



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Quarterly Report: Third Quarter 2024

October 15, 2024

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 2024, filed with City Council pursuant to § 2-56-120 of the Municipal Code of Chicago.

I am mindful of the fact that we publish this report as the City reckons with an annual budgeting process which, this year, must answer for and address a deficit of nearly one billion dollars. To be sure, the highest costs at issue in OIG's work don't come with price tags; it is difficult to put a price on legitimacy or a price tag on accountability. When I talk about prioritizing the work which best positions us to pay down the deficit of legitimacy at which the City of Chicago operates, that deficit is a metaphorical one, and even our most impactful work in paying down probably cannot be measured in dollars.

It matters, though, that we are doing that work against the backdrop of a very significant deficit of very literal dollars. I do not believe that counting dollars is the right measure for effective oversight, because transparency doesn't show up on a balance sheet and accountability doesn't earn interest; Chicagoans are entitled to them all the same. Nonetheless, it is worth noting that, in this quarter alone, much of our program and policy work identified and addressed inefficiencies in City programs and opportunities for cost savings, and our investigative work uncovered misspent funds that resulted in meaningful fines and recoveries.

In the third quarter, we published an updated data dashboard on patrol staffing resources in the Chicago Police Department and an accompanying report, highlighting data deficits which are an obstacle to efficient and cost-effective resource allocation in the department, which, by a wide margin, occupies the largest portion of the City's budget. We audited the City's workers' compensation program, assessing efficiency and cost controls in a City program which had, during our period of inquiry, open claims expected to cost over half a billion dollars across their lifetimes. We identified the City's failure to realize disadvantaged business participation goals in its decades-old lease of the City's parking meters to a private entity, compounding the ill effects of a disastrously expensive deal for Chicago. We uncovered confusion and uncertainty regarding the interpretation and applicability of a long-standing memorandum of understanding on the question of whether certain City employees were entitled to count holiday hours toward overtime calculations; the Department of Law (DOL) declined to provide an opinion on the matter.

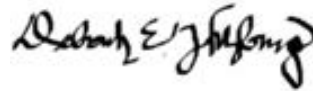
Meanwhile, in our investigative work reported in this quarter, we found up to \$489,000 in fees improperly paid to a DOL contractor. The Board of Ethics voted to pursue disciplinary fines in two cases resulting from OIG investigations, totaling \$12,000. A City contractor was court ordered to pay \$2,358 in a prosecution for obstructing an OIG investigation and making false statements, and the City will realize financial recoveries in two debarment actions resulting from OIG investigations, totaling \$150,000.

The financial savings and recoveries resulting from our work in this three month period stack up small against the City's budget woes, and they are not an adequate measure of the need for and impact of meaningful government oversight; however, where the City owes a great deal to its

residents and where we must work urgently to pay down more than one kind of deficit at a time, nor are they insignificant.

As the City faces its budget challenges, we welcome a sharpened focus on the efficient delivery of City services and the responsible allocation of resources; we will continue our work in those avenues and others in pursuit of a government which more closely resembles the one Chicagoans deserve.

Respectfully,

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

Deborah Witzburg
Inspector General
City of Chicago

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This quarterly report provides an overview of the operations of the City of Chicago Office of Inspector General (OIG) from July 1, 2024, through September 30, 2024, and includes information required by the Municipal Code of Chicago (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, and advisories 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 Employment Plan and as otherwise necessary to carry out its functions in overseeing hiring and promotion processes across the City.

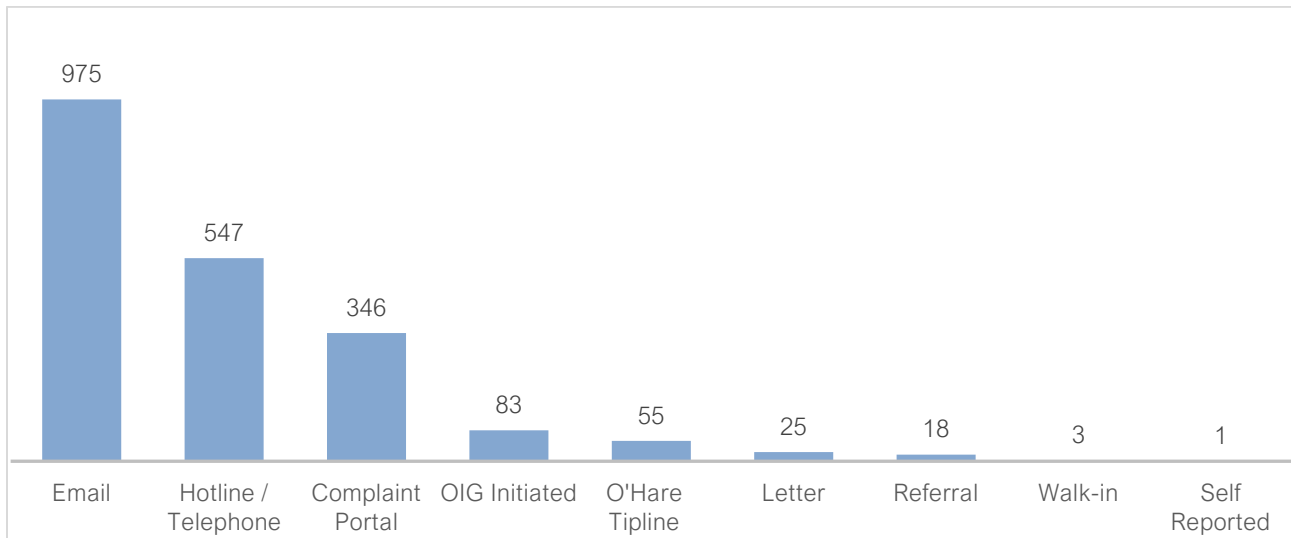
¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 2,053 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 2024, OIG made 374³ intake referrals to City departments or other agencies.⁴ 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 374 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 387 referrals.

⁴ 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	167
Chicago Civilian Office of Police Accountability	130
Chicago Department of Human Resources	30
Chicago Department of Streets and Sanitation	9
Chicago Public Schools Office of Inspector General	5
Chicago Fire Department	4
Chicago Department of Aviation	3
Illinois Office of Executive Inspector General	3
Cook County Office of Independent Inspector General	2
Illinois Department of Child and Family Services	2
Illinois Department of Children and Family Services Office of Inspector General	2
Illinois Office of Attorney General	2
Illinois State Police	2
U.S. Department of Homeland Security Office of Inspector General	2
Aurora Police Department	1
Calumet Park Police Department	1
Chicago Department of Family and Support Services	1
Chicago Department of Water Management	1
Chicago Housing Authority Office of Inspector General	1
Chicago Office of Emergency Management and Communications	1
Chicago Park District Office of Inspector General	1
Cicero Police Department	1
Cook County State's Attorney	1
Decatur Police Department	1
East Peoria Police Department	1
Federal Bureau of Investigation	1
Glendale Heights Police Department	1
Illinois Department of Healthcare and Family Services Office of Inspector General	1
Illinois Department of Human Services Office of Inspector General	1
Illinois Department of Insurance	1
Illinois State Board of Elections	1
Internal Revenue Service	1
Longmont Police Department	1
Melrose Park Police Department	1
Springfield Police Department	1
U.S. Department of Housing and Urban Development Office of Inspector General	1
U.S. Postal Service Office of Inspector General	1
US General Services Administration Office of Inspector General	1
Total	387

OIG may discontinue intakes that are, for a variety of reasons, not amenable to further consideration. Specifically, if after review an intake is determined to lack sufficient information or clarity in describing the alleged misconduct, waste, or inefficiency to provide a basis for investigative follow-up, or is incoherent, incomprehensible, or factually impossible, it is designated as “Do Not Process” and is discontinued. If a communication received and cataloged as an intake is determined to be an automated, accidental, irrelevant, or inappropriate electronic message, it is designated as “Spam” and discontinued. Finally, if a communication received and cataloged as an intake is determined to be a question or request for information that is directly answered by OIG, it is designated as an “Inquiry” and discontinued.

In Q3 2024, OIG discontinued 1,090 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do Not Process	529
Inquiries	350
Spam	211
Total	1,090

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 2024, OIG declined 18 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	8
Complaint Lacks Foundation	4
Complaint of the Same Conduct Already Received	2
Total	14

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)⁵ of Chicago and OIG.

A | Misconduct Investigations

1 | Investigative Activity This Quarter

As of the close of this quarter, OIG has 238 active investigations. During Q3 2024, OIG initiated 62 investigations, of which 39 were self-initiated, and concluded 24 investigations.

2 | Open Matters

OIG's 238 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 ⁶
City Employees	193
Elected Officials	18
Contractors, Subcontractors, and Persons Seeking Contracts	17
Licensees	3
Appointed Officials	1
Other	6
Total	238

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	236
Ineffectiveness	1
Waste/Inefficiency	1
Total	238

⁵ 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/>.

⁶ 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 238 pending investigations, 112 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 2024

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000040842	20-1162	Personnel rules violation
C2022-000041000	20-1335	Unauthorized outside employment/residency violation
C2022-000041038	20-1375	Failure to follow department rules in the course of an investigation
C2022-000041039	20-1376	False statements/violation of department rules
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine
C2022-000042145	21-0820	False records submitted to City
C2022-000042359	21-1049	MBE fraud
C2022-000042921	21-1635	Time falsification
C2022-000043865	N/A	Fraud
C2022-000043889	N/A	Time fraud
C2022-000043899	N/A	Criminal investigation
C2022-000043912	N/A	Ethics violation
C2022-000043921	N/A	Secondary employment violation
C2022-000043925	N/A	Procurement fraud

⁷In early 2022, OIG launched a new case management system, which accounts for the new case number format.

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000043944	N/A	Duty disability fraud
C2022-000043961	N/A	Ethics violation
C2022-000044003	N/A	Official misconduct
C2022-000044022	N/A	Residency violation
C2022-000044042	N/A	PPP fraud
C2022-000044045	N/A	Ethics violation
C2022-000044046	N/A	Official misconduct
C2022-000044065	N/A	False statements
C2022-000044078	N/A	Time falsification
C2022-000044086	N/A	Ethics violation
C2022-000044091	N/A	Residency violation
C2022-000044093	N/A	Official misconduct
C2022-000044099	N/A	Retaliation
C2022-000044101	N/A	Official misconduct
C2022-000044122	N/A	Criminal investigation
C2023-000000010	N/A	Official misconduct
C2023-000000026	N/A	Fraud
C2023-000000027	N/A	Fraud
C2023-000000028	N/A	Official misconduct
C2023-000000032	N/A	Official misconduct
C2023-000000033	N/A	Duty disability fraud
C2023-000000038	N/A	Ethics violation
C2023-000000040	N/A	Official misconduct
C2023-000000049	N/A	Ethics violation
C2023-000000050	N/A	Residency violation
C2023-000000053	N/A	Official misconduct
C2023-000000054	N/A	Official misconduct
C2023-000000061	N/A	Fraud
C2023-000000070	N/A	Secondary employment violation
C2023-000000075	N/A	Ethics violation
C2023-000000092	N/A	Ethics violation
C2023-000000093	N/A	Retaliation
C2023-000000097	N/A	Conduct unbecoming
C2023-000000102	N/A	Ethics violation

Case ID ⁷	Legacy ID	General Nature of Allegations
C2023-000000103	N/A	Personnel rule violation
C2023-000000104	N/A	Personnel rule violation
C2023-000000105	N/A	Personnel rule violation
C2023-000000109	N/A	Conduct unbecoming
C2023-000000118	N/A	EEO violation
C2023-000000119	N/A	Ethics violation
C2023-000000120	N/A	Residency violation
C2023-000000121	N/A	Duty disability fraud
C2023-000000128	N/A	PPP fraud
C2023-000000155	N/A	Secondary employment violation
C2023-000000157	N/A	Residency violation
C2023-000000158	N/A	Personnel rules violation
C2023-000000164	N/A	Conduct unbecoming
C2023-000000166	N/A	Fraud
C2023-000000175	N/A	PPP fraud
C2023-000000177	N/A	Ethics violation
C2023-000000178	N/A	Fraud
C2023-000000179	N/A	Retaliation
C2023-000000180	N/A	Ethics violation
C2023-000000181	N/A	PPP fraud
C2023-000000182	N/A	Bribery
C2023-000000183	N/A	Fraud
C2023-000000189	N/A	Theft
C2023-000000193	N/A	Fraud
C2023-000000194	N/A	Theft
C2023-000000199	N/A	Ethics violation
C2023-000000207	N/A	Fraud
C2023-000000208	N/A	Fraud
C2023-000000212	N/A	PPP fraud
C2023-000000213	N/A	Fraud
C2023-000000215	N/A	PPP fraud
C2023-000000223	N/A	PPP fraud
C2023-000000224	N/A	Residency violation
C2023-000000232	N/A	Personnel rule violation

Case ID ⁷	Legacy ID	General Nature of Allegations
C2023-000000248	N/A	Theft
C2023-000000260	N/A	Ethics violation
C2023-000000263	N/A	Fraud
C2023-000000264	N/A	PPP fraud
C2023-000000268	N/A	PPP fraud
C2023-000000269	N/A	PPP fraud
C2023-000000270	N/A	PPP fraud
C2023-000000271	N/A	PPP fraud
2023-0000000272	N/A	PPP fraud
C2023-000000273	N/A	PPP fraud
C2023-000000275	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
C2023-000000280	N/A	PPP fraud
C2023-000000281	N/A	PPP fraud
C2023-000000282	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 2024, OIG received one new complaint related to PBC.

B | Sustained Administrative Investigations

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

Below (Table 7) is an overview of sustained investigative matters and, pursuant to MCC § 2-56-110, deidentified synopses of administrative investigations completed and eligible to be reported as sustained investigative matters. A matter is not eligible for reporting until, pursuant to the MCC, the relevant City department has had 30 days (with the potential for an extension of an additional 30

days) to respond to OIG's findings and recommendations,⁸ 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.⁹

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

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

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000041693	Department of Fleet and Facility Management; Office of Public Safety Administration; Department of Buildings	Discharge one Department of Fleet and Facility Management (2FM) employee and an Office of Public Safety Administration (OPSA) employee and refer them for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR); impose discipline on a second 2FM employee commensurate with the gravity of the violations, past disciplinary record, and any other relevant considerations; revoke or, in the alternative, suspend 2FM employee's electrical licenses.	2FM and OPSA preliminarily agreed with OIG's recommendation to discharge the two employees and requested the Department of Law (DOL) prepare discharge charges; 2FM scheduled a pre-disciplinary meeting with the second 2FM employee; the Department of Buildings (DOB) suspended the 2FM employee's electrical licenses for 365 days.

⁸ 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.

⁹ 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.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000041798	Chicago Department of Transportation	Discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR.	The Chicago Department of Transportation (CDOT) preliminarily agreed with OIG's recommendations to discharge the employee and requested discharge charges from DOL.
C2022-000042777	Chicago Department of Transportation	Impose discipline against the employee commensurate with the gravity of the employee's violations, past disciplinary record, and any other relevant considerations.	CDOT suspended the employee for 25 calendar days.
C2022-000043160	Department of Administrative Hearings	Discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Administrative Hearings (DOAH) preliminarily agreed with OIG's recommendations to discharge the employee and requested discharge charges from DOL.
C2022-000043178	Office of Emergency Management and Communications	Refer former employee for placement on the ineligible for rehire list maintained by DHR.	The Office of Emergency Management and Communications (OEMC) referred the former employee for placement on the ineligible for rehire list maintained by DHR.
C2022-000043294	Civilian Office of Police Accountability	Refer former employee for placement on the ineligible for rehire list maintained by DHR.	The Civilian Office of Police Accountability (COPA) referred the former employee for placement on the ineligible for rehire list maintained by DHR.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000043390	Department of Procurement Services	Initiate debarment proceedings for the purpose of determining appropriate remedial action against the contractor.	The Department of Procurement Services (DPS) initiated debarment proceedings against the contractor.
C2022-000043941	Board of Ethics	Find probable cause to believe that the former appointed official violated the GEO and initiate enforcement proceedings to determine appropriate sanctions.	The Board of Ethics (BOE) found probable cause to believe that the former appointed official violated MCC § 2-156-160(a).
C2022-000044002	Board of Ethics	Find probable cause to believe that the employee violated the GEO and initiate enforcement proceedings to determine appropriate sanctions.	BOE found probable cause to believe that the employee violated MCC § 2-156-130(a) and subsequently voted to pursue a \$10,000 fine.
C2022-000044004	Chicago Department of Transportation	Discharge the employee and refer for placement on the ineligible for rehire list maintained by DHR.	CDOT preliminarily agreed with OIG's recommendations to discharge the employee and requested discharge charges from DOL.
C2022-000044008	Board of Ethics	Find probable cause to believe that the employee violated the GEO and initiate enforcement proceedings to determine appropriate sanctions.	BOE found probable cause to believe that the former employee violated MCC § 2-156-100 and subsequently voted to pursue a \$2,000 fine.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000044038	Chicago Police Department	Impose discipline on Lieutenant commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations; refer former Captain for placement on ineligible for rehire list maintained by DHR.	CPD imposed a three-day suspension on the Lieutenant and required them to attend additional use of force training; CPD referred the former Captain for placement on the ineligible for rehire list.
C2022-000044043	Department of Finance	Refer former employee for placement on the ineligible for rehire list maintained by DHR.	The Department of Finance (DOF) referred the former employee for placement on the ineligible for rehire list maintained by DHR.
C2022-000044094	Department of Streets and Sanitation	Discharge the employee 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 recommendations to discharge the employee and requested discharge charges from DOL.
C2022-000044102	Department of Business Affairs and Consumer Protection	Refer former official for placement on the ineligible for rehire list maintained by DHR.	The Office of the Mayor did not respond to OIG's recommendation in the time allowed by MCC § 2-56-065. After the response deadline but before the end of the quarter, the Office of the Mayor reported that they will refer the former appointed official for placement on the ineligible for rehire list.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000039	Office of Public Safety Administration	Discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR.	OPSA preliminarily agreed with OIG's recommendations to discharge the employee and requested discharge charges from DOL.
C2023-000000096	Chicago Public Library	Refer former employee for placement on the ineligible for rehire list maintained by DHR.	The Chicago Public Library (CPL) referred the former employee for placement on the ineligible for rehire list maintained by DHR.
C2023-000000176	Department of Finance	Discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR.	DOF preliminarily agreed with OIG's recommendations to discharge the employee and requested discharge charges from DOL.
C2023-000000288	Chicago Public Library	Discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR.	CPL discharged the employee and referred them for placement on the ineligible for rehire list.
C2023-000000313	Board of Ethics	Find probable cause to believe that the employee violated the GEO and initiate enforcement proceedings to determine appropriate sanctions.	BOE found probable cause to believe that the former employee violated MCC § 2-156-160(a).

1 | Misuse of Electrical Licenses (C2022-000041693)

An OIG investigation established that a general foreman of electrical mechanics for 2FM allowed unqualified workers to perform electrical work under permits they pulled using the general foreman's supervising electrician's license and failed to supervise the work done by others under permits pulled using their supervising electrician's license. OIG's investigation further established that the general foreman engaged in unauthorized secondary employment.

OIG found that the general foreman violated Section 4-290-010 (b) and Section 4-292-050 of the MCC and City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or

conduct prohibited by the MCC or other law), Subsection 43 (failure to comply with secondary employment requirements) and Personnel Rule XX, Section 3 (restrictions relating to outside employment). OIG recommended that 2FM terminate the general foreman and refer them for placement on the ineligible for rehire list maintained by DHR. 2FM preliminarily agreed with OIG's recommendation to discharge the employee and requested DOL prepare discharge charges for the employee.

Additionally, OIG recommended that DOB revoke the general foreman's supervising electrician's license and electrical contractor certification as permitted by Section 14A-3-305 of the MCC; or, in the alternative, suspend the general foreman's supervising electrician's license and electrical contractor certification as permitted by Section 14A-3-305 of the MCC; or, in the alternative, suspend the general foreman's permit privileges as permitted by Section 14A-3-304 of the MCC. In response, DOB suspended the general foreman's supervising electrician's license and electrical contractor certification for 365 days.

OIG's investigation further established that a 2FM foreman of electrical mechanics impermissibly performed electrical work and used a City vehicle to travel to their home to be present for inspections without permission. OIG found that the foreman of electrical mechanics violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC or other law), the City of Chicago Vehicle and Equipment Policy (revised August 2012), and Section 4-290-010 of the MCC, which requires electrical contractors to be licensed by the City. OIG recommended that 2FM impose discipline commensurate with the gravity of the foreman of electrical mechanics' violations, past disciplinary record, and any other relevant considerations. 2FM responded that a pre-disciplinary meeting with the foreman of electrical mechanics is pending until the discharge has been served on the general foreman.

Finally, OIG's investigation established that an electrical mechanic with OPSA repeatedly allowed others to perform electrical work under permits pulled with the general foreman's supervising electrician's license. OIG found that the OPSA electrical mechanic violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC or other law), and Section 4-290-010 of the MCC. OIG recommended that OPSA terminate the electrical mechanic and refer them for placement on the ineligible for rehire list maintained by DHR. OPSA failed to respond to OIG's recommendation with the time allowed by MCC § 2-56-065. After the response deadline but before the end of the quarter, OPSA preliminarily agreed with OIG's recommendation to discharge the employee and requested DOL prepare discharge charges for the employee.

2 | Fraudulent Paycheck Protection Program Loan; Housing Assistance Fraud; False Statements in an OIG Investigation (C2022-000041798)

An OIG investigation established that a CDOT concrete laborer knowingly provided false information in order to obtain rental assistance from federally funded programs by swearing in multiple affidavits that they did not have employment or income when they were in fact employed by the City at that time. The investigation also established that the employee fraudulently received funds from the federal Paycheck Protection Program (PPP). The employee neither owned nor operated a business at the time the PPP loan application was completed. Their PPP loan application therefore contained false representation and fabricated documents intended to demonstrate the employee's eligibility to receive the PPP funds. The employee knowingly obtained over \$20,000 in PPP funds to which they were not entitled. Furthermore, the employee provided

false, inaccurate, and deliberately incomplete statements to OIG investigators during the course of the investigation.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false, inaccurate or deliberately incomplete statement in an official inquiry, investigation or other official proceeding), Subsection 15 (engaging in any act or conduct prohibited by the MCC or other law), and Subsection 50 (conduct unbecoming an officer or public employee). OIG recommended that CDOT discharge the employee and refer them for placement on the ineligible for rehire list. CDOT preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. CDOT requested DOL prepare discharge charges for the employee.

3 | Misuse of Sick Leave (C2022-000042777)

An OIG investigation established that a CDOT foreman violated the City's sick leave policy when they used sick leave for out-of-state travel and not for a permissible health-related purpose. Airline records showed that the foreman flew out of the state of Illinois and remained out of state despite being on paid COVID-19 sick leave on the dates of their travel.

OIG found that the employee violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 13 (use of sick leave in an unauthorized manner).

OIG recommended CDOT impose discipline against the foreman commensurate with the gravity of the employee's violations, past disciplinary record, and any other relevant considerations. CDOT suspended the foreman for 25 calendar days.

4 | Fraudulent Paycheck Protection Program Loan (C2022-000043160)

An OIG investigation established that an administrative assistant in DOAH fraudulently received federal PPP funds. The employee neither owned nor operated a business at the time the PPP loan application was completed. Their loan application therefore contained false representations and fabricated documents intended to demonstrate the employee's eligibility to receive PPP funds. The employee knowingly obtained over \$20,000 in PPP funds to which they were not entitled.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited the MCC or other law), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that DOAH discharge the employee and refer them for placement on the ineligible for rehire list. In response, DOAH preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. DOAH requested DOL prepare discharge charges for the employee.

5 | Residency Violation (C2022-000043178)

An OIG investigation established that a former traffic control aide with OEMC did not reside in the City of Chicago and instead resided in Glenwood, Illinois. OIG's investigation established that the employee signed two separate leases in Glenwood and consistently made rent payments from 2018 until 2023. The employee identified themselves as a Glenwood resident in court documents

and received bank statements in Glenwood. The employee resigned after being notified by OIG that OIG was going to interview them as a subject.

OIG found that the employee violated the City's residency restriction outlined in MCC Section 2-152-050 and City of Chicago Personnel Rule XVIII, Section 1, Subsections 15 (engaging in any act or conduct prohibited by the MCC or other law) and 41 (failure to be an actual resident of Chicago).

OIG recommended that OEMC refer the employee for placement on the ineligible for rehire list maintained by DHR. In response, OEMC did so.

6 | Breach of Confidentiality Obligations; Failure to Report Prior Discipline (C2022-000043294)

An OIG investigation established that a former COPA major case specialist failed to disclose their disciplinary history from a prior employer despite an obligation to do so, and that the former employee violated COPA's confidentiality policy. OIG learned that the former employee had been disciplined by a prior employer for falsifying time and failed to disclose the facts of their discipline to COPA, as required by COPA rules. The former employee also made an unauthorized disclosure of information regarding an open and high-profile investigation in a public forum in violation of COPA's express rules requiring employees obtain the permission of the department head before sharing such information. The former employee resigned from COPA during OIG's investigation, but prior to being contacted by OIG in this matter.

OIG found that the employee violated City of Chicago Personnel Rules XVIII, Section 1, Subsections 6 (failing to disclose any information requested); 44 (violating confidentiality of municipal records); and 48 (violating departmental regulations and rules).

OIG recommended COPA refer the employee for placement on the ineligible for rehire list maintained by DHR. COPA accordingly requested DHR place the former employee on the ineligible for rehire list.

7 | Intentional Billing Irregularities by City Debt Collection Contractor (C2022-000043390)

An OIG investigation established that a City debt collection contractor misused its access to the City's debt collection portal to assign itself unripe utility debt for collection. The contractor subsequently submitted invoices to the City seeking a contractual 25% contingency fee for its collection of the debt. In reality, collecting this debt required no meaningful effort, as the accounts were either not properly assigned to the contractor, had debts that were not yet ripe for collection, or had no debt at all due to regular on-time payments. Through this scheme, the contractor was able to assign accounts to themselves in order to claim a 25% alleged collection fee on a customer's routine on-time payments. The accounts the contractor improperly assigned to itself included several high-profile properties whose utility bills were regularly paid on time. As a result of the contractor's conduct, it received up to \$489,000 in improper contingency fee payments from the City.

OIG found that the contractor's conduct violated City of Chicago Debarment Rules V(g)(1), which prohibits intentional or negligent billing irregularities, and V(g)(2), which prohibits submitting frivolous or exaggerated claims.

DOL had previously terminated the City's contract with the contractor. OIG recommended that DPS also initiate debarment proceedings for the purpose of determining appropriate remedial action against the contractor. In response, DPS initiated debarment proceedings against both the contractor as an entity and individually against the attorney who was responsible for the bulk of the improper assignments. DOF indicated that when it became aware of possible misconduct by the contractor, it took steps to limit system access to ensure that collection firms could not repeat the behavior at issue and later disabled the contractor's access to all systems. DOF also withheld subsequent payments to the contractor in the amount of the improper payments to which the contractor was not entitled.

8 | False Statements of Financial Interest (C2022-000043941)

An OIG investigation established that a former appointed official made material omissions on their 2017, 2018, and 2019 Statements of Financial Interest (SOFIs). The former appointee failed to report their substantial outside income as the president of a company on their 2017 and 2019 SOFIs, and failed to report various board and committee memberships on their 2017, 2018, and 2019 SOFIs.

OIG found that the former appointed official violated the GEO, MCC § 2-156-160(a), which requires certain City officials and employees to disclose outside income as well as board or committee memberships.

OIG recommended that the City of Chicago BOE find probable cause to believe that the former appointed official violated the GEO and impose appropriate sanctions pursuant to MCC § 2-156-465(b)(5). At its September 2024 meeting, BOE voted to find probable cause the former appointed official violated MCC § 2-156-160(a). Pursuant to MCC § 2-156-385(3), the former appointed official is entitled to respond to the finding.

9 | Unlawful Supervision of Relative (C2022-000044002)

An OIG investigation established that a DSS assistant commissioner supervised their sister-in-law, a DSS field sanitation investigator, from 2015 until 2021 when the field sanitation investigator and the assistant commissioner's sibling finalized their divorce. OIG found that prior to the divorce, the assistant commissioner was in a position of ultimate supervisory authority over the field sanitation investigator and approved and signed their non-discretionary salary increases as well as their vacation and other sick leave requests.

OIG found that the assistant commissioner's conduct violated the GEO, MCC § 2-156-130(a), which prohibits any "official or employee [from] employ[ing]... in any city agency in which said official or employee serves or over which he exercises authority, supervision, or control, any person... who is a relative or domestic partner of said official or employee." The Ethics Ordinance defines a relative as including any "person who is related to an official, candidate for city office, or employee as spouse or as any of the following, whether by blood or by adoption:... sister-in-law..." MCC § 2-156-010(w). The Board of Ethics has, in a prior precedential opinion, defined the term "employ" in MCC § 2-156-130(a) to include "assigning, directing, inspecting and overseeing the work performance of an employee, signing City documents relating to an employee, and exercising the authority to make decisions or recommendations affecting an employee."

OIG recommended that, pursuant to its authority under MCC § 2-156-385, BOE find probable cause to believe that the assistant commissioner violated the GEO and initiated enforcement proceedings to determine appropriate sanctions. At their July 15, 2024, meeting, BOE found probable cause for a violation. Subsequently, at its September 2024 meeting, BOE voted to pursue a \$10,000 fine against the subject.

10 | Residency Violation (C2022-000044004)

An OIG investigation established that a CDOT hoisting engineer does not reside in the City of Chicago and resides in Bolingbrook, Illinois in violation of the City's residency requirement, MCC § 2-152-050. OIG's investigation revealed that the employee briefly resided at a City address, but then abandoned the residence for their true domicile in Bolingbrook.

OIG found that the employee violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC) and Subsection 41 (failure to be an actual resident of the City of Chicago).

OIG recommended CDOT terminate the employee and refer the employee for placement on the ineligible for rehire list. In response, CDOT preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. CDOT requested DOL prepare discharge charges for the employee.

11 | Post-Employment Restrictions Violation (C2022-000044008)

An OIG investigation established that a former DOF risk analyst assisted or represented an entity in violation of the GEO's prohibition against doing so. The investigation revealed that the former employee submitted a claim on a City contract in which they participated personally and substantially while a City employee.

OIG accordingly determined that the employee violated MCC § 2-156-100, which prohibits former City employees from assisting or representing another entity in a transaction on which the individual worked while employed by the City.

OIG requested that the BOE issue a finding of probable cause to believe the former employee violated the GEO. BOE voted to find probable cause at its July 2024 meeting and subsequently voted to pursue a \$2,000 fine against the subject at its September 2024 meeting.

12 | Excessive Use of Force (C2022-000044038)

An OIG investigation established that a CPD Sergeant (now a Lieutenant), used excessive force during a widespread protest in downtown Chicago in August 2020. OIG found that the Sergeant unreasonably and without a lawful purpose struck a protestor—who was not an assailant and who posed no apparent threat to the Sergeant or others—in the lower back with a baton. OIG's investigation further established that shortly after the Sergeant struck the protestor, a CPD Deputy Chief (who has since retired from CPD) improperly grabbed the same protestor while they were on the ground and sprayed them directly in the face with Oleoresin Capsicum (OC) spray.

OIG found that the Sergeant's conduct violated CPD's order governing the circumstances in which baton strikes are a permissible use of force (G03-02-07), while the Deputy Chief's conduct violated CPD's order governing the circumstances in which use of OC spray is permitted (G03-02-05). Both

CPD members' conduct also violated CPD's order governing the use of force generally (G03-02) as well as the following CPD Rules of Conduct: Rule 2 (any action or conduct which impedes CPD's efforts to achieve its policy and goals or brings discredit upon CPD), Rule 3 (any failure to promote CPD's efforts to implement its policy or accomplish its goals), Rule 6 (disobedience of an order or directive), Rule 8 (disrespect to or maltreatment of any person), Rule 9 (engaging in any unjustified verbal or physical altercation with any person), and Rule 38 (unlawful or unnecessary use of a weapon).

During the investigation, the Deputy Chief retired from CPD. OIG recommended that CPD refer them for placement on the ineligible for rehire list maintained by DHR. In response, CPD referred the Deputy Chief to DHR for placement on the ineligible for rehire list. OIG recommended that CPD impose discipline on the Sergeant commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. In response, CPD imposed a three-day suspension and assigned the Sergeant to additional use of force training.

13 | Secondary Employment (C2022-000044043)

An OIG investigation established that a former supervising clerk with DOF managed a travel agency business as an active employee and while on medical leave without prior departmental authorization. The employee was the registered agent and sole manager of an online travel agency and frequently posted on social media about traveling and generating income from the business, despite not requesting departmental approval as required. Because the former employee did not request departmental approval for their secondary employment, DOF did not have the opportunity to assess whether the former employee's continued secondary employment was inconsistent with the basis for the employee's medical leave. The employee resigned prior to the conclusion of the investigation.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 43 (failure to comply with the requirements of secondary employment) and Personnel Rule XX, Section 3 – Outside Employment.

OIG recommended that DOF refer the employee for placement on the ineligible for rehire list maintained by DHR. In response, DOF did so.

14 | Fraudulent Paycheck Protection Program Loan; Forgery of City Paystub (C2022-000044094)

An OIG investigation established that a DSS pool motor truck driver created fraudulent city earnings statements and engaged in fraud concerning a PPP loan. Specifically, the pool motor truck driver, who was then a seasonal motor truck driver, as part of an apartment application forged city earnings statements for off-season periods during which they were not employed by the city. Additionally, the driver applied for and received \$20,832 in PPP funds for an alleged food delivery business. In order to qualify for the PPP loan, the driver submitted falsified tax forms that show fabricated and grossly inflated profits from the alleged business. OIG reviewed the earnings statements, relevant PPP loan application documents, and financial records, and interviewed the subject.

For having forged earnings statements, OIG found that the driver's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsections 11 (falsification of any attendance or other

employment records) and 15 (engaging in any act or conduct prohibited by the MCC or other law). Additionally, for fraudulent receipt of a PPP loan, OIG found that the driver violated City of Chicago Personnel Rule XVIII, Section I, Subsections 50 (conduct unbecoming an officer or public employee) and 15 (engaging in any act or conduct prohibited the MCC or other law).

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

15 | Discourteous Treatment of City Employees; Discrimination Against City Employees; False Statements in an OIG Investigation (C2022-000044102)

An OIG investigation established that a former high-ranking official in the Department of Business Affairs and Consumer Protection treated multiple employees in a discourteous manner, including subjecting them to prolonged verbal abuse and discrimination, thus creating a hostile work environment. In particular, the official frequently yelled at, disrespected, and belittled subordinate employees, often in front of other staff. Additionally, the official used explicit language in front of and directed at the employees, with the usage being so common that multiple staff members would place guesses as to how many times the official would use particular vulgar words in a given meeting. The official also frequently used discriminatory language in the presence of and directed at employees, often commenting on employees' actual or perceived ethnicities. In at least one instance, the official told an employee that they would not be considered for a promotion due to their actual or perceived ethnicity not being what the official wanted for the position. The official's behavior created an uncomfortable office environment and caused numerous members of the official's department to look for employment elsewhere. Furthermore, during the course of OIG's investigation, the official provided multiple false and inaccurate statements to investigators.

OIG found that the official's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false, inaccurate or deliberately incomplete statements in an official inquiry, investigation or other official proceeding), Subsection 15 (engaging in any act or conduct prohibited by the MCC or other law), Subsection 23 (discourteous treatment, including verbal abuse, of any other City employee or member of the public), Subsection 39 (incompetence or inefficiency in the performance of the duties of the position), Subsection 42 (discrimination against an employee or applicant because of race, color, religion, sex, disability, national origin, ancestry, age, sexual orientation, or gender identity, marital status, parental status and military service or discharge status), and Subsection 50 (conduct unbecoming an officer or public employee).

The official retired during the course of OIG's investigation, after having been interviewed by OIG. OIG recommended that the Mayor refer the official for placement on the ineligible for rehire list maintained by DHR. The Office of the Mayor failed to respond to OIG's investigation in the time allowed by MCC § 2-56-065, which provides that the ultimate jurisdictional authority must respond to OIG reports within 30 days. The deadline may be extended once by an additional 30 days. The Office of the Mayor failed to provide a response by the extended deadline. After the extended deadline but before the end of the quarter, the Office of the Mayor responded that it agreed with OIG's recommendation and "will refer" the former appointed official for placement on the ineligible for rehire list.

16 | Time Fraud (C2023-000000039)

An OIG investigation established that an OPSA employee committed time fraud and violated the City Vehicle and Equipment policy when, on several occasions, the employee clocked into work, drove a City van to their home, and remained at their home without their supervisor's approval for a significant amount of time to attend to personal matters.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 1 (absence without leave), Subsection 2 (leaving the department, office, or work site without property authorization), Subsection 11 (falsification of any attendance or other employment records), and the City of Chicago Vehicle and Equipment Policy.

OIG recommended that OPSA terminate the employee. OPSA failed to respond to OIG's investigation in the time allowed by MCC § 2-56-065, which provides that the ultimate jurisdictional authority must respond to OIG investigative reports within 30 days. The deadline may be extended once by an additional 30 days. OPSA failed to provide a response by the extended deadline. After the extended deadline but before the end of the quarter, OPSA preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. OPSA requested DOL prepare discharge charges for the employee.

17 | Residency Violation (C2023-000000096)

An OIG investigation established that a former library associate with CPL does not reside in the City of Chicago and resides in County Club Hills, Illinois, in violation of the City's residency requirement, MCC § 2-152-050. OIG also found that the employee knowingly provided a false address on the City's residency affidavit.

During the subject's interview with OIG, the subject admitted that they purchased a home in Country Club Hills in 2017. Part of their mortgage agreement included an occupancy clause that required the subject to use the property as their primary residence. The subject admitted that they did not pay any bills and the city address listed on their employment paperwork and paid the bills with their spouse at the County Club Hills location. In addition, over the course of approximately four months, OIG conducted six separate surveillances of the County Club Hills residence. During all six surveillances, the subject was observed departing from and/or arriving to the County Club Hills residence. Two days after the subject's OIG interview, the subject retired from their city employment.

Further, the subject falsified their City residency affidavit by stating that they lived at a City address while knowingly living at the County Club Hills residence. OIG concluded that the subject's conduct violated City of Chicago Personnel Rules, Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the MCC, the Illinois Compiled Statutes (ILCS), applicable laws of other states, or federal statutes) and Subsection 41 (failure to be an actual resident of the City of Chicago). OIG also concluded that the subject knowingly provided a false address on their residency affidavit in violation of Personnel Rule XVIII, Section 1, Subsection 6 (providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City), and MCC § Section 1-21- 010.

OIG recommended that CPL refer the subject for placement on the ineligible for rehire list maintained by DHR. In response, CPL did so.

18 | Discourteous Treatment of Members of the Public; False Statements in an Official Inquiry (C2023-000000176)

An OIG investigation established that a DOF parking enforcement aide treated members of the public, including juvenile members of the public, discourteously and provoked or incited such persons to engage in an unjustified physical altercation. Video evidence showed that the employee, while in a fast food restaurant, continuously engaged a group of individuals, some of whom the employee believed to be juveniles, in aggressive and hostile behavior. The employee then escalated the altercation by striking one of the individuals with a closed fist. Furthermore, during DOF supervisors' investigation into the altercation, the employee provided false and misleading details regarding the circumstances of their involvement and the location of the altercation.

OIG found that the employee violated City of Chicago Personnel Rules Rule XVII Section 1, Subsection 8 (making false, inaccurate, or deliberately incomplete statements in an official inquiry, investigation, or other official proceeding), Subsection 23 (discourteous treatment, including verbal abuse, of any other City employee or member of the public. Provoking or inciting another employee or member of the public to engage in such conduct), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that DOF discharge the employee and refer them for placement on the ineligible for rehire list. DOF preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. DOF requested DOL prepare discharge charges for the employee.

19 | Sexual Harassment (C2023-000000288)

An OIG investigation established that a CPL library clerk inappropriately interacted with CPL patrons and improperly used information obtained in the course of the duties of their City position to make social media contact with CPL patrons.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsections 15 (prohibiting conduct in violation of the MCC), 23 (discourteous treatment), 42(a) (sexual harassment), and 50 (conduct unbecoming), as well as the prohibition against sexual harassment within the Human Rights Ordinance of the MCC, Section 6-10-040, and the prohibition against sexual harassment within the City of Chicago Diversity and Equal Employment Opportunity Policy.

OIG recommended that CPL discharge the library clerk and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CPL did so.

20 | False Statements of Financial Interest (C2023-000000313)

An OIG investigation established a former Department of Assets, Information and Services (AIS, now 2FM) employee filed false SOFIs in 2019, 2020, and 2021 by failing to disclose their financial interest in rental properties in the City. While the former employee received funds from the City's Emergency Rental Assistance Program for rental property they owned, the employee failed to disclose their property interests on their SOFIs.

OIG found that the former employee violated the GEO, MCC § 2-156-160(a).

OIG recommended that BOE find probable cause to believe that the former employee violated the GEO and impose appropriate sanctions pursuant to MCC § 2-156-465(b)(5). At its September 2024 meeting, BOE voted to find probable cause that the former employee violated MCC § 2-156-160(a). Pursuant to MCC § 2-156, the former employee is entitled to respond to the finding.

C | Synopses of and Developments in Charged Criminal Cases

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 a criminal case related to an OIG investigation.

1| [City of Chicago v. Brett Frey, Case No. 20241400857 \(Cir. Ct. Cook County\), OIG Case No. C2022-000043881](#)

On May 22, 2024, the City of Chicago filed a verified complaint for a violation of MCC § 2-56-140 (obstruction of OIG investigation) and § 1-21-010 (false statements to the City) against Brett Frey, a part-owner and employee of City contractor Air One Equipment, Inc. The complaint alleges that, during an interview in an OIG investigation, Frey misrepresented Air One's involvement in a contemplated transaction that would have enabled a Chicago Fire Department (CFD) employee to sell goods to CFD, in violation of the City of Chicago GEO. In an initial interview, Frey denied that Air One had any knowledge of or involvement in a contemplated transaction for CFD to purchase custom shelving for a CFD trailer. In a subsequent interview, Frey admitted that he and Air One were involved in the contemplated transaction and that he initially worked with a CFD employee on the transaction.

The City's complaint sought a fine of \$500 for Frey's violation of MCC § 2-56-140, as well as a fine of \$1,000 and the City's attorney's fees and costs for Frey's violation of MCC § 1-21-010. The City subsequently resolved the matter, with Frey agreeing to be found liable without admitting liability and make a payment of \$2,358.00 to the City, reflecting the maximum fine for the counts alleged in the complaint plus the City's reasonable attorney's fees and costs.

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.

1| Complaints for Discretionary Decertification to the Illinois Law Enforcement Training and Standards Board

In Illinois, all law enforcement officers are required to be certified by the Illinois Law Enforcement Training and Standards Board (ILETSB). Certification verifies that an officer meets the minimum personnel standards and has completed the required testing and training to be a police officer. ILETSB has authority to revoke or “decertify” an officer’s certification if they no longer meet the state standards or have engaged in certain decertifiable conduct.

The Illinois SAFE-T Act, passed in 2021, changed and expanded the process by which ILETSB may decertify officers. Prior to passage of the SAFE-T Act, officers were typically decertified only following conviction of certain limited criminal offenses. Since relevant provisions of the SAFE-T Act took effect on July 1, 2022, ILETSB has had authority to decertify officers on a discretionary basis for certain enumerated reasons under 50 ILCS 705/6.3; pursuant to this section, a law enforcement officer may be decertified for conduct that, if criminally convicted, would trigger automatic decertification; excessive force; tampering with dash/body camera footage; false statements or evidence tampering; failing to perform a duty to intervene; or other unprofessional or unethical conduct or practice harmful to the public. An inspector general is among those authorities which, pursuant to the SAFE-T Act, “shall notify” ILETSB of potentially decertifiable conduct by a law enforcement officer.

In this quarter, OIG has begun submitting notice of potentially decertifiable conduct by CPD members, as identified in closed administrative investigations conducted by OIG, to ILETSB; OIG has submitted such notices where appropriate for all qualifying investigations from July 1, 2022 to present.

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. Other rules and regulations, such as Executive Order 2011-4, place further restrictions on donations.¹⁰

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 this quarter, OIG’s Center for Information Technology and Analytics is in the final stages of developing and streamlining an automated data process to facilitate this proactive analysis—specifically, to identify potentially improper contributions made to elected City officials or candidates by restricted contributors. In this

¹⁰ 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.

effort, OIG will integrate and match 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 10 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 10 days to challenge the determination or cure the violation by returning the excess donation.¹¹ If the excess donation is returned in a timely manner, or it is determined that a violation did not occur, OIG closes the matter administratively. 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 closed one campaign finance matter that involved \$3,500 in disallowed contributions. Details are provided in the table below.

Table 8: Campaign Finance Activity

Case #	Donation Amount (Year)	Donation Source	Donation Recipient	Amount of Returned Funds
C2024-000000055	\$5,000 (2022)	Company affiliated with Entity doing business with the City	City elected official	\$3,500

2 | O’Hare 21

OIG provides oversight for major construction initiatives across the City. Specifically, OIG has worked with the Chicago Department of Aviation (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 DPS, CDA, and OIG.

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

OIG has developed an [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.

¹¹ 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.

F | Fines and Recoveries

In the third quarter, the City made recoveries from two City contractors in debarment proceedings arising from OIG investigations. To resolve debarment proceedings arising from an OIG investigation, City contractor Air One Equipment, Inc. agreed, among other terms, to make a \$50,000 payment to the City.

To resolve debarment proceedings arising from an OIG investigation, City contractor Benchmark Construction, Inc. agreed, among other terms, to pay the City \$100,000 as a voluntary contribution to the fund dedicated to promoting and supporting the City's Minority- and Women-owned Business Enterprise Program.

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 CPD’s 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 two Public Safety section reports released this quarter.

1 | Staffing: Sworn Chicago Police Department Members Assigned with Patrol Duties¹²

Whether responding to a 911 call or patrolling a Beat, CPD members are essential to ensuring public safety by responding to emergencies and being present in communities. Yet, measuring CPD’s patrol presence in a particular location in the City is a complex, opaque, and imprecise exercise. Seemingly simple questions of fundamental importance to public safety in Chicago—how many CPD members are on patrol in the City, and where and when do those members patrol?—are surprisingly difficult to answer precisely, both for purposes of oversight and transparency from outside of CPD, and for purposes of effective supervision and operational management from within CPD. To address these concerns and help answer these fundamental questions, OIG published a report describing CPD’s patrol staffing structure, previous and ongoing efforts to obtain information on patrol staffing from the Department, and the limitations around CPD’s patrol staffing data.

To accompany this report, OIG updated the Sworn CPD Members suite of data dashboards on its Information Portal (<https://igchicago.org/information-portal/>) to include granular data on the time of day and geographic areas in which CPD members patrol. OIG’s dashboards display patrol staffing data for each period of work hours in a day and for one day in each month. Through these dashboards, OIG seeks to give stakeholders a clearer, more accurate view of how many CPD members are working at a given time in Chicago’s neighborhoods.

This inquiry is descriptive; it does not include recommendations to CPD or any other City agency. Additionally, neither the dashboards nor this report presents a predictive staffing model that seeks to answer questions and make determinations regarding patrol strength—that is, whether CPD is appropriately staffed during any given time or place. Rather, with this report and the accompanying dashboards, OIG aims to provide clear, accurate, and comprehensive data on CPD’s staffing levels.

Although this report did not make recommendations, and therefore CPD was not required to respond, OIG provided CPD with a draft of the report and an invitation to preview the updated dashboards prior to publication. After a meeting attended by OIG, CPD, and OPSA, CPD Superintendent Snelling provided a written response in which he raised concerns about the accuracy and reliability of OIG’s dashboard. Superintendent Snelling further “encourage[d] the OIG

¹² Published July 25, 2024. See <https://igchicago.org/publications/cpd-members-patrol-staffing/>.

to avail itself of the resources that both CPD and PSA have offered to improve both the Report and Dashboard.” As noted in OIG’s reply, OIG has been awaiting access to the data “resources” to which CPD referred since April 2023. As of the publication of the report and more than one year after OIG requested it, OIG has not been provided with access to any additional staffing data. Furthermore, CPD has not provided any demonstration of how CPD measures patrol staffing levels. OIG will continue to update and improve the dashboard accompanying this report as more data becomes available.

2 | Public Safety Section 2023 Annual Report¹³

The MCC requires the Public Safety section to publish an annual report summarizing its reports, recommendations, and analyses from the prior year. In its Annual Report, published this quarter, the Public Safety section detailed work conducted during 2023 in each of its three primary channels: audit-based inquiries; inspection of individual closed disciplinary cases; and collection and analysis of data from CPD and City sources on many aspects of policing, public safety operations, and the police disciplinary system.

The 2023 Annual Report included outcome summaries of the following: Enforcement of the Chicago Police Department’s Rule Against False Reports (May 2023); Investigations of Sexual Misconduct Allegations Against Chicago Police Department Members 2022 (May 2023); Final Report – Chicago Police Department’s Search Warrant Process (June 2023); Community-Police Mediation Pilot Program (July 2023); Enforcement of the Chicago Police Department’s Rules Requiring Members to Report Misconduct (August 2023); Chicago Police Department 911 Response Time Data Collection and Reporting (September 2023); Understanding the City of Chicago Police Department’s Budget 2023 (October 2023); Recent Developments on Chicago Police Department’s Use of Gang Data (November 2023); and Follow-up to OIG’s Review of Compliance with the City of Chicago’s Video Release Policy for Use of Force Incidents (December 2023).

The 2023 Annual Report further included information on the Public Safety section’s screening of 1,289 closed disciplinary investigations conducted by BIA and COPA, and its in-depth review of 82 of those investigations, including investigations mandated for review by the consent decree. Of the closed investigations selected for in-depth review in 2023, OIG recommended that three investigations conducted by BIA and ten investigations conducted by COPA be reopened to correct deficiencies materially affecting their outcomes. The results of OIG’s 13 recommendations to reopen are detailed in the 2023 Annual Report.

Finally, in fulfillment of the Public Safety section’s obligations pursuant to the MCC and the consent decree to conduct data and trend analysis in certain subject areas, the 2023 Annual Report contained data and analysis on public safety operations including 911 calls for service, arrests, misconduct complaints, investigatory stops, and use of force reporting.

¹³ Published August 5, 2024. See <https://igchicago.org/publications/public-safety-2023-annual-report/>.

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 251 closed disciplinary cases and opened 18 for in-depth review. OIG found six BIA investigations that contained deficiencies materially affecting their outcomes.

Table 9: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	94	12
COPA	157	6
Total	251	18

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent three letters of recommendation to reopen investigations to COPA and one letter of recommendation to reopen an investigation to BIA. All recommendations to reopen are pending responses. OIG also sent one notification letter to COPA citing discrepancies between COPA's analysis of the allegations and its findings recorded to the disciplinary record, after which the appropriate records were corrected.

Additionally, by the end of this quarter, OIG received a response from BIA on one recommendation to reopen and from COPA on one recommendation to reopen. OIG made both recommendations in 2024-Q2. COPA and BIA accepted OIG's recommendations to reopen their respective investigations.

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

confidentiality provisions set out in MCC § 2-56-110.

[a | Recommendation to Reopen to Conduct a Rule 14 Analysis \(C2024-000000008\)](#)

OIG reviewed a COPA investigation concerning allegations that CPD Officer John Kaporis, Star #18741, used a racial slur by referring to two Black individuals as “shines;” reported false, incomplete, inaccurate, and/or misleading information when he called 911 to report an officer in need of help; failed to report misconduct by a CPD member; and failed to identify his brother, Detective Christoph Kaporis, Star #21235, as an involved CPD member during the incident. COPA sustained all allegations against Officer Kaporis. Further, COPA sustained seven allegations against Detective Kaporis, including that he pointed a firearm at an individual without justification, performed an unlawful seizure of that individual, and several other CPD operational and/or conduct unbecoming violations. COPA recommended discipline of a suspension of 365 days up to separation for both Officer Kaporis and Detective Kaporis.

COPA’s investigation revealed that, on April 21, 2022, Officer Kaporis, while off-duty, and his son called 911 several times to report suspicious activity at or near Officer Kaporis’ mother’s home. When CPD members responded on scene, Officer Kaporis reported that someone was playing pranks on his family by requesting various home care services at his mother’s home, which was vacant. Officer Kaporis told responding officers that there were two Black individuals, which he referred to as “Shines,” inside his mother’s home cleaning without his permission.

On the body worn camera (BWC) footage captured by one of the officers dispatched to the scene, Officer Kaporis is seen referring to the Black individuals as “shines,” while speaking to Detective Kaporis, their sister, and an unknown individual on the phone. After the responding officers had left the scene, Officer Kaporis called 911 at 8:10 pm to report that he observed suspicious U-Haul trucks and a car drive past the home then up and down the alleyway. Detective Kaporis and his wife arrived, and Detective Kaporis went to the backyard while Officer Kaporis and his sister-in-law remained in the front of the home. At 8:11 pm, Officer Kaporis called 911 again, and reported a “10-1,” and identified his brother, Detective Kaporis, as attempting to stop two other Black individuals that had gotten out of a U-Haul truck and fled on foot.¹⁴

Subsequently, in his COPA interview, Officer Kaporis stated that no one chased the two Black individuals, that he had previously identified, on foot. Officer Kaporis stated that he attempted to wave them down as they drove by him. Officer Kaporis told COPA he did not see Detective Kaporis in the alley at the time of the incident but assumed something was “not normal in the alley, and someone may have needed help.” However, in the 911 call, Officer Kaporis reported that Detective Kaporis was chasing the men and needed “10-1” assistance. Officer Kaporis admitted to COPA that he knew if he called a “10-1,” officers would respond immediately. When asked why he did not call Detective Kaporis to ensure that he was okay, Officer Kaporis stated he was more concerned with the noises he heard. However, after consulting with his attorney, Officer Kaporis told COPA that he believed his brother was in danger because he could not see what was going on and had no contact with him. When COPA asked if he made a false 911 call by reporting a “10-1,” Kaporis stated he did not recall.

¹⁴ “10-1” is the highest priority call that involves any life-threatening circumstances for an officer in need of immediate assistance.

COPA's Final Summary Report (FSR) includes a Credibility Assessment in which COPA found "this investigation revealed that Officer Kaporis and Det Kaporis were not credible in their statements," and that "Officer Kaporis abused his authority by falsely calling in a '10-1' to get immediate police response at the location of the incident." Despite finding the accused CPD members "not credible" and that Detective Kaporis made a report "falsely", COPA did not conduct any analysis regarding potential violations of Rule 14 of CPD's Rules of Conduct, which prohibits false reports, written or oral. Rather, COPA sustained the allegation that Officer Kaporis gave false, incomplete, inaccurate, and/or misleading information when he called 911 to report a "10-1" and found violations of Rules 2, 6, and 10 of CPD's Rules of Conduct.

OIG reviewed Officer Kaporis' disciplinary history in the Case Management System (CMS), and found that he has been accused in 51 investigations since his appointment on October 23, 1995. Officer Kaporis was found to have violated Rule 14 in two separate investigations: first, in 2001, where he made false statements regarding his whereabouts while interacting with a complainant, and second, in 2004, where he knowingly filed a false criminal report of forgery.

OIG recommended that COPA reopen Log #2022-0001652 to conduct and document an analysis of whether Officer Kaporis violated Rule 14 when he called for "10-1" assistance. COPA accepted OIG's recommendation to reopen the investigation.

After further review, COPA concluded that Officer Kaporis violated Rule 14 when he called 911 and reported a "10-1" falsely indicating Detective Kaporis was involved in a life-threatening incident. COPA recommended separation for Officer Kaporis and CPD's Superintendent concurred with COPA's recommendation.

b | Recommendation to Reopen to Conduct a Rule 14 Analysis (C2024-000000023)

OIG reviewed COPA investigation concerning allegations against CPD members Anna Hosepian, Star #2851, Matthew Gozdal III, Star #9220, and Matthew Beesley, Star #18844, related to an improper stop and search. The complainant alleged Officer Hosepian used excessive force when Officer Hosepian slapped them in their face during the incident. COPA sustained allegations against Officers Hosepian and Gozdal. For Officer Hosepian, COPA recommended a "20-day up to 60-day suspension," and anger management and de-escalation training. For Officer Gozdal, COPA recommended a 30-day suspension and de-escalation training.

The Investigatory Stop Report (ISR) completed by Officer Gozdal for this incident specified that on June 25, 2020, Officers Hosepian, Gozdal, and Beesley conducted a traffic stop on the complainant at approximately 10:20 a.m. for failing to use a turn signal 100 feet prior to turning. BWC footage shows Officer Hosepian approaching the complainant's vehicle and Officer Gozdal opening the driver's door. Officer Hosepian requested the complainant provide their identification, but the complainant refused and asked that the Officers close the driver's side door. Officer Hosepian ordered the complainant to step out of the vehicle, but the complainant did not comply. Officer Gozdal reached into the vehicle to unbuckle the complainant's seatbelt and pulled the complainant out of the car to detain them. The complainant told Officers they were feeling alright until the Officers approached and tried to kill them, and Officer Hosepian told the complainant to calm down, stating, "I'm not in the mood for this shit, alright? Just calm down." While Officer Gozdal conducted a protective pat down of the complainant, the complainant told Officers they did not have any right to pull them out of the car and search them. Officer Gozdal detained the complainant at the rear of the vehicle for the remainder of the traffic stop.

Officer Hosepian asked the complainant three times where their insurance was located in the vehicle, and the complainant responded, "I'm not giving you nothing." When Officer Hosepian opened the rear driver's side door to search, the complainant yelled out, "Why you searching my car? I did not give you permission to search my goddamn car." Officer Hosepian approached the handcuffed complainant in the rear of the vehicle and stated, "Don't fucking yell. Shut the fuck up. Shut the fuck up" and delivered an open hand strike to the complainant's face. Officer Hosepian searched the front passenger side of the vehicle and opened the glove compartment before moving to the rear passenger side of the vehicle. The complainant yelled that Officer Hosepian illegally searched their car and slapped them in their face, and Officer Hosepian stated to the complainant, "I pushed you away so shut the fuck up, alright? Idiot."

Officer Hosepian again asked the complainant where their insurance was located, and the complainant responded, "Man, in that car. You see it." Officer Hosepian asked the complainant, "Where in the car?" The complainant stated, "Forget that. I don't got no words for you, Hosepian. You slapped me. You assaulted me." Officer Hosepian again asked the complainant, "Where in the car?", but the complainant refused to answer and yelled out, "Battery. Battery." Officer Gozdal also asked the complainant for the location of their insurance, and the complainant responded, "Hosepian assaulted me." Officer Hosepian returned to the front passenger side of the vehicle, opened the glove compartment, removed the contents of the glove compartment, and searched through the complainant's personal property for proof of insurance. Officer Hosepian told the complainant three times they did not have insurance, and the complainant responded, "Write your ticket and go home then, lady." The complainant was issued one citation for driving without insurance and received another citation for failing to use a turn signal prior to turning.

During Officer Hosepian's interview, COPA asked Officer Hosepian the reason for searching the complainant's glove compartment. Officer Hosepian testified that the complainant gave permission to search the glove compartment for the insurance paperwork, stating, "[They] got a ticket for – when I asked [them] for, [they are] the one that told me to go into the glove compartment because I kept requesting for insurance. So um, [they] said in the glove compartment, if I recall correctly and the paperwork came out and I think [they] had two [different] insurances in there and it didn't belong to [them] or the vehicle." COPA asked Officer Hosepian, "So you're saying [they] gave you permission to go into the glove compartment to find that paperwork?" Officer Hosepian responded, "I believe so, yes." In the FSR, COPA acknowledged "Officer Hosepian said [they] went into [the complainant's] glove compartment because [they] told [them] that [their] insurance information was there." Although Officer Hosepian's BWC footage of the incident refutes Officer Hosepian's statement that the complainant provided permission to search their glovebox, COPA did not investigate nor conduct any analysis regarding a Rule 14 violation.

OIG recommended that COPA reopen this investigation to include a Rule 14 analysis of statements made by Officer Hosepian to COPA and to determine whether their conduct violated any additional applicable rules and directives.

COPA declined OIG's recommendation to reopen stating that "Proof of a Rule 14 violation requires three elements: that a false statement was made, that it was made willfully, and that it was made about a fact that was material to the incident under investigation. COPA does not believe the evidence proves Officer Hosepian's statements to COPA violated Rule 14." COPA further offered that it interviewed Officer Hosepian two and a half years after the incident and that they told "investigators several times that [they were] responding to questions based on [their] recollection."

COPA acknowledged that Officer Hosepian's recollection was wrong, but did "not agree that there was sufficient evidence to prove that Officer Hosepian intended to deceive in this instance."

c | Recommendation to Reopen to Conduct a Rule 14 Analysis (C2024-000000049)

OIG reviewed a COPA investigation involving allegations against CPD member Paul Srodulski, Star #18452, related to their use of excessive force during an emergency takedown, resulting in the complainant losing three teeth.

CPD's Original Case Incident Report, which lists Officer Srodulski as a reporting officer, states that on August 28, 2022, "In order to gain control of the offender, R/Os completed an emergency take down. While on the ground, [complainant] began to stiffen [their] body refusing to put [their] hands behind [their] back disregarding R/Os multiple verbal commands to put [their] hands behind [their] back. Offender began to flail [their] legs evading the arrest. With the help of R/Os and assisting officers [the complainant] then complied and was handcuffed without further incident." After being transported for processing, the complainant was taken for medical treatment for injuries sustained to the mouth and nose.

In the accompanying Tactical Response Report (TRR), the report narrative completed by Officer Srodulski, states, "At the end of the incident and when [complainant] was placed in squadrol 431 for transport, R/O did not know of any injuries to [complainant] due [complainant] still having [their] mask on. Upon arrival to District 004 station and seeing [complainant] unmasked R/O noticed blood in the area around the mouth of [the complainant]. [Complainant] was then transported to South Shore Hospital to be checked out."

Additionally reported in the TRR, under the Reporting Supervisor section, Sergeant Gregory Zaragoza, Star #2699, wrote, "The R/Sgt was near the event but not close enough to witness or hear the event occur. During the event described by PO Srodulski #18452, the subject was taken to the ground in order to take [them] into custody. During this event the subject sustained an abrasion to [their] upper lip and resulted in [them] losing 3 teeth. PO Srodulski #18452 was not aware of the injury as the subject was wearing a balaclava [sic] style face mask which covered [their] mouth area. The subject was taken to 004 for processing when [their] mask was removed, and the injury was discovered."

During Officer Srodulski's interview with COPA, Officer Srodulski was asked if they were able to make any physical observations about the complainant after the complainant was brought to the ground. Officer Srodulski stated, "No. At that time -- well, at that time it was just this -- [their] shirt and [their] pants and [their] arms. [They] still had the ski mask on at that time." COPA then asked Officer Srodulski if they noticed any injuries at all, Officer Srodulski stated, "Not at all." When asked to describe their encounter with the complainant, Officer Srodulski stated, "I pulled [them] to me and then we continued to the ground. So, I went with [them]; so, it wasn't a slamming motion up here to here. It was -- I pulled [them] toward me, and then we both fell to the ground." And again, after being asked if they noticed any injuries at all, Officer Srodulski stated, "I -- I did not. At that time, I did not."

Contrary to Officer Srodulski's claim to have been unaware of any injuries sustained by the complainant during their take down to the ground, BWC footage captured at the scene shows Officer Srodulski stating, "I think I knocked out two of [their] teeth." Officer Colleen Lindgren's, Star

#14018, BWC video also captures Officer Srodulski's comment about knocking out the complainant's teeth; Officer Lindgren responds, "Damn." Officer Calvin Gray's, Star #10494, BWC video captures the complainant inside the squadrol without a mask and with visible blood on their face.

COPA concluded that Officer Srodulski's use of force was unreasonable and recommended a 10-day suspension. However, COPA failed to conduct a Rule 14 analysis to address Officer Srodulski's statement to COPA that they did not notice any injuries after the takedown, when BWC footage captures statements to the contrary on the scene. OIG recommended that COPA reopen this investigation to conduct a Rule 14 analysis of whether Officer Srodulski made false statements regarding whether they were immediately aware of the complainant's injuries.

COPA declined OIG's recommendation to reopen this investigation. In COPA's response to OIG, it stated that "COPA does not believe that it can show that Officer Srodulski's statements regarding [their] knowledge of injury were willfully false... COPA has no evidence that [they] intended to mislead or to fabricate [their] account about [their] knowledge of the complainant's injury."

2 | Advisory

a | Advisory Regarding Chicago Police Department Member Affiliation with Anti-Government and Extremist Groups (C2023-000000081)¹⁵

On April 25, 2024, OIG notified the Office of the Mayor of concerns about the incidence and handling of allegations that members of CPD belong to or associate with extremist and anti-government groups. This issue has been the subject of extensive press coverage, City Council hearings, and discussion by public officials. Nonetheless, OIG found that the City's handling of extremism in its police ranks has fallen short of commitments made by City and CPD leadership.

In the course of its work mandated by § 2-56-230(c)(ii) of the MCC, OIG has reviewed several BIA investigations into allegations that CPD members have belonged to or associated with certain anti-government and extremist organizations—specifically, the Proud Boys, the Oath Keepers, and the Three Percenters. In its recent investigations—unlike in its own historical practice—CPD has failed to consider whether CPD members' associations with certain groups or organizations might violate CPD's Rules and Regulations, which prohibit "[a]ny action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department."

The issue of extremism in law enforcement is one of paramount importance as Chicago works to foster public trust in CPD, and it is an issue that has been faced by other law enforcement agencies across the country; some of those agencies have taken corrective actions with which Chicago has not kept pace. Recognizing the urgency of the issue, the range of solutions potentially available, and the inadequacy of CPD's disciplinary response, OIG recommended that Mayor Brandon Johnson convene a task force comprised of representatives from any appropriate City agency or department, as well as any appropriate community stakeholders, to plan for and implement a

¹⁵ Published July 9, 2024. See <https://igchicago.org/wp-content/uploads/2024/07/Advisory-Regarding-CPD-Member-Affiliation-with-Anti-Government-and-Extremist-Groups-2.pdf>.

comprehensive, whole-of-government approach to preventing, identifying, and eliminating extremist and anti-government activities and associations within CPD.

In a written response, the Office of the Mayor stated that “the Johnson Administration and the Chicago Police Department remain fully committed to rooting out extremist, anti-government, and biased organizations in our law enforcement ranks. There is no place in the CPD for those who participate in such organizations.” The Office of the Mayor further stated that it is “committed to working with CPD and across departments and agencies to ensure that there is a comprehensive and meaningful approach to preventing, identifying, and eliminating extremist, antigovernment, and biased associations within CPD” and says that it will “work with” a variety of entities in this pursuit. The Office of the Mayor neither accepted OIG’s recommendation nor committed to any specific action at all.

3 | Notification

a | Notification to COPA to Correct the Finding (2024-000005709)

OIG reviewed an investigation conducted by COPA concerning allegations that CPD members Jose Lopez, Star #11943, Antonio Ramirez, Star #19116, David Arauz, Star #4101, and Roger Farias, Star #9942, engaged in unprofessional conduct including race-based and/or sexual orientation-based verbal abuse, and various BWC violations.

According to CPD’s CMS, COPA reached findings of Sustained on five of the seven allegations against Officer Lopez, including: (1) deactivating BWC prematurely in violation of Special Order S03-14; (2) engaging in unprofessional conduct by directing the words to the effect of, “Lick my balls,” to the complainant; (3) engaging in unprofessional conduct by directing words to the effect of, “Ok, Donkey,” to the complainant; (4) engaging in sexual orientation-based verbal abuse by directing words to the effect of, “Who’s gay now?” to the complainant; and (5) engaging in race-based verbal abuse by directing words to the effect of “Smile so I can see you back there” to the complainant.

As related to Officer Farias, CMS shows findings of Sustained on three of the eight allegations to include: (1) failing to timely activate BWC in violation of Special Order S03-1; (2) engaging in sexual orientation-based verbal abuse by directing words to the effect of, “Who’s gay now?” to the complainant; and (3) engaging in unprofessional conduct by directing the words, “We’ll get you an emotional support animal, too,” to the complainant.

OIG’s review of the Allegations section in the FSR reflects that COPA reached a finding of Not Sustained on the allegation that Officers Farias and Lopez engaged in sexual orientation-based verbal abuse—however, the allegation is supported by COPA’s analysis of the evidence despite contradicting the listed finding on this allegation in CMS. Also, COPA lists the allegation that Officer Lopez engaged in unprofessional conduct by directing the words to the effect of, “Lick my balls,” to the complainant as Not Sustained, contrary to COPA’s analysis that supports a finding of Sustained on this allegation.

OIG notified COPA of these errors and inconsistencies, and recommended it make the necessary corrections in CMS to the findings on the sexual orientation-based allegation made against Officers Lopez and Farias. OIG also recommended COPA make the necessary corrections to align the

Allegation section of its FSR to its analysis of the allegation that Officer Lopez displayed unprofessional conduct by directing words to the effect of, "Lick my balls." COPA concurred with OIG's recommendation and made the necessary corrections.

After reopening the investigation, in COPA's FSR, it explained that the phrase, "Who's gay now?" was made in the squadrol by an officer, but COPA could not identify whether Officer Farias or Officer Lopez made the statement; therefore, COPA Not Sustained the allegation. COPA corrected the finding in CPD's CMS to Sustained for the allegation that Officer Lopez engaged in unprofessional conduct by directing the words to the effect of, "Lick my balls," to 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 Department of Finance's Civilian Workers' Compensation Program Administration (C2022-000043770)¹⁶

OIG conducted an audit of DOF's administration of the City's civilian Workers' Compensation Program (the Program). The City Council Committee on Finance (the Committee) administered the City of Chicago's Workers' Compensation Program until 2019. Alderperson Edward Burke chaired the Committee for over 30 years. During this time, the Committee processed workers' compensation claims. In most municipalities, an executive department, rather than a legislative committee, manages workers' compensation. On January 2, 2019, Burke was charged with attempted extortion in a criminal complaint filed in the Northern District of Illinois; two days later, he resigned as chair of the Committee.¹⁷ On January 23, 2019, the City transferred responsibility for the Workers' Compensation Program from the Committee to the Comptroller of DOF by amendment to the relevant MCC provisions.¹⁸ On February 1, 2019, the City hired audit and advisory firm Grant Thornton "to assist the City with a review of the [Workers' Compensation] Program to identify potential patterns or instances of fraud, waste, and abuse [...]."¹⁹ Grant Thornton performed the review and issued its report on May 10, 2019. Grant Thornton's recommendations provided the starting point for OIG's performance audit of the Program. The objectives of OIG's audit were to determine whether DOF:

1. implemented corrective actions recommended by Grant Thornton in its 2019 report on the City's civilian Workers' Compensation Program; and
2. publishes an annual report on the activity of the Program, as required by the MCC § 2-32-1410.

OIG found that DOF has substantially implemented Grant Thornton's recommended corrective actions. Specifically:

1. DOF has implemented corrective actions related to fraud risk assessment;
2. DOF has implemented corrective actions related to data analytics;
3. DOF has partially implemented corrective actions related to claims administration; and

¹⁶ Published July 31, 2024. See <https://igchicago.org/wp-content/uploads/2024/07/Audit-of-DOFs-Civilian-Workers-Compensation-Program-Administration.pdf>.

¹⁷ On December 21, 2023, Burke was convicted on racketeering, bribery, and extortion charges. United States Attorney's Office, Northern District of Illinois, "Press Release: Former City of Chicago Alderman Convicted on Federal Racketeering, Bribery, and Extortion Charges," December 21, 2023, accessed May 6, 2024, <https://www.justice.gov/usao-ndil/pr/former-city-chicago-alderman-convicted-federal-racketeering-bribery-and-extortion>.

¹⁸ MCC §§ 2-32-1400 and 2-32-1410.

¹⁹ Grant Thornton LLP, "City of Chicago Workers' Compensation Program Final Report," May 10, 2019, 1, accessed July 25, 2023, <https://www.chicago.gov/content/dam/city/depts/dol/general/AuditofWorkersCompProgram.pdf>.

4. DOF has not yet established a formal peer jurisdiction analytic program.

In addition, OIG found that DOF has published the Program's annual reports, as required by the MCC, but should standardize reporting periods and ensure all required content is included. OIG recommended that DOF continue to implement corrective actions addressing the recommendations made in Grant Thornton's 2019 report. Specifically, OIG recommended that DOF clarify its written procedures to ensure that Program staff:

- calculate the total amount of average weekly wage and temporary disability benefits within three business days of receiving a claim;
- capture recorded claimant statements for each claim, or document their attempts if they are unable to do so;
- complete the filing of first report of injury required under the Illinois Workers' Compensation Act, 820 ILCS 305/6 (2021);
- conduct and document a reserve analysis for all claims; and
- review claims adjusters' initial reviews and ongoing analyses of medical records.

Additionally, OIG recommended that DOF further develop its peer jurisdiction network by establishing a formal analytic program. Finally, OIG recommended that DOF develop a procedure with clear timelines and assigned responsibilities for publishing annual reports containing all information required by the MCC.

In response to OIG's audit findings and recommendations, DOF provided written procedures designed to ensure compliance with Grant Thornton's recommendations and stated that it "has and will continue to direct" its third-party administrator to adhere to the procedures. DOF also stated it was preparing to hire a Workers' Compensation Analyst to "coordinate knowledge exchange with peer organizations," and will begin publishing the Workers' Compensation Annual Report at approximately the same time each year with all information required by the MCC.

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 seven notifications or advisories this quarter.

1 | Compliance with Minority- and Women-Owned Business Enterprise Participation Requirements (C2022-000041812)

OIG notified the Office of the Mayor of concerns with the City's monitoring of concessionaire agreements for compliance with minority- and women-owned business (M/WBE) participation requirements—particularly the M/WBE participation requirements set forth in the 2008 concessionaire agreement between the City and Chicago Parking Meters, LLC (CPM). OIG determined that from 2011 to 2018, CPM claimed MBE credit for a vendor that was not MBE-certified. It was troubling that, for approximately seven years, the City did not identify that CPM had improperly counted the vendor as MBE certified.

OIG determined that no City policies identified a specific party or City entity as being responsible for ensuring compliance with M/WBE requirements in concessionaire agreements. Had a policy or procedure been in place for monitoring the M/WBE compliance of companies operating under concessionaire agreements, it may have been earlier revealed and addressed that a non-MBE certified vendor had been counted toward the parking-meter lease M/WBE participation requirements. As such, OIG recommended that the City implement sufficient oversight processes or procedures to ensure that concessionaires maintain compliance with the City's M/WBE requirements.

In response, the Office of the Mayor stated that the Financial Policy/CFO Division of DOF will work with DPS to cross-check annual M/WBE compliance reports from concessionaires against the City's list of certified vendors. Additionally, the Office of the Mayor stated that a letter was sent to CPM informing them that their annual progress reports will be considered an attestation that the M/WBEs identified in those reports have been certified as required under the agreement.

2 | Appropriate Treatment of Chicago Fire Department Student Trainees (C2022-000043846)

OIG investigated an allegation that multiple CFD members participated in an inappropriate and sexual conversation in the vicinity of a ride-along Emergency Medical Technician (EMT) student at City Colleges of Chicago (CCC). As part of their curriculum, CCC EMT students go on ride-alongs in CFD ambulances. Although OIG's investigation did not reveal evidence sufficient to sustain allegations of misconduct against any specific CFD employee, OIG's investigation did reveal that an inappropriate conversation among CFD members occurred in the presence of the EMT student.

OIG has previously received complaints in which a student allegedly experienced sexually harassing behavior while engaging in a ride-along with CFD. In light of this information, OIG recommended CFD take any further steps it deemed appropriate, including conducting any additional training or education, to address the necessity of behaving appropriately in the presence of ride-along students.

In response, CFD indicated that, in coordination and cooperation with CCC, CFD now requires CFD employees supervising paramedic students during ride-along training to complete a training program prior to any CFD Emergency Medical Services officer serving as a preceptor. The program is run by CCC and provides information and training on maintaining appropriate conduct and environments for the students during their experience riding in a CFD ambulance. CFD indicated its belief that this training is integral toward ensuring an appropriate environment for the paramedic students continuing their learning while with CFD.

3 | Errors in Government Ethics Ordinance (C2022-00000043868)

OIG notified BOE and the Chairperson of the City Council Committee on Ethics and Government Oversight of errors in the City of Chicago GEO, MCC § 2-156 *et seq.*, that OIG has encountered in the course of its work. Specifically, OIG noted that the GEO's bribery provision, MCC § 2-156-142(e), appeared to inadvertently fail to proscribe the payment or offering of bribes calculated to influence the actions of City employees (as opposed to City officials or contractors). OIG noted that bribes designed to influence the actions of City employees are by far the most common form of bribery OIG encounters in its investigative work and that the highly meaningful—and apparently inadvertent—exclusion of employees from a key prong of the bribery ordinance has affected OIG's

work. OIG recommended that this error be rectified by adding employees to the list of individuals whom payments cannot be calculated to influence.

In addition, OIG identified two errors in GEO provisions related to SOFIs. First, OIG noted that MCC § 2-156-160(a)(2) required the disclosure of information regarding SOFI filers' relationship with entities "doing business with the city," without providing a clear explanation of when the entities had to be "doing business with the city" in order to trigger the disclosure requirement. OIG recommended that this error be rectified by an amendment to the GEO and/or SOFI questions making clear that disclosure is required so long as the relevant entity was "doing business with the city" at any point in the preceding calendar year. Second, OIG noted that a portion of the GEO addressing fines for candidates for City office who file false or misleading SOFIs, MCC § 2-156-465(b)(6), cross-referenced a GEO provision that did not exist. OIG recommended that City Council correct the errant cross-reference.

In response, the Chairperson of the Committee on Ethics and Government Oversight introduced legislation, drafted in conjunction with BOE, correcting the errors in the bribery provision and in MCC § 2-156-160(a)(2). The substance of the legislation was subsequently added to a separate piece of legislation, which the City Council passed at its September 18, 2024, meeting.

4 | Department of Streets and Sanitation Gift Policy (C2022-000043928)

OIG investigated an allegation that a DSS laborer was offered and accepted cash in an envelope while on the clock. The investigation did not result in any sustained allegations of misconduct. However, as a result of information learned during the investigation, OIG notified DSS that some DSS laborers had not been informed of the Governmental Ethics Ordinance prohibition against soliciting or accepting gifts. OIG discovered that the DSS Laborer Responsibilities Addendum I in effect during OIG's period of inquiry only prohibited quid pro quo exchanges without mention of the prohibition on gifts, and that laborers did not consistently receive training or information regarding gift prohibitions.

In response, DSS agreed to reinforce its policies on, develop and distribute written communication about, monitor compliance with, and encourage reporting on violations of the prohibition against gift solicitation or acceptance by laborers.

5 | Department of Fleet and Facility Management Overtime Calculation (C2023-000000123)

OIG investigated an allegation that 2FM was counting certain hours when an employee was not physically working when determining 2FM employees' entitlement to overtime pay, in violation of the City of Chicago Personnel Rules. Specifically, credited holiday hours were being counted toward total hours worked for the week of the holiday for purposes of calculating overtime. The investigation did not result in any sustained allegations of misconduct. However, it revealed that City actors had conflicting views on how to interpret the language of a Memorandum of Understanding (MOU) executed between a coalition of labor unions (Coalition) and the City of Chicago, as well as whether that MOU was still in effect. This confusion led to 2FM's no longer adhering to the MOU on the point of overtime calculation, while subject matter experts at DHR told OIG that they believe the MOU is still in force and must be followed.

OIG recommended DOL and DHR review the MOU and provide definitive and uniform guidance to City departments about its effectiveness and the appropriate interpretation of its provisions governing overtime calculation.

DHR responded to OIG that the MOU remained in effect unless it is modified, provided OIG with its assessment of specific passages and terms, and stated that the “City’s position is that the referenced MOU between the City and the Coalition is valid, and the terms and conditions of the memorandum are currently in use.” DHR indicated the issues were referred to DOL without response. DHR did not indicate that it provided definitive and uniform guidance regarding the MOU to any City departments, other than OIG.

DOL responded to OIG stating that, “[i]n this instance, the underlying issue is definitive and uniform guidance governing overtime calculations. Guidance regarding overtime calculations is provided by the Department of Human Resources. On that basis, the Department of Law shall not opine.” DOL did not indicate that it provided definitive and uniform guidance regarding the MOU to any City departments.

6 | Chicago Department of Aviation Handling of Equal Employment Opportunity Complaints (C2023-000000206)

OIG notified CDA regarding concerns of supervisors issuing discipline to employees who have potentially violated the City’s Equal Employment Opportunity (EEO) policy prior to referring such matters as required in the policy, which could limit OIG’s ability to investigate the matters and recommend discipline.

OIG explained that the City’s EEO policy provides specific requirements as to how alleged violations of the policy should be investigated and treated. With many EEO complaints, a complainant may file a complaint with the Diversity and EEO Division or to their department’s EEO liaison. After a determination as to whether the allegations are true or not by the EEO Division, the EEO Division may determine to open an investigation, refer the matter back to the department for further review, or work with the department to address complaints through counseling, written guidance, or other intervention strategies pursuant to Section XII(b) and (d) of the City’s EEO policy.

Additionally, for complaints made by employees of City vendors or contractors alleging inappropriate conduct by City employees, such matters must be forwarded to OIG to be investigated or otherwise addressed. It is important that discipline not be imposed prior to the matter being referred to OIG, or there could be limitations on OIG’s ability to investigate the matter due to administrative double jeopardy.

OIG specifically recommended that, in matters involving EEO complaints made by employees of City vendors or contractors alleging inappropriate conduct by a City employee, CDA either confer with OIG or refer such matters to the EEO Division for subsequent referral to OIG, prior to taking any action, including but not limited to, issuing discipline.

In response, CDA stated that it reminded its labor relations team to ensure that discipline is not issued on matters pending investigation with the OIG and EEO, so as not to bind the investigative authority to any discipline already imposed by the department. CDA’s labor relations team was also instructed to inform supervisors that discipline should not be issued on matters pending investigation by EEO and OIG, and to reach out with questions to OIG and/or EEO if there is

uncertainty regarding whether a matter is pending investigation. Finally, CDA's senior leadership team are to be briefed and reminded that they should consult with the CDA labor relations team before issuing discipline and that they should not issue discipline on any matters that are pending investigation by EEO and OIG.

7 | Office of Public Safety Administration Password Sharing (C2023-000000235)

An OIG investigation established that OPSA employees were sharing logins and passwords for two core Human Resources (HR) databases because they had not been provided with edit access to perform key HR functions. Without the ability to properly code employee status and upload the required supporting paperwork, newly hired City employees would not have received paychecks, and newly retired or on-leave City employees may have continued to receive paychecks. To work around these access issues, OPSA employees shared logins and passwords for accounts with edit access. The edit access delay appears to stem from a litany of issues related to transition of former CPD HR into OPSA. Before OPSA's creation, CPD HR staff relied upon a single employee's login and password as that employee had the sole account with edit access to the City's HR databases. Additionally, the older HR software will intermittently mass revoke the access of OPSA employees following internal changes to the system's access hierarchy.

OIG found that the login and password sharing violated the former Department of Innovation and Technology's (now the Department of Technology and Innovation (DTI)) Information Security and Technology Policy, Subsections 7.2.3(e) (passwords must not be disclosed to anyone); 7.2.3(f) (group passwords and/or shared passwords are explicitly prohibited); and 7.2.3(g) (all passwords are to be treated as *Confidential* information). OIG did not bring sustained misconduct allegations because the individual OPSA employees who violated these policies were placed in the position of being functionally required to violate these policies in order to keep OPSA functioning and core city services running.

OIG notified OPSA and DTI of its findings and recommended that OPSA and DTI prioritize finding a solution to the technology issues interfering with OPSA employees' ability to receive and maintain edit access abilities to the City's HR databases. In response, OPSA and DTI informed OIG that the agencies partnered to successfully provide every OPSA HR employee with edit access to the necessary HR databases. Additionally, DTI is working to resolve the technology issues that intermittently mass revoke access to one of the older HR databases and is in the process of planning for its eventual replacement.

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 one additional report this quarter.

1 | Chicago's Campaign Finance Rules: An Explainer on the Law and Its Gaps (C2023-000000015)

OIG released a report explaining the City's current campaign finance laws and gaps in those laws. The City has several laws in place to prevent "pay-to-play" schemes with City officials or candidates in the form of campaign finance restrictions. These laws limit the amount of money that a person with an interest in City business can contribute to a City official's political campaign or to a

candidate for a City office. Although campaign finance laws are designed to protect against corruption or the appearance of corruption, gaps in City law permit certain entities who have an interest in City business to contribute unlimited amounts of funds to elected City officials and candidates. OIG's explainer aims to provide Chicagoans with basic information about the current state of the City's campaign finance laws, and what they do, and, pointedly, do not prohibit.

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 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 review 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 are in compliance with the Contractor Policy. This review includes analyzing contracts for common-law employee risks and ensuring the inclusion of *Shakman*-related boilerplate language. OIG shall report on all service contracts or agreements received and reviewed by OIG Compliance. This quarter, OIG did not complete review of any contracts. 96 contracts are under review.

2 | Hiring Related Reviews Performed by OIG

a | Contacts by Hiring Departments

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

b | Contacts by the Fire Department

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

e | Exemptions

OIG reviews adherence to exemption requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²⁰ This quarter, OIG received notification of 48 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 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 five senior manager hiring packets and found no violations.

²⁰ 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.

g | Selected Department of Law Hiring Sequences

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

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

OIG receives notifications of disciplinary decisions, arbitration decisions, and potential grievance settlement agreements that may impact the procedures outlined in the City's Employment Plans. This quarter, OIG received and reviewed one resolution of grievance by settlement.

i | Modifications to Class Specifications,²¹ Minimum Qualifications, and Screening and Hiring Criteria

OIG may review modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG received and reviewed two notifications of proposed modifications to minimum qualifications.

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 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 written rationale related to a no consensus selection.

m | Chicago Police Department Emergency Appointments

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

²¹ According to the Employment Plan, "Class specifications" are descriptions of the duties and responsibilities of a class of positions that distinguish one class from another. They are, in effect, the general descriptions utilized to determine the proper level to which a position should be assigned, and they include the general job duties and minimum qualifications of the position. Class specifications shall include sufficient detail so as to accurately reflect the job duties.

n | Chicago Fire Department Emergency Appointments

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

3 | Hiring Related Audits Performed by OIG

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

This quarter, OIG conducted audits of five hiring sequences across four City departments. OIG selected these hiring sequences based on risk factors such as past errors and complaints. Each quarter, OIG may audit in-process and completed hiring sequences conducted by the following departments or their successors: AIS, CDA, DOB, DSS, CDOT, the Department of Water Management (DWM), and six other City departments selected at the discretion of OIG. For 2024, OIG selected the following six additional departments: the Chicago Treasurer's Office, the Office of the City Clerk (OCC), the Chicago Department of Public Health (CDPH), OPSA, OEMC, and the Department of Family and Support Services (DFSS). The table below details the hiring sequences audited by OIG this quarter.

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

Department	Title	Findings	OIG Recommendation	Department Action
Office of Emergency Management and Communication	Traffic Control Aide	No violations or errors were found.	N/A	No response required.
Department of Aviation	Administrative Services Officer II	No violations or errors were found.	N/A	No response required.
Department of Fleet and Facility Management	Director of Facilities Management - Real Estate	No violations or errors were found.	N/A	No response required.
Office of Emergency Management and Communication	Police Communications Operator I	No violations or errors were found.	N/A	No response required.
Chicago Police Department	Digital Media Specialist	CPD selected three candidates for a second	CPD work with OPSA and DHR to ensure that the sequences comply with the Plan.	CPD concurred with OIG, and for all future hiring sequences covered by the City Employment

		round of interviews without conducting a consensus meeting, in violation of the City's Employment Plan.		Plan, including senior manager titles, CPD will work with OPSA and DHR to ensure that the sequences comply with the Plan.
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OIG Compliance Case No. C2024-000000140 – Chicago Police Department Violation

On August 15, 2024, OIG notified the Superintendent of Police of a City of Chicago Employment Plan violation arising from the candidate selection phase of the Digital Media Specialist hiring sequence in CPD. OIG identified the violation after it initiated a discretionary audit of the hiring sequence. During its audit, OIG found that CPD selected three candidates for a second round of interviews without conducting a consensus meeting.

Chapter V(B)(12) of the City of Chicago Employment Plan (the Plan) requires “a [c]onsensus [m]eeting led by a DHR recruiter...” be conducted after interviews have concluded. Only at this consensus meeting may “interviewers decide . . . that more information is needed before they can make a successful decision” and so they may “conduct second round interviews with all or some of the Candidates who were interviewed in the first round.” City of Chi. Hiring Plan Ch. V(B)(15). As described above, CPD selected three candidates to proceed to a second round of interviews without conducting a consensus meeting. CPD concurred with OIG recommendations and stated “that, for all future hiring sequences covered by the City of Chicago Employment Plan, including senior manager titles, that the CPD will work with OPSA and DHR to ensure that the sequences comply with the Plan.”

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 audited one test administration for covered positions within CPD and did not observe any violations or errors.

d | Chicago Fire Department Testing

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

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 conducted one audit of a CPD hiring sequence and found no violations or errors.

g | Selected Chicago Fire Department Hiring Sequences

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

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

OIG is required to conduct audits of CPD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for 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 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 conducted one audit of a CFD referral list.

l | Chicago Police Department Acting Up

OIG is required to audit compliance with Chapter X of CPD's Hire 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 Hire 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 Hire Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CPD's Hire 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 Hire Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CFD's Hire 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 11 hiring sequences across seven City departments. The table below shows the breakdown of monitoring activity by department.²²

Table 12: Hiring Sequences Monitored in Q3

Department	Intake Meetings Monitored	Tests Monitored ²³	Interview Sets Monitored ²⁴	Consensus Meetings Monitored	Violations	Errors
Chicago Department of Aviation	0	0	1	0	0	0
Chicago Fire Department	0	3	1	0	0	0
Chicago Police Department	0	1	1	0	0	0

²² If a department is not included in this table, OIG did not monitor any elements of that department's hiring sequence(s).

²³ Tests monitored are totaled by exam type, i.e. Police Officer, Detective, etc.; not total number of tests monitored for exam type.

²⁴ Interview Sets Monitored are totaled by positions monitored; not total number of interviews monitored.

Department of Streets and Sanitation	0	0	0	1	0	0
Department of Water Management	0	0	0	1	0	0
Chicago Department of Public Health	0	0	1	0	0	0
Chicago Department of Transportation	0	0	1	0	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 received three new escalations, which are pending review. Additionally, OIG referred one escalation to the DHR commissioner for resolution, and closed one escalation without investigation, both of which are summarized below this table.

Table 13: Escalations Received in Q3 2024

Escalation Status	Number of Escalations
Newly Initiated	3
Pending	3
Referred to DHR Commissioner	1
Closed with Investigation	0
Closed without Investigation ²⁵	1

OIG Intake No. 2024-000005774 – Department of Technology and Innovation

On May 20, 2024, OIG received an escalation related to DTI's accounting technician hiring sequence, stating that the department did not use interview questions that were approved by DHR. The City of Chicago's Employment Plan provides that "OIG shall evaluate the circumstances surrounding the escalation and may do one or more of the following: conduct a review of the hiring sequence, refer the matter to the [Department of Human Resources] DHR Commissioner or appropriate department head for resolution, and/or refer the matter to the Investigation Section of OIG." OIG has evaluated the circumstances surrounding the escalation and determined that it

²⁵ 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.

should refer the escalation to the DHR Commissioner for resolution, and did not take any further action.

OIG Compliance Case No. C2024-000000089 – Chicago Department of Aviation Violation

On March 5, 2024, OIG was notified by a recruiter with DHR that for the hiring sequence for the position of clerk IV with CDA, CDA did not offer interviews to all candidates on the interview list which had been provided by the recruiter.

After all interviews were completed and job offers extended, the City employee responsible for contacting applicants realized that two applicants were never called to interview. The employee responsible notified DHR and OIG and then contacted the applicants to offer interviews. The applicants each declined. As the violation was the result of a clerical error by the employee, OIG did not have any recommendations for CDA.

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 2024

Complaint Status	Number of Complaints
Newly Initiated	24
Pending	20
Closed ²⁶	0
Declined	4

OIG Compliance Case No. C2024-000000016 – Department of Assets, Information, and Services Violation

On February 15, 2024, OIG reviewed records which indicated that a former employee of AIS had been served with a notice of termination on October 20, 2023, but had not been subsequently recategorized as "Terminated" in the City's Human Resources tracking systems. The employee

²⁶ Complaints categorized as Closed are considered Closed after OIG reviews the complaint and issues a finding with or without recommendations to the respective department.

ceased working for the City yet remained in an “Active” status until December 2023, when OIG contacted department representatives, inquiring about the issue.

OIG contacted DOF to review the employee’s payroll records following their termination. OIG learned that the employee did not receive ordinary pay, but because they remained “Active” status, they were awarded and paid for 16 hours vacation time after their termination notice had been served.

OIG recommended that DHR and 2FM review their end of employment processes to determine which necessary steps were omitted in this circumstance, or which communications were misunderstood. DHR and 2FM responded that they would each reinforce these procedures in their bimonthly meetings across all City departments.



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, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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