



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
25

Quarterly Report: Third Quarter 2025

October 15, 2025

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO

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 third quarter of 2025, filed with City Council pursuant to Section 2-56-120 of the Municipal Code of Chicago (MCC).

We publish our report for the third quarter of 2025 at a tremendously challenging time. The City is beginning to grapple in earnest with a yawning budget deficit, tensions with the federal government are running high, and government accountability efforts across the nation are being weakened or abandoned altogether. These circumstances cast in high relief the urgency of fostering trust and public confidence in City government, and I sincerely believe that robust, independent oversight is critical to doing so.

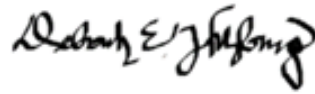
Oversight is an effective bulwark against inefficiency and abuse, however, only when it is unobstructed. As OIG has worked during this term to pursue our investigative work more aggressively than ever before, we have been vigilant in guarding our work from interference. Of the 12 sustained administrative cases we report in this quarter, fully one third of them involve allegations that a subject failed to cooperate with an OIG investigation. In each of the four cases in which we found that a subject failed to cooperate with our work as they are legally required to do, we recommended that the subject be terminated from City employment.

A government which is accountable to the governed cannot tolerate a refusal of scrutiny. In three of the four investigations in which we recommended the firing of a subject who failed to cooperate, the affected City departments agreed and are pursuing termination. I am grateful to those departments—the Chicago Police Department, the Chicago Department of Public Health, and the Office of Public Safety Administration—for underscoring the message that a failure to cooperate with OIG is inconsistent with City employment. In the fourth of those investigations, the Mayor's Office declined to terminate—or, in fact, to discipline at all—a senior employee against whom we sustained failure to cooperate allegations. I am troubled by an appearance that there are different rules for different people, depending on who they are and with whom they work.

Cases reported this quarter also include internal investigations pursued pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel, cases in which we found violations of the City's Governmental Ethics Ordinance, and pandemic relief fraud. Also reported here is our ongoing work reviewing closed police misconduct investigations, our program and policy work on effectiveness and efficiency in City government, and our monitoring of the City's employment practices.

I am, as always, sincerely grateful for the work of my colleagues at OIG, and I am more certain than ever of the profound importance of the work they do. It is difficult to imagine a more critical time than now to build a City government we can ask people to trust.

Respectfully,

A handwritten signature in black ink, appearing to read "Deborah E. Witzburg". The signature is fluid and cursive, with a large, stylized initial 'D'.

Deborah Witzburg
Inspector General
City of Chicago

Table of Contents

(When viewing as a PDF online, click on any item on the Table of Contents to follow a link to that section.)

I Mission of the Office of Inspector General	5
II Intakes.....	6
III Investigations.....	9
A Misconduct Investigations	9
B Sustained Administrative Investigations.....	15
C Synopses of and Developments in Charged Criminal Cases	23
D Synopses and Results Of Administrative Appeals, Grievances, or Other Actions	24
E Special Investigations	24
F Fines and Recoveries.....	27
IV Public Safety	28
A Evaluations and Reviews	28
B Review of Closed Disciplinary Investigations.....	30
V Reports and Monitoring Activity	41
A Audits and Follow-Ups.....	41
B Advisories and Department Notification Letters	42
C Other Reports and Activities.....	47
D Monitoring Employment Actions	47

This quarterly report provides an overview of the operations of OIG from July 1, 2025, through September 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 [published on the OIG website](#). 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.

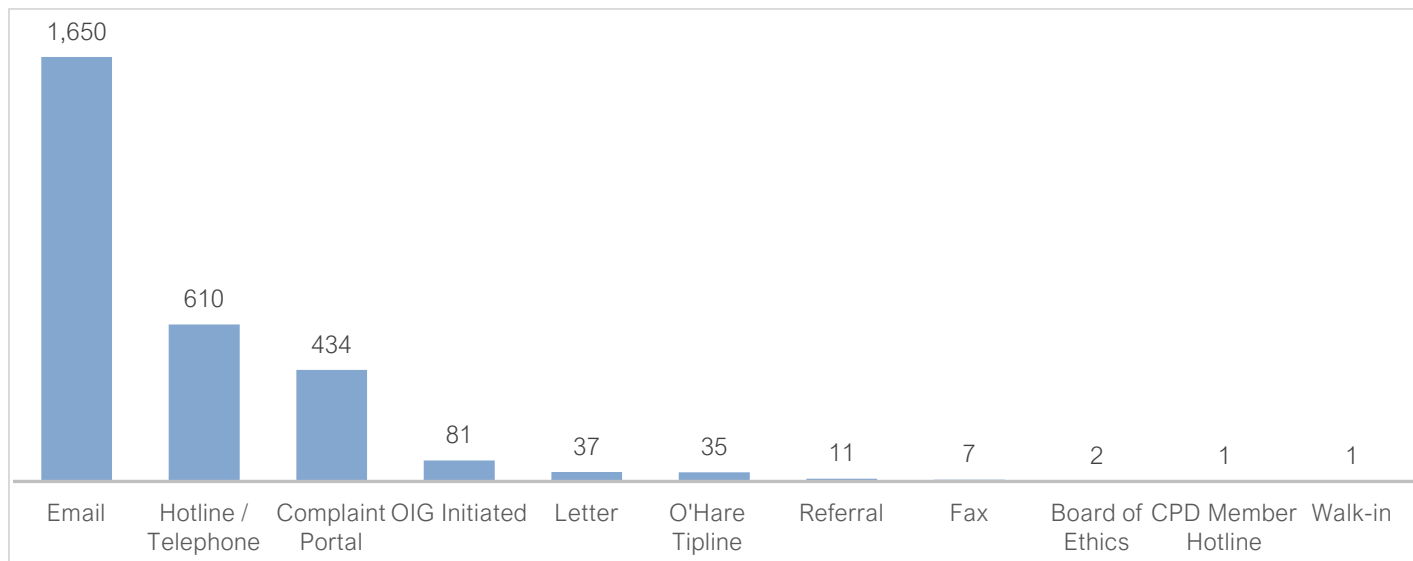
¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 2,869 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 Q3 2025, OIG made 473³ 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 463 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 473 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	249
Civilian Office of Police Accountability	112
Chicago Department of Human Resources	23
Chicago Department of Streets and Sanitation	11
Chicago Department of Aviation	10
Chicago Fire Department	9
Chicago Park District Office of Inspector General	8
Chicago Public Schools Office of Inspector General	6
Illinois Office of Executive Inspector General	5
Chicago Department of Transportation	4
U.S. Department of Housing and Urban Development Office of Inspector General	4
Chicago Department of Water Management	3
Chicago Housing Authority Office of Inspector General	3
Illinois Office of Attorney General	3
Chicago Office of Emergency Management and Communications	2
Chicago Office of Public Safety Administration	2
City Colleges of Chicago Office of Inspector General	2
Illinois Department of Human Services Office of Inspector General	2
Chicago City Council	1
Chicago Commission on Animal Care and Control	1
Chicago Department of Buildings	1
Chicago Department of Family and Support Services	1
Chicago Department of Fleet and Facility Management	1
Chicago Department of Housing	1
Chicago Public Library	1
Country Club Hills Police Department	1
Federal Bureau of Investigation	1
National Center for Missing and Exploited Children	1
Riverdale Police Department	1
Tinley Park Police Department	1
U.S. Department of Justice Office of Inspector General	1
U.S. Drug Enforcement Agency	1
Will County Sheriff's Office	1
Total	473

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 can be directly answered by OIG, it is designated as an “Inquiry,” responded to, and discontinued.

In Q3 2025, OIG discontinued 1,773 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do Not Process	936
Inquiries	451
Spam	386
Total	1,773

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 Q3 2025, OIG declined 7 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	2
Complaint Lacks Foundation	5
Total	7

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 306 active investigations. During Q3 2025, OIG initiated 21 investigations, of which 10 were self-initiated, and concluded 33 investigations.

2 | Open Matters

OIG's 306 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	256
Elected Officials	26
Contractors, Subcontractors, and Persons Seeking Contracts	19
Licensees	3
Appointed Officials	0
Other	2
Total	306

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	305
Ineffectiveness	1
Waste/Inefficiency	0
Total	306

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: <https://pbcchicago.com/>.

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 306 pending investigations, 159 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.

Table 6: Investigations Open Over Twelve Months, Q3 2025

Case ID ⁸	Legacy ID	General Nature of Allegations
C2022-000041000	20-1335	Unauthorized outside employment/residency violation
C2022-000041038	20-1375	Criminal violation
C2022-000041039	20-1376	False statements/violation of department rules
C2022-000041245	20-1589	Criminal violation
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine
C2022-000041581	21-0220	Criminal violation
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
C2022-000043961	N/A	Ethics violation
C2022-000044042	N/A	Paycheck Protection Program (PPP) fraud
C2022-000044045	N/A	Ethics violation

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
C2022-000044046	N/A	Official misconduct
C2022-000044065	N/A	False statements
C2022-000044091	N/A	Residency violation
C2022-000044099	N/A	Retaliation
C2022-000044122	N/A	Criminal violation
C2023-000000026	N/A	Criminal violation
C2023-000000027	N/A	Criminal violation
C2023-000000028	N/A	Official misconduct
C2023-000000032	N/A	Official misconduct
C2023-000000038	N/A	Ethics violation
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
C2023-000000128	N/A	Criminal violation
C2023-000000152	N/A	Criminal violation
C2023-000000158	N/A	Personnel rules violation
C2023-000000164	N/A	Conduct unbecoming
C2023-000000166	N/A	Criminal violation
C2023-000000177	N/A	Ethics violation
C2023-000000178	N/A	Criminal violation
C2023-000000179	N/A	Retaliation
C2023-000000180	N/A	Ethics violation
C2023-000000183	N/A	Fraud
C2023-000000189	N/A	Theft
C2023-000000215	N/A	PPP fraud
C2023-000000224	N/A	Residency violation
C2023-000000232	N/A	Personnel rule violation
C2023-000000260	N/A	Ethics violation
C2023-000000267	N/A	PPP fraud
C2023-000000268	N/A	PPP fraud
C2023-000000270	N/A	PPP fraud
C2023-000000271	N/A	PPP fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
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 violation
C2023-000000282	N/A	Criminal violation
C2023-000000298	N/A	Bribery
C2023-000000332	N/A	PPP fraud
C2023-000000335	N/A	Time theft
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
C2024-000000006	N/A	Unlawful eavesdropping
C2024-000000007	N/A	Ethics violation
C2024-000000013	N/A	Residency violation
C2024-000000014	N/A	Ethics violation
C2024-000000017	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
C2024-000000067	N/A	Ethics violation
C2024-000000068	N/A	Ethics violation
C2024-000000072	N/A	EEO violation
C2024-000000081	N/A	Personnel rule violation

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000082	N/A	Personnel rule violation
C2024-000000083	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
C2024-000000120	N/A	Personnel rule violation
C2024-000000121	N/A	Personnel rule violation
C2024-000000134	N/A	Ethics violation
C2024-000000143	N/A	Ethics violation
C2024-000000160	N/A	Criminal violation
C2024-000000161	N/A	Sexual harassment
C2024-000000169	N/A	Ethics violation
C2024-000000170	N/A	Criminal violation
C2024-000000171	N/A	Criminal violation
C2024-000000173	N/A	Retaliation
C2024-000000182	N/A	Criminal violation
C2024-000000183	N/A	Criminal violation
C2024-000000188	N/A	Ethics violation
C2024-000000190	N/A	Criminal violation
C2024-000000192	N/A	Perjury
C2024-000000193	N/A	Personnel rule violation
C2024-000000201	N/A	Retaliation
C2024-000000206	N/A	Campaign finance violation(s)
C2024-000000214	N/A	False statement(s)
C2024-000000215	N/A	Ethics violation
C2024-000000217	N/A	PPP fraud
C2024-000000218	N/A	Personnel rule violation
C2024-000000220	N/A	Residency violation
C2024-000000227	N/A	Procurement fraud
C2024-000000267	N/A	Ethics violation
C2024-000000268	N/A	PPP fraud
C2024-000000269	N/A	PPP fraud
C2024-000000270	N/A	PPP fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000271	N/A	PPP fraud
C2024-000000272	N/A	PPP fraud
C2024-000000273	N/A	PPP fraud
C2024-000000274	N/A	PPP fraud
C2024-000000275	N/A	PPP fraud
C2024-000000276	N/A	PPP fraud
C2024-000000277	N/A	PPP fraud
C2024-000000278	N/A	PPP fraud
C2024-000000279	N/A	PPP fraud
C2024-000000280	N/A	PPP fraud
C2024-000000281	N/A	PPP fraud
C2024-000000282	N/A	PPP fraud
C2024-000000283	N/A	PPP fraud
C2024-000000284	N/A	PPP fraud
C2024-000000285	N/A	PPP fraud
C2024-000000291	N/A	PPP fraud
C2024-000000292	N/A	PPP fraud
C2024-000000293	N/A	PPP fraud
C2024-000000294	N/A	PPP fraud
C2024-000000295	N/A	Bribery
C2024-000000296	N/A	PPP fraud
C2024-000000297	N/A	Personnel rule violation
C2024-000000298	N/A	Criminal violation
C2024-000000299	N/A	PPP fraud
C2024-000000300	N/A	PPP fraud
C2024-000000301	N/A	PPP fraud
C2024-000000303	N/A	PPP fraud
C2024-000000304	N/A	PPP fraud
C2024-000000305	N/A	PPP fraud
C2024-000000306	N/A	PPP fraud
C2024-000000369	N/A	Theft
C2024-000000372	N/A	Fraud
C2024-000000378	N/A	Residency violation
C2024-000000379	N/A	WBE fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000392	N/A	Bribery
C2024-000000393	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 Q3 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 Mayor’s Office 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

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

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.

and outcome of the cases for public reporting purposes and thus may not contain all allegations and/or findings for each case.

Table 7: Overview of Cases Completed and Reported as Sustained Matters

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000010	Department of Aviation	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 Aviation (CDA) declined to impose discipline while the subject is on an approved leave of absence; will impose discipline upon the subject's return.
C2023-000000121	Department of Water Management	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Water Management (DWM) preliminarily agreed with OIG's recommendation and requested the Department of Law (DOL) prepare discharge charges for the subject.
C2023-000000207	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.
C2023-000000223	Department of Public Health; Board of Ethics	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR; Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	The Department of Public Health (CDPH) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject; the Board of Ethics (BOE) has not yet made a determination on probable cause.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000264	Office of Public Safety Administration	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Office of Public Safety Administration (OPSA) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2023-000000324	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.
C2023-000000336	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.
C2023-000000357	Mayor's Office	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Mayor's Office did not agree with OIG's recommendation and declined to impose discipline.
C2024-000000064	Department of Streets and Sanitation	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Streets and Sanitation (DSS) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2024-000000322	Office of Inspector General	(Conducted pursuant to OIG's Policy Regarding Investigations of the Inspector General or Office of Inspector General Personnel)	OIG discharged the subject and referred them for placement on the ineligible for rehire list.
C2024-000000385	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
C2025-000000149	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

1 | Misuse of City Vehicle; False Statements (C2023-000000010)

An OIG investigation established that a CDA director improperly used their City vehicle for personal reasons and, when confronted, falsely claimed ignorance of the policy regarding City vehicle use. Specifically, the subject used their City vehicle to transport one family member, who was not a City employee, on an errand unrelated to City business on at least one occasion and to transport another family member, also not a City employee, to a local Chicago Transit Authority (CTA) station on multiple occasions. This use of the vehicle violated the City of Chicago Vehicle and Equipment Policy. When OIG confronted the subject, the subject falsely claimed no knowledge of that Policy, even though they had previously signed forms affirming that they understood and agreed to abide by that policy.

OIG found that the subject's conduct violated MCC § 1-21-010 (knowingly making a false statement of material fact to the City) and MCC § 2-56-140 (obstructing an inspector general investigation). OIG also found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false statements in an official investigation), Subsection 15 (engaging in any conduct prohibited by MCC), and Subsection 48 (violating any departmental regulations, rules or procedures, specifically the City of Chicago Vehicle and Equipment Policy).

OIG recommended that CDA discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CDA "elected to not separate" the subject "at this time," citing the fact that the subject was on an approved leave of absence. CDA further responded that "if/when" the subject returned to work, CDA would "discipline [them] accordingly and consummate [sic] with the level of [discipline] [they have] on file."

2 | Unapproved Secondary Employment (C2023-000000121)

An OIG investigation established that a DWM motor truck driver engaged in unapproved secondary employment. The subject completed City forms on four separate occasions where they affirmatively represented that they did not have outside employment, were not self-employed, and did not have a business interest or act in a consultant capacity. However, Illinois Secretary of State filings disclosed that—during at least part of the time period covered by those City forms—the subject was the president and a director of a trucking company.

OIG found that the employee violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 6 (failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City) and Subsection 43 (failure to comply with secondary employment requirements); as well as City of Chicago Personnel Rule XX, Section 3 (requiring employees to obtain department permission prior to engaging in outside employment).

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.

3 | Failure to Cooperate (C2023-000000207)

An OIG investigation has established that a CPD police officer failed to cooperate with OIG's investigation regarding their high volume of suspicious financial transactions.

OIG compelled the subject to attend an interview and informed them at the interview that their testimony could not be used against them in a criminal prosecution. After answering questions regarding their background as a City employee, the subject declined to answer further questions and instead invoked the Fifth Amendment right to remain silent. Pursuant to protocol, a superior CPD officer ordered the subject to answer OIG's questions concerning their possible misconduct. The subject failed to answer OIG's remaining questions in a direct violation of that order.

The subject disobeyed a director order from a superior officer and therefore violated CPD Rules and Regulations, Rule 3 (any failure to promote the Department's efforts to implement its policy or accomplish its goals), Rule 5 (failure to perform any duty), Rule 6 (disobedience of an order or directive, whether written or oral), and Rule 7 (insubordination or disrespect toward a supervisory member on or off duty).

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

4 | Unapproved Secondary Employment; Failure to Cooperate; Ethics Violation (C2023-000000223)

An OIG investigation established that a CDPH finance officer engaged in unapproved secondary employment, then failed to cooperate with OIG's investigation. OIG obtained financial records documenting business income that the subject generated from a financial consulting business that provides tax preparation services. The subject did not report that income on their annual Statements of Financial Interests (SOFI) with BOE, nor did they receive the necessary approval for several years of their secondary employment. The subject admitted the secondary employment to OIG but refused to provide documents related to the business that OIG requested from them, including business tax filings, records of their employees, and records of the income generated by the business, thereby hindering OIG's ability to conduct its investigation.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 43 (failure to comply with the requirements of secondary employment) and Subsection 15 (engaging in any act or conduct prohibited by the MCC by failing to cooperate with the investigation contrary to MCC § 2-56-090); City of Chicago Personnel Rule XX, Section 3, Subsection (b) (establishing the procedures for securing outside employment); and GEO § 2-156-160 (establishing SOFI filing requirements).

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

find probable cause to believe that the subject violated the GEO and impose appropriate sanctions. BOE has not yet made a determination on probable cause.

5 | PPP Loan Fraud; Conduct Unbecoming of a Public Employee; Failure to Cooperate (C2023-000000264)

An OIG investigation established that an OPSA lineman fraudulently obtained funds from the federal PPP, despite not having the requisite business or qualifying business expenses. The subject did so by making false representations on the loan application and with a falsified Internal Revenue Service (IRS) document. Specifically, the subject received \$17,890 in PPP funds and applied for loan forgiveness by claiming they had a lawn care business. OIG did not find evidence that the subject ever had such a business. Moreover, despite substantial efforts to interview the subject regarding this allegation and obtain proof of the business, they failed to appear for the interview and failed to respond to OIG's requests for documents to substantiate the existence of the business.

OIG found that the subject violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (violation of law, specifically 18 U.S.C. § 1001) and Subsection 50 (conduct unbecoming). Additionally, OIG found that the subject violated MCC § 2-56-090 (duty to cooperate with OIG).

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

6 | Failure to Provide Information on Statements of Financial Interest (C2023-000000324)

An OIG investigation established that a former Department of Finance (DOF) compliance officer twice provided false responses on their 2020 and 2021 SOFIs to BOE. The subject claimed that they did not have a financial interest in city real estate despite owning a multi-unit residential building where they lived in one of the units and rented out other units to tenants. The SOFI form specifically directs filers to disclose situations in which their principal place of residence is a "multiple-unit or mixed-use building" in which the filer has a financial interest.

OIG found that the subject's conduct violated the GEO § 2-156-160 (establishing SOFI filing requirements).

OIG recommended that that BOE find probable cause to believe that the subject violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO.

7 | Misuse of City Title and Position; Unauthorized Use of City Property to Conduct Secondary Employment (C2023-000000336)

An OIG investigation established that a CDA director was the owner of a business not related to their City employment. The director used their position with the City and their City title to expedite their special event permit application that allowed their business to participate in certain events. OIG also established that the subject used City resources, such as their City computer, City email address, and a City printer without authorization to conduct secondary business while on City time.

OIG found that the subject's conduct violated GEO § 2-156-060 (unauthorized use of any City property).

OIG recommended that that BOE find probable cause to believe that the subject violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO.

8 | Failure to Cooperate (C2023-000000357)

An OIG investigation established that a senior staff member in the Mayor's Office failed to cooperate with an OIG investigation. OIG was investigating allegations that the subject had conditioned the approval of public safety services in a particular ward upon the affirmative votes of the ward alderperson on particular Mayoral-backed legislation.

During its investigation, OIG attempted to interview two other senior staff members in the Mayor's Office, Witness A and Witness B. Both Witness A and Witness B reported that an attorney from DOL would attend their interviews. OIG declined to conduct those confidential investigative interviews with a DOL attorney present and issued written interrogatories in lieu of those interviews. Both witnesses answered the interrogatories. In the case of Witness A, OIG agreed at their request to two separate extension requests (totaling over a month of extended time) of its deadline to answer the interrogatories. When OIG denied a third extension request and told Witness A that a failure to respond by the extended deadline would be considered a failure to cooperate, Witness A complied and responded.

As for the subject of the investigation, OIG originally reached out by phone in October 2024 and spoke with the subject about scheduling a subject interview. The subject stated they would call OIG back. OIG did not hear back and sent an email to the subject days later suggesting an interview date later in November 2024. The subject responded, stating that a DOL attorney would attend the interview; the DOL attorney told OIG that the subject might also retain private counsel. Consistent with its position on the witness interviews in this investigation, in which Witness A and Witness B fulfilled their duty to cooperate by responding the written interrogatories, OIG declined to interview the subject with a DOL attorney present and sent them written interrogatories on February 11, 2025. OIG's initial transmission set a response deadline of February 25, 2025. OIG did not receive any acknowledgement to its transmission email or any response by the initial deadline. OIG followed up by voicemail on March 11, 2025, and by email on March 18, 2025. In its March 18 email, OIG communicated that it had received no responses to its written questions and that it would continue its investigation and potentially consider the subject's failure to respond as a violation of their duty to cooperate.

OIG was unable to gather sufficient evidence to conclude by a preponderance of the evidence whether the subject engaged in misconduct related to the original allegation that they conditioned critical City services upon an alderperson's support for Mayoral-backed legislation. OIG therefore did not reach an investigative finding regarding that underlying allegation.

However, OIG found that the subject violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC), by failing to cooperate with the investigation, in violation of MCC § 2-56-090.

OIG transmitted its summary report and the supporting materials to the Mayor's Office on June 30, 2025, recommending that the Mayor's Office discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. The Mayor's Office response to OIG's recommendation was due on July 30, 2025. In late July, the Mayor's Office accessed the summary

report of investigation (SRI), which OIG had transmitted weeks before, and requested an extension for its response. On July 24, 2025, OIG was contacted by a privately retained attorney representing the subject, to whom the Mayor's Office had apparently provided OIG's SRI. The attorney claimed that they had attempted to contact OIG in June to inform OIG of their representation and the subject's intention to cooperate in the investigation. The attorney, however, was unable to provide any records indicating they had actually emailed OIG, and OIG never received any communication from the attorney until after the Mayor's Office received notice—and apparently notified the subject and/or their attorney—of OIG's intention to pursue discipline for the subject's failure to cooperate. Under the circumstances, OIG declined to reopen its investigation and informed the Mayor's Office that it continued to recommend the subject's discharge.

In a response signed by Witness A, the Mayor's Office disagreed with OIG's conclusion that the subject failed to cooperate. In sum, the Mayor's Office stated that it "did not find evidence" that the subject was "deliberately indifferent to the OIG's investigation" or that the subject "willfully impeded" the investigation. The Mayor's Office further concluded that it was "unjustifiable to impose OIG's recommended consequences for failing to cooperate with the OIG when the OIG delayed and made cooperation difficult by its own actions, including its outright refusal to interview [the subject] based on [their] own choice of counsel." Apparently in support of its position, the Mayor's Office cited amendments to MCC § 2-56-050 regarding DOL's authority to represent a subject in an OIG interview which did not take effect for more than six months after the events at issue here.

9 | Public Indecency (C2024-000000064)

An OIG investigation established that a DSS sanitation laborer masturbated in a vehicle which was parked on a public street. Several residents in the area witnessed the subject's conduct and made a report to CPD about the incident. After the subject returned to the scene 10 days later, CPD responded, and the subject was arrested and cited for public indecency/sex conduct based on the original incident. The laborer pleaded guilty to the charge based on the first incident. The subject was off-duty at the time of both incidents, but OIG determined that the nature of the conduct, combined with the public-facing nature of the subject's role, established a nexus between the conduct and the subject's City job and therefore warranted a disciplinary recommendation.

OIG found that the subject's conduct violated 720 ILCS 5/11-30 (public indecency), MCC § 8-8-080 (indecent exposure), and City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes), Subsection 48 (violating any departmental regulations, rules or procedures), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that DSS discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DSS preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.¹¹

10 | Violation of Policy; False Statement (C2024-000000322)

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 technical support

¹¹ After the close of the third quarter but before the date of this report, OIG received confirmation that the subject had been terminated and placed on the ineligible for rehire list.

administrator used a mobile device to clock in or clock out on multiple occasions in violation of OIG policy and made a false statement to OIG in the course of its investigation.¹²

OIG found the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false, inaccurate or deliberately incomplete statements in an official inquiry), Subsection 11 (falsification of any attendance records), Subsection 48 (violating any departmental regulations, rules, or procedures), and Subsection 50 (conduct unbecoming).

OIG discharged the subject and referred them for placement on the ineligible for rehire list.

11 | Sexual Harassment by Appointed Official (C2024-000000385)

An OIG investigation established that a former Mayoral appointee to a City board or commission made comments amounting to sexual harassment to City employees while in a City office. Specifically, while conducting City work, the subject made two unwelcome comments of a sexual nature in the presence of multiple City employees, which had the effect of creating an offensive working environment. In OIG's interview of the subject, they denied making the comments but conceded that such comments would be inappropriate. However, OIG interviewed several witnesses who were consistent and credible in their accounts of the interaction with the subject.

OIG found that the subject violated GEO § 2-156-149 (sexual harassment by officials).

OIG recommended that BOE find probable cause that the subject violated the GEO and pursue appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO.

12 | Failure to Properly Maintain Investigative File (C2025-000000149)

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 investigator failed to competently maintain an investigative file.

OIG found the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 39 (incompetence) and Subsection 48 (violating any departmental procedures).

OIG issued a written reprimand to the subject.

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.

¹² See <https://igchicago.org/wp-content/uploads/2023/07/Internal-Investigations-Policy.pdf>.

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

OIG previously reported in its [Fourth Quarter 2022](#) 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's sentencing was continued from August 20 to October 17, 2025, on joint motion of the parties.

2 | State of Illinois v. Jeffrey Kriv, 23CR0218601 (Circuit Court of Cook County), OIG Case C2022-000043852

OIG previously reported in its Fourth Quarter 2024 report on the indictment of Jeffrey Kriv. Kriv, while a Chicago Police officer, provided fraudulent documents and made false statements, under oath, to the City of Chicago Department of Administrative Hearings to dispute several parking tickets and moving violations related to his personal vehicles. Kriv was indicted on four counts of the felony offense of perjury and five counts of the felony offense of forgery.

On September 24, 2025, Kriv pleaded guilty to an amended count of Class 4 Felony Theft, 720 ILCS 5/16-1(a)(1). The remaining counts were dismissed. Kriv was sentenced to a period of 18 months felony probation and agreed to pay restitution to the City of Chicago in the amount of \$4,515, which represents the total fines sought in the 56 tickets that were dismissed.

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.¹³

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.¹⁴ 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 eight campaign finance matters, resulting in the return of \$14,160 in improper contributions. Details are provided in the table below.

¹³ 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.

¹⁴ 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.

Table 8: Campaign Finance Activity

Case #	Aggregate Donation Amount (Year)	Donation Source	Donation Recipient	Amount of Returned Funds
C2024-000000109	\$2,500 (2021)	Person seeking to do business with the City	Elected official of the City	\$1,000
C2024-000000219	\$2,500 (2023)	Affiliated company of person doing business with Chicago Park District	Elected official of the City	\$1,000
C2024-000000266	\$2,500 (2021) \$7,500 (2022) \$5,000 (2023)	Person doing business with the City	Elected official of the City	\$10,500
C2024-000000339	\$2,000 (2022)	Person doing business with the City	Elected official of the City	\$500
C2024-000000341	\$2,160 (2022)	Person doing business with the City	Elected official of the City	\$660
C2025-000000021	\$2,000 (2023)	Person doing business with the Chicago Housing Authority	Elected official of the City	\$500

2 | O'Hare 21

OIG provides oversight for major construction initiatives across the City. Specifically, OIG has worked with 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 of promoting transparency and accountability in City business.

OIG has developed an [O'Hare 21-specific tipline](#) and [email address](#) 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. [All BOE settlement agreements are available to the public on the City's website.](#)

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 | Follow-up to OIG's Evaluation of Fairness and Consistency in the Disciplinary Process for CPD Members¹⁵

The Public Safety section of OIG completed a follow-up to its June 2022 evaluation, Fairness and Consistency in the Disciplinary Process for CPD Members.¹⁶ In its 2022 report, OIG evaluated the policies and procedures of BIA, COPA, and the Police Board in recommending and reviewing discipline for sustained allegations of misconduct by CPD members. OIG's original inquiry found that the existing BIA, COPA, and Police Board policies did not provide clear and actionable guidance to agency personnel to ensure procedural consistency and fairness in disciplinary determinations across misconduct investigations. The absence of sufficiently robust policy guidance risked that the disciplinary process could be unpredictable for involved members and could result in arbitrary disciplinary outcomes. OIG concluded that while the investigating and reviewing agencies must consider different facts in each disciplinary case, they should follow consistent and fair procedures to guide that consideration.

Based on those findings, OIG made four recommendations aimed at improving consistency and fairness in the disciplinary process.

- First, OIG recommended that COPA should revise its policies to ensure consistency and accuracy across the agency's Employee Policy Handbook, two Investigations Manuals, and any additional policies it issues.
- Second, OIG recommended that BIA and COPA revise their policies to require that personnel developing disciplinary recommendations document mitigating and aggravating factors and how they influenced the disciplinary recommendation.
- Third, OIG recommended that appropriate representatives of BIA, COPA, and the Police Board solicit feedback from one another and the unions representing CPD members, as appropriate and required by law, to develop a standardized list of aggravating and mitigating factors to be used as an advisory tool to formulate disciplinary recommendations and review discipline. OIG noted that any resulting list of factors should be made publicly available.

¹⁵ Published August 29, 2025. See <https://igchicago.org/publications/cpd-disciplinary-process-follow-up/>.

¹⁶ City of Chicago Office of Inspector General, "Fairness and Consistency in the Disciplinary Process for Chicago Police Department Members," June 6, 2022, <https://igchicago.org/publications/fairness-and-consistency-in-the-disciplinary-process-for-chicago-police-department-members/>.

- Fourth, OIG recommended that DOL provide legal guidance to BIA and COPA to support the development of a single, standardized list of aggravating and mitigating factors that could serve as guidelines to be used in determining disciplinary recommendations for CPD members of any rank or position.

In the follow-up inquiry, OIG inquired about the corrective actions taken by CPD, COPA, the Police Board, and DOL in response to the recommendations in its original report. Based on the responses, OIG concluded that CPD and COPA had implemented corrective actions to varying degrees. Further, the Police Board disagreed with OIG's recommendation and had not taken any responsive action, while OIG's recommendation to DOL was not yet applicable. Specifically, COPA had partially implemented OIG's recommendation to revise policies to ensure consistency and accuracy across the agency's Employee Policy Handbook, Investigative Manuals, and other additional policies, by drafting a new policy guidance (Recommendation 1). Furthermore, by introducing new relevant forms and templates, COPA had also partially implemented OIG's recommendation to document the consideration of aggravating and mitigating factors in disciplinary review (Recommendation 2). CPD had fully implemented Recommendation 2, by revising an existing directive and integrating the updated policy into training modules.

As of July 2025, COPA and CPD had convened a working group "focused on aligning disciplinary recommendations for police misconduct."¹⁷ However, CPD, COPA, and the Police Board had not implemented OIG's recommendation to develop a single, standardized list of aggravating and mitigating factors to be used as an advisory tool for disciplinary recommendations and subsequent review of discipline (Recommendation 3). Similarly, though DOL reported that it continues to provide legal guidance to COPA and BIA in accordance with the consent decree, OIG did not assess DOL's corrective actions because CPD, COPA, and the Police Board have not developed a standardized list of factors used to decide upon disciplinary recommendations (Recommendation 4).

In conclusion, OIG found that COPA had made efforts to improve the consistency of the disciplinary recommendations it makes, including creating draft policy guidance to instruct staff on how to complete the recommended discipline portion of the Final Summary Report (FSR), and creating guidance and forms on considering and documenting aggravating and mitigating factors used in the determination of recommended discipline. CPD also reported some progress, requiring in policy that BIA investigators must document aggravating and mitigating factors considered in the basis for the recommended discipline.

Complicating the efforts for consistency in police discipline are the still-unresolved negotiations between the City and the Fraternal Order of Police (FOP) around a police disciplinary matrix, with little indication of progress towards a negotiated matrix, since the discontinuation of use of the CR Matrix. OIG found that CPD and COPA have independently made progress toward the goal of improving internal consistency in disciplinary recommendations since OIG's 2022 report. However, without formal cross-agency guidance, such as a disciplinary matrix, the risks of inconsistent discipline identified in OIG's original report remain. Though the investigating and reviewing agencies must consider the unique facts in each disciplinary case, they should follow and demonstrate consistent and fair procedures to guide that consideration. A lack of sufficiently robust guidance for

¹⁷ Civilian Office of Police Accountability, "2025 Second Quarter Report," accessed August 19, 2025, <https://www.chicagocopa.org/wp-content/uploads/2025/07/2025-Q2-Report-1.pdf>.

determining recommended disciplinary penalties risks inconsistent or arbitrary disciplinary outcomes for CPD members. Inconsistent outcomes, and a lack of clear publicly available disciplinary guidelines, hinder both CPD members and the public in their ability to understand and have confidence in the police accountability system in Chicago. Accordingly, OIG urged the relevant parties to continue their efforts in pursuit of procedural consistency and fairness in the determination of discipline across police misconduct investigations.

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 281 closed disciplinary cases and opened 37 for in-depth review. OIG found one BIA and six COPA investigations that contained deficiencies materially affecting their outcomes.

Table 9: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	156	7
COPA	125	30
Total	281	37

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent one letter of recommendation to reopen an investigation to BIA and four letters of recommendation to reopen investigations to COPA. BIA accepted OIG's one recommendation. COPA accepted one and declined two of OIG's recommendations; one response is pending.

Additionally, by the end of this quarter, OIG found that BIA reopened an investigation where OIG made a recommendation in the second quarter of 2025, but BIA did not send a formal response. There are three recommendations to reopen sent in the second quarter of 2025 pending responses from BIA. OIG received responses from COPA on four investigations made in the second quarter of 2025. COPA accepted two and declined two of OIG's recommendations to reopen.

Below are summaries of investigations that have reached a final disciplinary decision during the third quarter. 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 Investigate All Appropriate Allegations (C2023-000000022/CPD Log #2018-1088016)

COPA investigated allegations that Officer Demond Sykes, Star #13871, did not have probable cause to arrest the complainant; that Officer Christina Pena, Star #10868, maltreated the complainant; and that Sergeant Jacalyn Doyle, Star #1018, witnessed the maltreatment but failed to intervene. On September 17, 2017, Officer Sykes arrested the complainant, who was riding a bicycle, for failure to stop at two stop signs and resisting/obstructing a peace officer. The complainant and their bicycle were transported to CPD's 15th District station. Shortly thereafter, CPD members transported the complainant to the 25th District station for processing. Officer Pena prepared bail bond paperwork and asked the complainant to review and sign it. The complainant reviewed the paperwork and informed Officer Pena that the address listed was incorrect. Officer Pena told the transporting officers that they could leave the station, and the complainant could get themselves home. CPD officers left the complainant to find alternative transportation from the 25th District station to the 15th District station where their bicycle was inventoried.

As a result of its investigation, COPA concluded that the allegations made against Officer Pena and Sergeant Doyle were unfounded, and COPA determined that additional allegations were warranted against Officer Sykes. However, COPA failed to serve the additional allegations, due to Officer Sykes placement in a no-pay status for a separate misconduct incident. COPA placed the allegations against Officer Sykes in a Close Hold status.

On January 20, 2023, OIG recommended that COPA reopen the investigation to serve Officer Sykes with the additional allegations that COPA identified and take any additional steps necessary to reach a finding. OIG also recommended that COPA identify the mechanism or procedure it has in place to ensure COPA is notified when and if Officer Sykes returns to work so that it may conclude its investigation.

On May 8, 2023, COPA reopened the investigation in response to OIG's recommendation. OIG reviewed the electronic case file and according to a note dated June 30, 2025, COPA later decided to re-close the case without serving Officer Sykes with the additional allegations, due to the age of the case, but did not notify OIG.

b | Recommendation to Reopen to Address All Appropriate Allegations (C2024-000000095/CPD Log #2021-0000718)

COPA investigated allegations against CPD member Jennifer Finnegan, Star #16637, and their use of excessive force in retaliation to an arrestee biting Officer Finnegan. Officer Finnegan and Officer Rene Duran, Star #15514, were dispatched to check the well-being of the arrestee, who was described as a person "appearing to be overdosing." While being detained, the arrestee kicked Officer Finnegan in the chest. The arrestee was then "placed on the ground in [a] laying down

position” to gain control of the arrestee’s legs. The arrestee bit Officer Finnegan on their lower right arm, and Officer Finnegan responded by grabbing the arrestee “by the neck area.” Officer Finnegan applied a wristlock hold and the arrestee was transported to the hospital.

On Officer Duran’s body worn camera (BWC) footage, Officer Finnegan states, “You motherfucker,” repeatedly, with their hand around the arrestee’s neck for approximately five seconds. While in the ambulance, Officer Duran pushes the arrestee’s head down into the gurney and tells the arrestee to stop acting like a “fucking animal.”

COPA determined that this investigation met its criteria for closure under its Timeliness Initiative Project (TIP) and placed this investigation in a Non-Disciplinary Closure (NDC) status.¹⁸ COPA’s NDC memorandum lists allegations concerning unjustified uses of force against a restrained individual, highly objectionable instances of verbal abuse (as defined by MCC § 2-78-10), and acts of retaliation by Department members, as allegations that are disqualified from non-disciplinary closure.

OIG recommended that COPA reopen the investigation to investigate all appropriate allegations and close the matter in accordance with its policy.

In response to OIG’s recommendations, COPA reopened the investigation. COPA sustained allegations against Officer Finnegan for using excessive force by placing their hands on or about the arrestee’s neck, and for directing abusive, profane, and/or threatening language toward the arrestee, recommending a 1 to 30-day suspension and retraining on CPD’s use of force policy. In addition, COPA sustained allegations against Officer Duran for using excessive force on the arrestee while they were restrained and recommended a 1 to 30-day suspension and retraining on CPD’s use of force policy. COPA also sustained allegations against Lieutenant Joseph Ferrero, Star #233, and Sergeant Amelia Kessem, Star #2190, for failing to report Officer Finnegan’s potential misconduct to COPA, recommending both receive a reprimand and retraining on responsibilities when reviewing Tactical Response Reports (TRRs).

[c | Recommendation to Reopen to Conduct a Rule 14 Analysis \(C2024-000000231/CPD Log #2021-0004861\)](#)

COPA conducted a preliminary investigation concerning allegations that CPD members Divale Roberson, Star #16993, and Alain Dillon, Star #16145, wrongfully stopped and detained the complainant and passenger for not using a turn signal and unlawfully searched the complainant’s car during a traffic stop. COPA determined its “preliminary investigation did not reveal verifiable evidence of misconduct under its jurisdiction” and referred the investigation to BIA to determine if the Investigative Stop Report (ISR) accurately reported the reason that Officers Roberson and Dillon did not issue an Investigatory Stop Receipt.

BIA conducted its preliminary investigation and issued a Summary Punishment Action Request (SPAR) to both Officers Roberson and Dillon, recommending a reprimand for failure to provide an Investigatory Stop Receipt, and administratively closed the investigation.

¹⁸ According to COPA’s website, The Timeliness Initiative Project was a project launched by COPA to review aging investigations older than 18 months to determine if an alternative approach was warranted to expediting the closure of certain investigations.

During its review, OIG identified that Officers Roberson and Dillon completed an ISR for both subjects with the statement “ISR Receipt Refused” when BWC footage showed they did not offer either subject an ISR receipt. OIG recommended that BIA reopen the investigation to conduct an analysis under CPD’s Rule 14, which prohibits false reports, as to whether Officers Robinson and Dillon’s statement, as it appears on their ISRs, constitutes a false report.

In response to OIG’s recommendations, BIA agreed to reopen the investigation and served both Officers Roberson and Dillon with an additional allegation that they inaccurately documented in the ISR narrative that the subjects refused the receipt during the traffic stop. BIA interviewed Officers Roberson and Dillon and determined that they did not add the statement “ISR Receipt Refused” with intention to provide a false statement finding, therefore, that they did not violate Rule 14.

BIA sustained the allegation that Officers Roberson and Dillon inaccurately documented that the subject refused the ISR receipt in violation of Rule 2, which prohibits any action or conduct which impedes the Department’s efforts to achieve its policy and goals or brings discredit upon the Department; and recommended a one-day suspension for both officers.

d | Recommendation to Reopen to Investigate All Allegations and to Fully Account for All Available Evidence (C2024-000000419/ CPD Log #2023-0002399)

OIG reviewed a COPA investigation involving allegations that CPD member Kenneth Sunde, Star #18633, disrespected and sexually harassed the complainant by using their (Officer Sunde’s) pelvis to pin the complainant to the vehicle during a traffic stop. After a preliminary investigation, COPA administratively closed the investigation stating, “The allegation that the accused used [their] pelvis to pin [the complainant] against the vehicle was not observed...There is no objective verifiable evidence to support moving forward with this investigation.”

OIG reviewed BWC footage included in the investigative file and observed Officers Sunde and Michael W. Donnelly, Star #13784, use profanity and insulting language towards the complainant and deactivate their BWCs before the traffic stop concluded. COPA did not address Officers Sunde and Donnelly’s use of profanity or their early BWC deactivation, nor did it address the failure of the supervisor on-scene, Sergeant Erick Seng, Star #2677, to activate their BWC. OIG recommended that COPA reopen the investigation to address the language used by Officers Sunde and Donnelly, the early deactivation of their BWC, and any other applicable rule violations associated with the traffic stop.

In response to OIG’s recommendations, COPA accepted OIG’s recommendation and reopened the investigation. COPA determined that the accused members’ use of profanity and their early BWC deactivation allegation are not under its jurisdiction and referred the investigation to BIA.

BIA conducted its investigation and sustained allegations that Officers Sunde and Donnelly used insulting language and several profanities toward the subject of a traffic stop, deactivated their BWCs early, and failed to submit an IISR prior to the end of their tour of duty. BIA also sustained an allegation that Sergeant Seng failed to activate their BWC during a traffic stop. BIA recommended a ten-day suspension for both Officers Sunde and Donnelly and a five-day Suspension for Sergeant Seng.

e | Recommendation to Reopen to Consider All Available Evidence and Potential Rule Violations (C2024-000000458/CPD Log# 2022-0005045)

BIA investigated allegations that off-duty CPD Officer Luis Cruz, Star #15202, fondled the complainant's vagina, anus, and breast without their consent. Officer Cruz was arrested, charged, and convicted of Simple Battery following the incident.

BIA administratively closed the investigation, short of a finding, after learning of Officer Cruz's criminal conviction. During its review, OIG identified that BIA did not address the potential violation of CPD's Rules of Conduct, Rule 1, which expressly prohibits the violation of any law or ordinance.

OIG recommended that BIA reopen the investigation to consider all available evidence and applicable rule violations associated with the disposition of Officer Cruz's criminal case.

In response to OIG's recommendations, BIA declined to reopen the investigation and did not provide an explanation for the declination.

f | Recommendation to Reopen to Conduct an Analysis of All Potential Violations (C2025-000000034/CPD Log #2024-0008121)

BIA investigated allegations that CPD members David Bahena, Star #15670, and Jeremiah Cole, Star #9106, failed to provide service after responding to a call for a well-being check on two minor children. Officers Bahena and Cole responded to a call made by a grandparent of two minors alleging that they were not being fed and were being verbally abused by their parent. Officers Bahena and Cole spoke with the parent of the two minor children, who related that they had been dealing with child abuse allegations that have been unfounded by DCFS. Officers Bahena and Cole concluded there was nothing else they could do, walked away from the parent, and spoke to the grandparent who then requested a sergeant.

Sergeant Rigoberto Tovar, Star #2027, arrived at the scene and on their BWC video asks the parent if they could get the children on camera "just for DCFS purposes." Sergeant Tovar explains to the parent, "I don't have to talk to them. I just want to make sure they're alive. That's it." Sergeant Tovar speaks with the minors in front of their parent. One child stated, "I don't feel safe here." Ultimately, Sergeant Tovar states, "I'm done here," walks away from the child, and concludes the investigation.

BIA unfounded the allegation against Officers Bahena and Cole, and no allegations were brought against Sergeant Tovar.

OIG recommended that the investigation be reopened to determine whether it would be appropriate to bring an allegation for failure to conduct a preliminary investigation against Officer Bahena, Officer Cole, and Sergeant Tovar.

In response to OIG's recommendations, BIA reopened its investigation. BIA brought an allegation against Officers Bahena and Cole, and Sergeant Tovar for failure to comply with General Order G04-04, "Domestic Incidents." After additional analysis, BIA unfounded the allegation against Officers Bahena and Cole, and sustained the allegation against Sergeant Tovar. Sergeant Tovar received a reprimand.

g | Recommendation to Reopen to Consider All Available Evidence and Conduct Additional Analysis (C2025-000000035/ CPD Log#2023-0005450)

BIA investigated allegations that CPD member Anthony Fosco, Star #15727, told the complainant that they (Officer Fosco) were a gang member and showed the complainant a Latin King tattoo on their chest during a traffic stop. BIA unfounded the allegations made against Officer Fosco. During its review of BWC video, OIG observed Officer Fosco questioning the complainant about the Latin Kings, display a Latin King hand sign and use the phrase, “on the crown.” BIA did not question Officer Fosco about their repeated use of the phrase, “on the crown,” their display of a Latin King hand sign, or their display of a chest tattoo while discussing Latin Kings with the complainant during the traffic stop. BIA also did not conduct any analysis of whether Officer Fosco violated CPD’s Rule 14, prohibiting false reports, when, during his subject interview with BIA: (1) Officer Fosco claimed that the complainant accused them of being a Latin King gang member earlier based on the complainant’s observation of Officer Fosco’s crown tattoo; or (2) Officer Fosco stated the use of the phrase “on the crown” was a sarcastic response to an accusation by the complainant, when Officer Fosco’s first use of the phrase and partial display of the tattoo were not in response to anything said by the complainant. Further, BIA’s investigative file did not reflect any analysis of whether Officer Fosco’s conduct may have brought discredit upon the Department in violation of Rule 2. Based on BIA’s investigative file, it was also unclear whether BIA conducted a thorough review of the BWC video captured during the traffic stop.

OIG recommended that BIA reopen the investigation to consider all available evidence and conduct an analysis of whether the conduct at issue violated Rules 2 and 14 of CPD’s Rules of Conduct.

In response to OIG’s recommendations, BIA reopened its investigation, conducted a social media intelligence investigation of Officer Fosco and their family members, and determined it was unable to find evidence of gang affiliation. BIA also reviewed all available BWC footage and conducted a second interview with Officer Fosco. BIA sustained the allegation that Officer Fosco’s conduct brought discredit to the Department, recommending a one-day suspension, and reached a finding of Not Sustained on the allegation that Officer Fosco was a Latin King gang member; BIA did not bring a Rule 14 allegation against Officer Fosco.

h | Recommendation to Reopen to Consider All Available Evidence (C2025-000000113/CPD Log#2023-0004338)

COPA conducted a preliminary investigation involving an allegation that CPD members damaged the front door to the complainant’s in-law’s residence and made entry without a warrant. A CPD member working in a covert capacity reported that several subjects were outside of a residence, holding and pointing firearms at oncoming vehicles. When additional CPD members arrived on scene, they observed one subject enter the residence. The CPD members exited their vehicles and observed two additional subjects holding firearms run inside the residence. The CPD members followed the subjects to the front door and the subjects slammed the door on them. Officer Timothy Lammert, Star #17995, attempted to open the locked door before kicking and breaking the door down and gaining entry. Several CPD members entered the residence, detained the subjects, and recovered multiple firearms.

COPA investigated allegations that CPD members forced entry into a residence without a warrant and caused damage to the residence’s front door. COPA administratively closed the investigation due to insufficient evidence of misconduct, stating that the forced entry was justified given the totality of the circumstances.

During its review of BWC footage contained in the investigative file, OIG observed that CPD members, Ryan Parrish, Star #18373, Luciano Yi, Star #19441, and Lammert, searched throughout the residence by opening and emptying bags, opening storage containers and appliances, and lifting mattresses. While COPA addressed the lawfulness of the CPD members' initial entry into the residence, it did not comment on the officers' actions once inside.

OIG recommended that COPA reopen the investigation to consider all available evidence, conduct an analysis of whether the search conducted by Officers Parrish, Yi, and Lammert was permissible under the Fourth Amendment to the United States Constitution, and determine whether their actions violate any CPD rules and directives.

In response to OIG's recommendations, COPA declined to reopen the investigation. In COPA's response, it stated that reopening the case would be an "inefficient use of COPA's time and resources given the improbability that any potential recommended discipline would survive the grievance process." COPA cited the officers' collective bargaining agreement that requires an investigation be completed within 18-months after a case is opened. If COPA does not meet this deadline, and if an arbitrator does not find reasonable cause for delay, an arbitrator has the authority to reduce or reverse any penalty COPA recommends. COPA stated that reopening this investigation, which was opened in September 2023, would be "futile because an arbitrator would likely reduce or reverse any proposed penalties related to the case."

i | Recommendation to Reopen to Gather All Available Evidence (C2025-000000118/CPD Log#2024-0007236)

COPA investigated allegations that CPD members Kevyn Velazco, Star #14783, and Jonathan Tovar, Star #15007, verbally aggravated and physically assaulted the complainant, causing injuries during the complainant's arrest. COPA administratively closed this investigation stating, "COPA reviewed all the available evidence and determined there is insufficient evidence of misconduct to justify proceeding further with this investigation."

During its review, OIG identified that COPA did not conduct a thorough preliminary investigation and failed to include evidence in their investigative file, including photographs of the complainant's injuries taken by CPD's Evidence Technician (ET) and the final approved versions Officers Velazco and Tovar's TRRs. COPA also did not include within its investigative file any follow up on the status of the complainant's interview with COPA nor their statement to COPA that they had obtained third-party video footage of the incident. Further, COPA did not conduct an analysis of the complainant's visible injuries.

OIG recommended that COPA reopen the investigation to complete its preliminary investigation and to gather all available evidence.

In response to OIG's recommendations, COPA agreed to reopen the investigation. COPA included CPD's ET photographs of the complainant's injuries, the final approved TRRs for Officers Velazco and Tovar, and the complainant's medical records to its investigative file. COPA also documented its attempts to contact the complainant and noted their attempts were unsuccessful. COPA administratively closed the investigation without serving allegations to Officers Velazco and Tovar stating, "COPA's investigation did not result in sufficient objective verifiable evidence of misconduct."

j | Recommendation to Reopen to Conduct a Rule 14 Analysis (C2025-000000146/CPD Log #2024-0007154)

BIA investigated allegations that CPD Sergeant Rasah Daily, Star #2369, was arrested for driving under the influence of alcohol, fled the scene of a traffic accident after striking a Chicago Transit Authority bus, falsely reported to responding officers that they were not involved in a traffic accident, and was disrespectful to CPD members on the scene. BIA sustained all allegations against Sergeant Daily and recommended a 45-day suspension.

During its review, OIG found that despite BIA's sustaining an allegation that Sergeant Daily made a false statement, BIA did not conduct an analysis of whether Sergeant Daily's conduct violated CPD's Rule 14, prohibiting false reports.

OIG recommended that BIA reopen the investigation to complete a Rule 14 analysis regarding the false statement made by Sergeant Daily.

In response to OIG's recommendations, BIA reopened the investigation, completed a Rule 14 analysis, and concluded that Sergeant Daily's false statement was not "willful or wanton misconduct," and therefore was not a Rule 14 violation.

k | Recommendation to Reopen to Investigate All Potential Misconduct (C2025-000000194/CPD Log #2023-0004747)

COPA investigated allegations that CPD member Clifford Martin Jr., Star #18859, pointed their firearm at a subject without justification and placed their knee on the subject's chest without justification. COPA administratively closed the investigation citing insufficient evidence of misconduct.

During its review, OIG identified that Officers Martin and Alejandro Velez, Star #7857, may have performed an improper strip search of the subject, in violation of CPD General Order G06-01-03, "Conducting Strip Searches." Officers Martin and Velez had the subject remove their pants and expose their underwear, searched up the leg holes of the subject's underwear, conducted the strip search in a non-private room with a window, failed to obtain a supervisor's authorization for the strip search, and did not complete the required strip search report.

OIG recommended that COPA reopen the investigation to complete an analysis of whether the CPD members improperly performed a strip search of the subject.

In response to OIG's recommendation, COPA declined to reopen the investigation. COPA stated, "If this case were to be reopened and the strip search allegation investigated by COPA, due to the fact that the 18-month deadline has well been exceeded, the penalty recommended for the officers would merely be retraining related to the procedures surrounding strip searches." COPA stated it will recommend retraining for Officers Martin and Velez regarding CPD's strip search policies.

l | Recommendation to Reopen to Investigate All Potential Rule Violations (C2025-000000220/CPD Log #2025-0001729)

BIA investigated allegations that CPD members Armando Zamudio, Jr., Star #5833, and Essoromawe Karma, Star #18282, failed to ensure that their arrestee was properly handcuffed, in that the arrestee was able to remove one hand from the handcuffs when placed into custody; failed to properly secure their arrestee, in that the arrestee escaped from custody; failed to notify the

Office of Emergency Management & Communications (OEMC) of their escaped arrestee and foot pursuit in a timely manner; and failed to notify their supervisor of their escaped arrestee who was in crisis and climbed over the guardrail of a bridge, and their foot pursuit in a timely manner. BIA sustained all allegations and recommended a 20-day suspension plus placement into CPD's Personnel Concerns Program.

During its review, OIG observed that there was nothing in the investigative file that indicated whether Officers Zamudio, Jr. and Karma completed the required reports for the incident, including a Foot Pursuit Report, a Crisis Intervention Report, a Mental Health Incident Notice, and a TRR.

OIG recommended that BIA reopen the investigation to determine whether Officers Zamudio, Jr. and Karma completed the required reports for the incident.

In response to OIG's recommendations, BIA agreed to reopen the investigation. BIA obtained and included in its investigative file the Foot Pursuit Report and Crisis Intervention Report that documented that the arrestee received a Mental Health Incident Notice. BIA determined that a TRR was not required for the incident, stating that the arrestee was not actively resisting and was not engaged in a physical act to obstruct Officers Zamudio, Jr. and Karma. BIA determined that neither its original Sustained findings nor disciplinary recommendation were altered by the additional reports completed for the incident.

m | Recommendation to Reopen to Account for All Allegations (C2025-000000222/CPD Log #2023-0005451)

COPA investigated allegations that Officer Pablo Cartagena, Star #12513, failed to complete the required reports related to their use of force on a subject, used excessive force when placing their foot on the chest and/or neck area of a subject, failed to utilize due care by failing to properly secure a firearm, and failed to utilize due care when pointing a firearm in the direction of other CPD members. COPA sustained all allegations and recommended a 1 to 29-day suspension, in addition to retraining on CPD's policies for the use of force, completion of reports, and proper recovery and securing of firearms.

During its review, OIG identified an allegation brought by COPA on which the agency failed to reach a finding. COPA served Officer Cartagena with an allegation that they called a member of the public a "stupid ass," and questioned Officer Cartagena about their use of the derogatory term. However, COPA did not include the allegation in the electronic case file in its case management system (CMS) or its FSR.

OIG recommended that COPA reopen the investigation to address the allegation that Officer Cartagena called a member of the public a "stupid ass."

In response to OIG's recommendations, COPA agreed to reopen the investigation. COPA found that the police officer violated CPD policy related to interacting with bystanders on scene. COPA reached a sustained finding for the allegation that Officer Cartagena violated CPD General Order G02-04, "Prohibition Regarding Racial Profiling And Other Bias-Based Policing," when calling a member of the public a "stupid ass." The recommended discipline remained unchanged.

n | Recommendation to Reopen for Reassignment to BIA (C2025-000000244/CPD Log #2024-0003351)

COPA investigated allegations that CPD member, Officer Joseph Cappello IV, Star #10626, violated Department policy by displaying a Proud Boys tattoo on their chest, and wore an unauthorized patch of a “right wing gun club” on their uniform. COPA administratively closed its investigation into the allegation that Officer Cappello had a Proud Boys tattoo and referred the allegation that Officer Cappello IV wore an unauthorized patch on their uniform to BIA for its review. BIA sustained the allegation that Officer Cappello IV violated Department policy by wearing the unauthorized patch and recommended a one-day suspension.

During its review, OIG identified that the allegation related to the Proud Boys had not been investigated, and neither of the allegations against Officer Cappello IV fell under COPA’s jurisdiction. When there is no allegation of biased-based verbal abuse alleged or identified, BIA typically investigates allegations of CPD members being affiliated with extremist groups (i.e. Proud Boys). Therefore, it was unclear why COPA administratively closed an investigation into an allegation that did not fall under its jurisdiction.

OIG recommended that COPA reopen the investigation to reinstate the allegation that Officer Cappello IV displayed a Proud Boys tattoo on their chest and assign the allegation to BIA for investigation.

In response to OIG’s recommendation COPA agreed to reopen the investigation, reinstate the allegation against Officer Cappello IV, and assign it to BIA for investigation.

BIA did not inquire into the tattoo image and reached a finding of Unfounded for the allegation that Officer Cappello IV displayed a Proud Boys tattoo on their chest. In its Supplemental Closing Report, BIA states that it concurred with COPA’s preliminary investigative findings based on the photo evidence that only showed a small section of the tattoo and the lack of cooperation from the complainant. However, BIA acknowledged that it, “did not provide a formal explanation in the Closing Report in support of COPA’s administrative closure.” BIA changed the finding from administratively closed to unfounded.

o | Recommendation to Reopen to Address All Potential Rule Violations (C2025-000000267/CPD Log #2025-0002498)

BIA investigated allegations that CPD Probationary Police Officer (PPO) Demetrius Jennings, Star #8058, was intoxicated while on-duty. BIA sustained the allegation and recommended a 15-day suspension and placement into CPD’s Personnel Concerns Program.

During its review, OIG identified that BIA did not address information contained in the Initiation Report that PPO Jennings admitted to driving to CPD’s 6th District station to report for their tour of duty while under the influence of alcohol, nor did it address a Sergeant’s report that documented that PPO Jennings was in possession of their service weapon while under the influence of alcohol.

OIG recommended that BIA reopen the investigation to further review statements that may lead to additional allegations that PPO Jennings was in possession of their firearm while intoxicated in violation of Uniform and Property Directive U04-02, drove to work while under the influence of alcohol, and other potential violations of CPD rules and directives.

In response to OIG's recommendations, BIA agreed to reopen the investigation to address PPO Jennings' possession of a firearm while intoxicated. However, BIA did not address their driving under the influence of alcohol, determining that there were no witnesses to attest that PPO Jennings drove while intoxicated. BIA sustained the allegation that PPO Jennings was in possession of their firearm while intoxicated. The original recommended discipline of a 15-day suspension and placement into CPD's Personnel Concerns Program was unchanged.

p | Recommendation to Reopen to Fully Account For All Available Evidence (C2025-000000268/CPD Log #2024-0003973)

COPA investigated allegations related to a traffic stop that occurred following an altercation between several CPD members and the family of a domestic-related homicide victim. A large group of the homicide victim's family members gathered near the scene of the homicide, leading CPD to request more units for "crime scene and crowd control."

The altercation began after a group of family members did not move away from the entrance to an alley when a CPD vehicle attempted to enter the alley. The victim's sibling engaged CPD Officer Damian Alfaro, Star #11258, in a physical confrontation. Another family member shoved Officer Alfaro away from the victim's sibling and wrestled with Officer Alfaro and Officer Ryan Luzin, Star #17586, while the victim's sibling left the area and got into another relative's vehicle.

After arresting the family member who wrestled with Officers Alfaro and Luzin, CPD members searched for the victim's sibling and found them in the passenger seat of a vehicle driven by a relative. The CPD members conducted a traffic stop during which Officer Alfaro pointed their firearm at the vehicle. The CPD members arrested the victim's sibling for battery and handcuffed the driver while searching the vehicle. The driver filed a complaint alleging the CPD members conducted a traffic stop at gunpoint without justification, forcibly removed them from their vehicle without justification, handcuffed them without justification, searched their vehicle and personal items without justification, damaged the weather stripping on their vehicle, and directed profanity at them.

COPA sustained allegations regarding the vehicle search, use of handcuffs, and use of profanity. COPA unfounded the allegation that the traffic stop occurred without justification and reached a finding of Not Sustained for Officer Alfaro's firearm pointing while conducting the traffic stop. COPA brought and sustained an additional allegation against Officer Alfaro for failing to report their firearm pointing incident to OEMC, as required by CPD directives and the consent decree entered in *Illinois v. Chicago*.

During its review, OIG identified evidence that Officer Natalie Vera, Star #17307, also pointed their firearm at the vehicle, which COPA did not address during its investigation. OIG recommended that COPA reopen the investigation to consider whether Officer Vera failed to notify OEMC of their firearm pointing incident and to consider whether this fact was material to Officer Vera's participation in the traffic stop.

In response to OIG's recommendations, COPA declined to reopen the investigation. In COPA's response, it stated that COPA did not believe reopening the investigation would result in material changes to its findings and recommendations, as COPA sustained other allegations against Officer Vera that led to a recommendation for suspension. COPA reported it would recommend that Officer Vera receive retraining regarding firearm pointing incidents.

q | Recommendation to Reopen to Consider All Available Evidence (C2025-000000289/CPD Log #2023-0005654)

COPA investigated allegations against CPD members, Amra Bukalo-Mehmedovic, Star #7811, Jesus Miranda, Star #15029, and Jacob Pagan, Star #16589, related to a traffic stop on November 28, 2023. COPA sustained an allegation that Officers Bukalo-Mehmedovic, Miranda, and Pagan failed to complete an ISR documenting their interaction with the complainant. COPA also sustained an allegation that Officer Bukalo-Mehmedovic failed to accurately document the search of the complainant and the complainant's vehicle in a Traffic Stop Statistical Study (TSSS) Report. COPA recommended a Reprimand and retraining on CPD's ISR policy for all three CPD members, in addition to retraining on CPD's TSSS policy for Officer Bukalo-Mehmedovic.

During its review, OIG identified that COPA did not address the complainant's allegation that a male CPD member removed \$1,200 from their pants and did not return it to them.

OIG recommended that COPA reopen the investigation to consider all available evidence and investigate all potential allegations, including the complainant's allegation that a male CPD member stole \$1,200 from them.

In response to OIG's recommendations, COPA declined to reopen the investigation, stating the entirety of the interaction was captured on BWC footage and there is no objective verifiable evidence that a CPD member took \$1,200 in cash from the complainant.

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. The following summarizes one such report published this quarter.

1 | Audit of the Chicago Department of Public Health's Mental Health Equity Initiative (C2023-000000115)¹⁹

OIG conducted an audit of equity in the provision of mental health services as reflected in the CDPH Mental Health Equity Initiative (MHEI) network. The objective of OIG's audit was to determine the extent to which MHEI mental health sites provide equitable and integrated care.

OIG concluded that CDPH is supporting equitable and integrated mental health services for Chicagoans through the MHEI network, which includes Mental Health Centers operated directly by the City ("City-run") and those operated by 43 nonprofit organizations contracted by the City (otherwise known as "delegate agencies"). However, to improve access to these services, CDPH should further integrate City-run Mental Health Centers and delegate agencies as one network,

¹⁹ City of Chicago Office of Inspector General, "Audit of the Chicago Department of Public Health's Mental Health Equity Initiative," August 12, 2025, <https://igchicago.org/wp-content/uploads/2025/08/OIG-Audit-of-CDPHs-Mental-Equity-Program.pdf>.

provide consistent administrative guidance, and improve the completeness and alignment of data across recordkeeping systems at its Mental Health Centers.

OIG found that the MHEI network generally provides mental health care to Chicagoans that aligns with the MHEI program priorities to provide equitable and integrated care. CDPH can improve administration of the program to resolve inconsistencies, however. MHEI clinics generally do not impose client-facing barriers to mental health services and do provide culturally competent mental health services, though some could improve capacity to provide linguistically responsive care.

Regarding clinics operated by delegate agencies, OIG found the clinics provide integrated care, but for most sites CDPH could do more to ensure delegates report relevant performance metrics. Regarding City-run Mental Health Clinics specifically, OIG found CDPH has policies in place to ensure integrated mental and physical health care, but it does not track metrics for these sites. Some of these City-run Centers also face site-specific challenges that may present barriers to clients seeking care. OIG also found that the City-run Mental Health Centers' service data is not complete or reliable enough to enable informed decisions about operations nor to share performance indicators with the public. Because of its poor quality, CDPH cannot use this data to understand the Mental Health Centers' performance or establish measurable goals for them.

OIG recommended that CDPH increase its integration of delegate agencies and its own Mental Health Centers into the same network, and further develop its guidance to ensure consistency in service delivery. OIG also recommended that CDPH leverage its unique position to develop an employment pipeline to ensure the network has sufficient bilingual clinicians. OIG furthermore recommended that CDPH work to improve the completeness and alignment of data captured at its own Mental Health Centers and then leverage the improved data to define and use performance metrics to monitor program performance.

In response to OIG's audit findings and recommendations, CDPH stated that it would define its low-barrier service expectations and ensure providers adhere to these, improve directional signage at the Mental Health Centers, and provide monthly training and convening events to grow collaboration between delegates and City-run Mental Health Centers. CDPH also stated that it would work to grow the pipeline of behavioral health professionals who speak more than one language and improve its guidance on language interpretation in clinical services. To improve program metrics and data, CDPH stated that it would ensure delegates and Mental Health Centers complete an integrated care self-assessment and develop associated work plans, centralize its client intake system with clearly defined data workflows, finish cleaning its Mental Health Centers service data, and release annual reports of network-wide data.

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 three notifications and two advisories this quarter.

1 | Notification Concerning Secondary Employment and Third-party Paid Travel for Individuals Appearing in Their Official Capacity (C2023-000000070)

OIG notified BOE and DHR about a concern regarding the issues of secondary employment and third-party paid travel for individuals appearing in their official capacity as a City employee, and the risk of internally inconsistent enforcement of the sets of City rules governing those areas.

OIG learned that a non-clerical employee of the Mayor's Office served on the board of an industry self-regulatory body in the same field as their City employment. The employee received compensation for this work from that body, as well as paid-for travel. However, the employee also completed work for this organization on City time and using City resources. Through a review of relevant communications, OIG determined that this arrangement was known to both BOE and DHR and at various times the employee received advice—which they followed—on the applicable rules from both BOE and DHR.

OIG reviewed City Personnel Rule XX, Section 3, which defines outside employment and outlines the procedures by which a City employee can be approved for outside employment. Additionally, City Personnel Rule XXIX, Section 2 states that “[n]o non-clerical employee of the Office of the Mayor, or any member of the Mayor’s security detail, or entity in which such persons have a financial interest, shall have any employment relationship with any entity other than the City, nor shall such persons have a financial interest, as set forth in section 2-156-010 (1) (Governmental Ethics), in any business.”

OIG also reviewed the GEO, specifically § 2-156-142(d)(12), which allows employees to accept reasonable hosting and travel expenses for appearances or public events related to official city business; and § 2-156-142(f), which bars City employees from soliciting or accepting any money or other thing of value in return for advice or assistance on matters concerning the operation or business of the City.

OIG determined that the employee was engaged in a secondary role by a non-City organization that compensated the employee nearly \$60,000 over the course of a year in addition to the non-City organization paying for the employee’s travel to meetings for the secondary role. The employee also conducted meetings online for this secondary role while on City time and using a City laptop in a City office. OIG also found that during the employee’s application for, acceptance of, and engagement in this secondary role, they appropriately sought advice from both BOE and DHR regarding the arrangement and received advice that potentially contradicted both the Personnel Rules and the GEO.

OIG recommended that BOE and DHR work to clearly define the parameters of when and whether a City employee’s secondary activities can be considered official City business, and develop clear collaboration guidelines for BOE and DHR employees to follow when issues presented by employees come under the purview of both BOE and DHR.

In response, DHR noted that its current leadership was not involved in this matter, but that “DHR will ensure that it and BOE communicate should future circumstances arise that require insight from both departments.” BOE, however, disagreed with OIG’s findings concerning relevant aspects of the GEO. BOE concluded that the employee’s secondary role was allowed under the GEO, and that the employee’s secondary role was not giving advice concerning the operation or the business of the City, but was in fact official City business, despite the employee being compensated thousands

of dollars for said official City business. BOE recommended that BOE and DHR be consulted simultaneously should a similar situation arise again.

2 | Notification Concerning the City Fueling Station at O'Hare International Airport (C2023-000000194)

OIG notified the Department of Fleet and Facility Management (2FM) and CDA about a concern regarding issues at the City fueling station at O'Hare International Airport (O'Hare).

In reviewing relevant documentation and interviewing involved City personnel, OIG identified multiple issues with the practices of CDA-contracted security and 2FM personnel concerning access to the O'Hare fueling station and fueling of City vehicles. Those issues included a lack of controls or lack of enforcement of current controls for the physical fuel cards issued to 2FM fuel service attendants, vehicles receiving City fuel without being properly logged, and escort logs at the security post, which provide a record of who has access to a secure area, not being properly completed.

OIG recommended that 2FM and CDA work to identify and improve weaknesses in the enforcement of controls surrounding access to and use of the O'Hare City fueling station, including ensuring that security personnel follow established security protocols for access, and enforcing 2FM policies concerning fuel cards.

In response, 2FM agreed that increased enforcement of controls for fuel card usage and the use of the O'Hare City fueling station is needed. Further training will be provided to relevant 2FM personnel. CDA agreed with the need for adherence to all security protocols. CDA stated it will continue to regularly review and assess the performance of the involved security contractor, and will conduct random site visits and audits to ensure escort logs are being completely accurately. CDA stated that the security contractor will also provide additional training to their personnel related to these issues.

3 | Notification Concerning HIPAA Implications with Newly Arrived Asylum Seekers (C2024-000000058)

OIG notified DOL and the Department of Technology and Innovation (DTI) of concerns regarding potential non-compliance with the Health Insurance Portability and Accountability Act (HIPAA), as well as other potential data and privacy issues occurring during intakes of newly arrived asylum seekers.

OIG received a complaint alleging that mutual aid volunteers at City police stations and airports were collecting personal information from newly arrived asylum seekers using a form in Airtable, an app creation platform. The form did not explain any privacy rights or how the collected information would be used or shared, nor did it appear to be transmitted over secure interfaces. The complainant also alleged that OEMC and DFSS had created an online intake form through Smartsheet, a cloud-based project management software, that allowed individuals to request services on behalf of newly arrived asylum seekers. The form allegedly sought identifying information and asked users to specify whether the request included medical treatment. The complainant also alleged that the Smartsheet form included a dashboard view in which personally identifiable information that had been collected could be viewed by others, including volunteers, potentially implicating the HIPAA Privacy Rule, which regulates the use and disclosure of individuals' health information.

OIG engaged in multiple conversations with senior staff across City departments to learn about the creation and implementation of the two forms. No one with whom OIG spoke was able to provide information about the security of the Airtable form, who specifically had access to the form, or whether consent was acquired before collecting and using the information contained in the form. OIG determined that CDPH designed and implemented the Smartsheet form, but little was known about who had access to the data collected on the form or whether consent was acquired before obtaining and using the information collected. OIG learned that the Smartsheet form was used by healthcare teams to prioritize individuals for shelter placement and to track healthcare requests from police stations. As part of this process, healthcare providers would use the forms to communicate to police districts, shelters, and hospitals. CDPH confirmed that volunteers initially had access to the Smartsheet form and then did not, but the timeline for that access remains unclear.

OIG's limited inquiry brought to light several concerning issues, including: a lack of consensus as to who had access to each form or for how long access lasted; a lack of language on the forms advising of an individual's privacy rights or explaining how the information collected would be used; and a lack of any indication that consent to share the collected information was obtained from individuals prior to asking them for their personal information. It is unclear what security mechanisms were in place to protect the data collected. In its limited investigation, OIG was unable to discern whether the data collected was used in a way that would trigger the HIPAA Privacy Rule, but considering that information from the Smartsheet form was used to communicate with shelters and hospitals, HIPAA's protections may have been implicated.

OIG recommended that DOL and DTI take any appropriate steps to ensure that data collection and sharing is conducted in a manner consistent with HIPAA and other privacy laws, that electronic data is collected and transmitted in a secure manner, and that individuals asked to provide personal data are advised of their rights and of how their information will be used.

In response, DOL stated that it had conducted a thorough review and concluded that there was "no basis to support the claim that the City of Chicago has violated the Health Insurance Portability and Accountability Act (HIPAA)." DOL further stated that the City is a hybrid entity under HIPAA, whereby the City designates certain components of City government as healthcare components, and only those components are subject to the HIPAA Privacy Rule and related requirements. Further, some of those components operate in a business associate capacity and are subject to the HIPAA Privacy Rule only when they handle protected health information in that limited capacity.

DOL stated that none of the three departments referenced in OIG's limited investigation were operating in a manner that would subject them to the HIPAA Privacy Rule. DOL did not address OIG's other recommendations.

4 | Advisory on Regulating the Conduct of City Council Members (C2024-000000135)

OIG advised the City Council Committee on Committees and Rules regarding categories of alleged Aldermanic misconduct that, while appearing potentially unethical or inappropriate, fall outside the scope of misconduct prohibited by the GEO, therefore depriving OIG of the ability to recommend findings or sanctions for this misconduct from BOE.

The MCC grants OIG the authority to investigate misconduct by Alderpersons, as elected officers of the City, pursuant to MCC §§ 2-56030(b) and -050(a)(1). In contrast to City employees, however,

Alderspersons are not subject to the City of Chicago Personnel Rules or the City's Diversity and Equal Employment Opportunity Policy. Alderspersons are, of course, subject to criminal laws, and OIG is empowered to participate in investigations into criminal misconduct by Alderspersons pursuant to MCC §2-56-030(j). The only administrative sanction OIG can pursue for Aldermanic misconduct which falls short of criminal conduct, however, is a finding of probable cause for a violation of the GEO from BOE. This leaves significant potential misconduct which may fall outside those specific categories enumerated in the GEO and therefore may not be subject to investigation by OIG.

Rule 37 of the Rules of Order and Procedure of the City Council, City of Chicago for Years 2023-2027, endows the Committee on Committees and Rules with jurisdiction over, among other things, "the conduct of Council members." City Council has already promulgated Rule 50, which empowers it to take action to address misconduct occurring during City Council meetings, but City Council has not exercised its authority to address misconduct committed by its members outside the Council chamber.

OIG recommended that the Committee on Committees and Rules develop clear rules and procedures by which it can meaningfully evaluate and adjudicate any Aldermanic misconduct which might not otherwise be prohibited by the GEO or criminal law.

OIG invited the Committee on Committees and Rules to respond in writing, noting that any such response would be made public together with this advisory pursuant to MCC § 2-56-110(a)(b). OIG received no response.

5 | Advisory Concerning Public Comments (C2025-000000020)

OIG advised COPA regarding public comments on investigative outcomes prior to the completion of investigations.

As previously identified in OIG's 2018 "Report Concerning COPA's Release of Investigative Reports While Under Review by the Superintendent", ²⁰premature disclosures made by COPA can have negative implications. Statements made by COPA's chief administrator concerning ongoing investigations may be allowed by statute and COPA policies. However, making such statements opens the door to scrutiny about the existence of biases in COPA's investigations. Creating such a scenario can have concerning implications for the public's faith in COPA's mission or the public's understanding of COPA as a fair and unbiased institution.

OIG reviewed COPA's enabling ordinance in the MCC, which gives its chief administrator the power "[t]o address...community groups, and inform the public, on the mission, policies and ongoing operations of the Office," MCC§ 2-78-120(t), and COPA's policy on Confidentiality and Non-Disclosure. OIG also reviewed multiple instances of COPA making public comments related to on-going investigations.

OIG recommended that COPA establish guidelines for the chief administrator's public commentary on ongoing investigations, which appropriately balance the public's interest in transparency with the

²⁰ City of Chicago Office of Inspector General, "Report Concerning COPA's Release of Investigative Reports While Under Review by the Superintendent," August 9, 2018, <https://igchicago.org/publications/report-concerning-copas-release-of-investigative-reports-while-under-review-by-the-superintendent/>.

need to maintain the integrity of the disciplinary system and the public's perception of the system's fairness.

In response, COPA recognized that public statements during ongoing investigations may compromise the integrity of the investigative process, erode the public's trust, and potentially prejudice the disciplinary process. COPA advised that it is actively engaged with the Community Commission for Public Safety and Accountability in the development of formal guidance to establish clear and definitive protocols for the chief administrator's public commentary on ongoing investigations.

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 quarter.

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. Ill.). 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 did not receive any 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 follow 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 did not receive or review any contracts.

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 one notification of a direct contact occurrence.

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.

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.

e | Exemptions

OIG reviews adherence to exemption requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²² This quarter, OIG received notification of 56 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 two 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 did not receive or review any notifications of arbitration decisions, 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 62 modifications to class specifications. Of these, OIG reviewed 20 specifications which modified minimum qualifications to include language specifying that work experience can meet minimum qualifications 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.

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.

l | 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.

²² 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.

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 audited one hiring sequence. 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: 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. Additionally, OIG has the authority, pursuant to 2-56-035 of the MCC, to audit employment actions under the hiring plan and related policies and procedures.

The table below details the hiring sequences audited by OIG this quarter.

Table 10: Hiring Sequences Audited in Q3 2025 Pursuant to the City of Chicago Employment Plan

Department	Title	Findings	OIG Recommendation	Department Action
Department of Family and Support Services	Director of Accounting	No violations or errors were found.	N/A	No response required.

Compliance Case No. C2024-000000132

An OIG audit established that DHR recruiter failed to include notes from the consensus meeting in the hiring packet for a filtration engineer hiring sequence DWM. OIG also found that the hiring manager failed to provide a justification memo to DHR prior to extending offers of employment, even though the hiring manager is required to provide a justification memo when the hiring team cannot reach consensus on selection.

OIG recommended that DHR provide training emphasizing the requirements of recruiters regarding consensus meeting notes. OIG also recommended that DHR provide training emphasizing each department's obligations regarding justification memos. In response, DHR stated it would conduct coaching with the recruiter regarding these issues. DHR also stated that it would aim to issue a revised version of the Employment Plan in 2026.

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.

Compliance Intake No. 2024-00008152

A mandatory OIG review of hiring practices established that no violations or errors occurred during a hiring sequence for SCUBA diver with CFD's Air Sea Rescue Unit. OIG reviewed the complete hire packet and associated documents. OIG had no findings or recommendations and thus no response was required from OPSA.

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 conducted one audit of a CFD hiring sequence.

Table 11: Hiring Sequences Audited in Q3 2025 Pursuant to the CFD Hiring Plan for Uniformed Positions

Department	Title	Findings	OIG Recommendation	Department Action
Chicago Fire Department	Commander (Safety)	No violations or errors were found.	N/A	No response required.

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 six hiring sequences across three City departments. The table below shows the breakdown of monitoring activity by department.²³

²³ If a department is not included in this table, OIG did not monitor any elements of that department's hiring sequence(s).

Table 12: Hiring Sequences Monitored in Q3 2025

Department	Intake Meetings Monitored	Tests Monitored ²⁴	Interview Sets Monitored ²⁵	Consensus Meetings Monitored	Violations	Errors
Office of Budget Management	0	0	1	0	0	0
Chicago Police Department	0	2	0	0	0	0
Department of Water Management	0	1	0	2	0	0

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 did not receive any new escalations.

Table 13: Escalations Received in Q3 2025

Escalation Status	Number of Escalations
Newly Initiated	0
Pending	1
Referred to DHR Commissioner	0
Closed with Investigation	1
Closed without Investigation ²⁶	1

OIG Compliance Intake No. 2025-000001863

On March 18, 2025, the Compliance unit of OIG was notified by a recruiter with DHR that they had suspended the hiring sequence for a paralegal II- finance and economic development position. The suspension was because two DHR interviewers failed to take complete notes on the required candidate assessment forms.

The suspension was released, the original interviewers were replaced with two new interviewers, and the paralegal position was subsequently filled. No subsequent violations or errors under the Employment Plan were identified. OIG Compliance completed its review and found that DHR

²⁴ Tests monitored are totaled by exam type, i.e. Police Officer, Detective, etc.; not total number of tests monitored for exam type.

²⁵ Interview Sets Monitored are totaled by positions monitored; not total number of interviews monitored.

²⁶ 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.

appropriately suspended the hiring sequence and released the suspended hiring process. OIG Compliance sent a letter of no violation to DHR, and no response was needed from DHR pursuant to Chapter XIV(B)(6) of the Employment Plan.

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.

Table 14: Hiring and Employment-Related Complaints Received in Q3 2025

Complaint Status	Number of Complaints
Newly Initiated	36
Pending	28
Closed ²⁷	0
Declined	8

²⁷ 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 igchicago.org.

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