months ago was unlikely to result in sustained discipline.

g | Recommendation to Reopen to Conduct Additional Analysis (C2025-00000086)

COPA investigated allegations that CPD members Majid Mustafa, Star #15771, and Crystal Campos, Star #5776, used excessive force against the complainant and failed to complete a Tactical Response Report (TRR) to document the force used during a traffic stop. COPA administratively closed Log #2024-0007030, stating its preliminary investigation did not result in sufficient objective verifiable evidence of misconduct to warrant serving allegations.
During its review, OIG identified that COPA did not conduct an analysis of whether Officer Mustafa's actions in reaching into the vehicle, unlocking the door, and opening the complainant's vehicle door constituted a warrantless search.

OIG recommended that COPA reopen the investigation to consider all available evidence and conduct an analysis of whether Officer Mustafa improperly searched the complainant's vehicle when Officer Mustafa reached into the complainant's vehicle and unlocked the driver's side door.

In response to OIG's recommendations, COPA declined to reopen the investigation. In its letter, COPA states, "Even if Officer Mustafa's intrusion into the complainant's vehicle did constitute a search, however, such search would have been authorized under the search incident to arrest exception to the warrant requirement. Under the search-incident-to-arrest doctrine, an arrestee's person and the area within their immediate control are subject to search." COPA also stated the CPD member was more likely than not to have probable cause to justify the complainant's arrest when the complainant informed the CPD member that they did not have a driver's license, which was confiscated in a prior traffic stop.

h | Recommendation to Reopen to Consider All Available Evidence (C2025-000000157)

COPA investigated allegations that a CPD member Brandon Twyman, Star #15662, used excessive force against an arrestee by pushing them into a wall and a bench and failed to use de-escalation techniques to prevent or reduce the need for force. COPA further alleged that CPD member Darell Willis, Star #19819 directed profanity toward the arrestee. COPA sustained the allegations that Officer Twyman used excessive force by pushing the arrestee into the concrete bench and failed to use de-escalation techniques, but did not sustain the allegation on the push of the arrestee into the wall. COPA also sustained the allegation that Officer Willis used profanity towards the arrestee. COPA recommended discipline of Violation Noted for both CPD members.

During its review of BWC video, OIG observed that the arrestee sustained visible injuries seconds after Officer Twyman pushes the arrestee into a bench. OIG's review of the investigative file found that COPA did not address the injuries sustained by the arrestee, nor did it address whether Officer Twyman should have completed a TRR.

OIG recommended that COPA reopen the investigation to consider all available evidence and determine whether Officer Twyman should have completed a TRR for the use of force incident.

In response to OIG's recommendations, COPA declined to reopen its investigation due to timeliness concerns. In its response to OIG, COPA states, "re-opening this case at this time to analyze that issue would jeopardize COPA's other important findings in this case, including findings of excessive force, failure to de-escalate, and verbal abuse."

2 | Notifications

a | Notification to COPA of an Error with Its Final Summary Report (C2025-000000143)

OIG notified COPA of an error identified in its FSRs in CPD's CMS. OIG identified two investigative files that contained unsigned FSRs. According to COPA's FSR Policy, Section (II)(D) requires, "All FSRs must have a DRAFT watermark designation until the report is finalized and approved by the Chief Administrator (or designee)." COPA's Final Summary Report Policy further states, "No FSR, or any of the Findings, conclusions, or recommendations contained within it, is final until it is approved by the Chief Administrator (or designee)." The FSRs identified by OIG did not contain a DRAFT watermark designation; however, it was unclear whether the FSRs were approved by the Chief Administrator or designee, as there was no signature on the "Approved" line.

COPA corrected its error by uploading a signed FSR to each investigation identified by OIG.

V | Reports and Monitoring Activity

A | Audits and Follow-Ups

Separate from its confidential investigative work, OIG's Audit and Program Review (APR) section produces a variety of public reports, including independent and objective analyses and evaluations of City programs and operations with recommendations to strengthen and improve the delivery of City services. These engagements focus on the integrity, accountability, economy, efficiency, and effectiveness of each subject.

1 | Audit of the Department of Human Resources' Employee Assistance Program (C2023-00000315)¹⁸

OIG conducted an audit of DHR's administration of the City's civilian Employee Assistance Program (EAP).¹⁹ The objectives of OIG's audit were to determine whether DHR designed and administered the EAP to address the needs of the City's workforce and comply with recordkeeping requirements.

The purposes of an EAP are to address workplace productivity issues and connect employees with mental health and other personal services. OIG concluded that DHR cannot determine whether the City of Chicago's EAP achieves either of these aims because the program lacks structure, guidance, and clear goals. This has limited the EAP's usefulness as a tool to support employees and improve their job performance. Moreover, the program, with its shortcomings, does not align with the City's broader efforts to strengthen mental health care infrastructure for Chicagoans. OIG also concluded that, while DHR has worked with the City's Department of Technology and Innovation (DTI) to ensure sensitive data is secure, DHR should document its related internal policies.

OIG found that DHR has not positioned its EAP to meet the needs of the City's workforce. The City's civilian EAP has no documented policies and procedures to guide operations and ensure consistent, standardized service delivery. In addition, OIG found that although DHR worked with DTI to identify and address data security issues regarding sensitive EAP information, DHR has not documented internal policies to ensure it continues to protect this information and comply with legal requirements moving forward.

OIG recommended that DHR assess and document the EAP needs of the City's workforce to account for demographics and work location in addition to historical usage of the service. Additionally, DHR should set program goals informed by its assessment of workforce needs and collect relevant data to monitor the program's progress toward these goals. DHR should develop policies and procedures to ensure consistent service delivery. DHR should also regularly review and update the list of external agencies to which the EAP refers clients for additional services, to ensure it is complete and accurate. In partnership with DTI, DHR should document policies and procedures identified by DTI's risk analysis to standardize EAP staff responsibilities around data security and ensure ongoing compliance with the Health Information Portability and Accountability Act

¹⁸ City of Chicago Office of Inspector General, "Audit of the Department of Human Resources' Employee Assistance Program," April 17, 2025, <u>https://igchicago.org/wp-content/uploads/2025/04/OIG-Audit-of-DHRs-Employee-Assistance-Program.pdf</u>.

¹⁹ The Chicago Police Department and the Chicago Fire Department have their own dedicated EAPs. Employees of those departments are not eligible for DHR's program for civilian employees.

(HIPAA) Security Rule.²⁰

In response to OIG's audit findings and recommendations, DHR stated that it had requested that the City reclassify the EAP clinical therapist position to an EAP counselor, which would "not only provide therapeutic counseling but also provide strategic development and oversight of the EAP program." DHR stated that it would be the responsibility of the EAP counselor to,

- conduct an assessment of the needs of the City's workforce;
- determine the program goals and key performance metrics based on the assessment;
- develop policies, procedures, and outreach plans; and
- update the EAP referral lists.

DHR also stated that it would develop standard operating procedures to ensure EAP recordkeeping complies with HIPAA.

B | Advisories and Department Notification Letters

Advisories and department notification letters describe management problems observed by OIG sections in the course of its various oversight activities, which OIG determines to merit official notice to City or department leadership. OIG completed two notifications this quarter.

1 | Notification Concerning an Indicted Licensee (C2023-00000227)

OIG established that the owners of a construction company, which was a certified Woman-owned Business Enterprise (WBE) and held an active mason contractor license with the City, were indicted under state law for the offense of fraud.

OIG sent a notification to the DOB and DPS regarding the indictment so that the agencies could take any action the agencies deemed appropriate.

In response, DOB revoked the mason contractor license. Additionally, DPS found the vendor ineligible to do business with the City until a final adjudication is made with respect to the criminal offense.

2 | Notification Concerning Exposure of 311 User Information (C2024-000000228)

OIG notified the Department of Streets and Sanitation (DSS) about a concern regarding the exposure of 311 user information.

OIG reviewed the City's Privacy Policy. Under the Policy, DSS employees are not expressly authorized to expose a 311 application user's identity. The Policy notes that the data collection regarding a 311 application user's information, such as their name, email address, address, and phone number, is used to "improve" the City's online services. Moreover, while this Policy explains there may be a need to contact the 311 application user for additional information, the City's 311 materials do not indicate any possibility that it will disclose information regarding a 311 application user's complaint(s) to third parties.

²⁰ U.S. Department of Health and Human Services, "The HIPAA Security Rule," October 20, 2022, accessed June 20, 2025, <u>https://www.hhs.gov/hipaa/for-professionals/security/index.html</u>.

OIG notified DSS of the concern that exposure of a 311 user's identity raises potential public safety concerns. The fact that a 311 application captures user's identifying information is not posted on the City's 311 website. This practice is prudent; identification of complainants may pose safety risks, among them the prospect of retaliation against complainants who report the conduct of third parties, including neighbors. This prospect of retaliation also risks creating a chilling effect on the public's use of 311 services.

In response, DSS stated that the department will re-emphasize to its exempt managers the importance of confidentiality in communication with residents/citizens regarding 311 complaints.

C | Other Reports and Activities

In the service of its mission to promote economy, effectiveness, efficiency, and integrity, OIG may periodically participate in additional activities and inquiries, outside of the other categories identified here, to improve transparency and accountability in City government, and may from time to time issue additional reports. OIG issued no additional reports this guarter.

D | Monitoring Employment Actions

OIG's Compliance unit, situated within its Legal section, has broad oversight responsibilities under the Employment and Hiring Plans which govern the employment practices of the City, CPD, and the Chicago Fire Department (CFD). The Compliance unit came into formal existence as a product of an evolving partnership between OIG and the court-appointed monitor overseeing the City's hiring and promotion practices under the decree entered in *Shakman, et al. v. City of Chicago, et al.*, No. 69-cv-2145 (N.D. III.). From spring 2010 through spring 2014, the OIG-*Shakman* Monitor partnership gradually transitioned from the court-appointed Monitor to OIG for both disciplinary investigations and program compliance and monitoring activities. That transition was completed in June 2014 with the court's finding the City in substantial compliance with the *Shakman* decree.

The Compliance unit's responsibilities are specific to overseeing the City's employment actions, issuing guidance, training, and program recommendations to City departments on a broad and complex array of employment-related actions; monitoring human resources activities including hiring and promotion; performing legally mandated and discretionary audits and reviews; and reviewing the City's hiring and employment practices to ensure compliance with applicable rules.

The Compliance unit performs quarterly reviews and audits of data regarding the hiring processes to identify Employment Plan violations or errors. As defined in the Employment Plan, a review involves a check of all relevant documentation and data concerning a matter, while an audit is a check of a random sample or risk-based sample of the documentation and data concerning a hiring element. Employment Plan violations are actions and/or behaviors that are not in compliance with the City's Employment and Hiring Plans. Errors are deviations in processes that are not Employment Plan violations, but actions and/or behaviors that differ from established departmental processes.

The following section includes information on these activities and others on which OIG is required to report pursuant to the Employment and Hiring Plans and MCC § 2-56-035.

1 | Review of Contracting Activity

Under the Contractor Policy, departments are required to annually report to OIG the names of all contractors performing services on City premises. This quarter, OIG received fourteen annual reports from departments of contractors performing services on City premises.

OIG may also choose to review any solicitation documents, draft agreements, final contracts, or agreement terms to assess whether they are in compliance with the Contractor Policy. This review includes analyzing contracts for common-law employee risks and ensuring the inclusion of the 2014 Hiring Plan Prohibitions and a Contractor Selection Certification.²¹ OIG shall report on all service contracts or agreements received and reviewed by OIG Compliance. This quarter, OIG completed review of 193 contracts.

Table 10: Contracting Activity Reviewed in Q2 2025 Pursuant to the City of Chicago Contractor Policy $^{\rm 22}$

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Antonio Cazares Balladares - Cazares Landscaping	Ward 30	approved by DHR 05/22/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lisa Walker	Department of Finance	approved by DHR 02/6/2024	None
Gerardo Alvarez - Ed Signs	Ward 46	4/29/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
George Smith - KGB Multimedia	Ward 6	4/25/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Julia Porter Maddox	Ward 6	4/25/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lindsey Block	Ward 9	4/18/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.

²¹ The 2014 Hiring Plan Prohibitions state that the City is prohibited from hiring persons as governmental employees in non-exempt positions on the basis of political reasons or factors. Contractor Selection Certifications are certifications signed by the contractor and user department affirming that no political reasons, factors, or other improper considerations influenced the selection.

https://www.chicago.gov/content/dam/city/depts/dhr/supp_info/ShakmanSettlement/Contractor_Policy-FINAL_4_15_19.pdf at III.B.

²² OIG is required to "report on all service contracts or agreements received and reviewed by OIG Hiring Oversight. The results of all such reviews shall be published quarterly This reporting shall include, but not be limited to, the following: (1) the name of each contractor, agency, or other organization, (2) the contracting Department, (3) the start date and/or duration of each contract or agreement, (4) any compliance issues raised or discovered by OIG, and (5) the corrective action, if any, taken by the contracting department. " See

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Knights Consulting, LLC	Office of City Clerk	approved by DHR 05/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
David Balestrery - Sentry Security	Ward 50	4/10/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Chosyn Lockett	Ward 18	4/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Yves Hughes - Next Door Multimedia LLC	Ward 27	4/7/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
MS Productions & Kiddie World Characters	Ward 18	4/12/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dean'e Lamb - Liberty Street Marketing	Ward 5	4/2/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Richard Robinson	Ward 5	4/2/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Erik Blome	Ward 23	3/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Quinton McNair - Strugglebeard Bakery	Ward 4	3/25/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dr. Helen Cejtin	Chicago Department of Public Health	3/18/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Darwin Gordon - Gorges Catering	Ward 4	3/18/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Gardner Douglas/Ear Kandi	Ward 4	3/14/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Daniela Camacho - Magic Cleaning Chicago	Ward 47	3/21/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Daniel Cohen	Ward 35	2/25/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Kenneth Williams - Silk- N-Classy LLC	Ward 4	3/13/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Regina Jackson - Carni- Go LLC Catering	Ward 4	approved by DHR 03/12/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
M. Harris & Co.	Office of City Clerk	approved by DHR 03/31/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
William Sampson	Ward 46	3/21/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lindsey Block	Ward 9	3/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Druker Yadgir & Haupt LLC	Ward 27	3/6/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Brian Berg	Ward 9	3/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Christine Pierce	Ward 4	3/6/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Yves Hughes	Ward 27	3/5/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Demetrius Thornton - Dsquare Media Group	Ward 17	2/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Cynthia Love	Ward 17	2/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Antonio Lightfoot, Indigo Portrait Studio	Ward 5	2/14/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Martha Smart	Ward 4	2/19/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Corvus Janitorial	Ward 42	2/18/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Boyce Possley Communications	Ward 13	2/18/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nijeria Boone - Mosiac Media Strategies	Ward 5	2/14/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Emily Rapport	Ward 35	2/7/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Breana Braden - B Creative	Ward 21	2/7/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Breana Braden - B Creative	Ward 6	1/15/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Reyna K Wences Najera	Ward 35	1/31/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Xanat Sobrevilla	Ward 35	1/27/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Cleopatra Draper	Ward 5	2/3/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Steve Valenziano	Ward 34	2/27/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Levar Elliot - New Beginnings Rehab	Ward 9	1/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Antonio Gutierrez	Ward 35	1/27/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nelson Martin (NELMAR LLC)	Ward 6	1/28/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Raven King - Synergetic Strategies	Ward 6	1/31/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dometria Lawrence (CRST)	Ward 46	1/22/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Dwight Davis	Ward 37	1/13/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Patricia Vasquez	Ward 35	1/13/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Mark Sledge	Ward 8	2/24/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Delinda Ellis	Ward 24	1/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lavell Pitts	Ward 24	1/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Breana Braden - BCreative	Ward 24	1/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Alvin Rider Jr	Ward 8	1/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Boyce Possley Communications	Ward 8	1/8/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lana Manson - Clean All Maid Service	Ward 21	12/31/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
BClean Cleaning Service - British Cooper	Ward 46	1/22/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Steven Vance - CityScape LLC	Ward 46	12/30/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Breana Braden - B Creative	Ward 46	1/10/2025	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Michael C Dorf, Law Offices	Ward 48	12/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Annice Fisher - Developing Capacity Consulting	Ward 48	12/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Elisabeth Espino	Ward 33	approved by DHR 12/20/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lanette Warbington	Ward 21	12/20/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Ezes Painting & Design	Ward 48	12/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Richard Harris (Zariah's Cleaning Service LLC)	Ward 3	12/19/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jordan Dubin - JNDubin Consulting	Ward 46	12/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Ean Willis (The Loung Online LLC)	Ward 7	approved by DHR 12/20/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Robert E. Thomas, Jameson Commercial Real Estate	Ward 48	12/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
James Ginderske	Ward 49	12/7/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
David Guzman Cruz	Ward 30	12/5/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
The William Everett Group	Chicago Department of Public Health	approved by DHR 12/5/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Norman Bolden (NorFlo Holding Corp)	Ward 4	11/26/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Mark Mason (eDot, LLC)	Ward 46	11/5/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
John Goodwin	Ward 8	11/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Andrea Dillon (Bon Manger Catering)	Ward 6	11/17/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Renuka Sharma (ScaleLit NFP)	City Council	11/15/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Renuka Sharma (ScaleLit NFP)	City Council	11/15/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Darwin Gordon (Gorges Catering)	Ward 4	11/11/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lloyd DeJohnette	Ward 4	11/11/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Evelyne Navarijo Lopez	Ward 48	11/22/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Julia Porter Maddox	Ward 6	11/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Chosyn Lockett	Ward 18	10/28/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Shalin Jain (Happy Fox Inc.)	Ward 33	10/25/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Emily Rapport, SuperVoid LLC	City Council	10/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Gabriela Rivero (GBR Enterprises dba GMR Translations	Ward 33	9/25/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Guadalupe Rivera, Radical Solutions	Ward 30	10/16/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Karen Fair, KRP Supplies	Ward 6	10/9/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Farley Williams, HotMix 5 DJs	Ward 6	10/10/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Robert Yadgir (Druker, Yadgir & Haupt LLC)	Ward 27	10/11/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Jordan Dubin, JNDubin Consulting	City Council	10/3/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Yves Hughes, Next Door Multimedia	City Council	10/7/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
British Cooper (B Clean Cleaning Services)	Ward 46	10/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Brendan Shiller (BSatChi)	Ward 46	9/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lanette Warbington	Ward 4	9/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Kenneth Williams	Ward 4	9/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jordan Dubin, JNDubin Consulting	Ward 12	9/20/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Erik Blome	Ward 23	9/16/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Carlos Redmond (Chicago Area Veterans Forum nfp)	Ward 21	9/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Quwa Digital, Sufyan Shaltaf	Ward 4	9/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Brian Schodorf, Schodorf Media	Office of City Clerk	9/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Farrah Harris	Office of City Clerk	approved by DHR 09/30/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Shannon Nutter	Ward 35	9/12/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Danielle Dorsey	Ward 17	9/11/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Mathew Podgorski - Public Research LLC	Ward 38	9/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Brittany Bindrim - Black Dove Design	Ward 28	8/27/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dean Cantave	Ward 8	8/16/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Daniel Burke, Security Professionals LLC	Ward 50	8/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Cody Morrison (Pax Nexus LLC)	Ward 21	6/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nelson Martin (NELMAR LLC)	Ward 6	8/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jacqueline Anderson	Ward 22	8/9/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
John C. Stamps	Ward 17	8/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Marlene Gonzalez - Life Coaching LLC	Ward 14	8/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Leslie Sadkowski	Ward 15	7/31/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Matt Podgorski, Mark Cavers	Ward 41	7/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Orange Hat Innovation LLC	Ward 50	7/12/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Yves Hughes, Next Door Multimedia	Ward 27	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
KRP Supplies	Ward 6	7/9/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Lisa Howard	Ward 5	7/3/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Terraza's Landscaping	Ward 30	7/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Elizabeth Espino	Ward 33	6/14/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Erik Blome	Ward 13	6/6/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
JG's Reptile Road Show and More	Ward 4	6/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Graeson Rosa	Ward 35	5/30/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Knights Consulting	Office of City Clerk	approved by DHR 06/7/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Bumperball Chicago	Ward 4	4/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Smoktiques	Ward 25	6/7/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Michael K Peery	Ward 21	5/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Union Promo Store - Ben J Ritter	Ward 5	5/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Susan Kennedy- Riechers	Department of Finance	approved by DHR 05/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Richard Richardson	Ward 5	5/22/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Connor Mitchell	Ward 44	5/2/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Melvin Woolfolk	Ward 33	4/10/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Melvin Wollfolk	Ward 33	4/10/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jacqueline Anderson	Ward 49	4/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Liberty Street Marketing LLC	Ward 5	4/23/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Plymouth Restaurant	Ward 4	4/22/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Carni-Go LLC	Ward 4	4/22/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Patricia Vasquez	Ward 35	4/24/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
N. Dean & Co	Ward 18	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
DH Systems Solutions (Daniel Hazlett)	Chicago Department of Public Health	approved by DHR 05/23/2024	None
Joelle Lamarre	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
William Powell	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Cameo Humes	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Leah Dexter	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Gold Coast Deli	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Jolene Scott	Ward 4	4/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Isaac Silver	Ward 33	approved by DHR 04/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Leslie Sadkowski	Ward 15	3/26/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Tavell Grant, Access Granted LLC	Ward 6	3/26/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Corvus Janitorial	Ward 42	1/10/2023	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nijeria Boone	Ward 5	3/21/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Antonio Lightfoot, Indigo Portrait Studio	Ward 5	3/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jordan Dubin (JNDubin Consulting)	Ward 1	3/18/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Aisha Humphries	Ward 6	3/21/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nicole Baldwin	Ward 6	3/13/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
El Mezquite Restaurant	Ward 25	3/8/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Denise Foy (Zhoosh Creative)	Ward 42	2/28/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Nickel Works Consulting	Ward 21	3/6/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dina Everage	Ward 6	3/6/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Cynthia Love	Ward 17	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Demetrius Thornton	Ward 17	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Delinda Ellis	Ward 24	2/16/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Breana Braden, B Creative	Ward 6	2/15/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Laura Knights, Knights Consulting LLC	Office of City Clerk	approved by DHR 02/15/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Supervoid LLC dba Always Open Design (Emily Rapport)	Ward 40	2/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
WECYCLE LLC	Ward 29	2/9/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Ear Kandi Entertainment	Ward 4	approved by DHR 02/15/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
B Creative Marketing Agency	Ward 24	3/25/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Latino Express Corp	Ward 4	approved by DHR 02/9/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Modern Tech Consultants LLC	Ward 10	2/8/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Daniel Cohen	Ward 35	2/2/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Emily Talen (Geo Da Press LLC)	Ward 35	approved by DHR 02/28/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jam Music	Ward 4	approved by DHR 02/2/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Barbara's Your Home and House Care	Ward 29	1/31/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Manuel Diaz, FELA LLC	Ward 14	1/31/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
KGB Multimedia	Ward 6	1/8/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
FELA LLC	Ward 14	approved by DHR 02/6/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Kristina Ferran	Ward 34	1/17/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Steve Valenziano	Ward 34	1/17/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Dwight Davis	Ward 37	1/8/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Rider Consulting Group	Ward 8	1/11/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
J.M. Midway Landscaping	Ward 13	1/5/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Boyce Possley Communications	Ward 8	1/10/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Mark Sledge	Ward 8	1/4/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Jordan Dubin (JNDubin)	Ward 48	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Derrick Clifton, Neta BBQ	Ward 18	1/1/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Clean All Maid and Janitorial Services	Ward 21	12/29/2023	No 2014 Hiring Plan prohibitions; No contractor selection certification.

Contractor	Contracting Department	Contract Start Date	Compliance Issues Identified
Synergetic Strategies	Ward 21	12/29/2023	No 2014 Hiring Plan prohibitions; No contractor selection certification.
FELA LLC	Ward 14	approved by DHR 02/28/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Lanette Warbington	Ward 21	12/28/2023	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Boyce & Possley Communications	Ward 13	approved by DHR 04/2/2024	No 2014 Hiring Plan prohibitions; No contractor selection certification.
Martha Smart	Ward 4	11/16/2023	No 2014 Hiring Plan prohibitions; No contractor selection certification.

2 | Hiring Related Reviews Performed by OIG

a | Contacts by Hiring Departments

OIG tracks all reported or discovered instances in which hiring departments contacted DHR to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are not exempt from the requirements of the *Shakman* decree ("covered positions") or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of such direct contact occurrences.

b | Contacts by the Fire Department

OIG tracks all reported or discovered instances in which CFD contacted DHR or OPSA's human resources function (OPSA-HR) to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are not exempt from the requirements of the *Shakman* decree (covered positions) or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of such direct contact occurrences.

c | Chicago Police Department Intervention

OIG tracks all reported or discovered instances in which CPD hiring units contacted DHR or OPSA-HR to lobby for or advocate on behalf of actual or potential applicants for covered positions or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of CPD intervention.

d | Contacts by Elected and Appointed Officials

OIG tracks all reported or discovered instances in which elected or appointed officials of any political party or any agent acting on behalf of an elected or appointed official, political party, or political organization contacted the City attempting to affect any hiring for any covered position or other employment actions.

Additionally, City employees often report contacts by elected or appointed officials that may be categorized as inquiries on behalf of their constituents, but not as an attempt to affect any hiring decisions for any covered position or other employment actions. This quarter, OIG received two notifications of political contacts.

e | Exemptions

OIG reviews adherence to exemption requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²³ This quarter, OIG received notification of 53 exempt appointments.

f | Senior Manager Hires

OIG may review in-process senior manager hires pursuant to Chapter VI of the City's Employment Plan, Chapter VII of the CPD Hiring Plan for Sworn Titles, and Chapter VI of the CFD Hiring Plan for Uniformed Positions, each covering the Senior Manager Hiring Process. This quarter, OIG reviewed three senior manager hiring sequences and found no violations.

g | Selected Department of Law Hiring Sequences

Pursuant to Section B.7 of the DOL Hiring Process, OIG has the authority to review in-process DOL hiring packets. Hiring packets include assessment forms, notes, documents, written justifications, and hire certification forms. This quarter, OIG conducted no reviews of DOL hiring sequences.

h | Discipline, Arbitrations, and Resolution of Grievances by Settlement

OIG receives notifications of disciplinary decisions, arbitration decisions, and potential grievance settlement agreements that may impact the procedures outlined in the City's Employment Plans. This quarter, OIG received and reviewed one arbitration decision. OIG did not receive or review any disciplinary decisions or resolutions of grievances by settlement.

i | Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG may review modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG reviewed 178 modifications to class specifications, and 55 new class specifications. Of these, OIG reviewed 144 minimum qualifications that were modified or created to include language specifying work experience in lieu of a college degree.

j | Referral Lists

A referral list includes applicants/bidders who meet the predetermined minimum qualifications generated by DHR for City positions. OIG may review this list by examining a sample of referral lists and notifying DHR when potential issues are identified. This quarter, OIG did not review any referral lists.

²³ An exempt position is a City position to which the requirements governing Covered Positions do not apply. These positions are cataloged on the Exempt List which is publicly available on the DHR website.

k | Chicago Police Department Written Rationale

OIG reviews any written rationale when no consensus selection was reached during a Consensus Meeting for Covered Positions within CPD. This quarter, OIG did not receive any such written rationale related to a no consensus selection.

1 | Chicago Fire Department Written Rationale

OIG reviews any written rationale when no consensus selection was reached during a Consensus Meeting for Covered Positions. This quarter, OIG did not receive any such written rationale related to a no consensus selection.

m | Chicago Police Department Emergency Appointments

OIG reviews circumstances and written justifications for any emergency appointments made pursuant to the City of Chicago Personnel Rules and Section 2-74-050(8) of the MCC. This quarter, OIG did not receive notification of any CPD emergency appointments.

n | Chicago Fire Department Emergency Appointments

OIG reviews circumstances and written justifications for any emergency appointments made pursuant to the City of Chicago Personnel Rules and Section 2-74-050(8) of the MCC. This quarter, OIG did not receive notification of any CFD emergency appointments.

3 | Hiring Related Audits Performed by OIG

a | Selected Hiring Sequences covered by the City of Chicago Employment Plan

This quarter, OIG conducted audits of four hiring sequences across two City departments. OIG selected these hiring sequences based on risk factors such as past errors and complaints.

Each quarter, OIG may audit in-process and completed hiring sequences conducted by the following departments or their successors: the Department of Fleet and Facility Management (2FM), CDA, DOB, DSS, CDOT, DWM, and six other City departments selected at the discretion of OIG. For 2025, OIG selected the following six additional departments: COPA, CDPH, the Chicago Public Library (CPL), BACP, CPD, and DHR. The table below details the hiring sequences audited by OIG this quarter.

Department	Title	Findings	OIG Recommendation	Department Action
Office of Budget Management	Deputy Budget Director	No violations or errors were found.	N/A	No response required.
Department of Fleet and Facility Management	Foreman of Machinists - Auto	No violations or errors were found.	N/A	No response required.

Table 11: Hiring Sequences Audited in Q1 2025 Pursuant to the City of Chicago Employment Plan

Department of Fleet and	Foreman of	No	N/A	No response
Facility Management	Machinists -	violations or		required.
	Auto	errors were		
		found.		
Department of Fleet and	Foreman of	No	N/A	No response
Facility Management	Machinists -	violations or		required.
	Auto	errors were		
		found.		

b | Examinations Covered by the City of Chicago Employment Plan

OIG may conduct an audit of DHR test development, administration, and scoring each quarter. This quarter, OIG did not conduct any audits of examinations covered by the City of Chicago Employment Plan.

c | Chicago Police Department Testing

OIG is required to conduct audits of CPD testing including test administration and scoring. This quarter, OIG did not conduct any audits of test administrations for covered positions within CPD.

d | Chicago Fire Department Testing

OIG is required to conduct audits of CFD testing including test administration and scoring. This quarter, OIG did not conduct any audits of test administrations for covered positions within CFD.

e | Acting Up

OIG audits compliance with Chapter XIII of the City's Employment Plan and the Acting Up Policy. This quarter, OIG received no DHR-approved waiver requests to the City's 90-Day Acting Up limit.

f | Selected Chicago Police Department Hiring Sequences

Pursuant to Chapter XI of the CPD Hiring Plan for Sworn Titles, OIG completes mandatory audits of in-process and completed CPD hiring sequences as well as employees hired through the Merit Promotion Process to ensure compliance with the hiring process. This quarter, OIG did not conduct any audits of CPD hiring sequences.

g | Selected Chicago Fire Department Hiring Sequences

Pursuant to Chapter IX of the CFD Hiring Plan for Uniformed Positions, OIG completes mandatory audits of in-process and completed CFD hiring sequences as well as employees hired through the Performance Selection Process. This quarter, OIG did not conduct any audits of CFD hiring sequences.

h | Chicago Police Department Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG is required to conduct audits of CPD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CPD.

i | Chicago Fire Department Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG is required to conduct audits of CFD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CFD.

j | Chicago Police Department Candidate Lists

OIG is required to conduct audits of CPD candidate lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CPD candidate lists.

k | Chicago Fire Department Referral Lists

OIG is required to conduct audits of CFD referral lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CFD referral lists.

l | Chicago Police Department Acting Up

OIG is required to audit compliance with Chapter X of CPD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CPD.

m | Chicago Fire Department Acting Up

OIG is required to audit compliance with Chapter XI of CFD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CFD.

n | Chicago Police Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CPD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CPD's Hiring Plan.

o | Chicago Fire Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CFD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CFD's Hiring Plan.

4 | Other Compliance Activity

a | Monitoring

In addition to auditing hire packets, OIG monitors hiring sequences as they progress by attending and observing intake meetings, interviews, tests, and consensus meetings. The primary goal of monitoring hiring sequences is to identify any gaps in internal controls and non-compliance with the City of Chicago's Employment and Hiring Plans. However, real-time monitoring also allows OIG to detect and address compliance issues as they occur. OIG identifies the hiring sequences to be monitored based on risk factors such as past errors, complaints, and historical issues with particular positions. This quarter, OIG monitored ten hiring sequences across five City departments. The table below shows the breakdown of monitoring activity by department.²⁴

Department	Intake Meetings Monitored	Tests Monitored ²⁵	Interview Sets Monitored ²⁶	Consensus Meetings Monitored	Violations	Errors
Chicago Department of Transportation	0	1	0	1	0	0
Chicago Department of Aviation	0	0	0	1	0	0
Department of Finance	0	0	1	2	0	0
Department of Water Management	0	1	0	2	0	0
Chicago Department of Public Health	0	0	1	0	0	0

Table 12: Hiring Sequences Monitored in Q2 2025

b | Escalations

Recruiters, classification analysts, and testing administrators in DHR must escalate concerns regarding improper hiring by notifying OIG. In response to these notifications, OIG may take one or more of the following actions: conduct a review of the hiring sequence, refer the matter to the DHR commissioner or appropriate department head for resolution, or refer the matter to the OIG Investigations section.

This quarter, OIG received one new escalation.

Table 13: Escalations Received in Q2 2025

Escalation Status	Number of Escalations
Newly Initiated	1
Pending	3
Referred to DHR Commissioner	0
Closed with Investigation	0
Closed without Investigation ²⁷	1

²⁴ If a department is not included in this table, OIG did not monitor any elements of that department's hiring sequence(s).
²⁵ Tests monitored are totaled by exam type, i.e. Police Officer, Detective, etc.; not total number of tests monitored for exam type.

²⁶ Interview Sets Monitored are totaled by positions monitored; not total number of interviews monitored.

²⁷ Escalations categorized as Closed without Investigation are received by OIG with either (1) a self-initiated remedy from the DHR commissioner and the escalation is considered closed after OIG reviews the escalation and concurs with the remedy issued by DHR with no further recommendations made by OIG; or (2) after review or inquiry, any findings and recommendations of OIG are reported to the DHR commissioner and, when appropriate, the department head and the DHR commissioner reports to OIG what action they took on OIG's recommendation.

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On September 19, 2024, OIG received an escalation from an employee with DHR related to the hiring sequence of an IT security specialist with CDA. OIG found that a DHR recruiter for the requisition incorrectly believed that the title was a senior manager position and provided the hiring department application materials for all candidates. However, since the title was not a senior manager position, Chapter V(B)(3) of the City's Employment Plan requires DHR to create a list of minimally qualified candidates in random order.

This error led to subsequent misunderstandings between DHR and CDA, which resulted in multiple related contacts to OIG. CDA ultimately coordinated with DHR employment services management to determine the individuals that should have been referred and conducted interviews of those candidates in compliance with the Employment Plan.

Accordingly, OIG had no additional recommendations related to the escalation and no response was required from DHR.

c | Processing of Complaints

OIG receives complaints regarding the City's hiring and employment processes, including allegations of unlawful political discrimination and retaliation and other improper considerations in connection with City employment. These complaints may be resolved in several ways, depending on the nature of the complaint. If there is an allegation of an Employment Plan violation or breach of a policy or procedure related to hiring, OIG may open an inquiry into the matter to determine whether such a violation or breach occurred. If a violation or breach is sustained, OIG may make corrective recommendations to the appropriate department or may undertake further investigation. If, after sufficient inquiry, no violation or breach is found, OIG will close the case as Not Sustained. If, during an inquiry, OIG identifies a process or program that could benefit from a more comprehensive audit, OIG may consider a formal audit or program review.

The table below summarizes the disposition of complaints related to the City's hiring and employment processes received this quarter.

Complaint Status	Number of Complaints
Newly Initiated	36
Pending	30
Closed ²⁸	0
Declined	6

Table 14: Hiring and Employment-Related Complaints Received in Q2 2025

²⁸ Complaints categorized are considered Closed after OIG reviews the complaint and issues a finding with or without recommendations to the respective department.



The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency.

The authority to perform this inquiry is established in the City of Chicago Municipal Code § § 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct; to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations; and, specifically, to review the operations of CPD and Chicago's police accountability agencies. Further, Paragraph 561 of the consent decree entered in *Illinois v. Chicago* requires OIG's Public Safety section to "review CPD actions for potential bias, including racial bias." The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, Chicago, IL 60604, or visit our website at <u>igchicago.org</u>.

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