



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Quarterly Report: Fourth Quarter 2024

January 15, 2025

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO

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

Enclosed for your review is the public report on the operations of the City of Chicago Office of Inspector General (OIG) during the fourth quarter of 2024, filed with City Council pursuant to Section 2-56-120 of the Municipal Code of Chicago (MCC).

OIG received nearly 11,000 intakes in 2024—an increase of more than 30% over 2023. I sincerely believe that to be good news. We are not receiving more intakes because more things are going wrong in City government. We are hearing from more Chicagoans, more often because more people know who we are, what we do, and where to find us—and they’re willing to believe that, if something goes wrong or if something could be improved, there’s a government agency which will help.

We use the information we receive in intakes to prioritize and shape projects, to inform and focus transparency initiatives, and to identify misconduct by bad actors in City government. This quarter, we report ten administrative investigations in which we identified misconduct by those under our jurisdiction. In seven of those ten investigations, we recommended that subjects be either terminated from their City jobs or designated as ineligible for rehire by the City. It is a great privilege to work in public service, and our work this quarter reflects the belief that those who abuse the public trust ought not continue to enjoy that privilege.

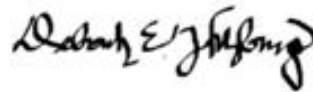
Sustained administrative investigations reported this quarter include ones in which OIG found that:

- Multiple members of the Chicago Fire department (CFD) falsified reports, made misrepresentations to the Chicago Police Department (CPD), and took other steps to provide “professional courtesy” to a CFD supervisor who was found slumped over the wheel of their vehicle;
- A Department of Finance employee misused their access to City systems to award themselves more than \$6,500 worth of unearned compensatory time;
- A police communications operator with the Office of Emergency Management and Communication violated the City’s residency rule, fraudulently obtained loan funds from the federal Payroll Protection Program (PPP), and lied to OIG;
- A Public Building Commission (PBC) commissioner improperly used their position in an attempt to influence PBC employees to engage a company in which the commissioner had a financial interest, and then failed to cooperate with OIG;
- Before joining CPD, a former CPD member fraudulently received PPP funds and lied to receive a housing voucher; and
- A Department of Streets and Sanitation ward superintendent attempted to sell an illegal machine gun to an undercover law enforcement agent while on City time and using their City vehicle.

There is no place in the government Chicagoans deserve for such conduct. We will continue to aggressively pursue those who contribute to the deficit of legitimacy at which the City operates, and we will fiercely guard OIG’s independence so that we can continue to do so effectively. To be sure, the cases we report this quarter make clear that there is a persistent need for confidential, independent misconduct investigations into wrongdoing at all levels and in all corners of City government, and we will remain vigilant against threats to OIG’s ability to carry out that work.

As always, I am grateful for the hard work and dedication of my colleagues at OIG.

Respectfully,

A handwritten signature in black ink, appearing to read "Deborah E. Witzburg". The signature is fluid and cursive, with the first name "Deborah" being more prominent.

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 October 1, 2024, through December 31, 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, advisories, and other reports are directed to the appropriate agency for comment and response, and are then [published on the OIG website](#). From time to time, OIG also issues notifications to a City department for attention and comment; those notifications are summarized, along with any response, in the ensuing quarterly report.

OIG's data analysis and visualization work is available on its [Information Portal](#).

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

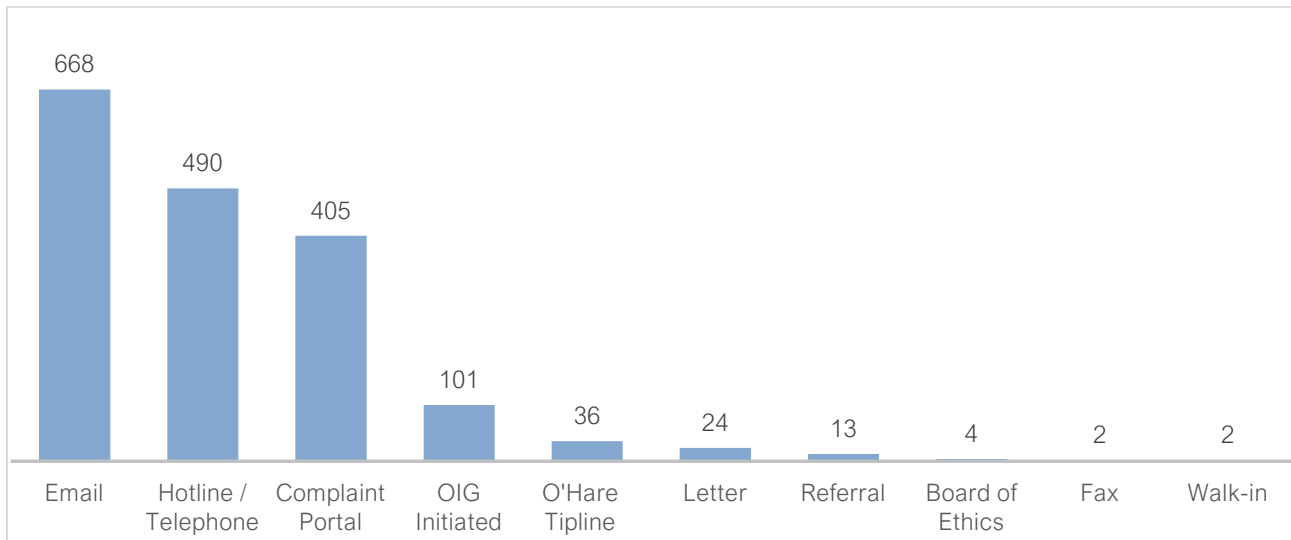
¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 1,745 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 Q4 2024, OIG made 284³ intake referrals to City departments⁴ or other agencies.⁵ The total number of referrals (see chart below) may be greater than the number of OIG referred intakes, as a single OIG intake may be referred to more than one agency.

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

³ OIG referred 284 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 292 referrals.

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

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

Table 1: Referred Intakes

Referred Agency	Number of Referrals
Chicago Police Department	134
Chicago Civilian Office of Police Accountability	78
Chicago Department of Human Resources	17
Chicago Fire Department	12
Chicago Department of Water Management	7
Chicago Department of Aviation	6
Chicago Department of Streets and Sanitation	6
Chicago Department of Transportation	3
Chicago Office of Emergency Management and Communications	3
Chicago Public Schools Office of Inspector General	3
Chicago Park District Office of Inspector General	2
Illinois Department of Human Services Office of Inspector General	2
Westmont Police Department	2
Chicago Department of Fleet and Facility Management	1
Chicago Housing Authority Office of Inspector General	1
Illinois Office of Executive Inspector General	1
City Colleges of Chicago Office of Inspector General	1
Cook County State's Attorney	1
Country Club Hills Police Department	1
Illinois Office of Attorney General	1
Livingston Police Department	1
Los Angeles Police Department	1
Manteca Police Department	1
Modesto Police Department	1
Richton Park Police Department	1
Rockford Police Department	1
Tracy Police Department	1
U.S. Customs and Border Protection	1
U.S. Department of Homeland Security Office of Inspector General	1
Woodford County Sheriff	1
Total	292

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 Q4 2024, OIG discontinued 892 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do Not Process	365
Inquiries	334
Spam	193
Total	892

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 Q4 2024, OIG declined ten 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	6
Complaint Lacks Foundation	3
Complaint of the Same Conduct Already Received	1
Total	10

III | Investigations

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

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

A | Misconduct Investigations

1 | Investigative Activity This Quarter

As of the close of this quarter, OIG has 278 active investigations. During Q4 2024, OIG initiated 55 investigations, of which 42 were self-initiated, and concluded 15 investigations.

2 | Open Matters

OIG's 278 currently active misconduct investigations involve a range of subjects and types of alleged misconduct.

Table 4: Subject of Investigations

Subject of Investigations	Number of Investigations ⁷
City Employees	231
Elected Officials	19
Contractors, Subcontractors, and Persons Seeking Contracts	17
Licensees	3
Appointed Officials	1
Other	7
Total	278

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	276
Ineffectiveness	1
Waste/Inefficiency	1
Total	278

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

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

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

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

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

b | Investigations Open Over Twelve Months

As required by MCC § 2-56-080, OIG reports each quarter on active investigations which have been open for more than 12 months. Of OIG's 278 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, Q4 2024

Case ID ⁸	Legacy ID	General Nature of Allegations
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
C2022-000042921	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
C2022-000043944	N/A	Duty disability fraud
C2022-000043961	N/A	Ethics violation

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

Case ID ⁸	Legacy ID	General Nature of Allegations
C2022-000044042	N/A	Paycheck Protection Program (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
C2023-000000093	N/A	Retaliation
C2023-000000102	N/A	Ethics violation
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
C2023-000000120	N/A	Residency violation

Case ID ⁸	Legacy ID	General Nature of Allegations
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
C2023-000000183	N/A	Fraud
C2023-000000189	N/A	Theft
C2023-000000194	N/A	Theft
C2023-000000199	N/A	Ethics violation
C2023-000000207	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
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
C2023-000000272	N/A	PPP fraud
C2023-000000273	N/A	PPP fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
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
C2023-000000298	N/A	Bribery
C2023-000000324	N/A	Ethics violation
C2023-000000325	N/A	Firearms in the workplace violation
C2023-000000332	N/A	PPP fraud
C2023-000000335	N/A	Time theft
C2023-000000336	N/A	Residency violation
C2023-000000344	N/A	Firearms in workplace violation
C2023-000000357	N/A	Ethics violation
C2023-000000358	N/A	Ethics violation
C2023-000000359	N/A	Violence in the workplace violation
C2023-000000360	N/A	Residency violation

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 Q4 2024, OIG received no new complaints related to PBC.

B | Sustained Administrative Investigations

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

Below (Table 7) is an overview of sustained investigative matters and, pursuant to MCC § 2-56-110, deidentified synopses of administrative investigations completed and eligible to be reported as sustained investigative matters. A matter is not eligible for reporting until, pursuant to the MCC, the

relevant City department has had 30 days (with the potential for an extension of an additional 30 days) to respond to OIG's findings and recommendations,⁹ and to inform OIG of what action(s) the department intends to take. Departments must follow strict protocols set forth in the City's Personnel Rules, Procurement Rules, and/or applicable collective bargaining agreements, prior to imposing discipline or other corrective action.¹⁰

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
C2022-000040842	Department of Buildings	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR).	The Department of Buildings (DOB) preliminarily agreed with OIG's recommendations to discharge the subject and requested discharge charges from the Department of Law (DOL).
C2022-000041246	Department of Streets and Sanitation	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Streets and Sanitation (DSS) terminated the subject.
C2022-000043833	Office of Emergency Management and Communications	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Office of Emergency Management and Communications (OEMC) preliminarily agreed with OIG's recommendations to discharge the subject and requested discharge charges from DOL.
C2022-000043937	Public Buildings Commission	Provide the summary report to the Chairman of the Board and	PBC's Executive Director agreed that the Code of Ethics did

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

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

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
		recommend discipline against the subject in a manner that is determined to be appropriate; amend the Code of Ethics to remedy its failure to address commissioner misconduct.	not provide for sanctions against commissioners and recommended that the PBC Board of Commissioners amend the Code of Ethics to do so.
C2022-000043956	Chicago Department of Aviation	Discharge the subject in accordance with the residency ordinance.	The Chicago Department of Aviation (CDA) preliminarily agreed with OIG's recommendations to discharge the subject and requested discharge charges from DOL.
C2022-000043968	Chicago Fire Department	Issue a formal determination that OIG's investigation substantiated serious misconduct by assistant deputy chief paramedic and firefighter and refer them for placement on the ineligible for rehire list maintained by DHR; discharge firefighter/paramedic, firefighter/EMT #1, and captain/EMT and refer them for placement on the ineligible for rehire list maintained by DHR; impose discipline against firefighter/EMT #2 and assistant deputy chief paramedic #2 commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations; require the Chicago Fire Department (CFD) district chief to attend a training on CFD's Code of Professional	CFD declined to refer the assistant deputy chief paramedic and firefighter for placement on the ineligible for rehire list; CFD issued a six-day suspension to the captain/EMT; CFD issued written reprimands to the firefighter/paramedic and firefighter/EMT #1; CFD issued an oral reprimand to firefighter/EMT #2; and CFD provided counseling to assistant deputy chief paramedic #2 and the district chief.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
		Conduct, the City's Personnel Rules, and Region 11 EMS policies.	
C2022-000044411	Department of Planning and Development; Board of Ethics	OIG recommended that the Department of Planning and Development (DPD) note the findings of OIG's investigation in the personnel file of the subject, a former employee; OIG recommended that the Board of Ethics (BOE) find there is probable cause to believe that the subject violated the GEO and consider appropriate sanctions (including consideration of whether their conduct amounts to a minor violation).	DPD noted the findings of OIG's investigation in the subject's personnel file; BOE found probable cause to believe that the former employee violated MCC § 2-156-060 and assessed a fine of \$1,500.
C2023-000000011	Chicago Department of Aviation	Impose discipline against the subject commensurate with the gravity of the violations, past disciplinary record, and any other relevant considerations.	CDA met with DOL to receive a recommendation on discipline; CDA previously issued the subject an oral reprimand for similar behavior and advised OIG that CDA would meet with the subject to issue progressive discipline for this matter.
C2023-000000297	Chicago Police Department	Issue a formal determination on the violation, designate the subject, a former employee, as having resigned under inquiry, and refer them for placement on the ineligible for rehire list maintained by DHR.	CPD referred the subject for placement on the ineligible for rehire list maintained by DHR.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000316	Department of Finance	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Finance (DOF) preliminarily agreed with OIG's recommendations to discharge the subject and requested discharge charges from DOL.

1 | Acceptance of Improper Gift (C2022-000040842)

An OIG investigation established that a DOB electrical inspector accepted an improper gift from an electrical contractor. DOB has a policy which prohibits employees from accepting gifts from consultants, design professionals, contractors, expeditors, and/or DOB customers. Here, the subject met with the contractor at a bar and accepted a \$200 payment from the contractor after providing advice to the contractor regarding certain electrical projects.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII Section 1, subsection 48 (violating any departmental regulations, rules or procedures), and subsection 50 (conduct unbecoming a public employee).

OIG recommended that DOB terminate the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DOB agreed with OIG's findings regarding the rules violated. DOB requested DOL prepare discharge charges.

2 | Possession and Attempted Sale of an Illegal Machine Gun; Official Misconduct; Misuse of City Property; Violation of Vehicle Policy; Conduct Unbecoming (C2022-000041246)¹¹

An OIG investigation established that a DSS ward superintendent attempted to sell an illegal machine gun to an undercover law enforcement agent while on City time and while using their City vehicle. Following the attempted sale, the ward superintendent allowed law enforcement to search the home they were living in, and law enforcement recovered the machine gun. The ward superintendent stated the gun was an heirloom from their grandfather.

OIG found that the ward superintendent's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsections 15 (engaging in any act or conduct prohibited by the Illinois Compiled Statutes, specifically 720 ILCS 5/24-1(a)(7)(i), 720 ILCS 5/8-4, and 720 ILCS 5/33-3(a)(2)); 19 (use of City of Chicago property for unauthorized purposes); 48 (violating any departmental policies); and 50 (conduct unbecoming a City employee).

¹¹ OIG concluded this case during the second quarter of 2022, but withheld a summary of its administrative investigation until the conclusion of a related criminal matter. See Second Quarter Report at page 15, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Q2-2022-Report.pdf>. Because that criminal proceeding concluded during the fourth quarter of 2024, OIG is including this summary.

OIG recommended that DSS terminate the ward superintendent and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DSS terminated the ward superintendent and requested the ward superintendent be placed on the ineligible for rehire list.

3 | Residency; False or Misleading Information on Documents Provided by the City; Fraudulent Paycheck Protection Program Loan; False Statements in an OIG Investigation (C2022-000043833)

An OIG investigation established that an OEMC police communications operator failed to be an actual resident of the City of Chicago by being domiciled in Indiana and failed to disclose their actual address in paperwork upon being hired with the City. The investigation also established that the subject illegally received funds totaling over \$40,000 from the federal PPP based on fraudulent representations made by the employee on Internal Revenue Service (IRS) Form 1040 Schedule C documents, in violation of a variety of federal statutes. Furthermore, the subject provided false, inaccurate, and deliberately incomplete statements to OIG investigators during the course of the investigation.

OIG found that the subject violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 6 (failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City), 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 Municipal Code of the City of Chicago... or federal statutes, specifically MCC § 2-152-050, 18 U.S.C. § 641, 18 U.S.C. § 1001, 18 U.S.C. § 1014 and 18 U.S.C. § 1343), Subsection 41 (failure to be an actual resident of the City of Chicago), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that OEMC discharge the subject and refer them for placement on the ineligible for rehire list. In response, OEMC agreed with OIG's findings regarding the rules violated. OEMC preliminarily agreed with OIG's recommendation to discharge the subject and refer them for placement on the ineligible for rehire list. OEMC requested DOL prepare discharge charges.

4 | Improper Influence; Failure to Cooperate (C2022-000043937)

An OIG investigation established that a commissioner of the PBC used their position in an attempt to influence employees of PBC to engage a company for PBC projects that would have provided the subject with an economic interest distinguishable from that of the general public. Specifically, the subject contacted PBC employees in an effort to get PBC to contract with the provider of a sanitation technology. At the time of the subject's contacts with PBC employees, the subject was the chairman of a company engaged to provide financial advisory services to the sanitation technology company, and the subject stood to gain commissions in the event that the company successfully sold the sanitation technology. Additionally, during the course of OIG's investigation, the subject willfully failed to provide documentation requested by OIG that was relevant to their financial interests in the contemplated transactions.

OIG found that the subject's conduct violated Section 202 of PBC's Code of Ethics (no Official or Employee shall make, participate in making, or in any way attempt to use his or her position to influence any Commission decision or action in which he or she knows or has reason to know that he or she has an Economic Interest distinguishable from that of the general public). The subject's

failure to cooperate with OIG violated the “Intergovernmental Agreement Between the Public Building Commission and the City of Chicago Providing that the City’s Office of Inspector General will also Serve as the Commission’s Inspector General,” specifically paragraph nine (duty to cooperate). OIG further noted that the PBC Code of Ethics does not address sanctions for PBC commissioners who violate the Code. OIG accordingly recommended that the PBC Executive Director provide the summary report to the Chairman of the Board and recommend discipline against the subject in a manner that is determined to be appropriate. OIG further recommended that PBC amend the Code of Ethics to remedy its failure to address commissioner misconduct.

In response, PBC neither agreed nor disagreed with OIG’s finding that the above misconduct occurred; that is, PBC was silent on OIG’s findings against the subject. PBC agreed that the Code of Ethics, as written, does not provide any sanctions for commissioners who violate the Code. PBC further noted that no actual financial transaction occurred, so it could not pursue remediation of a pecuniary benefit obtained by the subject. PBC’s response further reflects a recommendation that the PBC Board of Commissioners consider an amendment to the Code of Ethics that would enable sanctions against commissioners who violate the Code.

5 | Residency Violation; Unapproved Secondary Employment (C2022-000043956)

An OIG investigation established that a CDA motor truck driver resided outside of the City of Chicago and engaged in impermissible secondary employment. Specifically, OIG’s investigation established that the subject resided in Matteson, Illinois, and that they operated a private trucking business without required departmental approval.

OIG found that the subject violated City of Chicago Personnel Rules XVIII, Section 1, Subsections 15 (engaging in conduct violative of the MCC), and 41 (failure to be an actual resident of the City of Chicago), as well as the residency requirement in § 2-152-050 of the MCC. OIG further established by a preponderance of the evidence that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 42 (failure to comply with secondary employment requirements), and City of Chicago Personnel Rule XX, Section 3 (requiring employees to obtain department permission prior to engaging in outside employment).

OIG recommended that CDA discharge the subject in accordance with the City’s Residency Ordinance. CDA agreed with OIG’s findings regarding the rules and law violated. CDA preliminarily agreed with OIG’s recommendation and requested DOL prepare discharge charges.

6 | False Official Report; Emergency Medical Services (EMS) Act Violations; Preferential Treatment; Failure to Report (C2022-000043968)

An OIG investigation established that members of CFD falsified a patient care report, made misrepresentations to CPD, and took other steps to prevent discovery of the fact that a CFD assistant deputy chief paramedic was found unconscious and slumped over the wheel of their vehicle at an intersection and driven away from the scene by an on-duty CFD captain-EMT. On May 29, 2022, a CFD firetruck was dispatched to an intersection after a civilian called 911 and reported seeing a driver unconscious in their vehicle at a traffic light. Five CFD members arrived at the scene on the firetruck: a captain-EMT, a firefighter, a firefighter/paramedic, and two firefighter/EMTs (firefighter/EMT #1 and firefighter/EMT #2). They found the unconscious driver was the CFD assistant deputy chief paramedic, who was slumped over the wheel of their vehicle. The captain-EMT and firefighter/paramedic recognized the assistant deputy chief paramedic and woke them up.

The captain-EMT then told firefighter/EMT #1 and firefighter/EMT #2 to return to the firetruck and canceled a call for an ambulance which had been dispatched and was headed to the scene.

The captain-EMT and firefighter/paramedic helped move the assistant deputy chief paramedic to the rear seat of their vehicle. The captain-EMT then drove the assistant deputy chief paramedic in the assistant deputy chief paramedic's vehicle back to a nearby fire station. The firefighter/paramedic created a patient care report that stated, "no patient found at scene" at the captain-EMT's instruction, which the firefighter/paramedic and firefighter/EMT #1 signed. As the captain-EMT and the assistant deputy chief paramedic drove away, a dispatched CPD vehicle arrived on the scene seconds later. The firefighter/paramedic told the arriving CPD members that there was no patient found at the scene, and CPD left.

When the assistant deputy chief paramedic and the captain-EMT arrived at the fire station, the assistant deputy chief paramedic entered an office and fell asleep in a chair for approximately one and a half hours. The spouse of the assistant deputy chief paramedic, who is also a CFD member and serves in the same title (assistant deputy chief paramedic #2), was working that morning at the same fire station. Assistant deputy chief paramedic #2 saw the assistant deputy chief paramedic inside the fire station. They left together in a car and later discussed the incident, but neither reported it to any appropriate City authority.

Several CFD members stated that the assistant deputy chief paramedic fell asleep while driving because of a long work shift and was driven back as a "professional courtesy" shown toward certain employees; CFD members also acknowledged that CFD policy may not allow such "professional courtesy". A CFD district chief also said the contemporaneously created patient care report may have intentionally stated that there was no patient found at the scene as a "professional courtesy." OIG received information that the assistant deputy chief paramedic was intoxicated at the time of the incident. Because the assistant deputy chief paramedic was quickly transported away from the scene by the captain-EMT; the dispatched ambulance and police vehicles were waved away; and the captain-EMT, the firefighter/paramedic, and firefighter/EMT #1 created a false patient care report, OIG was unable to determine whether the assistant deputy chief paramedic was in fact intoxicated or whether they had operated the vehicle in which they were found while intoxicated.

During the investigation, the assistant deputy chief paramedic retired from CFD. OIG recommended that CFD issue a formal determination that OIG's investigation substantiated serious misconduct by the assistant deputy chief paramedic and refer them for placement on the ineligible for rehire list maintained by DHR for violating City Personnel Rules XVIII, Section 1, Subsection 52 (having other City employees perform services for unauthorized purposes or accepting the benefits of such performance). CFD disagreed with OIG's finding, disagreeing with OIG's determination that a benefit had been afforded to the assistant deputy chief paramedic. CFD further stated that the assistant deputy chief paramedic was not a patient and there was no evidence that they were intoxicated. CFD therefore declined to refer the assistant deputy chief paramedic for placement on the ineligible for rehire list.

OIG recommended that CFD discharge the captain-EMT and refer them for placement on the ineligible for rehire list maintained by DHR for violating City Personnel Rules XVIII, Section 1, Subsections 2 (leaving a work site without proper authorization), 6 (providing a false or misleading answer in any document provided by the City), 11 (falsification of employment records), 27 (giving

preferential treatment in the course of employment to any person unless authorized by law), 46 (failure to report); Code of Professional Conduct of CFD Sections 2.22 (leaving a post of duty without being properly relieved), 2.29 (making a false official report); CFD General Order 07-004 (ALS Fire Companies shall not, at any time or under any circumstances, be utilized to transport patients); the Region 11 Chicago EMS System Policy on Documentation Requirements (whenever contact with a patient is made regardless of treatment or transport, an approved PCR shall be completed in full for each patient); and 210 ILCS 50/3.170 (falsification of documents under the Emergency Medical Services (EMS) Systems Act). In response, CFD agreed with each of OIG's findings regarding the rules, policies, and laws violated with the exception of the violations of Personnel Rule XVIII, Section 1, Subsection 2, CFD Code of Professional Conduct Section 2.22, and CFD General Order 07-004. CFD issued a 6-day suspension.

OIG recommended that CFD discharge the firefighter/paramedic and refer them for placement on the ineligible for rehire list maintained by DHR for violating City Personnel Rules XVIII, Section 1, Subsections 6 (providing a false or misleading answer in any document provided by the City), 11 (falsification of employment records), 27 (giving preferential treatment in the course of employment to any person unless authorized by law), 46 (failure to report); Code of Professional Conduct of CFD Section 2.29 (making a false official report); the Region 11 Chicago EMS System Policy on Documentation Requirements (whenever contact with a patient is made regardless of treatment or transport, an approved PCR shall be completed in full for each patient); and 210 ILCS 50/3.170 (falsification of documents under the EMS Act). In response, CFD stated that it agreed with each of OIG's findings regarding the rules, policies, and law violated with the exception of Personnel Rule XVIII, Section 1, Subsection 11. CFD issued a written reprimand.

OIG recommended that CFD discharge firefighter/EMT #1 and refer them for placement on the ineligible for rehire list maintained by DHR for violating City Personnel Rules XVIII, Section 1, Subsections 6 (providing a false or misleading answer in any document provided by the City), 11 (falsification of employment records), 46 (failure to report); Code of Professional Conduct of CFD Section 2.29 (making a false official report); the Region 11 Chicago EMS System Policy on Documentation Requirements (whenever contact with a patient is made regardless of treatment or transport, an approved PCR shall be completed in full for each patient); and 210 ILCS 50/3.170 (falsification of documents under the EMS Act). In response, CFD stated that it agreed with each of OIG's findings regarding the rules, policies, and law violated with the exception of Personnel Rule XVIII, Section 1, Subsection 11. CFD issued a written reprimand and an oral reprimand.

OIG recommended that CFD impose discipline against firefighter/EMT #2, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations for violating City Personnel Rules XVIII, Section 1, Subsection 38 (inattention to duty); and Code of Professional Conduct of CFD Section 2.26 (inattention to duty). In response, CFD stated that it agreed with each of OIG's findings regarding the rule and policy violated. CFD issued an oral reprimand.

During the investigation, the firefighter retired from CFD. OIG recommended that CFD issue a formal determination that OIG's investigation substantiated serious misconduct by the firefighter and refer the firefighter for placement on the ineligible for rehire list maintained by DHR for violating City Personnel Rules XVIII, Section 1, Subsection 46 (failure to report). In response, CFD disagreed with OIG's findings as to the rule violated. CFD declined to recommend the firefighter for placement on the ineligible for rehire list.

OIG recommended that CFD impose discipline against assistant deputy chief paramedic #2, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations for violating City Personnel Rules XVIII, Section 1, Subsection 50 (conduct unbecoming); and Code of Professional Conduct of CFD at pages 2-3 (conduct unbecoming). In response, CFD disagreed with each of OIG's findings as to the rule and policies violated, but nonetheless provided counseling to the member.

OIG recommended that a CFD district chief attend a training on CFD's Code of Professional Conduct, the City's Personnel Rules, and Region 11 EMS policies to clarify any uncertainty around permissible "professional courtesies." In response, CFD provided counseling.

7 | Misuse of City Property (C2022-000044411)

An OIG investigation established that a former coordinator of economic development II for DPD used their official City photograph in support of their 2023 Chicago aldermanic campaign. When the official photograph was transmitted to the subject by email, it was accompanied by an admonition that the photograph could not be used in "political materials" or for "personal" purposes. The subject admitted that he "took the risk" in using the photograph in connection with his political campaign.

The subject was interviewed by OIG and admitted to the misuse of their City photograph. The subject resigned during OIG's investigation. OIG found that the subject's misuse of their City photograph violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 19 (use of City of Chicago property for unauthorized purposes), as well as the GEO, MCC § 2-156-060, which prohibits unauthorized use of City property.

Accordingly, OIG recommended that, pursuant to its authority under MCC § 2-156-385 and § 2-156-465, BOE find probable cause to believe that the subject violated the GEO and consider appropriate sanctions (including consideration of whether the conduct amounts to a minor violation). OIG further recommended that DPD note the findings of this investigation in the former employee's personnel file.

In response, DPD agreed with OIG's recommendation and placed OIG's findings in the subject's personnel file. BOE found probable cause to believe that the subject violated MCC § 2-156-060 and subsequently assessed a \$1,500 fine against the subject.

8 | Misuse of City Property; Violation of Departmental Rules (C2023-000000011)

An OIG investigation established that a high-ranking CDA employee parked their personal vehicle in a CDA parking lot for personal business, used a CDA vehicle for personal business, transported an unauthorized person in the CDA vehicle, allowed an unauthorized person to occupy a CDA conference room for a period of time, misrepresented their time-edit sheets in at least one instance, failed to follow written instruction to complete their time-edit sheets, and failed to seek permission for sick leave.

OIG found that the subject violated City of Chicago Personnel Rules XVIII, Section 1, Subsections 2 (leaving work without authorization), 19 (use of City property for unauthorized reasons), 39 (incompetence or inefficiency in the performance of a duty), 48 (violating departmental rules,

regulations, or procedures), 49 (unauthorized entry in City areas); the City Department of Assets, Information and Services (AIS) Vehicle Policy; a June 2021 CDA Memorandum on CDA Employee Parking; and CDA Standard Operating Procedure (SOP) Attendance and Swiping.

OIG recommended that CDA impose discipline against the subject commensurate with the gravity of the violations, past disciplinary record, and any other relevant considerations. In response, CDA agreed with each of OIG's findings regarding the rules and policies violated. CDA advised that it had met with DOL to receive a recommendation on discipline; CDA previously issued the subject a reprimand for "similar behavior" and advised OIG that CDA would meet with the employee to issue progressive discipline for the matter.

9 | Fraudulent Receipt of Pandemic and Housing Assistance; False Statements During Application Process (C2023-000000297)

An OIG investigation established that a former CPD Police Officer provided materially false information to the federal government in order to obtain a federal Economic Injury Disaster Loan (EIDL) advancement and a PPP loan, and subsequently illegally received funds from the Small Business Administration (SBA) in violation of CPD's Rules and Regulations, Article V, Rules of Conduct (CPD Rules). Additionally, in support of their PPP loan application, the subject provided the lender with a fabricated 2019 IRS Form 1040 Schedule C.

OIG's investigation also established that the subject defrauded the U.S. Department of Housing and Urban Development (HUD) by providing materially false information on recertification applications for a housing voucher program—specifically, by reporting that they had zero income and were unemployed in 2020 through 2021, which caused their rent to be \$0. The subject in fact maintained another residence in Forest Park, IL while receiving a housing voucher for a City address.

During OIG's investigation, the subject resigned. Although their fraudulent EIDL advancement, PPP loan, PPP loan forgiveness, and fraudulent zero income affidavits were completed prior to their admission into CPD's Education and Training Division, they failed to disclose this information during their background interview with CPD and in their CPD application materials in violation of the MCC, § 2-74-095 (no person shall knowingly make any false statement or material omission on any application for employment with the City). The subject's conduct violated CPD's Rules and Regulations, Article V, Rule 1 (violation of any law or ordinance) and Rule 2 (any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department).

OIG accordingly recommended that CPD issue a formal determination on the violations, designate the subject as having resigned under inquiry, and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CPD agreed with OIG's findings regarding the rules and law violated. CPD agreed with OIG's recommendation to refer the subject for placement on the ineligible for rehire list maintained by DHR. Separately, as required by 50 ILCS 705/6.3, OIG notified the Illinois Law Enforcement Training and Standards Board of its findings.

10 | Theft of City Funds (C2023-000000316)

An OIG investigation established that a payroll administrator with DOF misused their access to the City's payroll systems to pay themselves over \$6,500 in bought back compensatory time that they did not earn. The subject, who had a sophisticated understanding of the City's payroll apparatus, took advantage of circumstances at DOF that enabled them to pay themselves unearned compensatory time without initially being detected. The subject subsequently made efforts to conceal their conduct, and ultimately attempted to return the converted City funds, when year-end reconciliation reports threatened to reveal their conduct to other DOF employees.

OIG found that the subject violated City of Chicago Personnel Rules XVIII, Section 1: Subsection 11 (falsification of an employment record), Subsection 15 (engaging in any act or conduct prohibited by the Illinois Compiled Statutes, specifically 720 ILCS 5/16-1(a)(1)), Subsection 17 (misappropriating funds of the City), and Subsection 19 (theft of City property).

OIG recommended that DOF terminate the subject and refer them for placement on the ineligible for rehire list maintained DHR. In response, DOF agreed with OIG's findings regarding the rules violated. DOF preliminarily agreed with OIG's recommendation to discharge the employee and refer them for placement on the ineligible for rehire list. DOF requested that DOL prepare discharge charges.

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 two updates regarding criminal cases related to an OIG investigation.

1 | [State of Illinois v. Jeffrey Kriv, 23CR0218601 \(Circuit Court of Cook County\), OIG Case C2022-000043852](#)

As previously reported, on February 23, 2023, a Cook County grand jury indicted Jeffrey Kriv, a former CPD member, on four counts of the felony offense of perjury and five counts of the felony offense of forgery. On January 31, 2023, OIG had announced that charges had been filed against Kriv as a result of a joint investigation between OIG, the Cook County State's Attorney's Office, and CPD's Bureau of Internal Affairs (BIA).

OIG's investigation revealed that between 2009 and 2022, Kriv provided fraudulent documents and made false statements, under oath, to the City of Chicago Department of Administrative Hearings to dispute several parking tickets and moving violations related to his personal vehicles. Kriv was an active CPD member at the time of each incident.

On March 29, 2023, Kriv pleaded not guilty on all counts. Pre-trial motion practice and litigation is ongoing in this matter. The court has scheduled the next status hearing for February 20, 2025.

2 | [State of Illinois v. Barbara Johnson, 23CR1229401 \(Circuit Court of Cook County\), OIG Case No. C2022-000043401](#)

As previously reported, on November 27, 2023, a Cook County grand jury indicted Barbara Johnson, a former Office of the City Clerk (OCC) payment service representative, on two counts of theft, one count of computer fraud, and one count of official misconduct. The indictment stemmed from an OIG investigation which revealed that Johnson committed thefts of cash payments she received for the sale of City stickers pursuant to her position with OCC. Johnson did not appear for her initial arraignments on December 5, 2023, or December 19, 2023, but was ultimately arraigned and pleaded not guilty on all counts on February 27, 2024. Johnson's next court date is January 23, 2025.

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

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

E | Special Investigations

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

1 | Campaign Finance Investigations

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

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

Pursuant to MCC § 2-156-445, "[a]ny person who solicits, accepts, offers or makes a financial contribution that violates the limits set forth in this section...shall not be deemed in violation of this

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

section if such person returns or requests in writing the return of such financial contribution within ten calendar days of the recipient's or contributor's knowledge of the violation." Accordingly, once a potential violation is identified, OIG notifies the donor and the donation recipient of the violation and provides the individual or entity ten days to challenge the determination or cure the violation by returning the excess donation.¹³ If the excess donation is returned in a timely manner, or it is determined that a violation did not occur, OIG closes the matter 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 two campaign finance matters that involved \$1,500 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
C2024-000000090	\$2,500 (2022)	Entity affiliated with company doing business with the City	City elected official	\$1,000
C2024-000000374	\$2,000 (2022)	Entity seeking to do business with the City	City elected official	\$500

2 | O'Hare 21

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

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

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

F | Fines and Recoveries

OIG does not have any fines or recoveries to report this quarter.

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, the Civilian Office of Police Accountability (COPA), and the Police Board, as well as inspections of closed disciplinary investigations conducted by COPA and BIA.

A | Evaluations and Reviews

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

1 | Follow-up Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy¹⁴

OIG's Public Safety section completed a follow-up to its October 2020 evaluation of CPD's compliance with its policy regarding post-incident requirements for members who discharge their firearms, on- or off-duty.¹⁵ Based on CPD's responses, OIG concluded that CPD had implemented corrective actions related to the evaluation's findings to varying degrees. Of five recommendations, the Department partially implemented two corrective actions, minimally implemented two, and did not implement one.

CPD requires its members who discharge their firearms to satisfy several steps before returning to regular field duties. They include completing a minimum of 30 days of administrative duty; participating in the Traumatic Incident Stress Management (TISM) program, which includes a trauma debriefing session with the Professional Counseling Division; attending the Critical Incident Overview (CIO) training; and completing any other training curriculum developed by the Training Division, including an individualized training curriculum (i.e., Individualized Critical Incident Overview (ICIO) training). As CPD reported to OIG, these requirements are designed to "minimize the chance that officers will suffer from the negative emotional and psychological reactions that can occur after a firearm discharge incident."

OIG's original inquiry found that CPD was not in full compliance with its post-firearm discharge policy and that its internal controls were inadequate, as indicated by the Department's insufficient policies and procedures and poor documentation of members' completion of return-to-duty requirements. This lack of compliance has led to members returning to regular duty without satisfying all the return-to-duty requirements, potentially putting themselves and others at risk. OIG also found that CPD's return-to-duty process was not structured to meet members' needs in an individualized or timely manner. This lack of individualized and timely training has led to inefficiencies, with many members remaining on administrative leave beyond the required 30 days.

¹⁴ Published December 3, 2024. See <https://igchicago.org/publications/cpd-post-firearm-discharge-follow-up/>.

¹⁵ This inquiry did not evaluate other processes that may take place after a member discharges their firearm, such as relief of police powers, COPA's release of video footage within 60 days of an incident, or misconduct investigations.

Based on its original findings, OIG made five recommendations aimed at improving post-firearm discharge policies and procedures. First, OIG recommended that CPD develop and implement adequate internal controls to ensure members have completed all the necessary return-to-duty requirements before returning to field duty. Next, OIG recommended that CPD develop a software solution capable of providing relevant notifications and tracking all information necessary to verify completion of return-to-duty requirements. OIG also recommended that CPD review the purpose of the individualized training requirement in its directive, assess whether the ICIO training fulfills its purpose, and revise policies and procedures in accordance with its findings. Furthermore, OIG recommended that CPD track and document whether members have been involved in prior firearm discharge events to inform the TISM program and ensure members' unique trauma experiences are addressed. Finally, OIG recommended the Department examine why most members remain on administrative duty past the 30-day requirement and identify measures to improve the timeliness of its processes.¹⁶

OIG inquired about corrective actions taken by CPD in response to its recommendations. CPD reported that it had made progress on certain recommendations. Based on CPD's response, OIG concluded that the Department had implemented corrective actions at varying levels and did not implement one recommendation.

Specifically, CPD reported that the Office of the First Deputy Superintendent (OFDS) had implemented or updated its notification procedures to ensure that members involved in a firearm discharge incident complete all return-to-duty requirements.¹⁷ However, it had not yet finalized Standard Operating Procedures (SOPs) or built an application to track all return-to-duty requirements. CPD also reported that it had implemented an application to track TISM program completion but had not yet created mechanisms to track other return-to-duty requirements listed in the 30-day checklist, a form used by OFDS to document an involved member's satisfaction of return-to-duty requirements post firearm discharge, and the OFDS excel file, an internal Microsoft Excel spreadsheet that OFDS uses to track the duty status and release from administrative duty of involved members.¹⁸ In response to OIG's recommendation regarding the ICIO training, CPD stated that it had consulted with other jurisdictions and revised the ICIO training materials, adding a new course on tactical training. However, the Department had not yet implemented individualized trainings based on specific members' experiences. Moreover, CPD reported that while it can track previous firearm discharge incidents since the implementation of the TISM program, it does not use documentation from previous firearm discharge incidents to inform the TISM program and address the potentially unique trauma experiences of affected members. Finally, CPD reviewed reasons why most members remain on administrative duty for longer than 30 days, such as staffing and scheduling challenges, but failed to identify measures to improve the timeliness of its processes.

Although this follow-up inquiry did not contain recommendations, and therefore CPD was not required to respond, OIG provided the Department and the Office of Public Safety Administration (OPSA) with a draft of the report and invited both agencies to provide any further updates regarding

¹⁶ City of Chicago Office of Inspector General, "OIG Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy," October 27, 2020, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Evaluation-of-the-ChicagoPolice-Departments-Post-Firearm-Discharge-Policy.pdf>

¹⁷ At the time of CPD's response to OIG, Eric Carter was First Deputy Superintendent. As of January 2025, the position has remained unfilled since Carter left the position in April 2023.

¹⁸ See Chicago Police Department, "Form 12.124: Administrative Duty Assignment For Firearm Discharge Incidents Check List," accessed February 26, 2024. <https://directives.chicagopolice.org/forms/CPD-12.124.pdf>.

corrective actions that may be underway. On November 7, 2024, OIG met with personnel from CPD and OPSA, who reported that they were in the process of setting up and implementing Benchmark, a software management system that streamlines police trainings and personnel management. CPD and OPSA stated that, among other things, this new system will track all post-firearm discharge procedures, replacing the current post-incident procedures. The agencies further reported that they were in the process of working with Benchmark and internal subject matter experts to customize modules for CPD's specific needs. OIG urged CPD to fully implement all the recommended corrective actions.

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 250 closed disciplinary cases and opened 19 for in-depth review. OIG found two BIA and four COPA investigations that contained deficiencies materially affecting their outcomes.

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 § 2-56230(c), are separate from OIG's own confidential investigative work, which is governed by the confidentiality provisions set out in MCC § 2-56-110.

Table 9: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	147	6
COPA	103	13
Total	250	19

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent six letters of recommendation to reopen investigations to COPA and four letters of recommendation to reopen investigations to BIA. COPA accepted OIG's recommendation to reopen one investigation, and the other recommendations are pending a response. All recommendations to reopen made to BIA are pending responses. OIG also sent one notification letter to COPA of an error in identifying the accused CPD member in CPD's Case Management System (CMS), one notification to BIA of an error in the listed recommended penalty for a CPD member in CPD's CMS, and one notification to CPD involving a pattern of misconduct by a CPD member.

Additionally, by the end of this quarter, OIG received a response from BIA on one recommendation to reopen made in the third quarter of 2024, and from COPA on three recommendations to reopen made in 2024-Q3 and one recommendation to reopen made this quarter. 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 Account for All Available Evidence (C2023-000000311)

OIG reviewed a COPA investigation concerning allegations that CPD Officer John Brownridge, Star #9075, made unwanted physical contact and verbally abused a complainant by calling them "all types of Bs and Hs."

According to CPD's Original Case Incident Report, on August 11, 2023, Officer Brownridge and his partner, Officer Leslie Miranda, Star #18316, responded to a call of a domestic disturbance. After their arrival, they had difficulty contacting the caller using the building's call box. While attempting to contact the caller, the complainant and the victim approached the building and refused to allow the CPD members inside. The complainant and the victim tried to push Officer Brownridge out of the entryway, but Officer Brownridge pushed through and continued upstairs. The victim followed Officer Brownridge upstairs, passed them, and used their leg to block entry to the next section of the building. After a verbal altercation, the victim opened a door and Officer Brownridge proceeded through the door. As Officer Brownridge walked down the hall away from the complainant and victim, the victim threw an aluminum can at Officer Brownridge. Officer Brownridge turned around and performed an emergency takedown of the victim.

As additional units arrived, Officer Brownridge located the caller in the domestic disturbance incident. According to the Original Case Incident Report, the caller was observed with a swollen, bruised cheek, and the caller alleged that their romantic partner caused it.

In COPA's closing report, COPA added in a footnote that they, "reviewed the BWC and never heard PO Brownridge call [the victim] either [a bitch or a hoe]." OIG's review of Officer Brownridge's Body Worn Camera (BWC) footage found that Officer Brownridge used the word bitch twice; the first occurrence was heard when the officers and subjects were in the building's entryway. Specifically, Officer Brownridge says, "bitch, you about to get thrown..." and either the complainant or victim is heard saying, "It's the bitch for me." Officer Miranda's BWC also captures this comment. The second occurrence was heard on Officer Brownridge's BWC footage, whereafter the victim threw a metal can at Officer Brownridge, and he says, "bitch" just before turning around to perform an emergency takedown.

OIG recommended that COPA reopen this investigation to complete a thorough investigation and account for all available evidence, specifically the audio captured in the BWC footage.

In response to OIG's recommendations, COPA reopened its investigation. COPA interviewed Officer Brownridge who admitted to calling the complainant a "bitch." COPA sustained the allegation that the CPD officer used profanity toward the complainant and recommended a five-day suspension. COPA brought two additional allegations, that Officer Brownridge made unnecessary physical contact with the complainant and gained access to a residential building without justification; the allegations were not sustained and exonerated, respectively.

2 | Notification

a | Notification to BIA to Correct the Penalty (C2024-000000317)

OIG reviewed an investigation conducted by BIA concerning allegations that Officer Angel Martinez, Star #5124, wore his CPD outer bulletproof vest cover and CPD star while working secondary employment at Home Depot. In its review, OIG identified an error in the listed recommended penalty for Officer Martinez in CPD's CMS.

According to BIA's Investigative Closing Report, Officer Martinez requested the case be adjudicated through the mediation process.¹⁹ On September 23, 2024, Officer Martinez signed the Mediation Agreement agreeing that they would not contest the allegations or the findings and accepted the recommended penalty of a ten-day suspension with options.²⁰

OIG's review of the electronic investigative file in CMS shows the allegation brought against Officer Martinez as sustained with a penalty of a one-day suspension, contrary to the ten-day suspension stipulated in the mediation agreement.

OIG notified BIA of this error and recommended Officer Martinez's discipline record be corrected to reflect the mediation agreement of a ten-day suspension. BIA corrected the record to reflect the ten-day suspension as stipulated in the Mediation Agreement.

¹⁹ A CPD member may request, or BIA may offer mediation to an accused CPD member.

²⁰ Options provides CPD members with the choice to use paid time off in lieu of suspension.

b | Notification to COPA to Correct the Record (C2024-000000459)

OIG reviewed a COPA investigation concerning allegations that Officer Ivan Robles, Star #2871, penetrated the complainant's vagina with his penis without the complainant's consent, removed and/or rearranged clothing item(s) from the complainant's body without their consent, and was intoxicated while off duty. COPA reached findings of Not Sustained for all allegations.

OIG's review of the investigation found that an uninvolved CPD member, who shares the same last name with the CPD member actually involved in this incident, was named as the accused CPD member in CPD's CMS. However, COPA's investigative file contained documents such as the Notice of Charges, an interview transcript, and its Final Summary Report that identify Ivan Robles, Star #2871, as the accused CPD member.

OIG notified COPA of this error and recommended that COPA correct the record in CMS to reflect Officer Ivan Robles, Star #2871, as the accused CPD member. COPA made the recommended correction.

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. APR did not publish a report this quarter.

B | Advisories and Department Notification Letters

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

1 | Department of Human Resources Firearms and Violence in the Workplace Policies (C2023-000000159)

OIG notified DHR of concerns regarding unclear and inconsistent language between the City's Firearms and Violence in the Workplace (VIW) Policies. The concern arose during an OIG investigation, when OIG was attempting to analyze a City employee's possession of a weapon under the policies and concluded that, among other issues, it was not entirely clear which actions were against policy or what the applicable standards were. Specifically, the policies left ambiguity about the circumstances under which City employees may carry firearms on the clock, and the circumstances under which use or possession of a firearm constitutes prohibited violence in the workplace. OIG's investigation did not reveal evidence sufficient to sustain allegations of misconduct against any specific employee. OIG recommended that DHR resolve the ambiguities and any inconsistencies between the Firearms and VIW policies. To provide additional clarity for City employees, OIG further recommended that DHR provide guidance in the VIW policy on the circumstances under which one employee threatening another is a violation of the policy. In particular, OIG recommended that DHR clarify that the reasonableness of a person's fear of harm as a result of the threat is defined from an objective standard as opposed to a subjective standard.

In response, DHR stated that they would work with DOL to update the two policies to remove inconsistencies and ambiguities by the end of the first quarter of 2025.

2 | City Council Office of Financial Analysis Records Retention (C2023-000000187)

OIG became aware that the City Council Office of Financial Analysis (COFA) may not be in compliance with the Local Records Act, 50 ILCS 205 (LRA). Specifically, OIG learned that COFA is not operating with a retention schedule and has not preserved records prior to 2021 and possibly 2022. OIG notified COFA of LRA's requirements, which prohibit destruction of public records without approval of the appropriate Local Records Commission and require creation and submission of a records retention schedule to the Local Records Commission. OIG encouraged COFA to consult with DOL, other appropriate legal counsel, or the Cook County Local Records Commission regarding COFA's compliance with the Local Records Act. OIG did not request a response from COFA regarding this letter and has not received indication of what actions, if any,

COFA took in response to it. Instead, OIG anticipates that it will make recommendations to COFA regarding this issue in a future audit report, which will require a response from COFA.

C | Other Reports and Activities

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

D | Monitoring Employment Actions

OIG's Compliance unit, situated within its Legal section, has broad oversight responsibilities under the Employment and Hiring Plans which govern the employment practices of the City, CPD, and 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. There are 130 contracts 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 such direct contact occurrences.

b | Contacts by the Fire Department

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

c | Chicago Police Department Intervention

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

d | Contacts by Elected and Appointed Officials

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

Additionally, City employees often report contacts by elected or appointed officials that may be categorized as inquiries on behalf of their constituents, but not as an attempt to affect any hiring decisions for any covered position or other employment actions. This quarter, OIG received 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.²¹ This quarter, OIG received notification of 34 exempt appointments.

²¹ 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.

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 one senior manager hiring packet and found no violations.

g | Selected Department of Law Hiring Sequences

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

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

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

i | Modifications to Class Specifications,²² 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 one notification 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 such written rationale related to a no consensus selection.

l | Chicago Fire Department Written Rationale

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

²² 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.

m | Chicago Police Department Emergency Appointments

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

n | Chicago Fire Department Emergency Appointments

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

3 | Hiring Related Audits Performed by OIG

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

This quarter, OIG conducted audits of four hiring sequences across three 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, the Chicago Department of Transportation (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, 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 Q4 Pursuant to the City of Chicago Employment Plan

Department	Title	Findings	OIG Recommendation	Department Action
Department of Procurement Services	Certification - Compliance Officer	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 Aviation	IT Security Specialist	No violations or errors were found.	N/A	No response required.
Department of Buildings	Iron Inspector	No violations or errors were found.	N/A	No response required.

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 did not conduct any audits of test administrations for covered positions within CFD.

e | Acting Up

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

f | Selected Chicago Police Department Hiring Sequences

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

g | Selected Chicago Fire Department Hiring Sequences

Pursuant to Chapter IX of the CFD Hiring Plan for Uniformed Positions, OIG completes mandatory audits of in-process and completed CFD hiring sequences as well as employees hired through the Performance Selection Process. This quarter, OIG conducted three audits of CFD hiring sequences and found no violations or errors.

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 did not conduct any audits of CFD referral lists.

l | Chicago Police Department Acting Up

OIG is required to audit compliance with Chapter X of CPD's 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.²³

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

Table 11: Hiring Sequences Monitored in Q4

Department	Intake Meetings Monitored	Tests Monitored ²⁴	Interview Sets Monitored ²⁵	Consensus Meetings Monitored	Violations	Errors
Department of Fleet and Facility Management	0	0	0	1	0	0
Chicago Police Department	0	1	0	0	0	0
Chicago Department of Transportation	0	0	1	0	0	0
Chicago Department of Aviation	0	0	2	4	0	0
Department of Water Management	0	1	0	0	0	0
Chicago Public Library	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 no new escalations.

Table 12: Escalations Received in Q4 2024

Escalation Status	Number of Escalations
Newly Initiated	0
Pending	3
Referred to DHR Commissioner	0
Closed with Investigation	0
Closed without Investigation ²⁶	0

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

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

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

²⁶ Escalations categorized as Closed without Investigation are received by OIG with either (1) a self-initiated remedy from the DHR commissioner and the escalation is considered closed after OIG reviews the escalation and concurs with the remedy issued by DHR with no further recommendations made by OIG; or (2) after review or inquiry, any findings and recommendations of OIG are reported to the DHR commissioner and, when appropriate, the department head and the DHR commissioner reports to OIG what action they took on OIG's recommendation.

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 13: Hiring and Employment-Related Complaints Received in Q4 2024

Complaint Status	Number of Complaints
Newly Initiated	18
Pending	15
Closed ²⁷	0
Declined	3

²⁷ Complaints categorized are considered Closed after OIG reviews the complaint and issues a finding with or without recommendations to the respective department.



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

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

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

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