



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

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Advisory Concerning Unannounced Inspections of City Premises

November 4, 2025

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO



Deborah Witzburg | Inspector General
City of Chicago
Office of Inspector General
231 S. LaSalle Street, 12th Floor
Chicago, IL 60604
Phone: (773) 478-7799

November 4, 2025

Section 2-56-090 of the Municipal Code of Chicago (MCC) provides that “[e]ach department’s premises, equipment, personnel, books, records, and papers shall be made available as soon as practicable to the inspector general.” Unannounced inspections are an important tool in oversight work, allowing for unmanipulated assessment of practices, behaviors, and conditions.

On two occasions over the past year, however, Office of Inspector General (OIG) investigators have been denied access to City premises for the purpose of conducting an unannounced inspection. The first was an unannounced inspection of the Mayor’s so-called “Gift Room,” as described in OIG’s January 2025 *Advisory on Gifts Accepted on Behalf of the City*.¹ Following the publication of that Advisory, the Mayor’s Office published a 21-second video of the Gift Room to the Mayor’s YouTube page. The Mayor’s Office announced new rules concerning gifts accepted by the Mayor “on behalf of the City” and that the Gift Room would be opened to members of the press and the public. City records reveal, however, that the Gift Room depicted in the Mayor’s Office’s video, and which is open for public inspection was in fact not constructed until February 2025—after OIG attempted to conduct an unannounced inspection of gifts received by the Mayor’s Office. Because OIG was denied access to a City premise during its original inspection attempt, OIG was unable to independently confirm whether and where City property—including cufflinks, designer handbags, and men’s shoes—was being stored prior to the construction of the new Gift Room.

The second thwarted unannounced inspection attempt occurred in July 2025. OIG attempted to inspect a City office to search for items which OIG believed were being stored there in violation of City policy. An attorney with the City’s Department of Law (DOL) instructed a City employee using that office to not admit OIG during OIG’s initial visit. Several weeks later, OIG inspected the office with DOL present and confirmed the presence of those items in the office, underscoring the necessity and appropriateness of the inspection. However, obstruction of OIG’s attempt to conduct an unannounced inspection precluded the immediate gathering of complete and reliable evidence of then-current conditions bearing directly upon the alleged violation of City policy.

¹ <https://igchicago.org/wp-content/uploads/2025/01/OIG-Advisory-Concerning-Gifts-Accepted-on-Behalf-of-the-City.pdf>

OIG advised the Mayor in this Advisory that the MCC provides that “[e]ach department’s premises” must be “made available” to OIG “as soon as practicable.” OIG’s legal authority to access City premises is therefore not unqualified, but it does not permit outright denial of access without any showing of impracticability. In both of the instances discussed here, however, City premises being made available to OIG “as soon as practicable” should have resulted in physical access to those premises on the occasion of OIG’s initial visit, without obstruction, interruption, or delay. In both cases, OIG sought to conduct the search during business hours and while persons who would normally have access to the area to be inspected were present.

On its face, “as soon as practicable” does not mean with advance notice to a City department occupying City premises, with advance notice to DOL, or only with a DOL attorney present; OIG’s authority to access City premises is plainly not made contingent on any of those conditions—or, in fact, to any conditions other than practicability.

In its Advisory, attached at Appendix A, OIG recommended that the Mayor take appropriate steps to ensure that City premises are made available to OIG as required by law and to ensure the transparency and accountability of City government, including without limitation issuing guidance to City departments to clarify OIG’s legal authority to access City premises. OIG invited the Mayor’s Office to respond in writing.

On October 31, 2025, the Mayor’s Office responded, apparently declining to implement OIG’s recommendation. Regarding OIG’s July 2025 attempt to inspect a City office for the presence of prohibited items, the Mayor’s Office responded that “OIG cannot reasonably deny that it was granted access” to the office “as soon as practicable.” The Mayor’s Office suggested that certain exercises of OIG’s authority to access City premises might be ones in which “DOL’s involvement is warranted under other provisions of the MCC or the OIG Rules.” The only provision cited in apparent support of that position, though, is one in OIG’s Rules which allows witnesses and subjects in OIG investigations to bring counsel to *interviews*. See OIG Rules and Regulations § 11.7(E). That provision does not entitle a City employee to the presence of DOL while OIG conducts non-testimonial investigative steps; there is no more an entitlement to have DOL present during a premise inspection than during a covert surveillance.

With respect to the Gift Room, the Mayor’s Office response describes what it calls “evolving interpretations of the City’s Governmental Ethics Ordinance,” and states that “[t]he relocating of the Gift Room was not a covert undertaking but rather was done in full transparency.”

That response is attached at Appendix B.

Appendix A | OIG Letter



Deborah Witzburg | Inspector General
City of Chicago
Office of Inspector General
231 S. LaSalle Street, 12th Floor
Chicago, IL 60604
Phone: (773) 478-7799

Via Electronic Mail

September 24, 2025

Brandon Johnson
Mayor
City of Chicago
121 N. LaSalle Street, 5th Floor
Chicago, IL 60602

Dear Mayor Johnson:

The City of Chicago Office of Inspector General (OIG) writes to bring to your attention concerns regarding OIG's access to City premises for purposes of conducting unannounced inspections. The Municipal Code of Chicago (MCC) provides that "[e]ach department's premises, equipment, personnel, books, records, and papers shall be made available as soon as practicable to the inspector general." MCC §2-56-090. Unannounced inspections are an important tool in oversight work, allowing for unmanipulated assessment of practices, behaviors, and conditions; moreover, it is in the regular practice of inspectors general to conduct unannounced inspections.

OIG has, nonetheless, been obstructed in its recent efforts to conduct unannounced inspections of City premises. Specifically, and as discussed in further detail below:

- In a recent investigation, OIG attempted to conduct an unannounced inspection of a City office. OIG was searching for items which OIG believed were being stored in the office in violation of City policy. An attorney with the City's Department of Law (DOL) instructed a City employee to not admit OIG during OIG's initial visit. Several weeks later, OIG inspected the office with DOL present and located the items in the office, underscoring the necessity and appropriateness of the inspection. Obstruction of OIG's attempt to conduct an unannounced inspection precluded the immediate gathering of complete and reliable evidence of then-current conditions bearing directly upon the alleged violation of City policy.
- While investigating practices around gifts accepted on behalf of the City, OIG visited City Hall to conduct an unannounced inspection of the so-called "Gift Room." The Gift Room was a space identified by the Mayor's Office as being the storage location of a number of gifts accepted by the Mayor "on behalf of the City." In consultation with and apparently on the advice of DOL, OIG was denied access. Months later, the Mayor's Office announced that the Gift Room would be available for public inspection. OIG subsequently learned, however, that the space eventually made available for public inspection did not exist at the time of OIG's attempted unannounced inspection; rather, it was constructed and gift items brought to it in the months that followed OIG's attempt to conduct an unannounced inspection. Obstruction of OIG's attempt to conduct an unannounced inspection precluded

the gathering of any evidence about the then-present state of gifts accepted by the Mayor's Office on behalf of the City; in fact, the location which the Mayor's Office eventually made available for inspection was one which was built and filled months after OIG's initial attempt to inspect.

OIG therefore recommends that you take appropriate steps to ensure that City premises are made available to OIG as required by law and to ensure the transparency and accountability of City government.

1 | OIG's Unannounced Inspection of a City Office for Prohibited Items

On July 16, 2025, OIG personnel appeared at the offices of a City department after receiving information that items prohibited under City policy were being stored in a City office. OIG sought to conduct an unannounced inspection of specific areas in an office identified as storing the items. At that time, OIG was denied access to the office by a City employee at the direction of DOL—apparently representing the City employee in opposition to OIG.¹ Following the denial of access, OIG engaged in conversations with DOL regarding their interference in OIG's inspection. DOL informed OIG that the inspection could only be conducted with "notice" and with a DOL attorney present. Ultimately, DOL communicated that it would allow OIG access to the office, but only several hours after OIG's unannounced visit (when OIG investigators had already left) and only with a DOL attorney present. OIG declined to continue the inspection due to the passage of time, and the fact of the delay having allowed for the alteration, manipulation, or removal of evidence.

Subsequently, following further discussion, OIG was provided a video of the spaces it intended to inspect, depicting the items OIG was originally searching for being stored in the City office. On August 6, 2025, by agreement with the City Department and DOL, OIG arrived at the City offices and conducted an inspection. Within the office, OIG observed and documented the items. OIG was unable to determine whether any additional evidence might have existed at the time of the unannounced inspection.

2 | OIG's Unannounced Inspection of the Mayor's Office "Gift Room"

On November 8, 2024, OIG personnel appeared at the 5th floor of City Hall and requested access to the Gift Room. The Gift Room was a space identified by the Mayor's Office as being the storage location of a number of gifts accepted by the Mayor "on behalf of the City." OIG sought to conduct an unannounced inspection of the manner in which gifts are stored, in order to audit the presence of gifts that were purportedly stored in the Gift Room and to review controls around access to the Gift Room. At that time, OIG was denied access to the Gift Room by Mayor's Office staff at the direction of the DOL. Following that visit, OIG engaged in further conversations with DOL regarding access to the Gift Room. Ultimately, DOL—apparently representing the Mayor in opposition to OIG—communicated that OIG would not be granted access to the Gift Room. At no time did the Mayor's Office or DOL explain why it would not have been "practicable" to provide OIG immediate access to the Gift Room, in accordance with the MCC. Instead, in its response to OIG's advisory about the Gift Room, the Mayor's Office asserted that "[t]he MCC does not require the Mayor's Office to make gifts available for unannounced inspections, and the GEO [Governmental Ethics Ordinance] contains no mandate requiring the Mayor's Office to accommodate such visits."

¹ At the same time, DOL instructed the employee not to remove anything from the office until OIG could conduct its inspection.

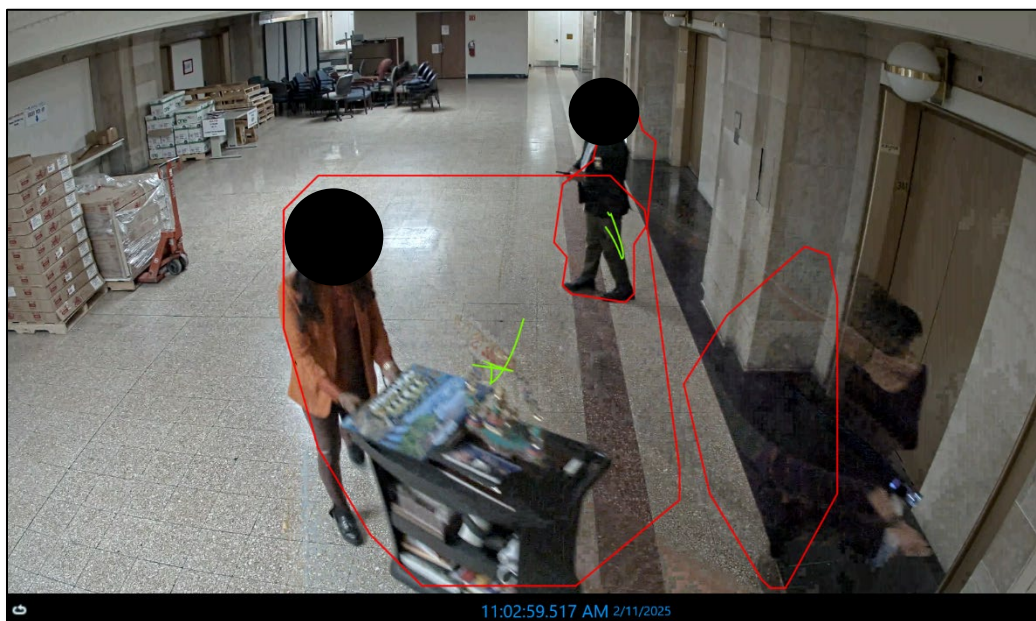
On February 12, 2025, following OIG's January 29, 2025, publication of its Advisory Concerning Gifts Accepted on Behalf of the City², the Mayor's Office published a 21-second video of the Gift Room to the Mayor's YouTube page. On March 10, 2025, the Mayor's Office announced new rules concerning gifts received by the Mayor on behalf of the City, and opened a Gift Room, located in Room 3M-15 at City Hall, to members of the press and, eventually, the public.

OIG learned, however, that the Gift Room depicted in the video and which is open for public inspection was in fact constructed in February 2025, months after OIG's initial attempt to inspect gifts accepted by the Mayor's Office. Information collected by OIG indicated that the Gift Room at 3M-15 was constructed between February 4-7, 2025 and that prior to that the space was a breakroom for Chicago Police officers assigned to City Hall. Furthermore, prior to being moved into the new Gift Room for "public accessibility" reasons, gifts were purportedly kept in a different room in City Hall. The timeline is corroborated by the evidence. A work order created on February 4, 2025 instructed the City's Department of Fleet & Facilities Management to "Disassemble furniture, remove whiteboards and coat hooks. Build and install metal shelves around perimeter for Mayor's gift room" in Room 3M-15:

Work Order	Date Created	Due Date	Priority Icon	Type Code	Request Description
5209637	2/4/2025	3/6/2025	Priority 3@TURQUOISE	CM	3M-15-Disassemble furniture, remove whiteboards and coat hooks. Build and install metal shelves around perimeter for Mayor's gift room.

Source: Document Response from Department of Fleet & Facilities Management.

Moreover, video footage obtained by OIG, capturing the elevator lobby on City Hall's level 3M, for the days following this work order which appears to show individuals moving items into the newly constructed Gift Room on February 11:



² Advisory Concerning Gifts Accepted on Behalf of the City, January 29, 2025
[\(https://igchicago.org/publications/advisory-concerning-gifts-accepted-on-behalf-of-the-city/\)](https://igchicago.org/publications/advisory-concerning-gifts-accepted-on-behalf-of-the-city/)

Source: City Hall video provided by the Office of Emergency Management & Communication (OEMC). Note: the red and yellow markings are present in the original video.

Ultimately neither OIG nor the public was able to independently confirm whether and where City property—including cufflinks, designer handbags, and men’s shoes—was being stored prior to the construction of the new Gift Room.

3 | The City’s Legal Obligations

As described above, the Municipal Code provides that “[e]ach department’s premises” must be “made available” to OIG “as soon as practicable.” OIG’s legal authority to access City premises is therefore not unqualified, but it does not permit outright denial of access without any showing of impracticability. “As soon as practicable” is not otherwise defined in the MCC, but a common dictionary definition of practicable is “capable of being put into practice or of being done or accomplished.” “Practicable,” Merriam-Webster Online Dictionary, (last accessed Sept. 24, 2025). Practicable is a flexible term which appears to take account of the practical realities and circumstances under which something must occur; those practical realities might include, for example, a situation in which OIG required access to records which were being stored in an off-site facility subject to a retrieval process and therefore not immediately on-hand. In both of the instances discussed here, however, City premises being made available to OIG “as soon as practicable” should have resulted in physical access to those premises on the occasion of OIG’s initial visit, without obstruction, interruption, or delay. In both cases, OIG sought to conduct the search during business hours and while persons who would normally have access to the area to be inspected were present.

On its face, “as soon as practicable” does not mean with advance notice to a City department occupying City premises, with advance notice to DOL, or only with a DOL attorney present; OIG’s authority to access City premises is plainly not made contingent on any of those conditions—or, in fact, to any conditions other than practicability. Where OIG is searching for contraband, it would be unreasonable to require notice to a subject of the search, which would allow them to remove the contraband. Where OIG is seeking to confirm the reported presence or possession of City property, it would be unreasonable to require notice which would permit that property to be returned if it had been removed.

OIG further notes that its ability to conduct unannounced inspections of City premises is not otherwise limited or prohibited by any other laws or rules of which it is aware, nor has DOL or any other City department identified rules or laws which might limit or prohibit such inspections. Indeed, courts have recognized that most workplace searches do not require a warrant or probable cause; they must only be “reasonable under all the circumstances.” *Gossmeier v. McDonald*, 128 F.3d 481, 490 (7th Cir. 1997) (brackets omitted).

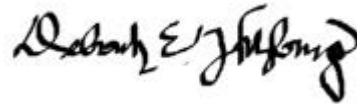
4 | Conclusion

Twice within the last year, OIG has been obstructed from conducting unannounced inspections of City premises to which OIG had a statutory right of access, with important detrimental effect on its ability to gather evidence in duly authorized investigations. As noted above, this deprives OIG of an important tool in oversight work, allowing for unmanipulated assessment of practices, behaviors, and conditions.

OIG recommends that you take appropriate steps to ensure that City premises are made available to OIG as required by law and to ensure the transparency and accountability of City government, including without limitation issuing guidance to City departments to clarify OIG's legal authority to access City premises.

OIG invites the Mayor's Office to respond in writing before October 24, 2025. Any such response will be made public together with this advisory.³

Respectfully,



Deborah Witzburg
Inspector General
City of Chicago

cc: Cristina Pacione-Zayas, Chief of Staff, Mayor's Office
Jessica Higgins, Assistant Deputy Mayor, Mayor's Office
Nathaniel Wackman, General Counsel, OIG

³ Section 2-56-110(a)(b) of the MCC authorizes OIG to make public statements "if an investigation, audit or review concerns inefficient or wasteful management." Obstructing OIG's ability to conduct duly authorized unannounced inspections is both a waste of OIG's investigative resources—which are City resources themselves—and inhibits OIG's ability to carry out its mandate of safeguarding City resources and ensuring the efficient and effective operation of City government.

Appendix B | Department Response



CITY OF CHICAGO OFFICE OF THE MAYOR

Via Electronic Mail

October 31, 2025

Deborah Witzburg
Inspector General
City of Chicago Office of the Inspector General
740 N. Sedgwick, Suite 200
Chicago, Illinois 60654

Re: OIG Advisory Regarding Access to Premises

Inspector General Witzburg:

I write on behalf of the Mayor in response to your advisory dated September 24, 2025 (the "Advisory"), which claims that the Office of Inspector General's ("OIG") efforts to conduct inspections of City premises were obstructed on two occasions. Each instance raised in your Advisory is addressed in turn below.

OIG's Unannounced Inspection of a City Office for Prohibited Items

The Advisory claims that OIG personnel were denied access to a City office on July 16, 2025; that after being denied access OIG and DOL "engaged in conversations regarding their interference;" and that "ultimately, DOL communicated that it would allow OIG access to the office, but only several hours after OIG's unannounced visit (when OIG investigators had already left) and only with a DOL attorney present." The Advisory additionally states that "following further discussion, OIG was provided a video of the spaces it intended to inspect, depicting the items OIG was originally searching for being stored in the City office. On August 6, 2025, by agreement with the City Department and DOL, OIG arrived at the City offices and conducted an inspection."

We have spoken with DOL and understand the characterization of these events in the Advisory to be incomplete and misleading. As an initial matter, the Advisory omits that when the OIG arrived at the office of a City employee on the morning of July 16, 2025 seeking to search the area in and around their desk, the employee exercised their right to have counsel present before further interacting with OIG personnel. *See* OIG Rule 11.7(E)(1). DOL immediately began arranging to have an attorney present and informed OIG that the office would be available for inspection at 3:00 p.m. DOL also suggested that the City employee provide a sworn statement that no items were removed or relocated in the office since the time of OIG's initial visit. OIG nevertheless voluntarily left the premises and refused to return at 3:00 p.m. when a DOL attorney was present. Instead, OIG suggested that DOL

provide a video of the premises in lieu of an inspection. DOL worked with the employee to ensure that a comprehensive video was taken the same day at 4:37 p.m., clearly showing the items for which the OIG was searching. DOL provided the video to OIG on July 18, 2025 with an affidavit in which the employee averred that the area OIG sought to search had not been altered in any way. Despite OIG's agreement to accept a video in lieu of an office inspection, OIG sent a letter to DOL on July 28, 2025 requesting production of items depicted in the video. After further discussion, OIG then agreed to a premises inspection on August 6, 2025 in lieu of production of the items. The inspection took place on that date with an attorney from DOL present.

Pursuant to MCC 2-56-090, "[e]ach department's premises, equipment, personnel, books, records and papers shall be made available as soon as practicable to the inspector general." While the Advisory acknowledges it does not have unqualified power to conduct unannounced inspections, it appears to construe "practicable" as only limiting access based on OIG's unilateral availability. There is no basis for this interpretation. As previously communicated, the practicality provision of MCC 2-56-090 applies mutually to all City departments that may be involved in a search conducted by the OIG, including the City department providing access, and DOL, to the extent DOL's involvement is warranted under other provisions of the MCC or the OIG Rules.

Here, based on the totality of the factual circumstances, OIG cannot reasonably deny that it was granted access as soon as was practicable; a City employee asked for representation prior to interacting with OIG personnel and representation was provided the same day. Additionally, the OIG represented that it would accept a video in lieu of an inspection, which was produced expeditiously.

OIG's Unannounced Inspection of the Mayor's Office "Gift Room"

The Advisory recaps the OIG's previous *Advisory Concerning GEO Compliance* and the City's response thereto, published in December 2024, and then proceeds to go into some detail on the subsequent measures taken by the City to transfer gifts received on behalf of the City to a space appropriate for public viewing.

While the February 2025 transition of the Gift Room has prompted further inquiry by the OIG, it is important to understand the context in which this endeavor arose. Following the issuance of OIG's *Advisory Concerning GEO Compliance* and the subsequent response from the Board of Ethics, the Mayor's Office acted promptly to modernize long-standing practices and ensure full alignment with both the letter and spirit of the Governmental Ethics Ordinance. These actions, including the establishment of a larger, dedicated space to display gifts and the launch of a public-facing webpage, reflect an ongoing commitment to ethical stewardship and transparency.

Historically, Mayoral administrations maintained a "Mayoral Logbook" within City Hall to document gifts received on behalf of the City. This practice originated from an agreement between the Board of Ethics and the administration of former Mayor Eugene Sawyer and was reaffirmed by successive administrations. However, in light of the OIG's December 2024 recommendations and the Board's concurrence that going forward the Mayor's Office should report all gifts, hosting, and travel to the Board within ten days of acceptance, as per §2-156-142 of the Governmental Ethics Ordinance, a new compliance and transparency process was implemented.

In the spirit of transparency and in response to the evolving interpretations of the City's Governmental Ethics Ordinance, the Mayor's Office undertook steps in early 2025 to enhance public access to gifts received on behalf of the City. These steps included launching a new webpage featuring a gift log and

video footage of gifts received on behalf of the City and relocating those gifts from an internal room on the fourth floor of City Hall to a space on floor 3M of City Hall that is appropriate for public access.

This larger dedicated physical space was completed in February 2025 and was done with compliance and public safety (proper ingress and egress) in mind. The relocating of the Gift Room was not a covert undertaking but rather was done in full transparency - concurrently, a new website was launched to provide the public with online access to related disclosures and an option to schedule in-person viewings.

The launch of the new Gift Room and website represent proactive measures taken by the Mayor's Office to align with updated interpretations of the Ordinance and to strengthen public transparency following the OIG's December 2024 advisory.

Conclusion

The Mayor's Office remains firmly committed to transparency, accountability, and cooperation with the Office of Inspector General. That commitment coexists with our lawful adherence to the rights, safety, and due process protections afforded to City employees and departments under the Municipal Code and applicable OIG Rules.

In both instances described above, the parties involved acted reasonably, promptly, and in good faith to facilitate OIG access while ensuring compliance with governing law and established procedure. The OIG's characterizations to the contrary omit key facts and misstate the parties' conduct. The Department of Law and the Mayor's Office provided timely accommodations consistent with the "as soon as practicable" standard under MCC §2-56-090, and, in the case of the Gift Room, implemented new measures that exceeded prior transparency practices.

The actions of the Mayor's Office do not reflect obstruction. Rather, the actions taken reflect thoughtful adherence to lawful processes and a demonstrated willingness to modernize and improve compliance frameworks when warranted. The Mayor's Office looks forward to continuing to do so in a manner that is grounded in mutual consideration for the distinct roles of the Mayor's Office and the OIG.

Sincerely,

A handwritten signature in black ink, appearing to read "CPZ", with a stylized flourish at the end.

Cristina Pacione-Zayas
Chief of Staff

CPZ/bg



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OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and -240.

For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at igchicago.org.

Talk to Us

(833) TALK-2-IG/(833) 825-5244

talk2ig@igchicago.org

igchicago.org/talk2ig

OIG Business Office

(773) 478-7799

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