



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
26

Recommendation to Inform and Improve Future Investigations Regarding Duty to Report

August 25, 2026

DAVID GLOCKNER | INSPECTOR GENERAL FOR THE CITY OF CHICAGO
TOBARA RICHARDSON | DEPUTY INSPECTOR GENERAL FOR PUBLIC SAFETY

August 25, 2026

Pursuant to the Municipal Code of Chicago (MCC) § 2-56-230(c), the Public Safety section of the City of Chicago Office of Inspector General (OIG) conducts reviews of individual closed disciplinary investigations conducted by the Civilian Office of Police Accountability (COPA) and the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA). Based on those reviews, OIG may make recommendations to inform and improve future disciplinary investigations to ensure that they are complete, thorough, objective, and fair.

CPD's Rules and Regulations include its Rules of Conduct, which serve to inform its members of conduct prohibited by the Department. CPD's Rule 21 prohibits "[f]ailure to report promptly to the Department any information concerning any crime or other unlawful action;" and CPD's Rule 22 prohibits "[f]ailure to report to the Department any violation of Rules and Regulations or any other improper conduct which is contrary to the policy, orders or directives of the Department."

In addition to these rules, CPD members are bound by provisions outlined in the *State of Illinois v. City of Chicago* Consent Decree. The Consent Decree requires the City of Chicago to make a website available for CPD members to anonymously report misconduct. At odds with this provision of the Consent Decree is CPD General Order G08-01-02, Complaint Initiation and Log Number Investigation Assignment, which requires non-supervisory CPD members to report any alleged misconduct to a Department supervisor, thus removing any option of anonymity.

During its regular review of closed disciplinary investigations, OIG identified three instances where these conflicting provisions resulted in CPD members being subject to discipline for reporting alleged misconduct outside the Department.

In the three investigations identified by OIG, CPD members reported alleged misconduct through COPA's web portal. Despite the CPD members reporting misconduct, in two of the three investigations, BIA brought charges and sustained allegations against the reporting CPD members for failing to follow CPD General Order G08-01-02, Complaint Initiation and Log Number Investigation Assignment, in violation of Rule 6—Disobedience of an order or directive, whether written or oral. In the third investigation, BIA verbally reprimanded the reporting CPD member.

While CPD General Order G08-01-02 and the Consent Decree aim to address the "code of silence," confusion may arise among CPD members on how to report misconduct and, in fact, anonymity is feasible given the conflicting messaging that both requires CPD members to report and subjects them to potential discipline for using a reporting method explicitly authorized in the Consent Decree. OIG notified CPD of the conflict between the Consent Decree and its General Order G08-01-02, and recommended CPD modify the General Order to include an anonymous reporting portal as a method that satisfies its members' duty to report, and ensures its members are not subject to potential discipline for anonymous reporting.

In response to OIG's recommendations, CPD stated that it agreed in principle with OIG's recommendations. Regarding OIG's first recommendation—that CPD members not be subject to discipline for reporting misconduct anonymously—CPD stated that it agreed no member should face disciplinary action for doing so. CPD noted that the cases OIG cited did not involve discipline

for failing to report misconduct; rather, the members were disciplined for disobeying an order or directive. CPD emphasized that G08-01-02 outlines members' obligations for reporting misconduct beyond the initial complaint submission, and those obligations must be met regardless of an anonymous report. CPD stated that in the cases OIG identified, the accused members' misconduct was not a failure to report but a failure to follow the procedures outlined in G08-01-02.

Regarding OIG's second recommendation—that CPD modify G08-01-02 to include an anonymous reporting portal as a method that satisfies members' reporting obligations—CPD declined to amend the order and suggested that additional training on the policy may be more appropriate. CPD stated that there are provisions in the order that allow members who fear retaliation to use alternative methods to report misconduct. CPD also referenced General Order G08-05, Prohibition of Retaliation, as a policy already in place to protect members from retaliatory actions.

OIG's letter to CPD containing its recommendations is attached at Appendix A, and CPD's response is attached at Appendix B.

Appendix A | OIG Letter



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

Via Electronic Mail

April 21, 2026

LARRY SNELLING
SUPERINTENDENT
CHICAGO POLICE DEPARTMENT
3510 SOUTH MICHIGAN AVENUE
CHICAGO, IL 60653

Re: Recommendation to Inform and Improve Future Investigations Regarding Duty to Report

Dear Superintendent Snelling:

Pursuant to the Municipal Code of Chicago (MCC) §§ 2-56-30 and -230, the Public Safety section of the City of Chicago Office of Inspector General (OIG) writes to recommend measures to inform and improve future disciplinary investigations conducted by the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA) where CPD members are recommended discipline for reporting potential misconduct through mechanisms outside their chain of command.

During its regular review of closed disciplinary investigations by BIA, OIG identified investigations where CPD members reported misconduct of another CPD member. These CPD members chose to file their complaints with the Civilian Office of Police Accountability. In these investigations, BIA recommended discipline to the reporting CPD members for failure to report misconduct to a supervisor in violation of General Order G08-01-02.

CPD's General Order G08-01-02 "Complaint Initiation and Log Number Investigation Assignment," outlines the responsibilities of CPD members to report complaints, the methods to submit complaints against Department members, and the procedures for initiating a Log Number upon receiving a complaint.¹ The order states that a non-supervisory Department member who observes, knows of, or is made aware of misconduct of a CPD member, should immediately report the alleged misconduct to a supervisor.² If the complaint is against a member of the reporting CPD member's chain of command, the reporting CPD member may request, from a BIA supervisor, an alternative reporting method. Department members who believe they are a victim of misconduct, may bring their allegation to any Department supervisor, including directly reporting the allegation to a supervisor in BIA.³

¹ Chicago Police Department, "General Order G08-01-02 Complaint Initiation and Log Number Investigation Assignment," December 31, 2022, accessed March 13, 2026.

² Ibid.

³ Ibid.

Consent Decree Mandates for CPD Members Reporting Misconduct

State of Illinois v. City of Chicago Consent Decree,⁴ Paragraph 429 states, “The City will continue to ensure that a website is made available to CPD members to anonymously report officer misconduct (“anonymous reporting website”) and will internally disseminate information regarding the anonymous reporting website to all CPD members. Reports made on the anonymous reporting website will not relieve CPD members of their duties under CPD Rules of Conduct 21 and 22.”⁵

The Consent Decree further addresses CPD members reporting misconduct and the potential for retaliation. Consent Decree Paragraphs 436 and 437 require CPD to establish policies and practices to “encourage and protect” Department members who report potential misconduct and ensure members who report misconduct are not subject to retaliation and other adverse actions, respectively.

In August 2023, OIG published an inquiry “Enforcement of the Chicago Police Department’s Rules Requiring Members to Report Misconduct.” In OIG’s review of CPD policies, it found that “CPD members are currently operating under two sets of policies at odds with one another—one that ostensibly allows them to report misconduct in a myriad of ways, and another that invalidates any reporting done outside the Department’s chain of command.”⁶

In its review of closed misconduct investigations, OIG identified three misconduct investigations where CPD members reported misconduct through a channel outlined in the Consent Decree; yet, in two of the investigations, BIA brought charges against the CPD members for failure to follow General Order G08-01-02, in violation of Rule 6- Disobedience of an order or directive, whether written or oral.

Relevant Misconduct Investigations

Log #2024-0002412

Log #2024-0002412 concerns allegations that a civilian CPD member overheard CPD Community Organizer Maria Chavero, [REDACTED], “making racist and political comments with members of the public.”⁷ CPD Deputy Director Michael Milstein, [REDACTED], initiated a complaint via the Civilian Office of Polica Accountability’s (COPA) web portal on behalf of the civilian CPD member. BIA was assigned to investigate the complaint but due to a lack of evidence, BIA did not sustain the allegation against Community Organizer Chavero. Conversely, BIA charged Deputy Director Milstein with violating Rule 6 for failing to follow General Order G08-01-02 when reporting misconduct.

⁴ Consent Decree, *State of Illinois v. City of Chicago*, No. 17-cv-6260 (N.D. Ill., Jan. 31, 2019).

⁵ Chicago Police Department, “Rules and Regulations of the Chicago Police Department,” April 16, 2015, accessed March 13, 2026, Rule 21- Failure to report promptly to the Department any information concerning any crime or other unlawful action. Rule 22- Failure to report to the Department any violation of Rules and Regulations or any other improper conduct which is contrary to the policy, orders or directives of the Department, <https://directives.chicagopolice.org/#directive/public/6412>.]

⁶ City of Chicago Office of Inspector General, [“Enforcement of the Chicago Police Department’s Rules Requiring Members to Report Misconduct,”](#) August 3, 2023.

⁷ Log #2024-0002412 Attachment 25, p.1.

According to BIA's Investigative Closing Report, the "R/Sgt asked why MILSTEIN had reported this through the web instead of an initiation report, MILSTEIN did not remember. MILSTEIN does not recall if [they were] trained on how to initiate complaints. MILSTEIN has initiated complaints in the past through COPA's website. [They do] not remember if anyone mentioned [their] improper complaint reporting to [them]."⁸

BIA sustained the allegation against Deputy Director Milstein and recommended a reprimand.⁹

Log #2023-0004371

Log #2023-0004371 concerns allegations made by an anonymous CPD member that CPD Sergeant Daniel Binfa, Star #1080, was discriminating against them.¹⁰ The anonymous complainant alleged that Sergeant Binfa "yelled at [the complainant] for working out in the PSTC [Public Safety Training Center] gym prior to the start of [the complainant's] tour of duty" and "assigned [the complainant] to work the guard shack alone after they found [the complainant] working out in the gym."¹¹

During BIA's preliminary investigation, it discovered the identity of the anonymous CPD member, and that the CPD member filed their complaint via COPA's web complaint portal. BIA exonerated the allegations that Sergeant Binfa discriminated against the CPD member by yelling at them and assigning them to work the guard shack. However, BIA charged the reporting CPD member with violating Rule 6 for failing to follow "Department Order G08-01-02 Complaint Initiation and Log Number Investigation Assignment Section 3.B when [they] filed an anonymous web complaint with the Civilian Office of Police Accountability."¹²

BIA interviewed the CPD member and asked why they filed a complaint with COPA and not a supervisor? The CPD member stated, "I don't know. This was my first time filing a complaint; I don't know why; I couldn't tell you why."¹³

BIA sustained the charges against the CPD member and issued a violation noted.¹⁴

Log #2023-0002263

Log #2023-0002263 concerns allegations that Probationary Police Officer (PPO) Casie Willard, Star #15130, made a racial statement towards PPO Allen Huang, Star #13835, in a GroupMe text message when PPO Willard wrote, "yo weak ass need to go back to where you came from."¹⁵ BIA sustained the allegation against PPO Willard and recommended a five-day suspension.

⁸ Ibid, p. 2.

⁹ Ibid, p. 5.

¹⁰ Log #2023-0004371 Attachment 37, PDF p.10.

¹¹ Ibid. PDF p.3-4.

¹² Ibid, PDF p.4.

¹³ Ibid, PDF p.11.

¹⁴ Log #2023-0004371 Attachment 39.

¹⁵ Log #2023-0002263, Attachment 15, p.1.

During BIA's interview with PPO Huang, the BIA reporting sergeant verbally reprimanded PPO Huang "because [they] filed [their] complaint anonymously through the Civilian Office of Police Accountability. R/Sgt explained that Officers are not allowed to file complaints anonymously and have to go to their supervisor to file any complaints."¹⁶

Discipline for Reporting Misconduct

In the investigations summarized above, BIA brought allegations against the complainant in two of the investigations and verbally reprimanded a complainant without bringing formal allegations for violating General Order G08-01-02, Complaint Initiation and Log Number Investigation Assignment.

While CPD General Order G08-01-02 and the Consent Decree aim to encourage reasonable, legal, and ethical behavior among Department members and address the "code of silence," confusion may arise among CPD members on how to report misconduct and, if in fact, anonymity is feasible given the conflicting messaging requiring CPD members to report, and yet disciplining them for using an available method to report misconduct outside of CPD supervisors.

In 2017, OIG created an exclusive portal ("CPD Member Hotline") for CPD members, both sworn and civilian, to submit anonymous misconduct complaints online without fear of retaliation or censure.¹⁷ The CPD Member Hotline uses a double-blind registration process that verifies the registering individual is in fact a CPD member and assigns them a unique, untraceable login number. Members then have access to the portal to file complaints or submit suggestions, thus providing an anonymous and confidential means of reporting misconduct. After submission, the portal provides members with a confirmation number that they can use to prove that they have reported the misconduct.

General Order G08-01-02 outlines steps for reporting misconduct but does not protect the reporting party's identity. An anonymous portal provides CPD members who may be hesitant to report in fear of retaliation, a method to report misconduct anonymously, if they choose. According to the Consent Decree, the requirement of an "anonymous reporting website" does not absolve a CPD member of their obligations under Rule 21 and 22. Given the conflicting nature of General Order G08-01-02 and the Consent Decree's requirement that a website is made available for CPD members, BIA should consider the spirit of Rules 21 and 22, and the Consent Decree when exercising its investigative responsibility and consider exonerating members who can provide evidence that misconduct was reported.

¹⁶ Ibid.

¹⁷ OIG created this technology-based tool at the request of CPD, prompted by recommendations from both the PATF and the U.S. DOJ. City of Chicago Office of Inspector General, "Fourth Quarter Report 2017," January 16, 2018, 2, accessed April 21, 2026, <https://igchicago.org/wp-content/uploads/2018/01/OIG-4th-Quarter-2017-Report.pdf>. Office of Inspector General, "CPD Member Hotline," accessed April 21, 2026, <https://cpdmemberhotline.org/login>.

Recommendations

In order to inform and improve future investigations, OIG recommends the following:

1. Ensure CPD members are not subject to discipline for failure to report, when identified as the reporting party of an anonymous complaint or when they have proof that they reported the misconduct.
2. Revise General Order G08-01-02 to include an anonymous reporting portal as a method that satisfies its member's duty to report.

Please provide written responses to these recommendations by May 21, 2026. You may contact Chief Investigative Analyst LaDonna Candia-Flanagan at lcandia-flanagan@igchicago.org or (773) 478-5614 with any questions. OIG looks forward to your agency's response, which will be published in accordance with MCC § 2-56-250.

Respectfully,



Tobara Richardson
Deputy Inspector General for Public Safety
Office of Inspector General

cc: Deborah Witzburg, Inspector General, OIG
Samuel Chae, Associate General Counsel for Public Safety, OIG
Dana O'Malley, Chief of Staff, CPD
Scott Spears, General Counsel, CPD
Chief Timothy Moore, BIA, CPD
Deputy Chief Traci Walker, BIA, CPD
Max Caproni, Executive Director, Chicago Police Board
Kyle Cooper, President, Chicago Police Board
Maggie Hickey, Monitor, Independent Monitoring Team
Mary Grieb, Deputy Bureau Chief, Illinois Attorney General's Office

Appendix B | Department Response



Brandon Johnson
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Fred L. Waller
Interim Superintendent of Police

July 21, 2026

VIA ELECTRONIC MAIL

Ms. Tobar Richardson (TRichardson@igchicago.org)
Deputy Inspector General for Public Safety
City of Chicago Office of Inspector General
231 South LaSalle Street
Chicago, Illinois 60604

Re: Recommendation to Inform and Improve Future Investigations Regarding the Duty to Report

Dear Deputy Inspector General Richardson:

Thank you for providing your recommendations to strengthen the Department's investigative processes regarding the duty to report misconduct. The Chicago Police Department views a member's duty to report misconduct, and strict adherence to General Order G08-01-02, as foundational to building public trust and internal accountability.

CPD offers the following responses to your specific recommendations:

- 1. Ensure CPD members are not subject to discipline for failure to report, when identified as the reporting party of an anonymous complaint or when they have proof that they reported the misconduct.**

CPD agrees with this recommendation in principle. CPD fully agrees that no member should face disciplinary action for reporting misconduct or for using anonymous reporting channels. However, CPD notes that in the three cases cited by the Public Safety Inspector General (PSIG), no member was disciplined for a failure to report. Rather, minor corrective actions or discipline stemmed strictly from a failure to follow the procedures set out in G08-01-02.

Members have obligations under G08-01-02 that go beyond the initial submission of a complaint. Non-Supervisory members must immediately notify a supervisor and prepare a To-From-Subject Report to their commanding officer. If the accused member is within their chain of command, the member may make the report to any supervisor or by contacting a Bureau of Internal Affairs (BIA) supervisor directly. Supervisory members must take immediate action to stop observed misconduct, document the complaint as a reporting or third-party, and promptly report the matter to the Civilian Office of Police Accountability.

G08-01-02 also provides an alternate reporting procedure for a supervisor to follow if the misconduct warrants a confidential log number. A supervisory member who becomes aware of an instance of

retaliation against another Department member who reports misconduct will also follow the procedures set out in General Order G08-05, Prohibition of Retaliation, which provides further guidance for reporting and investigating allegations of retaliation.

The Recommendation summarizes three cases in which the PSIG concludes that Department members were disciplined for reporting misconduct. In the first case, a supervisory member received a reprimand because he did not follow the procedures for supervisors set out in General Order G08-01-02.III.C. The supervisor said that he had not been trained and therefore was not aware of the appropriate process for initiating a complaint. The reprimand he received was not for submitting a complaint, but instead for failing to follow the procedures required of a Department supervisor.

The second case that the PSIG cited involves a non-supervisory member who made a complaint against a supervisor, but failed to follow the process set out in General Order G08-01-02.III.B. The member did not identify a reason for submitting an anonymous complaint, such as a fear of retaliation. When asked why the member did not follow procedure, the member asserted a lack of knowledge. As noted above, a member who does not want to report misconduct within the member's chain of command is afforded an alternate method for reporting misconduct. At the conclusion of the investigation, the member received a violation noted - not for reporting misconduct anonymously, but instead for failing to follow procedures required of a Department member.

The third case cited by the PSIG involves a group text chain between Probationary Police Officers (PPOs) on which one PPO alleged that another made a racial statement. The PSIG notes that during the complaining PPO's interview, the investigator verbally reprimanded the PPO for submitting the complaint anonymously. This situation is similar to that in the second case, above, in which the Department member was not aware of the correct procedure to follow when submitting a complaint. In this case, the PPO was not disciplined for reporting misconduct, and in fact received no discipline. Instead, the investigator told the PPO that the process that the PPO followed was improper.

CPD members are held accountable for knowing and following all CPD orders, including G08-01-02. A CPD member who disobeys an order or directive is subject to discipline under Rule 6.

2. Revise General Order G08-01-02 to include an anonymous reporting portal as a method that satisfies its member's duty to report.

CPD agrees that its members should be able to use an anonymous reporting portal, provided that the member fulfills all of the requirements provided in G08-01-02. However, CPD does not believe that a revision to G08-01-02 is required at this time.

G08-01-02 does not prohibit a CPD member from using an anonymous reporting portal. However, an anonymous submission alone does not absolve a member of the obligation to fulfill the additional reporting requirements outlined in the response to recommendation #1 above. As also explained above, Department members who have concerns about retaliation may be afforded an alternate method of reporting misconduct, including going to any Department supervisor to make such a report or having the misconduct investigation treated as confidential. Department members are also afforded protection

under General Order G08-05, Prohibition of Retaliation. While the Department will always consider revisions to orders, it may also be appropriate to provide further training on G08-01-02 instead of making revisions.

Best regards,



Scott Spears
General Counsel
Chicago Police Department

cc: Fred Waller, Interim Superintendent, Chicago Police Department
David Glockner, Inspector General
Samuel Chae, Associate General Counsel for Public Safety, Office of Inspector General
Dana O'Malley, Chief of Staff, CPD
Timothy Moore, Chief, Bureau of Internal Affairs, Chicago Police Department
Deputy Chief Traci Walker, Bureau of Internal Affairs, Chicago Police Department
Max Caproni, Executive Director, Chicago Police Board
Kyle Cooper, President, Chicago Police Board
Maggie Hickey, Monitor, Independent Monitoring Team
Mary Grieb, Deputy Bureau Chief, Illinois Attorney General's Office



LaDonna Candia-Flanagan

Chief Investigative Analyst, Public Safety

The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government.

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

Cover photo courtesy of the Department of Fleet and Facilities Management.

Alternate formats available upon request.

