



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
25

Quarterly Report: First Quarter 2025

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

I was confirmed as Inspector General for the City of Chicago on April 27, 2022. As we approach the fourth year of this term, I am deeply proud of the work being done by the extraordinarily talented and committed staff of the City of Chicago Office of Inspector General (OIG). I came into this job with three priorities for OIG: to prioritize work which fosters public trust in government and pays down the deficit of legitimacy at which the City of Chicago operates with its residents, to engineer OIG for long-term stability and success, and to leverage interdisciplinary cooperation across our practice areas to maximize our impact. I am pleased to see those priorities reflected in the work we have done in the first quarter of 2025, and which continues.

Over many decades, City government in Chicago has earned its reputation as broken and corrupt, and has given Chicagoans no reason to afford the benefit of any doubt to decisions made in dark corners of City Hall. We are holding people accountable when they abuse positions of public trust, and we are shining a light into those dark corners—working to pay down the City’s deficit of legitimacy.

In this quarter, we investigated and sustained allegations of misconduct against a City employee who brought a gun to work, a Chicago Police Department member who failed to disclose an illegal financial interest in City business, and a City employee who threatened and harassed a business under their jurisdiction during an intoxicated altercation—all because we cannot ask Chicagoans to trust a government whose employees conduct themselves in those ways.

We identified and effected the return of more than \$50,000 in improper campaign contributions to City officials, because we cannot have a for sale sign hanging on the door to City Hall. We are also working with the Department of Human Resources to ensure that positions in City government—including the highest ranking among them—have job descriptions with minimum qualifications as required by the City’s Employment Plan, so that taxpayer dollars are going to people qualified and equipped to work and succeed in positions of public trust.

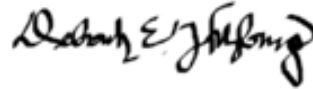
We are, meanwhile, working to protect OIG’s independence and ensure the long-term stability and viability of effective oversight in Chicago. We have proposed changes to the Municipal Code of Chicago to prevent interference with OIG’s work and safeguard its independence. Those proposed changes are pending before Chicago’s City Council, and I hope to see action taken on them soon.

Finally, we are seeing tremendous impact come from interdisciplinary collaboration across OIG’s practice areas. In this quarter, we published an advisory on concerns regarding a lack of public transparency surrounding extensive water main and sewer line construction work in the City that failed to comply with Illinois Environmental Protection Agency regulations—specifically, locations across Chicago where water mains and sewer lines are too close together. That product, which elicited a substantive response from the Department of Water Management and resulted in a subject matter hearing in the City Council’s Committee on Ethics and Government Oversight, was

the result of cooperation across OIG's Legal, Investigations, and Audit and Program Review sections.

There is a great deal more work to do, and I am honored to continue to do it alongside my colleagues at OIG. Thank you for your interest in our work.

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 OIG from January 1, 2025, through March 31, 2025, and includes information required by the MCC.

I | Mission of the Office of Inspector General

OIG's mission is to promote economy, effectiveness, efficiency, and integrity in the administration of programs and the operation of City government.¹ OIG accomplishes its mission through administrative and criminal investigations; program and policy work on effectiveness, efficiency, and equity; and transparency initiatives.

When OIG investigates and sustains allegations of misconduct, it issues summary reports of investigations to the appropriate authority, City management officials, and/or the Office of the Mayor, with investigative findings and recommendations for corrective action and discipline. Narrative summaries of sustained administrative investigations, i.e., those typically involving violations of the City's Personnel Rules, Debarment Rules, and Ethics Ordinance—and the resulting department or agency actions—are released in quarterly reports. OIG's investigations resulting in criminal sanctions or civil recovery actions are summarized in quarterly reports following public action (e.g., indictment) and updated in ensuing quarterly reports as court developments warrant.

OIG's performance audits, programmatic inquiries, advisories, and other reports are directed to the appropriate agency for comment and response, and are then [published on the OIG website](#). From time to time, OIG also issues notifications to a City department for attention and comment; those notifications are summarized, along with any response, in the ensuing quarterly report.

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

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

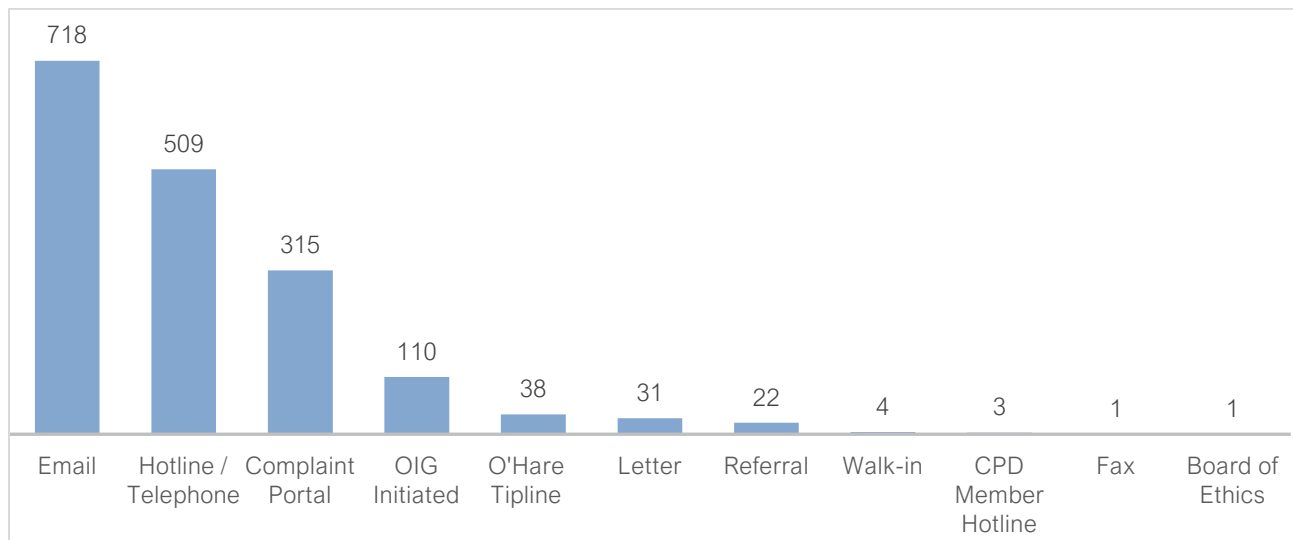
¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 1,752 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 Q1 2025, OIG made 421³ 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 421 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 429 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	213
Chicago Civilian Office of Police Accountability	101
Chicago Department of Human Resources	25
Chicago Fire Department	13
Chicago Department of Streets and Sanitation	11
Chicago Public Schools Office of Inspector General	8
Chicago Department of Aviation	7
Illinois Office of Executive Inspector General	6
Chicago Department of Transportation	5
Chicago Department of Water Management	4
Chicago Housing Authority Office of Inspector General	4
Chicago Office of Emergency Management and Communications	4
Chicago City Council	2
Chicago Department of Finance	2
Illinois Department of Human Services Office of Inspector General	2
U.S. Drug Enforcement Agency	2
U.S. Department of Veteran Affairs Office of Inspector General	2
Chicago Commission on Animal Care and Control	1
Chicago Department of Fleet and Facility Management	1
Chicago Park District Office of Inspector General	1
City Colleges of Chicago Office of Inspector General	1
Cook County Office of Independent Inspector General	1
Cook County Sheriff's Office of Professional Review	1
Dayton Police Department	1
Elmwood Park Police Department	1
Illinois Department of Child and Family Services	1
Illinois Department of Corrections	1
Illinois Department of Healthcare and Family Services Office of Inspector General	1
Illinois Department of Public Health	1
Park Forest Police Department	1
Stone Park Police Department	1
U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives	1
U.S. Customs and Border Protection	1
U.S. Department of Housing and Urban Development Office of Inspector General	1
University of Illinois Chicago Police Department	1
Total	429

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 Q1 2025, OIG discontinued 880 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Inquiries	362
Do Not Process	335
Spam	183
Total	880

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 Q1 2025, OIG declined 20 complaints alleging violations of the GEO.

Table 3: Ethics Complaints Declined

Category of Declined Ethics Complaints	Number of Declined Ethics Complaints
Failure to Allege a Violation of MCC § 2-156	8
Complaint Lacks Foundation	8
Complaint of the Same Conduct Already Received	4
Total	20

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 280 active investigations. During Q1 2025, OIG initiated 35 investigations, of which 25 were self-initiated, and concluded 33 investigations.

2 | Open Matters

OIG's 280 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	233
Elected Officials	20
Contractors, Subcontractors, and Persons Seeking Contracts	18
Licensees	1
Appointed Officials	1
Other	7
Total	280

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	278
Ineffectiveness	1
Waste/Inefficiency	1
Total	280

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 280 pending investigations, 113 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, Q1 2025

Case ID ⁸	Legacy ID	General Nature of Allegations
C2022-000041000	20-1335	Unauthorized outside employment/residency violation
C2022-000041038	20-1375	Criminal investigation
C2022-000041039	20-1376	False statements/violation of department rules
C2022-000041245	20-1589	Criminal investigation
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine
C2022-000041581	21-0220	Criminal investigation
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
C2022-000043912	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
C2022-000044122	N/A	Criminal investigation
C2023-000000010	N/A	Official misconduct
C2023-000000026	N/A	Criminal investigation
C2023-000000027	N/A	Criminal investigation
C2023-000000028	N/A	Official misconduct
C2023-000000032	N/A	Official misconduct
C2023-000000038	N/A	Ethics violation
C2023-000000049	N/A	Ethics 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
C2023-000000093	N/A	Retaliation
C2023-000000102	N/A	Ethics violation
C2023-000000103	N/A	Personnel rules violation
C2023-000000104	N/A	Personnel rules violation
C2023-000000105	n/A	Personnel rules violation
C2023-000000109	N/A	Conduct unbecoming
C2023-000000118	N/A	EEO violation
C2023-000000121	N/A	Duty disability fraud
C2023-000000128	N/A	Criminal investigation
C2023-000000152	N/A	Criminal investigation
C2023-000000155	N/A	Secondary employment violation
C2023-000000158	N/A	Personnel rules violation
C2023-000000164	N/A	Conduct unbecoming

Case ID ⁸	Legacy ID	General Nature of Allegations
C2023-000000166	N/A	Criminal investigation
C2023-000000177	N/A	Ethics violation
C2023-000000178	N/A	Criminal investigation
C2023-000000179	N/A	Retaliation
C2023-000000180	N/A	Ethics violation
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
C2023-000000215	N/A	PPP fraud
C2023-000000223	N/A	PPP fraud
C2023-000000224	N/A	Residency violation
C2023-000000232	N/A	Personnel rule violation
C2023-000000260	N/A	Ethics violation
C2023-000000264	N/A	PPP fraud
C2023-000000267	N/A	PPP fraud
C2023-000000268	N/A	PPP fraud
C2023-000000270	N/A	PPP fraud
C2023-000000271	N/A	PPP fraud
C2023-000000272	N/A	PPP fraud
C2023-000000274	N/A	PPP fraud
C2023-000000276	N/A	PPP fraud
C2023-000000277	N/A	PPP fraud
C2023-000000278	N/A	PPP fraud
C2023-000000279	N/A	PPP fraud
C2023-000000281	N/A	Criminal investigation
C2023-000000282	N/A	Criminal investigation
C2023-000000298	N/A	Bribery
C2023-000000324	N/A	Ethics 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

Case ID ⁸	Legacy ID	General Nature of Allegations
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
C2024-000000006	N/A	Unlawful Eavesdropping
C2024-000000007	N/A	Ethics Violation
C2024-000000013	N/A	Residency Violation
C2024-000000014	N/A	Ethics Violation
C2024-000000015	N/A	False Statements
C2024-000000017	N/A	Personnel Violation
C2024-000000024	N/A	PPP Fraud
C2024-000000025	N/A	Duty Disability Fraud
C2024-000000047	N/A	Obstruction
C2024-000000053	N/A	PPP Fraud
C2024-000000057	N/A	Bribery
C2024-000000059	N/A	Theft
C2024-000000369	N/A	Theft
C2024-000000372	N/A	Fraud
C2024-000000378	N/A	Residency Violation
C2024-000000379	N/A	WBE Fraud
C2024-000000385	N/A	Sexual Harassment
C2024-000000391	N/A	Personnel Violation
C2024-000000392	N/A	Bribery
C2024-000000393	N/A	Ethics Violation
C2024-000000407	N/A	MWBE Fraud
C2024-000000408	N/A	Theft
C2024-000000409	N/A	Residency Violation
C2024-000000430	N/A	PPP Fraud
C2024-000000431	N/A	Theft
C2024-000000432	N/A	PPP Fraud

3 | Public Building Commission Complaints and Investigations

MCC § 2-56-030 empowers OIG to exercise its powers and duties with respect to any sister agency pursuant to an intergovernmental agreement with that agency, and it does so with respect to PBC.

In Q1 2025, OIG received no new complaints related to PBC.

B | Sustained Administrative Investigations

OIG investigations may result in administrative sanctions, criminal charges, or both. Investigations leading to administrative sanctions involve violations of City rules, policies or procedures, and/or waste or inefficiency. For sustained administrative cases, OIG produces summary reports of investigation—a summary and analysis of the evidence and recommendations for disciplinary or other corrective action. OIG sends these reports to the appropriate authority as prescribed in the MCC, including the 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
C2022-000042359	Department of Procurement Services	Initiate debarment proceedings against two City subcontractors; determine whether prime contractor made good faith efforts to meet City Minority/Women-owned Business Enterprise (MBE/WBE) requirements;	The Department of Procurement Services (DPS) declined to initiate debarment proceedings against subcontractors; DPS reduced WBE participation credit on the contract. DPS

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
		discount Women-owned Business Enterprise (WBE) credit provided for work improperly claimed as performed by a WBE subcontractor.	scheduled meetings with the subcontractors to educate them on the City's MBE/WBE participation requirements.
C2022-000044022	Office of Emergency Management and Communications	Refer former employee for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR).	The Office of Emergency Management and Communications (OEMC) referred the subject for placement on the ineligible for rehire list maintained by DHR.
C2023-000000097	Department of Streets and Sanitation	Place OIG report in the former employee's personnel file and concur with OIG's finding; alternatively, in the event the Department of Streets and Sanitation (DSS) would have terminated the employee, refer the employee for placement on the ineligible for rehire list maintained by DHR.	DSS referred the subject for placement on the ineligible for rehire list maintained by DHR.
C2023-000000119	Board of Ethics	Find probable cause that the subject violated the Governmental Ethics Ordinance (GEO), pursue appropriate sanctions or fines, and require the subject to file corrected or supplemental statements of financial interests. OIG further recommended that, upon finding a violation, The Board of Ethics (BOE) refer the matter to DPS for debarment proceedings under the appropriate rule.	BOE found probable cause to believe that the subject violated the GEO.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000181	Chicago Fire Department	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Chicago Fire Department (CFD) suspended the subject for nine days.
C2023-000000325	Department of Water Management	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Water Management (DWM) issued a written reprimand to the subject.
C2023-000000331	Criminal Conduct/Withheld Due to Criminal Charges	Criminal Conduct/Withheld Due to Criminal Charges	Criminal Conduct/Withheld Due to Criminal Charges
C2023-000000349	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	BOE found probable cause to believe that the subject violated the GEO.
C2024-000000103	Department of Streets and Sanitation	Impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations.	DSS issued a one-day suspension to the subject.
C2024-000000390	Department of Business Affairs and Consumer Protection	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Business Affairs and Consumer Protection (BACP) preliminarily agreed with OIG's recommendation and requested the Department of Law (DOL) prepare discharge charges for the subject.

1 | Improper WBE Credit on City Contract (C2022-000042359)

An OIG investigation established that a WBE-certified materials supplier working on the Chicago Department of Aviation's (CDA) O'Hare 21 project failed to provide a commercially useful function as required by the MCC, contract terms, and City MBE/WBE rules. OIG's investigation additionally found that the materials supplier failed to provide a commercially useful function at the direction of the project's first-tier subcontractor in direct contradiction to instructions previously memorialized by the project's prime contractor/Construction Manager At Risk (CMAR).

OIG found (1) that the materials supplier violated the City of Chicago Debarment Rules V(b) (violation of a City contract so serious to justify debarment including a history of failure to meet MBE/WBE obligations), V(c) (causing to be made a false or fraudulent material statement in the performance of a City contract), and V(f) (operating an entity in a manner designed to defeat the purpose of any provision of the MCC); and (2) that the first-tier subcontractor violated the City of Chicago Debarment Rules V(b) (violation of a City contract so serious to justify debarment including a history of failure to meet MBE/WBE obligations) and V(c) (causing to be made a false or fraudulent material statement in the performance of a City contract). Accordingly, OIG recommended that DPS initiate debarment proceedings against both companies. OIG also recommended that DPS discount the claimed WBE credit in assessing the prime contractor/CMAR's overall MBE/WBE project credit. Finally, OIG recommended that DPS, as subject matter experts, review the prime contractor/CMAR's course of action to determine if their memorialized instructions to the first-tier subcontractor were sufficient to meet their contractual obligation to make good faith efforts to meet the City's MBE/WBE requirements.

In response, DPS reduced the WBE participation on the contract. However, DPS declined to initiate debarment proceedings because DPS argued (1) that the materials supplier neither had a history of failure to meet MBE/WBE obligations nor had a clear intent to evade the purpose of the MBE/WBE program and (2) that the first-tier subcontractor did not have a history of failing to meet program requirements despite this isolated failure. Instead, DPS set up meetings with the WBE materials supplier and the first-tier subcontractor to educate the companies on the City's MBE/WBE participation requirements.

2 | Residency Violation (C2022-000044022)

An OIG investigation established that a communications operator I with OEMC was not a resident of Chicago and instead lived in Bridgeview, Illinois. Evidence gathered by OIG included documents showing the subject had a mortgage on a house in Bridgeview, was listed on all the utility bills for that house in Bridgeview, teleworked from the Bridgeview house, and was observed on multiple OIG surveillances leaving the Bridgeview house in the morning to go to work. Shortly after OIG contacted OEMC to schedule an interview with the subject, the subject retired from City service.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Subsections 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), 15 (engaging in any act or conduct prohibited by the MCC, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes), and 41 (failure to be an actual resident of the City of Chicago).

Had the subject not resigned, OIG would have recommended that OEMC discharge them in accordance with the MCC. In light of the subject's having resigned, OIG recommended that OEMC refer them for placement on the ineligible for rehire list maintained by DHR. In response, OEMC agreed with OIG's recommendations and referred the employee to the ineligible for rehire list.

3 | Violation of Firearms in the Workplace Policy (C2023-000000097)

An OIG investigation established that a former DSS motor truck driver carried their personal firearm into a City building in violation of the City of Chicago Firearms in the Workplace Policy and in violation of City of Chicago Personnel Rule XVIII, Section 1, Subsection 50 (conduct unbecoming). The violation was discovered when the subject left their firearm in a bathroom inside the City building, where it was discovered by another employee. The subject retired from City employment during OIG's investigation.

Accordingly, while OIG would have recommended that DSS impose discipline against the subject commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations, OIG ultimately recommended that the report be placed in the subject's personnel file and that DSS concur with OIG's finding. OIG further recommended that, in the event DSS would have terminated the subject, they refer them for placement on the ineligible for rehire list maintained by DHR.

In response, DSS referred the subject for placement on the ineligible for rehire list maintained by DHR.

4 | Unlawful Financial Interest in City Business; Failure to Provide Information on Statements of Financial Interest (C2023-000000119)

An OIG investigation established that a CPD Lieutenant had an unlawful financial interest in City business in violation of the GEO, MCC § 2-156-110. The GEO prohibits City employees from having a financial interest, valued at more than \$1,000, in any City contract. The subject is the president of a company that entered into a subcontractor agreement to provide services as an independent contractor in relation to CDA's O'Hare 21 project. In bid documents submitted to the City prior to obtaining the contract with CDA, the subject's company was identified as part of the subcontracting team with an estimated 10% fee. In a past decision, BOE has held that where the participation of particular subcontractors is a component in the City's consideration of the contract award, such consideration gives those subcontractors an interest in the City contract.

OIG's investigation further established that the subject failed to disclose their business with the City on their Statements of Financial Interest (SOFIs) filed with BOE for the years 2021 through 2024, in violation of the GEO, MCC § 2-156-160.

OIG recommended that BOE find probable cause to believe that the Lieutenant violated the GEO, pursue appropriate sanctions or fines, and require them to file corrected or supplemental statements of financial interests. OIG further recommended that, upon finding a violation, BOE refer the matter to DPS for debarment proceedings under the appropriate rule. In response, BOE found probable cause to believe that the subject violated the GEO.

5 | Unauthorized Secondary Employment; Failure to Cooperate with OIG (C2023-000000181)

An OIG investigation established that a fire marshal-EMT with CFD engaged in unauthorized secondary employment and failed to cooperate with OIG's investigation. In an interview with OIG, the subject admitted to engaging in secondary employment without following the secondary employment procedures outlined in the City of Chicago Personnel Rules. During the course of the

investigation, the subject, through their legal counsel, ceased communicating with OIG and failed to provide documents requested by OIG.

OIG found that the subject's conduct violated City Personnel Rule XVIII Section 1 Subsection 43 (failure to comply with the requirements of secondary employment), Subsection 15 (engaging in any act or conduct prohibited by the MCC), City Personnel Rule XX, Section 3, Subsection (b) (outlining the procedure for securing outside employment), CFD Code of Professional Conduct, Rules and Regulations 2.12 (commission of any act prohibited by the Personnel Rule XVIII), and MCC § 2-56-090 (duty to cooperate with OIG investigations).

OIG recommended that CFD terminate the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CFD found that the employee did not violate secondary employment rules applicable to the employee's bargaining unit, and further found that the failure to cooperate was not wholly the fault of the employee. CFD suspended the employee for nine days.

6 | Unlawful Possession of a Firearm; Violation of Time and Attendance Policy (C2023-000000325)

An OIG investigation established that a construction laborer with DWM was arrested for possessing an illegal firearm in their personal vehicle. At the time of the subject's arrest, the subject was clocked in for work with DWM. During a traffic stop, CPD recovered a firearm from the subject, which was found when the subject pulled out a black crossbody bag to retrieve their identification. The subject's firearm was easily accessible to them, and they did not have an Illinois Concealed Carry License (CCL) at the time of the traffic stop. Additionally, the subject's Firearm Owner's Identification (FOID) had expired.

The subject made several appearances in court arising from this arrest, sometimes violating DWM's Time and Attendance Directive. Specifically, the subject violated that policy by taking an early lunch that was within the first three hours of their scheduled workday on October 5, 2023, and October 25, 2023, to attend their court appearances.

OIG found that the subject's conduct violated Illinois firearm law, 720 ILCS 5/24-1(a) (unlawful use of weapon), as their firearm was readily accessible in their vehicle without a valid CCL. The subject's firearm possession also violated MCC § 8-20-020 (unlawful possession of a firearm) and the City's Firearms in the Workplace Policy (City's Firearm Policy). The subject violated DWM's Time and Attendance Directive, effective September 1, 2016, and City's Personnel Rule Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes), Subsection 48 (violating any departmental regulations, rules or procedures), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that DWM discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DWM agreed with OIG's findings, but disagreed with OIG's disciplinary recommendations and instead issued a written reprimand to the subject. In its response to OIG, DWM wrote that it was "important to consider the broader context" of the incident. DWM wrote that the incident "occurred during unpaid time and involved [the employee's] personal vehicle—not a City-owned car, premises, or job site. There was no impact on [their] work performance or any risk posed to City employees or the public. Moreover, [the employee] was fully cooperative with law enforcement, and the State Attorney's Office ultimately declined to prosecute

[them].” DWM also highlighted that since the incident, the employee “successfully completed all requirements of the apprenticeship program. [Their] completion of the program highlights [their] potential and the progress [they have] made toward building a stable future through gainful employment. Rather than resorting to termination, this situation warrants corrective measures that address the error without being excessively punitive, including counseling on City policies.” Finally, DWM concluded that retaining the subject “not only upholds DWM’s commitment to nurturing talent from diverse and challenging backgrounds but also reinforces a culture of fairness, rehabilitation, and second chances. This balanced approach recognizes that personal mistakes do not define professional capabilities, and it offers [the subject] the opportunity to learn from this experience while continuing on [their] journey toward a full-time, sustainable career.”

7 | Criminal Conduct/Withheld Due to Ongoing Criminal Proceeding (C2023-000000331)

OIG conducted an administrative investigation into misconduct by a City employee, which is also at issue in a pending criminal proceeding. OIG will provide a summary and update at the conclusion of the criminal matter.

8 | Violation of Cross-Lobbying Ban; Unregistered Lobbying (C2023-000000349)

An OIG investigation established that a State of Illinois elected official impermissibly lobbied City officials in violation of the GEO, MCC § 2-156 et seq. OIG obtained emails, City contract and vendor payment records, and witness statements demonstrating that the subject lobbied for desired legislative outcomes on behalf of their clients, which included a company that held an eight-figure contract with CPD.

OIG found that the subject violated MCC § 2-156-309, which prohibits state elected officials from lobbying the City, and MCC § 2-156-210, which requires lobbyists to register with the City and file reports of their lobbying activity.

OIG recommended that BOE find probable cause to believe that the subject violated the GEO and impose sanctions accordingly. In response, BOE found probable cause to believe that the elected official had lobbied in violation of the GEO.

9 | Dangerous Driving in a City Vehicle (C2024-000000103)

An OIG investigation established that a DSS motor truck driver violated traffic rules by driving at an excessive speed across multiple lanes in a City of Chicago vehicle on Lake Shore Drive. The subject’s conduct was captured on video by a concerned member of the public who witnessed the driving. OIG corroborated the video with records demonstrating that the City vehicle was traveling over 77 miles per hour in an area where the speed limit is 40 miles per hour.

OIG found that the subject violated the City of Chicago Vehicle and Equipment Policy Section I, City of Chicago Personnel Rule XVIII, Section 1, Subsection 15, as well as 625 ILCS 5/11-709(a) and 625 ILCS 11-601.5(b).

OIG recommended that DSS impose discipline against the subject, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. In response, DSS

agreed with OIG's findings regarding the rules and policy violated, and issued a 1-day suspension to the subject.

10 | Unauthorized Use of City Property; Discourteous Treatment of a Member of the Public; Conduct Unbecoming a Public Employee (C2024-000000390)

An OIG investigation established that a BACP supervisor of business compliance verbally abused and harassed employees of a business that holds multiple City licenses and is subject to BACP jurisdiction, after the subject was denied entry to the business because they were intoxicated. Additionally, the subject made known their employment with BACP and used their position to make threats against the business if they were not let in during the extended altercation.

OIG found that the subject violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 19 (theft or unauthorized possession of City of Chicago or other public property, or use of such property for unauthorized purposes), Subsection 23 (discourteous treatment, including verbal abuse, of any other City employee or member of the public), Subsection 32 (treating discourteously any member of the public where such person can reasonably believe that the employee is acting within the scope of her or his employment), and Subsection 50 (conduct unbecoming an officer or public employee).

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

C | Synopses of and Developments in Charged Criminal Cases

OIG's criminal investigations may uncover violations of local, state, or federal criminal laws, which may be prosecuted by the U.S. Attorney's Office, Illinois Attorney General's Office, or Cook County State's Attorney's Office, as appropriate. For the purposes of OIG quarterly summaries, criminal cases are considered concluded when the subject(s) of the case is publicly charged by complaint, information, or indictment.

This quarter, OIG has one update regarding criminal cases related to an OIG investigation.

1 | State of Illinois v. Barbara Johnson, 23CR1229401 (Circuit Court of Cook County)

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. On February 27, 2025, Johnson pleaded guilty to computer fraud and official misconduct. She was sentenced to probation with a restitution judgment entered against her in favor of the City of Chicago in the amount of \$150,000.

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.¹¹

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

Pursuant to MCC § 2-156-445, "[a]ny person who solicits, accepts, offers or makes a financial contribution that violates the limits set forth in this section...shall not be deemed in violation of this section if such person returns or requests in writing the return of such financial contribution within ten calendar days of the recipient's or contributor's knowledge of the violation." Accordingly, once a potential violation is identified, OIG notifies the donor and the donation recipient of the violation and provides the individual or entity ten days to challenge the determination or cure the violation by returning the excess donation.¹² If the excess donation is returned in a timely manner, or it is determined that a violation did not occur, OIG closes the matter as not sustained. In the event the matter is not cured or successfully challenged, OIG will sustain an investigation and deliver the case to the BOE for adjudication.

¹¹ 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.

¹² 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.

This quarter, OIG resolved five campaign finance matters, resulting in the return of \$54,500 in improper contributions. Details are provided in the table below.

Table 8: Campaign Finance Activity

Case #	Aggregate Donation Amount (Year)	Donation Source	Donation Recipient	Amount of Returned Funds
C2023-000000307	\$5,000 (2022)	(1) Entity affiliated with company doing business with the City; and (2) Entity doing business with the City	Elected City official	\$3,500
C2023-000000341	\$2,500 (2022)	Entity doing business with the City	Elected City official	\$1,000
C2024-000000012	\$2,500 (2022)	Entity seeking to do business with the City	Elected City official	\$1,000
C2024-000000067	\$50,000 (2023)	Entity affiliated with company doing business with the City	Elected City official	\$48,500
C2024-000000375	\$2,000 (2022)	Entity seeking to do business with the City	Elected City 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.

F | Fines and Recoveries

In this quarter, BOE reached settlements on fines with the subjects of certain OIG investigations in which BOE found probable cause to believe that the subjects had violated the GEO. [All BOE settlement agreements are available to the public on the City's website.](#) The settlements reached this quarter are listed below. Because settlements with BOE, including the names of subjects, are public pursuant to MCC § 2-156-385(4), OIG lists the names of the subjects of its investigations below.

Table 9: Settlements and Fines

BOE Case Number	Subject Name	Date of Settlement	Fine Amount
24015.IG	Lemuel Austin	Jan. 8, 2025	\$7,000
24004.IG	Yat Fan Tam	Jan. 28, 2025	\$5,000
23067.IG.01	Christopher King	Jan. 28, 2025	\$10,000
23067.IG.03	Steven Clay	Feb. 10, 2025	\$5,000

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 the Bureau of Internal Affairs (BIA).

A | Evaluations and Reviews

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

1 | Use of the Affidavit Override in Disciplinary Investigations of Chicago Police Department Members Follow-Up¹³

The Public Safety section of OIG completed a follow-up to its December 2020 "Evaluation of the Use of the Affidavit Override in Disciplinary Investigations of Chicago Police Department Members."¹⁴ The purpose of the December 2020 evaluation was to assess use by COPA and BIA of the affidavit override—an authorization to complete an investigation without obtaining a sworn affidavit on the basis of there being objective, verifiable evidence to support the allegations—in disciplinary investigations of CPD members. Specifically, the evaluation aimed to identify whether there were any patterns among investigations involving an affidavit override request, determine whether investigations closed for lacking an affidavit may have met the eligibility criteria for an affidavit override request, and determine whether there were any disparities in the rates of closure for lacking an affidavit by victim demographics. In its original report, OIG found that the majority of finalized disciplinary investigations were closed for lacking an affidavit. COPA and CPD often did not pursue affidavit overrides and improperly closed investigations for lacking an affidavit including for investigations associated with a civil lawsuit. Additionally, investigations completed on the basis of an affidavit override had higher rates of sustained allegations.

Since OIG's initial report, a July 2021 amendment to Illinois state law eliminated the requirement for sworn affidavits for disciplinary investigations of law enforcement officers.¹⁵ In place of the affidavit requirement and affidavit override process, the Fraternal Order of Police Collective Bargaining Agreement adopted a "certification" requirement for a subset of complaints in order to proceed with an investigation of an FOP member. Certification is required when the complainant is anonymous or does not wish to disclose their identity. In these cases, the head of the relevant agency (i.e., BIA or COPA) may sign a certification stating that based on objective verifiable evidence, it is necessary and appropriate for an investigation to continue. In such cases of certification, the agency executing the certification will not be the agency investigating the complaint.

¹³ Published January 31, 2025. See <https://igchicago.org/publications/affidavit-override-follow-up/>.

¹⁴ City of Chicago Office of Inspector General, "Evaluation of the Use of the Affidavit Override in Disciplinary Investigations of Chicago Police Department Members," December 12, 2022, accessed September 10, 2023, <https://igchicago.org/wpcontent/uploads/2023/08/OIG-Evaluation-of-the-Use-of-the-Affidavit-Override-in-Disciplinary-Investigations-of-CPDMembers.pdf>.

¹⁵

The elimination of the affidavit requirement will apply to all CPD members with the title of Sergeant, Lieutenant, and Captain upon approval of forthcoming police contracts with the City. As such, OIG has followed up on its recommendations to CPD and COPA regarding the use of affidavit override in disciplinary investigations for the subset of CPD ranks for which the affidavit requirement is still in effect (i.e., Sergeants, Lieutenants, and Captains). Though the affidavit requirement only applies to these ranks, many of OIG's recommendations are relevant to CPD and COPA's pursuit of certifications in cases involving Fraternal Order of Police (FOP) members and can inform, generally, the agencies' practices for administrative termination, the closure of a disciplinary allegation with no finding.¹⁶

In its original report, OIG made 10 recommendations for corrective actions to both COPA and CPD. OIG's follow-up concluded that COPA fully implemented four of the original recommendations, substantially implemented three of the original recommendations, partially implemented two of the original recommendations, and had not implemented one recommendation for corrective action. OIG's follow-up further concluded that CPD fully implemented two recommendations for corrective actions, partially implemented four recommendations, and not implemented four recommendations for corrective actions.

In the original report, OIG found that victim demographic information in investigative records was incomplete, hindering any analysis of trends for victim demographics on the likelihood of a misconduct investigation to be closed for lacking an affidavit. OIG recommended COPA and CPD collect comprehensive demographic data on victims specifically in addition to demographic information collected on complainants. Both COPA and CPD noted that complainants voluntarily provide their demographic information. However, neither agency has implemented corrective actions to identify victim demographics within complainant demographic data, as not all complainants are victims.

OIG's original report found that COPA and CPD did not pursue overrides and improperly closed investigations for lacking an affidavit. As a result, OIG made recommendations to revise policies, document evidence and reasons for not pursuing overrides, and to reduce barriers for affidavit signees. Generally, OIG found that CPD and COPA have implemented, to differing extents, corrective actions to improve policies on when affidavits are required.. OIG further found that COPA had clarified that affidavits are never required for the investigation of civilian members, while CPD had not. Further, both agencies have fully implemented measures to document evidence collected or requested as well as reasons when affidavit overrides are not pursued. The agencies should ensure these measures are also taken for documenting the pursuit or lack of pursuit of certifications in investigations of FOP members.

OIG also found that CPD partially implemented measures to lower access barriers for signees or obtain affidavits from non-complainant third-party witnesses. COPA, however, substantially implemented this recommendation through policy that specifically provides that affidavits may be obtained from witnesses. COPA reported to OIG that it provides alternative methods for filing an affidavit other than an in-person signature. Both agencies noted the transition to the Case Management System (CMS) and the existence of a "case origin" field. However, OIG found that this

¹⁶ City of Chicago Office of Inspector General, "Advisory Concerning the Civilian Office of Police Accountability's Practice of Administratively Terminating Disciplinary Investigations," September, 10, 2020, <https://igchicago.org/wpcontent/uploads/2023/08/OIG-Advisory-Concerning-COPAs-Practice-of-Administratively-Terminating-DisciplinaryInvestigations.pdf>.

“case origin” field records the method in which the case was received, such as mail, email, fax, in-person, phone, referral, or web complaint. The field does not record the actor or agency (e.g., the victim, a witness, or another investigating agency) that originally filed the complaint. Independent of the pursuit of affidavits and affidavit overrides, both agencies should continue their efforts to lower barriers for complainants in all aspects of the investigative process and improve upon the data collected regarding complaints against CPD members, including case origin and victim demographics.

Finally, OIG found that both agencies partially implemented corrective actions to prohibit investigators from discouraging reporting parties from signing affidavits, with CPD disseminating a Department-wide eLearning and COPA incorporating this provision into its policy. COPA and CPD should continue their efforts to safeguard against the discouraging of reporting or disregard of witnesses or complainants included in Consent Decree ¶468 as both agencies work to achieve Full Compliance with this paragraph.

OIG’s original report also found that COPA and CPD often closed investigations associated with a civil lawsuit for lacking an affidavit. This risked outcomes in which the City would bear financial costs for conduct that had never been meaningfully investigated for disciplinary purposes. OIG recommended that both agencies track the status of civil litigation related to disciplinary investigations and contact victims and witnesses upon settlement or when civil proceedings have concluded. CPD has not implemented this recommendation; it does not have a process in place to monitor ongoing litigation. In addition, it does not have a policy to initiate contact with victims or witnesses of civil suits upon the conclusion of civil proceedings. Conversely, COPA receives information on related civil litigation from DOL on a bi-weekly basis, but similar to CPD, does not have guidance for contacting victims or witnesses upon the conclusion of a civil proceeding. In addition, OIG recommended that COPA and CPD consider adopting policies that allow for a verified court filing or sworn deposition testimony to satisfy the affidavit requirement, enabling a full investigation of allegations of misconduct raised in a civil lawsuit. OIG found that CPD has not adopted such policies. On the other hand, COPA does allow certain court documents to satisfy the sworn affidavit requirement. CPD’s lack of progress to monitor the status of civil suits for which there is a pending disciplinary matter, and CPD and COPA’s lack of formalized policy to initiate contact upon the conclusion of proceedings perpetuates the risk identified in OIG’s original report—that the City could decide upon and pay settlements regarding misconduct which has not undergone a thorough disciplinary investigation.

Lastly, OIG’s original report found that investigations completed based on an affidavit override resulted in sustained allegations at a higher rate than investigations completed based on an exemption or signed affidavit. OIG did not make any recommendations in connection to this finding.

2 | Public Safety 2025 Outlook on Police Oversight and Accountability¹⁷

Each year, OIG publishes an Outlook on Police Oversight and Accountability that lists projects under consideration for launch in that year by the Public Safety section. Potential projects are listed in categories corresponding to the Public Safety section’s strategic priorities: (a) CPD operational competence; (b) discipline and accountability; and (c) constitutional policing. In December 2024, OIG published its draft Outlook for public comment. The public comment period was open from

¹⁷ Published March 27, 2025. See <https://igchicago.org/publications/2025-outlook-police-oversight-and-accountability/>.

December 9, 2024, to January 31, 2025. The final version of the Outlook on Police Oversight and Accountability was published on March 27, 2025.

The list of projects is intended to serve as a guiding document and is subject to change. The Public Safety section may initiate other projects over the course of the year and the section may not undertake each of the listed projects in 2025. Potential projects are developed from a variety of sources, including input from community members, CPD members, and OIG staff.

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 275 closed disciplinary cases and opened 31 for in-depth review. OIG found three BIA and two COPA investigations that contained deficiencies materially affecting their outcomes.

Table 10: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	191	19
COPA	84	12
Total	275	31

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent two letters of recommendation to reopen investigations to COPA and four letters of recommendation to reopen investigations to BIA. BIA accepted OIG's recommendations; COPA's responses are pending. OIG also sent one notification letter to COPA of an error in identifying the roles of the accused CPD members in CPD's CMS, and one notification to BIA of an error in the listed allegation for a CPD member in CPD's CMS.

Additionally, by the end of this quarter, OIG received a response from BIA on two recommendations to reopen and from COPA on five recommendations to reopen made in the fourth quarter of 2024. COPA accepted OIG's recommendations to reopen two investigations and declined to reopen three investigations. BIA accepted OIG's recommendations to reopen two investigations. OIG also received a response from BIA on a notification made in the fourth quarter of 2024.

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 Reach a Finding \(C2022-000044052\)](#)

OIG reviewed a COPA investigation concerning allegations that a CPD Officer Kahlan Bardney, Star #8694, was arrested for strangling their intimate partner, who was pregnant. Officer Bardney pled guilty to misdemeanor battery and was sentenced to one year of court supervision.

Officer Bardney began a leave of absence on November 17, 2021, and was granted multiple extensions to their leave. On July 26, 2022, COPA placed the investigation in a Close Hold status, stating in its Summary of Administrative Closure memorandum, "the Close Hold is due to the investigator's inability to proceed with interviewing the accused officer." The memorandum also stated that "should the accused return to duty, COPA will serve [them] with allegations, interview [them], and conclude the investigation."

OIG recommended that COPA reopen this matter to interview Officer Bardney and take any additional steps necessary to reach a finding. OIG also requested that COPA identify what authority prevents it from interviewing a CPD member on a personal leave of absence. Additionally, OIG recommended that COPA identify the mechanism or procedure it has in place to ensure it is notified when, and if, Officer Bardney returned to work in order to conclude its investigation.

In response to OIG's recommendation, COPA agreed to reopen the investigation.

In its Final Summary Report (FSR), COPA stated that it made several attempts to interview Officer Bardney but was unsuccessful. According to COPA, "the CPD Officer was served at their last known address when [their] mother accepted the service of the allegations." Officer Bardney contacted COPA and agreed to an interview if they could retain counsel. On March 12, 2024, Officer Bardney contacted COPA and indicated that due to financial hardship they were unable to retain counsel and did not agree to an interview. Last, COPA sent a letter to Officer Bardney's last known address, but there was no response.

COPA sustained allegations that Officer Bardney called the complainant a "bitch," engaged in unjustified physical altercation, used their hand(s) to apply pressure to the complainant's neck, used their body to restrict the complainant's body from movement, knowingly engaged in conduct endangering the unborn child of the complainant, prevented the complainant from leaving the location, and obstructed the complainant from use of a cellphone. In its FSR, COPA wrote, "[They] committed serious acts of domestic violence against the complainant, leaving visible injuries. Additionally, [they] endangered the safety of [their] unborn child. Officer Bardney further brought discredit to the Department in that [they were] arrested, charged, and ultimately plead [sic] to a lesser offense for this incident. While Officer Bardney took some responsibility in [their] guilty plea,

the severity of this misconduct cannot be understated.” COPA recommended separation for Officer Bardney.

b | Recommendation to Reopen to Conduct Additional Analysis (C2022-000044107)

BIA investigated allegations that CPD member Kyle Mingari wore a balaclava bearing the Three Percenters insignia while on duty during a protest in the summer of 2020. The Anti-Defamation League, a global anti-hate organization with which CPD has partnered to provide hate crimes training for CPD members,¹⁸ describes the Three Percenters as a group of “anti-government extremists who are part of the militia movement.”¹⁹ According to the Southern Poverty Law Center, members of the group believe “that the current U.S government is tyrannical and actively working to infringe on Americans’ Constitutional rights and liberties.”²⁰

Mingari’s display of the Three Percenters insignia was the subject of news coverage in June 2020, and a CPD spokesperson was quoted as saying of the case, “These symbols are not representative of the Department...Members are prohibited from participating in any political activity while on duty or when in uniform, including wearing or displaying political paraphernalia.”

BIA conducted a preliminary investigation that relied on the opinion of a single source, that described the Three Percenters as “Red Blooded Americans,” and stated that “the majority of law enforcement officers display the [Three Percenters] flag simply because they like the design, [and] not so much [for] what it represents.” BIA administratively closed the case without any finding referring to CPD’s directive U04-01, Uniform and Appearance Standards, Section XVII.(E), which permits members to wear protective balaclava.

During its review, OIG identified that BIA did not consider Section XX.(K) of CPD’s Uniform and Appearance Standards policy, which prohibits members from wearing any unauthorized insignia or pin. Also, BIA did not conduct an analysis of whether Mingari’s display of the Three Percenters logo may have brought discredit upon the Department or failed to promote the Department’s efforts to implement its policy or accomplish its goals, in violation of Rules 2 and 3, respectively.

OIG recommended that BIA reopen the investigation to conduct any necessary additional investigation and analysis, including but not limited to determining whether a CPD member’s on-duty display of the insignia of the Three Percenters constitutes a violation of CPD’s rules and directives, including Rules 2, 3, and 12-Failure to wear the uniform as prescribed.

In response to OIG’s recommendations, BIA reopened the investigation and interviewed Mingari. In summary, Mingari stated that they believed the Three Percenters symbol to be a symbol for pro-military and pro-police, and they purchased the neck gaiter in 2014 or 2015 as a patriotic item to wear while riding their motorcycle. Mingari denied having membership in any extremist groups including the Three Percenters. BIA also questioned Mingari about not displaying their current star number on their helmet. Mingari took responsibility for not changing the Star number on their helmet as required.

¹⁸ See <https://www.adl.org/resources/press-release/adl-partnership-chicago-police-department-launches-first-its-kind-online>.

¹⁹ See <https://www.adl.org/resources/backgrounders/three-percenters>.

²⁰ See <https://www.splcenter.org/fighting-hate/extremist-files/group/three-percenters>.

BIA sustained an allegation that Mingari had violated CPD's Rule 12, and recommended Mingari receive a reprimand for wearing a face mask depicting a logo of the Three Percenters and for wearing their helmet without their assigned star number. BIA did not bring Rules 2 or 3 allegations against Mingari for wearing the Three Percenters mask while on duty.

c | Recommendation to Reopen to Address All Allegations (C2024-000000048)

OIG reviewed a COPA investigation concerning allegations that CPD Officers Bernadette Kelly, Star #7186, and Matthew Pufpaf, Star #19220, used excessive force against a juvenile arrestee by kicking and punching them, Officer Kelly inappropriately searched the arrestee's genital area during their arrest, and Officer Pufpaf failed to activate their body worn camera (BWC). COPA administratively closed this log number under its Timeliness Initiative and placed the investigation in a Non-Disciplinary Closure (NDC) status without taking any action or making any recommendations, including for any training for the involved CPD members.²¹

During its review, OIG determined that COPA did not include or properly categorize an allegation of sexual misconduct against Officer Kelly, nor did it conduct any analysis of the sexual misconduct allegations. COPA closed the investigation under its Timeliness Initiative despite sexual misconduct allegations being a disqualification for summary closure under COPA's own rules for the Initiative.²²

OIG recommended that COPA reopen the investigation to address the sexual misconduct allegation and close the matter in accordance with its policy.

In response to OIG's recommendation, COPA reopened the investigation to further investigate the allegations that Officer Kelly inappropriately searched the arrestee's genital area. COPA properly categorized the allegation as sexual misconduct and subsequently placed the investigation in a Close Hold status pending the outcome of a Police Board hearing concerning four separate investigations where Officer Kelly was accused of committing similar misconduct.

d | Recommendation to Reopen to Review Its Analysis (C2024-000000224)

BIA investigated allegations that Officers Oscar Alvarez, Star #15076, and Anissa Gomulka, Star #17599, failed to conduct a thorough investigation and failed to arrest a subject for violating an order of protection. In its initial Investigative Closing Report (ICR), BIA sustained both allegations against the accused members and recommended reprimands.

During its review, OIG identified a discrepancy between BIA's findings and their written analysis.

According to BIA's ICR and its CMS, BIA reached a finding of Sustained on the allegation that Officers Alvarez and Gomulka failed to provide police service when they did not attempt to arrest an individual for allegedly violating an order of protection. However, BIA wrote in its ICR that it agreed with the Officers' conclusion that no violation of the order of protection occurred; therefore, an arrest was unwarranted. It wrote that the Officers "weighed all the evidence presented to [them] during this incident" and determined that a violation of the order of protection did not occur, and

²¹ According to COPA's website, the Timeliness Initiative Project is a "comprehensive initiative... to review investigations 18 months or older to determine if an alternative approach...is warranted in order to expedite the closure of certain investigations" <https://www.chicagocopa.org/investigations/timeliness-initiative/>.

²² COPA lists, among other allegations, sexual misconduct as a disqualifying allegation for closure through its Timeliness Initiative <https://www.chicagocopa.org/investigations/timeliness-initiative/>.

“therefore [the alleged offender] should not be arrested.” BIA concluded that “without a verbal admission from [the alleged offender], [the Reporting Sergeant] concurs that [the alleged offender] did not violate the order of protection.” It was unclear how BIA’s analysis and agreement with the Officers’ decision to not arrest the alleged offender supported a finding of Sustained on the allegation that the Officers failed to attempt an arrest.

OIG recommended that BIA reopen the investigation to either align its finding with its written analysis or clarify its existing analysis that supported the sustained finding for failure to make an arrest.

After OIG made its recommendation, OIG reviewed the investigative file and learned that BIA reopened its investigation and corrected its finding to Not Sustained for the allegation that the CPD officers failed to make an arrest for violation of an order of protection.

e | Recommendation to Reopen to Correctly Identify the Accused (C2024-000000414)

BIA investigated allegations that Officers Edgar Rojas, Star #5152, and Carlos Sanchez, Star #19197, failed to arrest the complainant’s boyfriend after the complainant reported that the boyfriend damaged their home and stole their dog. BIA concluded that the Officers’ actions were “lawful and proper,” and exonerated them of the allegations.

During its review, OIG determined that BIA misidentified the accused in its CMS. In its investigative file, BIA utilized CPD’s event query, Attendance and Assignment sheet, and BWC video to identify Officers Edgar Rojas and Sanchez as the officers who responded to the call. Further, the incident that led to the investigation occurred in the 7th District where Officer Edgar Rojas was assigned.

OIG recommended that BIA reopen the investigation to correctly identify Officer Edgar Rojas as the accused CPD member and update Officer Edgar Rojas’ disciplinary history to reflect the investigation in CMS.

In response to OIG’s recommendations, BIA reopened the investigation and correctly identified Officer Edgar Rojas as the accused in CMS.

f | Recommendation to Reopen to Conduct a Rule 14 Analysis (C2024-000000457)

COPA investigated allegations that CPD Officer Luis Cruz, Star #15202 was arrested for Battery/Simple and Sex Offense – Criminal Sexual Abuse when they allegedly made unwanted sexual advances, inappropriate physical contact, and unwanted physical contact with the complainant.

Officer Cruz testified in the Circuit Court of Cook County that their hand did not make contact with the complainant’s vaginal area, nor did they ever touch the complainant’s breast. However, during Officer Cruz’s interview with COPA, Officer Cruz admitted to possibly touching the complainant’s breast and “consensual” touching of the complainant’s buttocks. COPA asked Officer Cruz whether the statement given to COPA was the same as their testimony in the criminal trial. Officer Cruz stated, “Yes.”

In COPA's FSR, COPA stated it questioned the reliability of statements made by Officer Cruz and the complainant. Specifically, COPA noted that Officer Cruz's account was "essentially consistent," but there were elements contradicted by criminal testimony, noting that, "During Officer Cruz's testimony, [they] testified that [they] did not touch [the complainant's] breast. However, on BWC and in Officer Cruz COPA statement, [they] indicated that [they] may have touched [the complainant's] breasts." COPA did not sustain six allegations regarding sexual misconduct against Officer Cruz. COPA sustained one allegation that Officer Cruz used CPD computerized information systems in an unauthorized manner and recommended a penalty of up to 30 days.

OIG recommended that COPA reopen the investigation to conduct an analysis of whether Officer Cruz violated Rule 14 of CPD's Rules of Conduct, prohibiting false reports. COPA declined OIG's recommendation to reopen. In COPA's response it stated, "COPA does not believe the evidence meets the burden of proof for a Rule 14 violation."

CPD's Superintendent concurred with the sustained allegation related to Officer Cruz's unauthorized use of CPD information systems but did not concur with COPA's finding of Not Sustained on allegations related to the "physical/sexual conduct." The Superintendent recommended an alternative finding of Sustained for the sexual misconduct allegations. In a letter to COPA, Superintendent Larry Snelling stated, "Officer Cruz was arrested and criminally charged with misdemeanor Battery...the presiding judge found [the evidence] sufficient to render a verdict of guilty beyond a reasonable doubt. This burden of proof is substantially higher than the Preponderance of Evidence standard required for a sustained finding of an administrative allegation." On this basis, Superintendent Snelling recommended an increased penalty of a 45-day suspension for Officer Cruz.

g | Recommendation to Reopen to Conduct a Rule 22 Analysis (C2024-000000475)

COPA investigated allegations that a CPD Officer Jorge Rivera, Star #18429, used excessive force and engaged in maltreatment of an arrestee, and that CPD Lieutenant Sharon Huffman, Star #620, failed to review the use of force used by Officer Rivera and failed to properly complete the Tactical Response Report (TRR). COPA sustained the allegations against Officer Rivera and recommended a reprimand and retraining on CPD's use of force policy. COPA reached a finding of Unfounded against Lieutenant Huffman.

CPD officers responded to a call of an attempted robbery. The CPD officers conducted an investigatory stop of two individuals who matched the description provided by the victim. One CPD officer successfully detained one of the subjects while the other subject broke free from Officer Rivera and fled on foot. Other CPD members on the scene were able to apprehend the arrestee and place them in handcuffs. Officer Rivera delivered a closed hand strike to the arrestee's face while helping to place them under arrest.

OIG found that COPA did not address whether the CPD members who witnessed the accused member's misconduct reported their observations to a supervisor, in compliance with Rule 22 of CPD's Rules of Conduct, which prohibits the failure to report to the Department any violation of Rules and Regulations or any other improper conduct which is contrary to the policy, orders or directives of the Department. Additionally, OIG identified potential misconduct by another CPD member who did not report their involvement in a traffic crash.

OIG recommended that COPA reopen the investigation to identify the CPD members who witnessed Officer Rivera's misconduct and determine whether they reported their observations in compliance with Rule 22 and other applicable directives. OIG also recommended COPA conduct an analysis to determine whether the CPD member involved in the traffic crash engaged in misconduct when failing to make a report.

In response to OIG's recommendations, COPA declined to reopen the investigation. In COPA's response it stated that the investigation occurred in September 2023 and that COPA believed they were unlikely to obtain sufficient evidence to sustain allegations for failure to report. COPA's response did not address the issue of whether an involved CPD member committed misconduct by failing to report their involvement in a traffic crash.

2 | Notifications

a | Notification to COPA to Correct the Record (C2025-000000085)

OIG reviewed an investigation concerning allegations that CPD Officer Francisco Perez II, Star #14988, performed an illegal search of the complainant's vehicle, retaliated against the complainant and their passenger by abusing their law enforcement authority, and acted unprofessionally by using profanity; Officers Brandon Almeda, Star #18232 and Brett Palm, Star #16255 acted unprofessionally by using profanity; Officer Palm retaliated against the complainant and their passenger by abusing their law enforcement authority, and Officer Daniel Doherty, Star #10869, failed to timely activate their BWC. COPA reached Sustained findings on two of the three allegations made against Officer Perez and one allegation against Officer Doherty. COPA reached a finding of Not Sustained on all of the allegations against Officers Almeda and Palm.

Although COPA notified Officers Almeda and Perez as accused members in this investigation, Officers Almeda and Palm were listed as witnesses in CPD's CMS.

OIG notified COPA of this error and recommended it correct Officers Almeda and Palm's listed role in the investigation to reflect their involvement as accused, the allegations brought against them, and the findings.

COPA notified OIG that the record had been corrected to reflect the officers as accused with the appropriate allegations and findings.

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.

1 | Audit and Program Review Section 2025 Annual Plan²³

Each year, OIG publishes an Annual Plan that lists projects under consideration for launch in that year by the Audit and Program Review section. Potential projects are listed into five broad categories corresponding with the functions and departments presented in the City's Annual Appropriation Ordinance, Summary E. In December 2024, OIG published its draft Annual Plan for public comment. The public comment period was open from December 9, 2024, to January 31, 2025. The final version of the Audit and Program Review Section Annual Plan was published on March 27, 2025.

The list of projects is intended to serve as a guiding document and is subject to change. The Audit and Program Review section may initiate other projects over the course of the year and the section may not undertake each of the listed projects in 2025. OIG gathers potential audit topics from a variety of sources, including intakes received from the public; suggestions from City officials, employees, and stakeholders; past OIG reports; OIG investigations; OIG staff knowledge; other governments' performance audits, audited financial statements, internal audits, and risk assessments; new City initiatives; program performance targets and results; public hearings and proceedings; and public source information, including media, professional, and academic reports and publications.

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 one advisory and two notifications this quarter.

1 | Advisory Concerning Gifts Accepted on Behalf of the City (CC2024-000000216)²⁴

The City of Chicago's Governmental Ethics Ordinance (GEO) limits the circumstances under which City employees and officials may accept gifts of value. As a general rule, City employees and officials may accept gifts "given to" or "accepted on behalf of the City"—provided, however, that such gifts are "promptly" reported to the Board of Ethics (BOE) and to the City's Comptroller, who is to add such gifts to an inventory of the City's property. Based on an unwritten arrangement dating back to the administration of Mayor Eugene Sawyer, successive mayors have not reported

²³ City of Chicago Office of Inspector General, "Audit and Program Review Section 2025 Annual Plan," March 27, 2025, <https://igchicago.org/wp-content/uploads/2025/03/OIG-Audit-and-Program-Review-2025-Annual-Plan-.pdf>.

²⁴ City of Chicago Office of Inspector General, "Advisory Concerning Gifts Accepted on Behalf of the City," January 29, 2025, <https://igchicago.org/publications/advisory-concerning-gifts-accepted-on-behalf-of-the-city/>.

gifts accepted on behalf of the City to BOE, but rather have been advised that such gifts could be recorded in a publicly available logbook maintained on the Fifth Floor of City Hall.

OIG visited the fifth floor of City Hall in an undercover capacity and requested access to the mayoral gift log. Mayor's Office staff denied the request and directed OIG's covert personnel to submit a Freedom of Information Act (FOIA) request for it. Again in a covert capacity, without identifying itself as the source of the request, OIG submitted a FOIA request for the log. The Mayor's Office did not timely respond, constituting a denial of the request. OIG subsequently sent an official document request for the log, and only then was it produced; the log was in the form of a spreadsheet that detailed gifts accepted "on behalf of the City," including alcohol, jewelry, clothes, and accessories. The log identified many of those gifts—including Hugo Boss cufflinks; Givenchy, Gucci, and Kate Spade handbags; a personalized Mont Blanc pen; and size 14 men's shoes—as being stored in a "Gift Room," and others in the Mayor's personal office in City Hall.

OIG subsequently visited the fifth floor of City Hall and requested access to the Gift Room to conduct an unannounced inspection. In consultation with and apparently on the advice of the City's Department of Law (DOL), Mayor's Office staff denied OIG access to the Gift Room. Thereafter, DOL—apparently representing the Mayor in opposition to OIG—persisted in denying OIG physical access to the Gift Room.

Section 2-56-090 of the Municipal Code of Chicago (MCC) makes it the duty of every elected or appointed officer, employee, department, and agency of the City to cooperate in OIG inquiries. Furthermore, pursuant to that section, "[e]ach department's premises, equipment, personnel, books, records and papers shall be made available as soon as practicable to the inspector general."

OIG recommended that the Mayor's Office comply with the generally applicable public reporting requirements for gifts accepted on behalf of the City, and make the Mayor's "Gift Room" available for inspection.

In a response dated January 24, 2025, the Mayor's Office indicated that it would make the Gift Room available for inspection by OIG, but only with "a properly scheduled appointment." The Mayor's Office response does not acknowledge that DOL, apparently acting on its behalf, persisted in denying OIG access to the Gift Room and does not explain why it would not have been "practicable" to provide OIG immediate access to the Gift Room, in accordance with the MCC.

The Mayor's Office further responded that it "will continue to comply with all guidance from the Board of Ethics" with respect to public reporting of gifts, and attached a letter from BOE, in which BOE also "concur[red]" with OIG that the Mayor's Office should comply with the plain language of the GEO requirements on reporting gifts accepted "on behalf of the City." The Mayor's Office said it "will work closely with the Board of Ethics to transition to this new guidance."

2 | Advisory Concerning Non-Compliant Separation of Water Mains and Sewers (C2022-000044003)²⁵

OIG notified DWM of concerns regarding a lack of public transparency surrounding extensive water main and sewer line construction work that failed to comply with Illinois Environmental Protection Agency (IEPA) regulations. In 2019, DWM discovered widespread noncompliance with IEPA requirements for the minimum horizontal and vertical distance between underground water mains and sewer lines (separation standards). DWM has subsequently cooperated with the IEPA to develop a remediation plan, reported noncompliant locations, and continues to correct noncompliance when it discovers it during the course of its regular work. The City demanded that contractors who constructed noncompliant water mains conduct corrective work at the contractors' expense, resulting in litigation by two contractors against the City. But the City had paid a company over \$288 million between 2013 and 2023 to, among other roles, ensure that contractors correctly installed water mains. Even after discovery of widespread separation standards noncompliance in 2019, the City continued to pay that same company millions of dollars annually for its services.

As of May 2024, DWM had reported 1,204 non-compliant locations—spread widely across the City—to the IEPA. The extent of noncompliance varies. In some instances, the noncompliant work nearly satisfies vertical or horizontal separation requirements. However, in at least 39 instances, a City water main or service line in fact crossed through sewer infrastructure.

Subject-matter experts informed OIG that the City's noncompliance with water main and sewer line separation standards does not necessarily present an acute safety risk, because the pressurization of City water mains mitigates the risk of water supply contamination. However, parts of the City's network of water mains have lost full pressurization multiple times in recent years. DWM notifies residents when there is a need to boil water before consuming it, but it takes time to disseminate information and there is no guarantee that every impacted resident will learn of a boil order.

The City's noncompliance with IEPA standards has practical impacts for Chicagoans. Correcting the noncompliant work may involve significant financial costs to the City, and the corrective work can be highly disruptive by prolonging the time that streets remain excavated during DWM construction projects. Extending the duration of such construction has significant quality-of-life impacts for City residents due to the noise and dust it creates as well as its impacts for street users, parking, and streetscapes.

OIG recommended that DWM increase and improve the information available to the public and members of City Council about this issue, including by providing updates on the City's progress toward compliance with IEPA water-sewer separation standards and on steps that DWM is taking to avoid this issue recurring. Additionally, OIG recommended that DWM coordinate with relevant City departments to provide accessible, proactive public education on how City residents should respond in the event of a water main depressurization, especially because it takes time for DWM to communicate to City residents about the need to boil water in the event of a water main depressurization.

In response, DWM "affirm[ed] that the water supply is safe." DWM reported that it preserves the safety of the water supply through multiple layers of systems, including by maintaining water

²⁵ City of Chicago Office of Inspector General, "Advisory Concerning Non-Compliant Separation of Water Mains and Sewers," February 19, 2025, <https://igchicago.org/publications/advisory-non-compliant-water-mains-sewers/>.

pressure levels that meet or exceed regulatory standards, by proactively monitoring for leaks in the system, by inspecting one-third of the water system each year, and by using leak data to prioritize spending on water main replacements. DWM “continuously monitors” the quality of water both as it leaves the water purification plants and as it travels through the distribution system.

DWM stated that it discloses to IEPA any field conditions that do not comply with IEPA water and sewer separation standards, and it corrects the noncompliance in the course of undertaking other work at non-compliant locations or when repairing parts of the water system that could impact noncompliant locations. DWM “acknowledge[d] that there have been, and will continue to be, financial costs associated with the Title 35 non-compliance and associated corrective work,” and that related litigation remains ongoing with two contractors that had performed water main replacement work.

As to OIG’s recommendation on transparency and public awareness, DWM stated that “information about this issue, including its reports to the IEPA regarding the discovery of non-compliant locations, is not confidential and may be requested by anyone who is interested.”

Regarding OIG’s recommendation that DWM coordinate with relevant City departments to provide proactive public education on how City residents should respond in the event of a water main depressurization, DWM stated that “[t]here are no additional steps or precautions that DWM would recommend for Chicagoans to take to protect themselves and ensure the safety of their drinking water due to regularly non-compliance with separation standards.” DWM’s position is that “where comprehensive monitoring indicates that no such risk is present and where residents do not need to take any action, such elevated public communications may dilute the desired impact of City communications when there is a confirmed risk and action by residents is actually needed, for example during boil orders.”

3 | Office of Emergency Management and Communications Emergency 911 Call Event Dispatch Policies (C2023-000000016)

OIG notified OEMC about potential mismanagement of 911 call events as a result of a complaint alleging difficulty for OEMC police communications operators (PCO) to dispatch 911 call events CPD when CPD resources are overwhelmed or unavailable. The complainant advised that PCOs are pressured by supervising PCOs to close or “file” out the 911 call events before they are addressed by CPD to clear the pending 911 call events board. Further, it was alleged that supervising PCOs close out 911 call events before dispatching them to CPD based on OEMC response time concerns. Finally, the complaint expressed concerns regarding the process for sharing information from duplicate calls, particularly when supervising PCOs or PCOs not on the dispatch team file the duplicate call.

OIG reviewed policies and procedures for PCOs and supervising PCOs provided by OEMC, reviewed applicable CPD General Orders, spoke to OEMC staff, and conducted an analysis of a sample of 911 call events. As a result, OIG discovered contradictions between policies described by the complainant and the ones described by OEMC senior staff, with senior staff noting that PCOs and supervising PCOs are not authorized to file or close out events based on a lack of CPD resources at any priority level. OIG’s review of a sample of 911 calls, however, appeared to potentially support the complainant’s understanding of the policy. Of the approximately 300 filed calls reviewed by OIG, there were 11 events of concern that identified high priority tickets (priority 1 and 2 events) including events of potential driving under the influence and a sex offense, that were

filed due to “manpower” or “no police service (nps).” Additionally, there were approximately 200 events, a majority of which were priority 1 and 2, filed as duplicates from a supervisor’s workstation. After a review of the policies and procedures provided by OEMC, OIG determined that there were not clear policies or procedures specifically allowing or prohibiting supervising PCOs and PCOs from closing out or canceling 911 call events before dispatching them to CPD. Furthermore, even if the policies OEMC provided are meant to accomplish that goal by establishing dispatch times to various priority levels, the complainant’s account and the sampled 911 calls suggest there is ongoing confusion among PCOs and supervising PCOs. Finally, while the materials do assign dispatch time limits to each priority and explain that a Radio Assignments Pending (RAP), which continues to periodically announce the call for dispatch, is to be issued if time limits are reached, the materials do not provide a clear explanation of what action should be taken if a RAP is never answered.

Relating to the complainant’s concern of tracking duplicate calls, OEMC senior staff reported to OIG that there is no standardized method of communicating the information contained on duplicate 911 call event reports and that information is often shared verbally by the PCO or supervisor who cross references and closes out a duplicate event. OEMC policies and procedures reviewed by OIG appeared to instruct that information from duplicate events should generally be entered electronically, but there did not appear to be a standard protocol for verbal communications or an explicit prohibition on verbal communications of such information.

OIG therefore recommended that OEMC implement policies or procedures clarifying the circumstances, if any, which allow OEMC supervising PCOs and PCOs to close out 911 call events before dispatching them to CPD. Furthermore, OIG recommended that OEMC review policies and procedures related to the closing of duplicate events and make any necessary changes or clarifications to ensure that information from duplicate events is communicated clearly to dispatching PCOs.

In response, OEMC stated that they provided procedures “for handling calls deemed as duplicates and also explained the procedures for the policy when calls reach the time limit without a call being dispatched known as the Radio Assignments Pending (RAP) procedure.” OEMC ran a data analysis “utilizing the parameters defined in the OIG communication and investigated 10 calls.” From that data analysis, OEMC determined “that no police service (NPS) was within OEMC policies and procedures for all those calls.” OEMC further advised that several of the calls it reviewed would have received no police service from CPD as it was determined the calls should be transferred to the Illinois State Police or to a suburb, or that medical services were more appropriate. OEMC did not report whether it conducted a review of its policies and procedures or whether any new policies or procedures would be implemented to clarify the circumstances, if any, which allow OEMC supervising PCOs and PCOs to close out 911 call events before dispatching them to CPD. Nor did OEMC report whether it would make any changes or clarifications to policies or procedures to ensure that information from duplicate events is communicated clearly to dispatching PCOs.

4 | Chicago Fire Department Secondary Employment Policies (C2023-000000181)

OIG notified CFD of concerns regarding inconsistencies with regard to the applicability of City secondary employment policies to CFD personnel. This concern arose in the course of an OIG misconduct investigation (summarized above) in which the CFD member stated that they were unaware of City rules regarding secondary employment and, in fact, had been affirmatively told they could have any secondary employment they wanted following their probationary period. On their

face, the City of Chicago Personnel Rules and the CFD Code of Conduct's requirement that CFD members adhere to the Personnel Rules appear to require CFD personnel to obtain the Department's authorization for secondary employment. CFD has at times agreed with that reading of the City's rules, both in the abstract and in practice. However, CFD and other City departments have not consistently interpreted the Personnel Rules and CFD's Code of Conduct this way as applied to CFD members. The Office of Public Safety Administration (OPSA) indicated that sworn CFD members are not required to complete secondary employment forms. A letter from CFD, relying on a 1999 DOL legal memorandum, claimed that CFD could not enforce secondary employment rules against CFD members represented by a union. In November 2020, a CFD official communicated to OIG that that CFD alleges violations of CFD Rule 2.12 when a CFD member engages in outside employment without first having an authorization in their file. Moreover—as has been previously described publicly in OIG's First Quarter 2024 Quarterly Report—in OIG case #C2022-000043881, OIG sustained a secondary employment violation against a CFD employee. In response, CFD agreed with OIG's sustaining of the violation and issued discipline to the CFD employee.

OIG recommended that CFD advise its members and, as appropriate, other City departments on the applicability of City of Chicago Personnel Rule XX, Section 3 to CFD members and formalize that determination in an appropriate manner such that it can be made available to CFD members and the public.

In response, CFD stated that CFD is unable to strictly enforce Personnel Rule XX until the secondary employment policy is negotiated with the Chicago Fire Fighters Union, Local 2.

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 received fourteen 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 the 2014 Hiring Plan Prohibitions and a Contractor Selection Certification. OIG shall report on all service contracts or agreements received and reviewed by OIG Compliance. This quarter, OIG completed review of one contract. There are 175 contracts under review.

OIG Compliance Case No. C2024-000000433

OIG identified violations of the City of Chicago Hiring Plan Contractor Policy (Contractor Policy) associated with a "Request to Engage Independent Contractor" and an "Independent Contractor Agreement" between an alderperson and a former aldermanic employee, signed in 2024. The contract provided that the former employee would provide "constituent services" for the alderman. This was similar to the job the former employee did while they were employed by the City, where they were an "aldermanic aide" for the same alderman who sought to use them as a contractor. OIG determined that the former employee was acting as a common law employee rather than an independent contractor in violation of the Contractor Policy. Under the Contractor Policy, the City may not use contractors who are functionally acting as City employees by virtue of their work arrangement. OIG found that the former employee was a common law employee because they referred to themselves as "assistant to the alderman" or "aldermanic assistant," had access to the 311's complaint portal, used a City email address, and worked almost entirely out of a Ward office located in City Hall. In fact, City records also conflicted about whether the former employee was actually still employed with the City.

Additionally, OIG determined that the contract was procedurally deficient because it did not contain, as required by the Contractor Policy, the 2014 Hiring Plan Prohibitions, a Contractor Selection Certification, was not approved by the Office of Budget and Management (OBM), an incorrect form was used, and the request was not submitted in a timely manner as the contract was signed after the contractor had begun work.

DHR responded and stated that it met with the alderman and their chief of staff, and that no further extension would be approved of the contract at issue. Additionally, the alderman would be obtaining and completing end of employment paperwork and removing the individual from City email systems. DHR also stated that for future contracts, OBM and DHR will review requests, the alderman will fill out the correct Independent Contractor form, and no independent contractor will start before a request is signed and executed by OBM and DHR.

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 no notifications of political contacts.

e | Exemptions

OIG reviews adherence to exemption requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²⁶ This quarter, OIG received notification of 39 exempt appointments.

²⁶ 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.

OIG Compliance Case No. C2024-000000139 – Department of Human Resources Violation

After receiving a complaint that an employee was hired due to the political connections of a family member, OIG reviewed the hiring records associated with a deputy mayor position. OIG's review determined that there were no Class Specifications for the relevant position. According to the City of Chicago 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 must include sufficient detail to accurately reflect the job duties. Under the Employment Plan, if an individual does not possess the minimum qualifications or hold any applicable required licenses or certifications, they cannot be appointed into the exempt position. The Employment Plan requires DHR to maintain a list of Classes and updated Class Specifications, which includes the minimum qualifications. Because this deputy mayor position did not have Class Specifications, including minimum qualifications, OIG was unable to determine whether the person who now fills that role was minimally qualified for the role, as opposed to the complaint's contention that the person was unqualified and hired only because of the political connections of their family member.

Further, since DHR did not have Class Specifications for the position, the Mayor's Office was not able to completely produce documentation that was mandated by the Employment Plan. Departments, including the Mayor's Office, must submit to DHR the resume and copies of any required licenses or certifications of the selected candidate demonstrating that they meet minimum qualifications, and the Class Specification of the Exempt position.

On November 6, 2024, OIG recommended that DHR work with the Mayor's Office to establish any missing Class Specifications. On January 8, 2025, DHR responded that they would work with the Mayor's Office to review and update current Class Specifications, and that DHR would ensure that all titles have proper Class Specifications, which will be made available as required.

OIG Compliance Case No. C2024-000000054 – Department of Streets and Sanitation Violation

OIG obtained information showing that two DSS ward superintendents were assigned to a single ward, in violation of the City's Employment Plan. Under the Employment Plan, ward superintendents serve as a liaison between DSS and the alderman for a specific ward. Importantly, the Employment Plan states that only one Ward Superintendent may be hired for each ward.

OIG reviewed ward superintendent assignment lists and daily activity sheets and found that a specific ward had two assigned ward superintendents, in violation of the Employment Plan. When OIG interviewed one of the ward superintendents, they told OIG that the other superintendent filled in when they were unavailable.

On December 10, 2024, OIG recommended that DSS correct its staffing allocation to ensure that only one ward superintendent was assigned to each ward. On January 9, 2025, DSS responded that they had reassigned one of the ward superintendents to a ward that was previously lacking a

superintendent, and that each ward within DSS's jurisdiction is now staffed with one Ward superintendent.

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 two senior manager hiring sequences and found no violations.

g | Selected Department of Law Hiring Sequences

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

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

OIG receives notifications of disciplinary decisions, arbitration decisions, and potential grievance settlement agreements that may impact the procedures outlined in the City's Employment Plans. This quarter, OIG did not receive any disciplinary decisions, arbitration decisions, or resolution of grievances by settlement.

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

OIG may review modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG 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 reviewed seven referral lists and found no issues.

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.

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: the Department of Fleet and Facility Management (2FM), CDA, the Department of Buildings (DOB), DSS, the Chicago Department of Transportation (CDOT), DWM, and six other City departments selected at the discretion of OIG. For 2025, OIG selected the following six additional departments: COPA, the Chicago Department of Public Health (CDPH), the Chicago Public Library (CPL), BACP, CPD, and DHR. The table below details the hiring sequences audited by OIG this quarter.

Table 11: Hiring Sequences Audited in Q1 2025 Pursuant to the City of Chicago Employment Plan

Department	Title	Findings	OIG Recommendation	Department Action
Chicago Public Library	Head Library Clerk	No violations or errors were found.	N/A	No response required.
Chicago Police Department	Project Coordinator	No violations or errors were found.	N/A	No response required.
Chicago Department of Finance	Lead Accountant	No violations or errors were found.	N/A	No response required.
Chicago Department of Aviation	Custodial Worker	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 concluded one audit of an examination covered by the City of Chicago Employment Plan.

OIG Compliance Case No. C2024-000000031

OIG conducted an audit of data regarding the testing portion of the Chicago Department of Transportation (CDOT) dispatcher-concrete position from October 2022. In conducting the audit, OIG identified two features of the test administration that had the potential to lead to violations of the City of Chicago Employment Plan. First, OIG learned that the 2022 test had the same questions and answers as the 2016 test administration. Second, subject matter experts were not required to sign a confidentiality agreement affirming that they would not share testing information as well as acknowledging that it is a violation of the Employment Plan and the City of Chicago Personnel Rules to share such information. These issues provided an opportunity for a candidate or a subject matter expert to commit fraud or other misconduct by remembering or sharing test information.

OIG recommended that for all future sequences involving covered positions under the City of Chicago's Employment Plan, DHR and CDOT consider whether they should administer previously administered tests or use a modified test and consider requiring subject matter experts who are City employees to sign confidentiality agreements to maintain the integrity of the test being developed.

DHR denied that violations of the Employment Plan had occurred in the hiring sequence. DHR stated that it is the general practice of the Testing Division to collect confidentiality agreements from subject matter experts during the job analysis and test development process, but Testing Division personnel were not able to locate the confidentiality agreement forms and produce them to OIG. DHR recognized the need for better tracking of its job analytic documentation. Therefore, DHR (1) issued an email reminder to DHR Testing Division staff with expectations for confidentiality agreements including who needs to complete the forms, circumstances under which they need to be completed, and how they should be saved for future use; (2) reviewed and updated the confidentiality agreement language; and (3) issued a new protocol to ensure confidentiality agreements with department subject matter experts will be easily accessible in the future. DHR noted that it will continue its practice of working with subject matter experts to update and review content and make changes as supported by job analysis and test review.

c | Chicago Police Department Testing

OIG is required to conduct audits of CPD testing including test administration and scoring. This quarter, OIG did not conduct any audits of test administrations for covered positions within CPD.

d | Chicago Fire Department Testing

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

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 did not conduct any audits of CFD hiring sequences.

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

OIG is required to conduct audits of CPD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CPD.

i | Chicago Fire Department Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG is required to conduct audits of CFD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CFD.

j | Chicago Police Department Candidate Lists

OIG is required to conduct audits of CPD candidate lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CPD candidate lists.

k | Chicago Fire Department Referral Lists

OIG is required to conduct audits of CFD referral lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CFD referral lists.

l | Chicago Police Department Acting Up

OIG is required to audit compliance with Chapter X of CPD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CPD.

m | Chicago Fire Department Acting Up

OIG is required to audit compliance with Chapter XI of CFD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CFD.

n | Chicago Police Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CPD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CPD's Hiring Plan.

o | Chicago Fire Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CFD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CFD's Hiring Plan.

4 | Other Compliance Activity

a | Monitoring

In addition to auditing hire packets, OIG monitors hiring sequences as they progress by attending and observing intake meetings, interviews, tests, and consensus meetings. The primary goal of monitoring hiring sequences is to identify any gaps in internal controls and non-compliance with the City of Chicago's Employment and Hiring Plans. However, real-time monitoring also allows OIG to detect and address compliance issues as they occur.

OIG identifies the hiring sequences to be monitored based on risk factors such as past errors, complaints, and historical issues with particular positions. This quarter, OIG monitored four hiring sequences across four City departments. The table below shows the breakdown of monitoring activity by department.²⁷

Table 12: Hiring Sequences Monitored in Q1 2025

Department	Intake Meetings Monitored	Tests Monitored ²⁸	Interview Sets Monitored ²⁹	Consensus Meetings Monitored	Violations	Errors
Civilian Office of Police Accountability	0	0	1	0	0	0
Chicago Department of Finance	0	0	0	1	0	0
Chicago Department of Public Health	0	0	1	0	0	0
Chicago Police Department	1	0	0	0	0	0

²⁷ If a department is not included in this table, OIG did not monitor any elements of that department's hiring sequence(s).

²⁸ Tests monitored are totaled by exam type, i.e. Police Officer, Detective, etc.; not total number of tests monitored for exam type.

²⁹ Interview Sets Monitored are totaled by positions monitored; not total number of interviews monitored.

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 one new escalation.

Table 13: Escalations Received in Q1 2025

Escalation Status	Number of Escalations
Newly Initiated	1
Pending	3
Referred to DHR Commissioner	0
Closed with Investigation	0
Closed without Investigation ³⁰	1

OIG Compliance Case No. C2024-000000357

OIG received an escalation on July 15, 2024, arising from the candidate selection phase of a hiring sequence for the position of Program Director with CPD. The escalation stated that the hiring sequence violated the City of Chicago Employment Plan because a consensus meeting for the referenced position was conducted without the assigned DHR recruiter. However, DHR subsequently worked with OPSA and CPD to conduct a consensus meeting in August 2024. Chapter V(B)(12) of the City of Chicago Employment Plan requires “a [c]onsensus [m]eeting led by a DHR recruiter...” be conducted after interviews have concluded to select the candidate(s) that will receive an offer of employment. The DHR recruiter is tasked with guiding the interviewers assigned to the hire sequence through a discussion in which all interviewers share their thoughts and opinions on interviewed candidates to make a hiring decision.

The DHR recruiter informed OIG that the hiring manager provided the Candidate Assessment Forms to the manager of human resources within OPSA as the human resources liaison was absent. When the DHR recruiter coordinated with the OPSA manager of human resources to obtain the forms, the DHR recruiter was informed that one of the interviewers retired from CPD, and therefore was unavailable to conduct the consensus meeting. Along with reporting this escalation to OIG, the DHR recruiter worked with OPSA and CPD to have the retired interviewer conduct a consensus meeting on August 30, 2024.

After reviewing the escalation, OIG had no further recommendations since the consensus meeting was ultimately conducted and was monitored by OIG. Therefore, no response was required under Chapter XIV(B)(6) of the Employment Plan.

³⁰ 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.

c | Processing of Complaints

OIG receives complaints regarding the City's hiring and employment processes, including allegations of unlawful political discrimination and retaliation and other improper considerations in connection with City employment. These complaints may be resolved in several ways, depending on the nature of the complaint. If there is an allegation of an Employment Plan violation or breach of a policy or procedure related to hiring, OIG may open an inquiry into the matter to determine whether such a violation or breach occurred. If a violation or breach is sustained, OIG may make corrective recommendations to the appropriate department or may undertake further investigation. If, after sufficient inquiry, no violation or breach is found, OIG will close the case as Not Sustained. If, during an inquiry, OIG identifies a process or program that could benefit from a more comprehensive audit, OIG may consider a formal audit or program review.

The table below summarizes the disposition of complaints related to the City's hiring and employment processes received this quarter.

Table 14: Hiring and Employment-Related Complaints Received in Q1 2025

Complaint Status	Number of Complaints
Newly Initiated	28
Pending	24
Closed ³¹	0
Declined	4

OIG Compliance Case No. C2024-000000309

OIG was notified that the consensus meeting for a paralegal II position in CDPH was waived by DHR recruiter. Chapter V(B)(12) of the City of Chicago Employment Plan states that “[a]fter the interviews for the vacancy are completed, the selection process for interviewed [p]ositions shall be based on a Consensus Meeting led by a DHR Recruiter and attended by all interviewers [...]”.

OIG was informed that all interviewers agreed to select the single candidate for hire. However, interviewers were not given the opportunity to participate in a consensus meeting led by a DHR recruiter at the conclusion of the interview process to review their respective interview results and any other relevant information to arrive at a hiring recommendation. Accordingly, such action violated the Employment Plan as consensus meetings must be conducted and led by DHR recruiters after interviews for a vacancy are completed.

DHR responded that, upon the recruiter's review of the candidate assessment forms, the recruiter noticed that both interviewers selected the same candidate for hire, and both did not recommend the other candidate. Since there was consensus on how the interviewers rated the candidates on the forms, the recruiter determined that a consensus meeting was not necessary. DHR recognized that this practice is not explicitly stated in the Employment Plan and therefore is viewed as violation of the plan. Accordingly, DHR will require consensus meetings on all future hiring sequences until revisions to the Employment Plan can be made to ensure compliance. In addition, staff will receive

³¹ Complaints categorized as Closed are considered Closed after OIG reviews the complaint and issues a finding with or without recommendations to the respective department.

communication that consensus meetings must be held for all future hiring sequences regardless of the number of interviews.



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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