



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Quarterly Report: Fourth Quarter 2023

January 12, 2024

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO

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

Among the challenges of oversight work is that of measuring success. The fact of the matter is that we will not fix all that is wrong with City government—and so we are left endeavoring to mark progress and quantify impact without reaching a finish line.

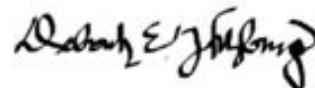
Some of our most important work in the service of our mission does not, in fact, lend itself to measurement. Looking back on 2023, the Office of Inspector General (OIG) undertook meaningful, productive engagement in Chicago's communities to inform and deepen our products and priorities. We performed thoughtful, human-centered fieldwork so that our work reflected the experiences of real Chicagoans. We grew our presence on the national oversight landscape, better enabling us to learn from and contribute to our colleagues in good government work. All of those efforts, however vital, elude empirical measurement.

Meanwhile, OIG did mark some critical, measurable successes in 2023, particularly in the fourth quarter. In the fourth quarter, OIG was found in full and effective compliance with and released from its obligations under the consent decree entered in *Illinois v. Chicago*—the first and only component of City government to fully satisfy and sustain compliance with its obligations. Also in the fourth quarter, in our investigative work, we reduced our count of cases open more than a year by nearly a third. We closed 139 cases in 2023. Our investigative work has not only gotten swifter but we have been markedly more aggressive in our pursuit of bad actors who break the rules; nearly half of the cases in which OIG has successfully pursued findings of probable cause in investigations into violations of the City's ethics rules in the last decade were in 2023 alone. In this quarter, we report on the successful prosecution of an individual for obstructing an OIG investigation—the first such prosecution of which we are aware.

As always, the fine work of OIG was powered by the extraordinary people who work here. We closed 2023 fully staffed, with 121 of 124 budgeted positions filled and candidates committed to the remaining three positions to start work in 2024. In 2023 we hired 40 new employees and made 16 internal promotions.

It is my tremendous good fortune to work alongside those people every day. As we continue our work in 2024, we will continue our efforts to pay down the deficit of legitimacy at which the City of Chicago operates. We will continue to do integrative, interdisciplinary oversight work to maximize our impact, and we will continue to engineer OIG for stable, progressive, long-term success—both the kind that is hard and the kind that is easy to measure.

Respectfully,



Deborah Witzburg
Inspector General
City of Chicago

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This quarterly report provides an overview of the operations of the City of Chicago Office of Inspector General (OIG) from October 1, 2023 through December 31, 2023, and includes information required by the Municipal Code of Chicago (MCC).

I | Mission of the Office of Inspector General

OIG’s mission is to promote economy, effectiveness, efficiency, and integrity in the administration of programs and the operation of City government.¹ OIG accomplishes its mission through investigations of allegations of misconduct, performance audits, evaluations and reviews, data analysis and visualization, and other inquiries.

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

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

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

Finally, OIG issues reports as required by the City’s Employment Plan and as otherwise necessary to carry out its functions in overseeing hiring and promotion processes across the City.

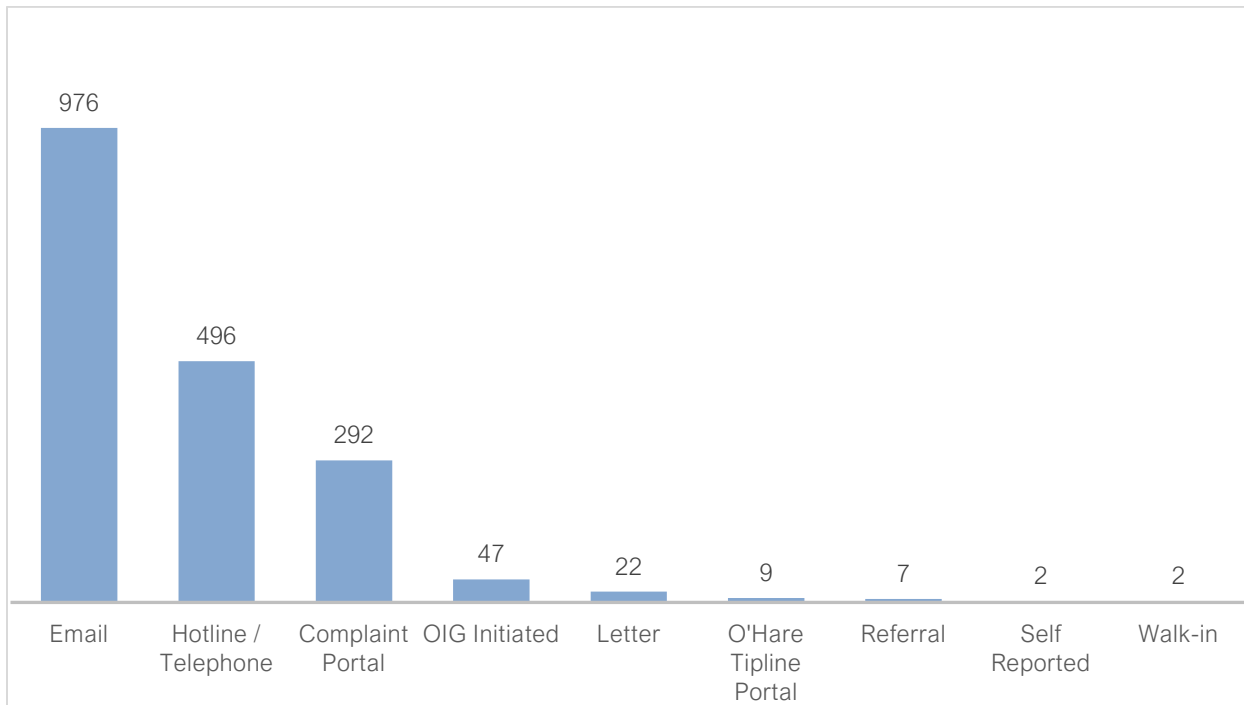
¹ “City government” includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 1,853 intakes this quarter. The following chart shows the various reporting methods by which those intakes were received.

Intakes Chart 1: Intakes by Reporting Method



In determining whether to open an inquiry into issues raised during intake, among other factors, OIG evaluates the nature of the issue raised; which of OIG's sections might be best equipped to address the issue; and, if an intake alleges misconduct, the potential magnitude or significance of the allegations.² Following this review, OIG may open an investigative or non-investigative inquiry, decline an intake, or refer it to another agency or City department. The following information outlines the actions OIG has taken in response to intakes received this quarter.

In Q4 2023, OIG referred 493³ intakes to City departments or other agencies.⁴ The total number of referrals (see chart below) may be greater than the number of OIG referred intakes, as a single OIG intake may be referred to more than one agency.

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

³ OIG referred 493 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 503 referrals.

⁴ Pursuant to MCC § 2-56-120, OIG does not report here referred intakes in which "(i) the complaint addresses potential criminal conduct and has been referred to a state or federal law enforcement agency, and (ii) the investigation of the conduct at issue is ongoing, and (iii) in the judgment of the inspector general, public disclosure of the referral would compromise the effectiveness of the investigation."

Table 1: Referred Intakes

Referred Agency	Number of Referrals
Chicago Civilian Office of Police Accountability	275
Chicago Police Department	164
Chicago Department of Human Resources	10
Chicago Fire Department	6
Illinois Office of Executive Inspector General	6
Chicago Public Schools Office of Inspector General	4
Federal Bureau of Investigation	3
Illinois Department of Children and Family Services Office of Inspector General	3
Illinois Department of Human Services Office of Inspector General	3
Cook County Office of Independent Inspector General	2
Illinois State Police	2
Streamwood Police Department	2
U.S. Small Business Administration Office of Inspector General	2
Bellwood Police Department	1
Bloomington Police Department	1
Chicago Department of Streets and Sanitation	1
Chicago Department of Water Management	1
Chicago Housing Authority Office of Inspector General	1
City Colleges of Chicago Office of Inspector General	1
Cook County Sherriff's Office Of Professional Review	1
Illinois Office of Attorney General	1
Illinois Secretary of State Office of Inspector General	1
Jeanette Police Department	1
McLean County Sheriff's Office	1
Merrillville Police Department	1
Monee Police Department	1
Orland Park Police Department	1
Riverdale Police Department	1
South Chicago Heights Police Department	1
Steger Police Department	1
Town of Normal	1
U.S. Department of Housing and Urban Development Office of Inspector General	1
U.S. Department of Veteran Affairs Office of Inspector General	1
U.S. General Services Administration Office of Inspector General	1
Total	503

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

designated as “Spam” and discontinued. Finally, if a communication received and cataloged as an intake is determined to be a question or request for information that is directly answered by OIG, it is designated as an “Inquiry” and discontinued.

In Q4 2023, OIG discontinued 876 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do Not Process	471
Inquiries	232
Spam	173
Total	876

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 § 2-156; (ii) refer the matter to the appropriate authority if OIG determines that the potential violation is minor and can be resolved internally as a personnel matter; or (iii) open an investigation.

In Q4 2023, OIG declined 40 complaints alleging violations of the GEO.

Table 3: Ethics Complaints Declined

Category of Declined Ethics Complaints	Number of Declined Ethics Complaints
Complaint Lacks Foundation	17
Complaint of Same Alleged Conduct Already Received	10
Failure to Allege a Violation of MCC § 2-156	13
Total	40

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 Buildings Commission (PBC)⁵ of Chicago and OIG.

A | Misconduct Investigations

1 | Investigative Activity This Quarter

As of the close of this quarter, OIG has 214 active investigations. During Q4 2023, OIG initiated 18 investigations, of which 3 were self-initiated, and concluded 53 investigations.

2 | Open Matters

OIG's 214 currently active misconduct investigations involve a range of subjects and types of alleged misconduct.

Table 4: Subject of Investigations

Subject of Investigations	Number of Investigations ⁶
City employees	171
Elected officials	19
Contractors, subcontractors, and persons seeking contracts	15
Licensees	2
Appointed officials	2
Persons seeking certification of eligibility	0
Other	5
Total	214

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	213
Ineffectiveness	0
Waste/Inefficiency	1
Total	214

⁵ Created by state legislation in 1956, PBC is responsible for planning, designing, and constructing municipal buildings, including schools, libraries, fieldhouses, and fire stations. See: <https://pbcchicago.com/>.

⁶ Counted here are the number of open investigations, not the number of unique subjects; that is, the same individual or entity may be the subject of more than one separate investigation.

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

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

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

b | Investigations Open Over Twelve Months

As required by MCC § 2-56-080, OIG reports each quarter on active investigations which have been open for more than 12 months. Of OIG's 214 pending investigations, 95 have been open for more than 12 months. Most cases remain pending because (1) they are complex or resource-intensive investigations that may require resolution of legal issues or involve multiple subjects; (2) they involve allegations that may be the subject of criminal investigation being conducted jointly with law enforcement investigative or prosecutorial partners at the federal, state, or local level; or (3) they were extended to allocate resources to higher risk, more time-sensitive investigations. Where other explanations are relevant for cases remaining open beyond 12 months, they are noted in the table below.

Table 6: Investigations Open Over Twelve Months, Q4, 2023

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000041000	20-1335	Unauthorized outside employment/residency violation
C2022-000041038	20-1375	Failure to follow department rules in the course of an investigation
C2022-000041039	20-1376	False statements/violation of department rules
C2022-000041504	21-0134	Procurement fraud
C2022-000041554	21-0191	Retaliation
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine
C2022-000041693	21-0340	Falsification/improper use of City resources
C2022-000041797	21-0453	Theft
C2022-000041798	21-0454	Theft
C2022-000041803	21-0459	Theft
C2022-000041808	21-0464	Theft
C2022-000041809	21-0465	Theft
C2022-000041810	21-0466	Theft
C2022-000041812	21-0468	Minority-owned business (MBE) fraud

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

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000041916	21-0576	False statements/violation of department rules
C2022-000042143	21-0818	Failure to follow department rules
C2022-000042145	21-0820	False records submitted to City
C2022-000042359	21-1049	MBE fraud
C2022-000042390	21-1080	Battery/failure to follow department rules
C2022-000042456	21-1153	Bribery
C2022-000042777	21-1482	COVID-19 leave fraud
C2022-000042912	21-1626	Ethics violation
C2022-000042921	21-1635	Time falsification
C2022-000042973	21-1689	Failure to follow department rules
C2022-000043160	21-1884	Secondary employment violation
C2022-000043178	21-1903	Failure to follow department rules
C2022-000043294	21-2029	Failure to follow department rules/incompetence
C2022-000043390	21-2126	Falsification
C2022-000043391	21-2127	Misappropriating City funds
C2022-000043401	21-2137	Theft
C2022-000043402	21-2138	Misappropriating City funds
C2022-000043431	21-2167	Ethics violation
C2022-000043571	22-0006	Failure to follow department rules/incompetence
C2022-000043617	22-0052	Failure to follow department rules
C2022-000043618	22-0053	Providing false information to the City
C2022-000043815	N/A	Failure to follow department rules
C2022-000043827	N/A	Preferential treatment
C2022-000043833	N/A	Time fraud/Fraud
C2022-000043846	N/A	Sexual harassment
C2022-000043865	N/A	Fraud
C2022-000043868	N/A	Ethics violation
C2022-000043889	N/A	Time fraud
C2022-000043899	N/A	Criminal investigation
C2022-000043902	N/A	Bribery
C2022-000043912	N/A	Ethics violation
C2022-000043917	N/A	Bribery
C2022-000043920	N/A	Misuse of position
C2022-000043921	N/A	Secondary employment violation

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000043925	N/A	Procurement fraud
C2022-000043928	N/A	Bribery
C2022-000043937	N/A	Ethics violation
C2022-000043941	N/A	Ethics violation
C2022-000043944	N/A	Duty disability fraud
C2022-000043956	N/A	Residency violation
C2022-000043961	N/A	Ethics violation
C2022-000043968	N/A	False statements
C2022-000043969	N/A	Retaliation
C2022-000043984	N/A	Residency violation
C2022-000043991	N/A	Ethics violation
C2022-000044002	N/A	Ethics violation
C2022-000044003	N/A	Official misconduct
C2022-000044004	N/A	Residency violation
C2022-000044008	N/A	Ethics violation
C2022-000044011	N/A	Ethics violation
C2022-000044022	N/A	Residency violation
C2022-000044038	N/A	Official misconduct
C2022-000044042	N/A	Fraud
C2022-000044043	N/A	FMLA abuse
C2022-000044045	N/A	Ethics violation
C2022-000044046	N/A	Official misconduct
C2022-000044055	N/A	Bribery
C2022-000044065	N/A	False statements
C2022-000044075	N/A	Official misconduct
C2022-000044078	N/A	Time falsification
C2022-000044086	N/A	Ethics violation
C2022-000044087	N/A	Official misconduct
C2022-000044089	N/A	Official misconduct
C2022-000044090	N/A	Bribery
C2022-000044091	N/A	Residency violation
C2022-000044093	N/A	Official misconduct
C2022-000044094	N/A	Fraud
C2022-000044101	N/A	Official misconduct

Case ID ⁷	Legacy ID	General Nature of Allegations
C2022-000044102	N/A	Official misconduct
C2022-000044111	N/A	Ethics violation

3 | Public Building Commission Complaints and Investigations

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

In Q4 2023, OIG received two 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 Mayor’s Office and affected City departments.

Below is an overview of sustained investigative matters and, pursuant to MCC § 2-56-110, deidentified synopses of administrative investigations completed and eligible to be reported as sustained investigative matters. A matter is not eligible for reporting until, pursuant to the MCC, the relevant City department has had 30 days (with the potential for an extension of an additional 30 days) to respond to OIG’s findings and recommendations,⁸ and to inform OIG of what action(s) the department intends to take. Departments must follow strict protocols set forth in the City’s Personnel Rules, Procurement Rules, and/or applicable collective bargaining agreements, prior to imposing discipline or other corrective action.⁹

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

⁸ PBC has 60 days to respond to a summary report of investigation by stating a description of any disciplinary or administrative action taken by the Commission. If PBC chooses not to take action or takes an action different from that recommended by OIG, PBC must describe that action and explain the reasons for that action.

⁹ In some instances, OIG may defer the reporting of a matter against an individual until the conclusion of an investigation of other individuals connected to the same misconduct, so as to preserve investigative equities and to assure that the administrative due process rights of those subject to the continuing investigation are protected.

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

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000040115	Department of Aviation	Issue a formal determination that OIG's investigation substantiated serious misconduct by the subject and refer the subject for placement on the ineligible for rehire list for one subject; Discharge and refer for placement on the ineligible for rehire list for one subject.	Referred for placement on the ineligible for rehire list for one subject; CDA has initiated the disciplinary process, in accordance with the City's Personnel Rules, for the other subject.
C2022-000040546	Department of Business Affairs and Consumer Protection	Impose discipline commensurate with the gravity of the subject's violations, past disciplinary record, and any other relevant considerations.	Verbal reprimand for one subject; verbal counseling for one subject.
C2022-000041400	Board of Ethics	Find there is probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	Found there is probable cause to believe that the subject violated the GEO.
C2022-000041814	Board of Ethics	Find there is probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	Found there is probable cause to believe that the subject violated the GEO.
C2022-000042128	Department of Fire	Impose discipline commensurate with the gravity of the subject's violations, past disciplinary record, and any other relevant considerations for one subject; issue a formal determination on the violations and refer for placement on the ineligible for rehire list for one subject.	Five-day suspension for one subject; referred for placement on the ineligible for rehire list for one subject.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000042213	Board of Ethics	Find there is probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	Found there is probable cause to believe that the subject violated the GEO.
C2022-000042867	Department of Streets and Sanitation	Refer for placement on the ineligible for rehire list.	Referred for placement on the ineligible for rehire list.
C2022-000043295	Office of Emergency Management and Communications	Discharge and refer for placement on the ineligible for rehire list.	Disagreed with all violations and recommendations.
C2022-000043297	Department of Transportation	Discharge and refer for placement on the ineligible for rehire list.	Five-day suspension for two subjects.
C2022-000043299	Department of Water Management; Board of Ethics	Impose discipline commensurate with the gravity of the subject's violations, past disciplinary record, and any other relevant considerations; Find that there is probable cause to believe that the subject violated the GEO.	Issued written reprimand; Found there is probable cause to believe that the subject violated the GEO.
C2022-000043401	Office of the City Clerk	Issue a formal determination on the violations and refer for placement on the ineligible for rehire list.	Referred for placement on the ineligible for rehire list.
C2022-000043429	Department of Procurement Services	Issue a formal determination on the violations and refer for placement on the ineligible for rehire list.	Referred for placement on the ineligible for rehire list.
C2022-000043537	Department of Family and Support Services	Impose discipline commensurate with the gravity of the subject's violations, past disciplinary record, and any other relevant considerations.	Initiated pre-disciplinary proceedings for a 29-day suspension.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000043538	Chicago Department of Public Health	Issue a formal determination on the violations and refer for placement on the ineligible for rehire list.	Referred for placement on the ineligible for rehire list.
C2022-000043711	Department of Water Management	Discharge and refer for placement on the ineligible for rehire list.	Subject retired in lieu of discharge proceedings.
C2022-000043794	Board of Ethics	Find there is probable cause that the subject violated the Ethics Ordinance and impose appropriate sanctions.	Found there is probable cause to conclude the subject violated the Ethics Ordinance.
C2022-000043967	Department of Finance, Department of Law, Department of Procurement Services	Initiate debarment proceedings for one subject; prohibit one subject from working on performance of any aspect of other subject's contract with the City.	Disabled access to all City systems; Terminated contract of subject; Initiated debarment proceedings for both subjects.
C2022-000044023	Department of Water Management	Discharge and refer for placement on the ineligible for rehire list.	Disagreed with violation and recommendation.
C2022-000044103	Department of Planning and Development	Issue a formal determination on the violations and refer for placement on the ineligible for rehire list.	Referred for placement on the ineligible for rehire list.
C2023-000000161	Department of Family and Support Services	Discharge and refer for placement on the ineligible for rehire list.	Discharged and referred for placement on the ineligible for rehire list.
C2023-000000247	Chicago Police Department	Discharge and refer for placement on the ineligible for rehire list.	Discharged and referred for placement on the ineligible for rehire list.

1 | Residency Violation; Falsification of Records; Conduct Unbecoming (C2022-000040115)

An OIG investigation established that a former Chicago Department of Aviation (CDA) motor truck driver (MTD) (MTD 1) resided outside of the City of Chicago and concealed their true residency by using the address of another, City-residing, CDA MTD (MTD 2) on City and State records. MTD 2 permitted MTD 1 to use MTD 2's City residence as a mailing address, and aided in MTD 1's residency avoidance by collecting and providing their mail to them after it arrived at their city residence.

OIG found that MTD 1's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsections 6 (failing to disclose information requested or providing false information in any information form or document provided by the City), 11 (falsification of employment records), 15 (engaging in any act or conduct prohibited by the Municipal Code), 41 (failure to be an actual resident of the City of Chicago), and 50 (conduct unbecoming a public employee) During the investigation, MTD 1 resigned from CDA. OIG recommended that CDA issue a formal determination that OIG's investigation substantiated serious misconduct and refer MTD 1 for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR) pursuant to the City's Policy Regarding Ineligibility for Rehire.

OIG also found that MTD 2, who aided in MTD 1's residency avoidance, violated City of Chicago Personnel Rule XVIII, Section 1, Subsections 46 (failure to report misconduct by City employees to the proper City authority) and 50 (conduct unbecoming of a public employee). OIG recommended that CDA discharge MTD 2 and refer them for placement on the ineligible for rehire list maintained by DHR.

In response, CDA agreed with OIG's recommendations, and referred MTD 1 to DHR for placement on the ineligible for rehire list. For MTD 2, CDA has initiated the disciplinary process, in accordance with the City's Personnel Rules.

2 | Incompetence (C2022-000040546)

An OIG investigation established that two Department of Business Affairs and Consumer Protection (DBACP) employees, a then-manager and a then-supervisor, incompetently performed the duties of their positions. Specifically, during the protests and unrest following the murder of George Floyd in May 2020, the manager and the supervisor improperly issued a cease and desist forthwith order to a not-for-profit for a purported failure to obtain a retail food license. The employees demonstrated a lack of necessary knowledge in applying the MCC, a lack of ability in the assessment of evidence, and a lack of knowledge regarding DBACP instruction for the issuance of a cease and desist forthwith. Additionally, the manager failed to competently supervise the subordinate supervisor by failing to halt the issuance of the cease and desist order, and the supervisor failed to competently supervise a DBACP investigator who prepared the cease and desist, resulting in inaccurate information in both the cease and desist forthwith and DBACP's supporting records.

OIG found that the manager and the supervisor violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 39 (incompetence).

OIG recommended that DBACP impose discipline against the two employees commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. In response, DBACP issued a verbal counseling to the manager (who now serves as a deputy commissioner for DBACP) and a verbal reprimand to the supervisor (who now serves as a manager for DBACP).

3 | Gift Ban Violation (C2022-000041400)

An OIG investigation established that an employee of a supplier to numerous City contractors delivered a holiday gift basket valued over \$50 to a City employee; that City employee immediately notified their supervisor and OIG after receiving the gift and was accordingly not a subject of OIG's investigation.

OIG found that the individual who provided the gift basket violated Section 2-156-142(c) of the GEO, which prohibits any person from giving a City employee an improper gift with intent to violate the law. Specifically, because the value of the gift basket provided to the City employee exceeded \$50, the gift was prohibited by MCC § 2-156-142(a)(2).

Pursuant to the GEO, OIG requested that the City of Chicago Board of Ethics (BOE) issue a finding of probable cause to believe the individual who made the gift violated the GEO. BOE voted unanimously to find probable cause at its November 2023 board meeting. Pursuant to MCC § 2-156, the individual is entitled to meet with BOE to respond.

4 | Retaliation (C2022-000041814)

An OIG investigation established that an elected official terminated the employment of two City employees shortly after those employees disclosed to the elected official that they believed the official was violating the GEO and the First Amendment of the U.S. Constitution and the Illinois Constitution by using City resources to host religious-themed events.

OIG found that the elected official's conduct violated the whistleblower protection provision of the GEO, MCC § 2-156-019, and Section 20 of the Illinois Whistleblower Act (IWA), which prohibit retaliation against City employees for engaging in protected reporting activity.

Pursuant to the GEO, OIG requested that BOE issue a finding of probable cause to believe the elected official violated the GEO. BOE voted unanimously to find probable cause at its November 2023 board meeting. Pursuant to MCC § 2-156, the official is entitled to meet with BOE to respond.

5 | Sexual Harassment, Discourteous Treatment, Failure to Report (C2022-000042128)

An OIG investigation established that a former Chicago Fire Department (CFD) firefighter grabbed, touched, and made inappropriate comments to an employee of a business the firefighter was inspecting. OIG's investigation also established that a CFD Lieutenant/EMT was disrespectful to and dismissive of the employee of the business when the Lieutenant/EMT spoke to them regarding their complaint and that the Lieutenant/EMT made an apparent attempt to discourage the complaint. The Lieutenant/EMT also failed to adequately report the complaint to the appropriate channels.

OIG found that former firefighter's conduct violated CFD Code of Professional Conduct Rules 2.05 (using insolent language or showing disrespect to any person) and 2.12 (violating City of Chicago Personnel Rule XVIII and CFD general order); CFD General Order 18-010 (adopting the City's Diversity and Equal Employment Opportunity Policy (EEO Policy) and prohibiting sexual harassment); 720 ILCS 5/12-3(a)(2) (proscription against battery); EEO Policy section II(b) (prohibiting sexual harassment); and City of Chicago Personnel Rule XVIII, section 1, subsections 15 (violating the Illinois Compiled Statutes), 23 (discourteous treatment of a member of the public), 32 (discourteous treatment of a member of the public while acting within the scope of employment), 42(a) (sexual harassment), 48 (violating departmental rules), and 50 (conduct unbecoming).

OIG further found that the Lieutenant/EMT's conduct violated City of Chicago Personnel Rule XVIII, section 1, subsection 48 (violating departmental regulations, rules, or procedures); CFD Code of

Professional Conduct Rule 2.12 (violating City of Chicago Personnel Rule XVIII and CFD general order); EEO Policy section IX(a) (requiring supervisors to promptly report harassment to a Departmental Liaison, EEO Officer, or EEO Deputy); and CFD General Order 18-010(II)(C) (requiring CFD supervisors to report sexual harassment to the City's Equal Employment Opportunity Office or DHR).

OIG recommended that CFD refer the former firefighter to DHR for placement on the City's ineligible for rehire list. In response, CFD referred the former firefighter to DHR for placement on the ineligible for rehire list.

OIG further recommended that CFD impose discipline against the Lieutenant/EMT commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. In response, CFD issued a 5-day suspension to the Lieutenant/EMT.

6 | Unauthorized Use of City Resources (C2022-000042213)

An OIG investigation established that an elected City official misused City resources for personal political purposes. Mobile phone records, City emails, and witness statements all demonstrated that the official directed an employee to use their City time and assigned tools to further personal, rather than City, goals.

OIG found that the official thereby violated provisions of the GEO, as well as 720 ILCS 5/33-3, the Illinois law prohibiting official misconduct.

OIG recommended that BOE find probable cause to believe that the official violated the GEO. The Board accordingly found probable cause to believe that the official misappropriated City resources for unauthorized purposes at its November 2023 meeting. Pursuant to MCC § 2-156, the official is entitled to meet with BOE to respond.

7 | Residency Violation (C2022-000042867)

An OIG investigation established that a former general laborer with the Department of Streets and Sanitation violated the City's residency requirement. OIG's investigation revealed that the former general laborer resided outside the City, in Algonquin, Illinois. OIG reviewed toll records and other documentary evidence and conducted multiple surveillances in which OIG observed the employee at the Algonquin residence.

OIG found that the employee violated City of Chicago 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) and Subsection 41 (Failure to be an actual resident of the City of Chicago.), as well as Municipal Code of Chicago § 2-152-050 (All officers and employees of the city shall be actual residents of the city).

OIG recommended that DSS refer the former general laborer to DHR for placement in the ineligible for rehire list. In response, DSS referred the general laborer to DHR for placement on the ineligible for rehire list.

8 | False Statements on Application (C2022-000043295)

An OIG investigation established that a high-level employee of the Office of Emergency Management and Communications (OEMC) knowingly provided false answers to questions in their OEMC application materials. Specifically, the employee indicated on a candidate questionnaire that they had never been the subject of a professional disciplinary proceeding and that no law enforcement agency had ever asked them to give an interview. The employee, however, was the subject of a professional disciplinary proceeding—a sustained Bureau of Internal Affairs misconduct investigation—and appeared at a subject interview, in connection with that investigation, during their prior employment with the Chicago Police Department.

OIG found that the employee violated MCC §§ 1-21-010(a) (prohibiting knowingly making false statements of material facts to the City in connection with any application) and 2-74-095 (prohibiting knowingly making false statements or material omissions on any application for employment with the City).

OIG recommended that OEMC discharge the employee and refer them to DHR for placement on the ineligible for rehire list. OEMC disagreed with OIG's findings, indicating that it did not believe the employee made false statements during the vetting and hiring process. Rather, OEMC believed the situation was a result of ambiguities that existed in the City's vetting form and hiring process. OEMC also indicated that the City has made changes to its vetting form based on this situation and instituted a new process for sharing work histories as part of the *Shakman*-exempt hiring process.¹⁰ OEMC declined to discipline the employee.

9 | Falsification of Attendance Records and Improper Absence from Work Site (C2022-000043297)

An OIG investigation established that two Chicago Department of Transportation (CDOT) hoisting engineers repeatedly falsified attendance records and left assigned work sites without proper authorization while on City time. OIG analyzed the employees' time records and conducted surveillance of the employees that confirmed they were away from their assigned work sites while clocked in.

OIG found that the employees' conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 2 (leaving the department, office, or worksite without proper authorization), Subsection 11 (falsification of attendance records), and Subsection 50 (conduct unbecoming a public employee), and the City of Chicago Swiping Policy.

OIG recommended that CDOT discharge both employees and refer both of them for placement on the ineligible for rehire list maintained by DHR. In response, CDOT suspended both employees for five days.

10 | Unapproved Secondary Employment and Financial Interest in City Business (C2022-000043299)

An OIG investigation established that a hoisting engineer with the Department of Water Management (DWM) engaged in unapproved secondary employment and received City funds as

¹⁰ See section V.D below.

compensation for electrical contracting work they performed as part of their secondary employment.

OIG found that the hoisting engineer's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 6 (failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form, or other document provided by the City), and Subsection 43 (failure to comply with the requirements of secondary employment). Further, the hoisting engineer violated the GEO, MCC § 2-156-110(a), when they received payment in funds belonging to or authorized by the City.

OIG recommended that DWM impose discipline against the hoisting engineer, commensurate with the gravity of their violations, past disciplinary record, and any other relevant considerations. OIG also recommended that, pursuant to its authority under MCC § 2-156-465, BOE find probable cause to believe that the hoisting engineer violated the GEO and impose appropriate sanctions. In response, DWM issued a written reprimand to the hoisting engineer and BOE voted unanimously to find probable cause at its December 2023 board meeting. Pursuant to MCC § 2-156, the hoisting engineer is entitled to meet with BOE to respond.

11 | Theft (C2022-000043401)

An OIG investigation established that a former Office of the City Clerk (OCC) payment service representative violated City of Chicago Personnel Rules by committing thefts of cash payments they received for the sale of City stickers pursuant to their position with OCC.

During the course of the investigation, OIG interviewed witnesses, analyzed documents from the OCC, and reviewed the relevant video security footage which identified the employee. OIG then cross-referenced the dates and times from the video security footage and matched them with the corresponding OCC sales records for the employee which revealed that cash payments were missing for those transactions. OIG further conducted a historical audit of the employee's available OCC sales records, which spanned from May 2014 to November 2021, to assess the scope of missing payments attributable to the employee. By identifying the City sticker sales in the over-the-counter (OTC) application which had no corresponding payment record in the point-of-sale (POS) system, OIG was able to determine that the amount of missing monies attributable to the employee was well into six figures. During the course of the investigation, the employee resigned from their City employment and did not give a statement in OIG's administrative investigation. The matter was referred for criminal prosecution.

The employee violated City of Chicago 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, specifically 720 ILCS 5/16-1(a)(1)), Subsection 19 (theft or unauthorized possession of City of Chicago or other public property or use of such property for unauthorized purposes), and Subsection 50 (conduct unbecoming an officer or public employee).

OIG recommended that OCC refer the employee for placement on the ineligible for rehire list maintained by DHR. In response, OCC referred the employee to DHR for placement on the ineligible for rehire list.

12 | Unauthorized Secondary Employment, Unauthorized Use of City Property, and Engaging in Fraud to Obtain Employment (C2022-000043429)

An OIG investigation established that a former high-level Department of Procurement Services (DPS) employee engaged in unauthorized secondary employment and unauthorized use of City property and time to conduct that secondary employment. OIG's investigation further established that the employee had engaged in fraud to obtain employment with DPS. During an interview with OIG, the employee admitted to conducting unauthorized secondary employment while on City time and to using City property to conduct that secondary employment without authorization. Further, OIG determined that documents presented by the employee during the hiring process purporting to dissolve their secondary businesses were never filed to the proper authority, resulting in the businesses remaining active despite the employee asserting otherwise to DPS.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 9 (fraud in securing employment), Subsection 11 (falsification of any attendance or other employment records), Subsection 19 (unauthorized use of City property), Subsection 31 (using work tools or materials and supplies to conduct secondary business), Subsection 43 (failure to comply with the requirements of secondary employment) and City Personnel Rule XX, Section 3, Subsection (b) (outlining the procedure for securing outside employment).

During the investigation, the employee resigned from DPS. OIG recommended that DPS refer them for placement on the ineligible for rehire list maintained by DHR. In response, DPS referred the employee to DHR for placement on the ineligible for rehire list.

13 | Unapproved Secondary Employment, Misuse of Sick Time, Seeking Preferential Treatment, Misuse of General Contractor's License (C2022-000043537)

An OIG investigation established an auditor with the Department of Family and Support Services (DFSS) permitted individuals to use their general contractor's license to obtain permits from the DOB when neither they nor their company performed the work associated with the permits. The auditor also violated the City's Personnel Rules by engaging in unapproved secondary employment as a general contractor, misusing sick time to attend building inspections, and seeking preferential treatment from a City building inspector.

OIG found that the auditor's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 ([e]ngaging 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) by violating MCC § 4-36-110(A) (prohibiting licensed contractors from "[k]nowingly [] allow[ing] any person to use the licensee's name or license identification on a permit application unless the licensee will be performing the work attributed to the licensee in the permit application). OIG further found that the auditor's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 13, which prohibits use of sick leave in an unauthorized manner, Subsection 43, which requires compliance with the City's secondary employment rules, and Subsection 48, which prohibits violations of departmental regulations, rules, or procedures. Finally, OIG found that the auditor's request for preferential treatment from a City building inspector constituted conduct unbecoming of a public employee in violation of City of Chicago Personnel Rule XVIII, Section 1, Subsection 50.

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

indicated that it initiated pre-disciplinary proceedings for issuance of a 29-day suspension to the auditor.

14 | Obstruction of an OIG Investigation (C2022-000043538)

An OIG investigation established that a former program director for the City of Chicago Department of Public Health (CDPH) lied to OIG about a call to BOE regarding a restaurant in which she had an ownership interest catering a retirement party for a colleague and printing flyers on a CPDH copier for the restaurant. In particular, the employee told OIG that she had called BOE prior to the restaurant catering the party and BOE said it was permissible for her to do so. Similarly, the employee communicated to OIG that BOE told her it was permissible to print the flyers before she actually printed them. In fact, OIG concluded that the employee only spoke with BOE on the day of and the day after her OIG interview, long after she had already catered the party and printed the flyers.

OIG found that the employee obstructed and/or interfered with OIG's investigation in violation of MCC § 2-56-140. OIG also found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false, inaccurate or deliberately incomplete statements in an official inquiry, investigation or other official proceeding); Subsection 15 (engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes); and Subsection 50 (conduct unbecoming an officer or public employee).

During the investigation, the former program director retired from CDPH. OIG recommended that CDPH find that the evidence established the violations and that CDPH refer the former program director for placement on the ineligible for rehire list maintained by DHR. In response to OIG's recommendations, CDPH referred the employee to DHR for placement on the ineligible for rehire list.

15 | Residency Violation (C2022-000043711)

An OIG investigation established that a DWM operating engineer lives in Lincolnwood, Illinois in violation of MCC § 2-152-050, which requires City employees to reside in Chicago. OIG obtained documents that revealed the employee owns and maintains a residence in Lincolnwood and regularly commuted to work from Lincolnwood. OIG conducted multiple surveillances and observed the employee commute to and from Lincolnwood, and never observed the employee at the purported City address. Utility records, tax documents, bank account information, and Lincolnwood police reports all link the employee to the Lincolnwood residence, at which the employee admitted to staying frequently.

OIG found that the employee violated MCC § 2-152-050 (All officers and employees of the city shall be actual residents of the city) and City of Chicago Personnel Rules XVIII, Section 1, Subsection 6 (Failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City), Subsection 8 (Making false, inaccurate or deliberately incomplete statements in an official inquiry, investigation or other official proceeding), Subsection 15 (Engaging in any act or conduct prohibited by the Municipal Code of the City of Chicago, the Illinois Compiled Statutes, applicable laws of other states, or federal statutes), and Subsection 41 (Failure to be an actual resident of the City of Chicago.).

OIG recommended that DWM discharge the employee in accordance with the residency ordinance and refer the employee for placement on the ineligible for rehire list maintained by DHR. In response, DWM served the employee with discharge papers in November 2023. In lieu of discharge, the employee retired. The employee was subsequently placed on the ineligible for rehire list.

16 | Improper Gift to a City Employee (C2022-000043794)

An OIG investigation established that a business owner provided an improper gift to a City of Chicago Department of Buildings inspector during a building inspection. During interviews with OIG, the business owner admitted to providing a gift to the inspector and the inspector corroborated the account of what occurred. OIG determined that the inspector returned the gift and notified their supervisors immediately; the inspector was therefore not a subject of the investigation.

OIG found that the business owner violated the GEO, MCC § 2-156-142(c), which prohibits any person from giving a City employee an improper gift.

OIG recommended that BOE find probable cause to believe that the business owner violated the GEO and impose appropriate sanctions. At its December 2023 meeting, BOE voted unanimously to find probable cause. The business owner and their representative or attorney are entitled to meet with BOE to respond.

17 | Negligent or Intentional Billing Irregularities (C2022-000043967)

An OIG investigation established that a City debt collection contractor misused its access to the City's debt collection portal to assign itself unripe utility debt for collection. The contractor subsequently submitted invoices to the City seeking a contractual 25% contingency fee for its collection of the debt, which required no meaningful collection efforts, as the account at issue had been regularly paid by the customer. As a result of the contractor's conduct, it received over \$200,000 in improper contingency fee payments from the City.

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

OIG recommended that DPS initiate debarment proceedings for the purpose of determining appropriate remedial action against the contractor. OIG further recommended that the Department of Law (DOL) and Department of Finance (DOF) prohibit the attorney responsible for the irregularities from participating in any aspect of the performance of the contractor's City contract. In response, DPS initiated debarment proceedings against the contractor and imposed interim constraints on the contractor, including termination of all existing contracts between the contractor and the City. DOL terminated the City's contract with the contractor. DOF indicated that when it became aware of possible misconduct by the contractor, it took steps to limit system access to ensure that collection firms could not repeat the behavior at issue. DOF also withheld subsequent payments to the contractor in the amount of the improper payments to which the contractor was not entitled. After the conclusion of OIG's investigation, DOF disabled the contractor's access to all systems.

18 | Impersonation of a Peace Officer (C2022-000044023)

An OIG investigation has established that a watchman with the Department of Water Management (DWM), engaged in false personation of a peace officer, which is prohibited by 720 ILCS 5/17-2-b-3. Specifically, the employee displayed a badge engraved with the City of Chicago seal and the words “Dept. of Water Security” to a civilian while representing that he was law enforcement during an off-duty traffic incident on June 21, 2022. This badge was not an official City of Chicago badge. During the investigation, OIG reviewed police reports, court documentation, and evidence inventoried by the Midlothian Police Department, which had initially investigated and charged the employee in the incident, though the charges were later dismissed. OIG interviewed witnesses and the employee and concluded that the employee had engaged in the prohibited conduct.

OIG found that the employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 15 (engaging in any act or conduct prohibited by Illinois statutes) and 50 (conduct unbecoming a public employee).

OIG recommended that DWM discharge the employee and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DWM disagreed with OIG’s finding and declined to initiate discipline for the employee.

19 | Unauthorized Secondary Employment (C2022-000044103)

An OIG investigation established that a former Chicago Department of Planning and Development (DPD) Recovery Team Program Manager taught two undergraduate courses at a local private university for the fall 2022 quarter and engaged in unauthorized secondary employment during work hours and violated DPD departmental regulations.

During the investigation, OIG interviewed witnesses and analyzed relevant documentation, including the employee’s Kronos records and paystubs from the local private university. OIG also received confirmation from the local private university that the employee taught the two undergraduate classes during times that coincided with the employee’s City work hours. While the investigation had not yet concluded, the employee resigned from their City employment.

The employee violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 11 (Falsification of any attendance or other employment records), Subsection 43 (Failure to comply with the requirements of secondary employment), Subsection 48 (Violating any departmental regulations, rules, or procedures) as well as Personnel Rule XX, Section 3 – Outside Employment.

OIG recommended that DPD refer the employee for placement on the ineligible for rehire list maintained by DHR. In response, DPD referred the employee for placement on the ineligible for rehire list with DHR.

20 | Residency Violation (C2023-000000161)

An OIG investigation established that an assistant community living specialist with DFSS violated the City’s residency requirement. OIG’s investigation revealed that the assistant community living specialist resided outside the City, in Westchester, Illinois. OIG reviewed CTA records and other documentary evidence and conducted multiple surveillances in which OIG observed the employee leaving the Westchester residence for work.

OIG found that the employee violated City of Chicago 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) and Subsection 41 (Failure to be an actual resident of the City of Chicago.), as well as Municipal Code of Chicago § 2-152-050 (All officers and employees of the city shall be actual residents of the city). OIG also found that the employee provided a false or misleading answer on two City forms related to their residency, and thus violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 6 (Failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form or other document provided by the City.).

In accordance with MCC § 2-152-050, OIG recommended that DFSS terminate the employee and refer them for placement on the ineligible for rehire list maintained by DHR. In response, DFSS terminated the employee and indicated it would refer them to DHR for placement on the ineligible for rehire list.

21 | Violation of CPD Rules and Regulations (C2023-000000247)

An OIG investigation established that a former Probationary Police Officer (PPO) with the Chicago Police Department (CPD), while off-duty, physically struck their spouse several times during a domestic dispute on May 13, 2023, and, while off-duty, left their duty weapon unsecured in the cargo area of their car on June 24, 2023. This matter was referred by the Civilian Office of Police Accountability (COPA) to OIG upon COPA's determination that it has a potential conflict of interest.

During the course of the investigation, OIG interviewed witnesses, including the subject PPO, analyzed relevant reports and documentation, and reviewed the relevant body worn camera footage and cell phone video footage which revealed the PPO committing the misconduct on May 13, 2023 and June 24, 2023, respectively.

The PPO's conduct violated Illinois Compiled Statutes 720 ILCS 5.0/12-3.2-A-2 (Domestic Battery) and CPD Rules and Regulations 1 (violation of any law or ordinance), Rule 2 (any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department), Rule 3 (any failure to promote the Department's efforts to implement its policy or accomplish its goals), Rule 6 (disobedience of an order or directive, whether written or oral), and Rule 8 (disrespect or maltreatment of any person, while on or off duty).

OIG recommended that CPD discharge the PPO and refer the PPO for placement on the ineligible for rehire list maintained by DHR. In response, CPD discharged the PPO and referred the PPO for placement on the ineligible for rehire list.

C | Synopses of and Developments in Charged Criminal Cases

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

This quarter, OIG has two updates regarding criminal cases related to an OIG investigation.

1 | [United States of America v. Edward Burke, 19-CR-322 \(N.D. Ill.\), OIG Case No. 19-0019](#)

On May 30, 2019, former Alderperson Edward M. Burke was indicted in the United States District Court for the Northern District of Illinois on racketeering and bribery charges for allegedly abusing his position to solicit and extort private legal work and other benefits from companies and individuals with business before the City. Indicted as co-defendants with Burke were real estate developer Charles Cui and aldermanic aide Peter J. Andrews. The allegations related to Burke corruptly soliciting work for his private law firm from companies involved in redevelopment projects at the Old Main Post Office and at a fast-food restaurant in his ward. Burke was also alleged to have threatened to oppose a Chicago museum's admission fee increase because the museum failed to respond to Burke's inquiry about an internship at the museum for a child of Burke's friend.

On December 21, 2023, a federal jury convicted Burke on 13 counts, including racketeering; corruptly soliciting, demanding, accepting, or agreeing to accept things of value; using an interstate facility to promote unlawful activity; and attempted extortion. Cui was also found guilty on five counts, while Andrews was acquitted of all charges against him. U.S. District Judge Virginia M. Kendall set sentencing for June 17, 2024 for Cui and June 19, 2024 for Burke.

2 | [State of Illinois v. Barbara Johnson, 23CR1229401 \(Circuit Court of Cook County\)](#),

On November 27, 2023, as the result of an OIG investigation, 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. Johnson did not appear for her initial arraignments on December 5, 2023 or December 19, 2023.

OIG's investigation revealed that Johnson committed thefts of cash payments she received for the sale of City stickers pursuant to her position with OCC. OIG's analysis revealed that over time, Johnson's theft from the City amounted to well into six figures.

D | [Synopsis and Results of Administrative Appeals, Grievances, or Other Actions; Updates](#)

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.

1 | [Update on OIG Case No. C2022-000043133](#)

In the Quarterly Report for the second quarter of 2023, OIG reported on its investigation establishing that the owner of a building located in Chicago bribed a Department of Buildings (DOB) inspector during a building inspection. Specifically, after the DOB inspector completed the inspection and noted multiple violations of the Chicago Building Code in the construction of two porches, the building owner placed an unknown amount of money in the inspector's shirt. The DOB inspector refused the money, and therefore, was not a subject in the investigation.

OIG requested that BOE issue a finding of probable cause to believe that the building owner violated the GEO and impose appropriate sanctions. BOE, at its May 2023 board meeting, found

there was probable cause to believe the building owner violated the GEO. BOE sent notice of the probable cause finding, and underlying evidence, to the building owner for a response. The building owner met with BOE at its August 2023 meeting, at which point BOE referred the matter back to OIG for further investigation.

OIG completed its supplemental investigation, reaching the same conclusion, and submitted the supplemental investigative report to BOE in October 2023. BOE met with the building owner at its December 2023 meeting, at which point BOE dismissed the matter, concluding that the evidence did not support a finding that the building owner attempted to place cash in the DOB Inspector's shirt.

[2 | City of Chicago v. Lavinia Muresan, 20231401535 \(Circuit Court of Cook County\), OIG Case No. C2022-000043177](#)

In the Quarterly Report for the third quarter of 2023, OIG reported on its investigation of a project manager with the Department of Buildings (DOB) who conducted permit reviews on behalf of the City for a permit expediting company licensed by the City and owned by the project manager's spouse. The spouse of the project manager knowingly made false statements regarding their relationship with the subject, which obstructed and delayed OIG's investigation. OIG's recommendations included that DOB refer the matter to the Department of Law (DOL) for prosecution of the spouse's violation of Municipal Code of Chicago (MCC) § 2-56-140 (obstructing OIG investigation). In response, DOB agreed with OIG's recommendation and referred the matter to DOL for prosecution.

In November 2023, DOL filed an action in the Circuit Court of Cook County against the spouse for obstructing OIG's investigation in violation of MCC § 2-56-140. DOL sought a fine of \$500 against the spouse, the maximum penalty allowed by § 2-56-140. In December 2023, the court entered judgment against the spouse in the amount of \$300.

E | Special Investigations

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

1 | Campaign Finance Investigations

The MCC bans City vendors, lobbyists, and those seeking to do business with the City from contributing more than \$1,500 each year to any elected City official or candidate's political campaign. Other rules and regulations, such as Executive Order 2011-4, place further restrictions on donations.¹¹

Campaign contributions that potentially violate the MCC are sometimes identified through complaints; OIG also, however, engages in proactive monitoring and analysis of campaign

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.

contribution data to identify and examine potential violations. In this quarter, OIG's Center for Information Technology and Analytics is in the final stages of developing and streamlining an automated data process to facilitate this proactive analysis—specifically, to identify potentially improper contributions made to elected City officials or candidates by restricted contributors. In this effort, OIG will integrate and match data from a variety of sources, including City contracts and records of payments made by the City to individuals and entities.

Pursuant to MCC § 2-156-445, “[a]ny person who solicits, accepts, offers or makes a financial contribution that violates the limits set forth in this section...shall not be deemed in violation of this section if such person returns or requests in writing the return of such financial contribution within 10 calendar days of the recipient’s or contributor’s knowledge of the violation.” Accordingly, once a potential violation is identified, OIG notifies the donor and the donation recipient of the violation and provides the individual or entity 10 days to challenge the determination or cure the violation by returning the excess donation.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 administratively. In the event the matter is not cured or successfully challenged, OIG will sustain an investigation and deliver the case to the BOE for adjudication.

This quarter, OIG closed one campaign finance matter that involved \$1,000 in prohibited contributions. Details are provided in the table below.

Table 8: Campaign Finance Activity

Case #	Donation Amount (Year)	Donation Source	Amount of Returned Funds
C2022-000044011	\$2,500 (2023)	Entity doing business with the City	\$1,000

2 | O’Hare 21

OIG provides oversight for major construction initiatives across the City. Specifically, OIG has worked with 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 the 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.

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.

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 | Recoveries

This quarter, there were no reports of financial recoveries related to OIG investigations.

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, efficiency, effectiveness, 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 CPD’s Bureau of Internal Affairs (BIA).

In this quarter, the federal court overseeing the City’s compliance with the consent decree entered in *Illinois v. Chicago* has found OIG and the Public Safety section in full and effective compliance with all applicable material requirements. On December 21, 2023, the court entered an order terminating OIG’s consent decree obligations, finding that OIG has sustained its demonstrated compliance for the required two-year period. The 799-paragraph consent decree is largely focused on CPD, but also imposed public safety reform-related obligations on several other City departments; OIG is the first and only component of City government to have achieved full compliance.

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 three Public Safety section reports released this quarter.

1 | Understanding the City of Chicago Police Department’s Budget¹³

In its third annual Budget Explainer, OIG provided stakeholders and taxpayers with basic, foundational information about the City’s budget and budget process, and how CPD’s budget is built. CPD is the City of Chicago’s largest department, and a large percentage of the City’s overall budget goes to fund CPD and other policing-related costs.

2 | Recent Developments on Chicago Police Department’s Use of Gang Data (#C2022-000044072)¹⁴

In the Community Commission for Public Safety and Accountability’s (CCPSA) first exercise of its policy-setting authority, the CCPSA amended CPD General Order “G01-03,” directing CPD’s collection and use of gang affiliation data. This development was the latest in a years-long public policy conversation around CPD’s collection and use of gang affiliation information. OIG published this product to ensure that Chicagoans and other stakeholders are well-informed as policies and practices continue to evolve.

¹³ Published October 12, 2023. See <https://igchicago.org/publications/cpd-budget-explainer-2023/>.

¹⁴ Published November 16, 2023. See <https://igchicago.org/publications/developments-on-cpd-gang-data/>.

3 | Video Release Follow-Up (#21-0710)¹⁵

OIG completed a follow-up to its 2020 review of the City of Chicago Video Release Policy (VRP or the Policy). Based on the responses of the involved agencies—COPA, the Office of Emergency Management and Communications (OEMC), CPD, and the Mayor’s Office—OIG concluded that the departments implemented corrective actions related to the initial findings to varying degrees. Specifically, OIG directed five recommendations to COPA, and the agency fully implemented three corrective actions, partially implemented one, and did not implement another. Of its four recommendations, OEMC fully implemented two and partially implemented two corrective actions. OIG directed four recommendations to CPD, and it fully implemented one corrective action, partially implemented one, and did not implement two. Lastly, of the four recommendations directed to then-Mayor Lori Lightfoot’s office, it fully implemented one corrective action, partially implemented one, and did not implement two.

The purpose of OIG’s original inquiry was to determine the City’s level of compliance with its Video Release Policy, which was first implemented in February 2016 based on a recommendation from the Police Accountability Task Force (PATF). PATF was created by former Mayor Rahm Emanuel following the City’s lengthy delay in releasing video footage of the October 2014 fatal shooting of Laquan McDonald by a CPD member. Video of the incident was not publicly released until November 2015, and then only by a court order following multiple attempts by local journalists to obtain the footage. Among its findings, PATF determined that releasing video, audio, and police documents of certain police use of force incidents—firearm discharges, taser discharges, and great bodily harm or death in custody—promotes transparency, which is essential for fostering trust between police and the community.¹⁶

The City’s Video Release Policy now mandates that these materials be released within 60 days or sooner. Under the Policy, COPA is responsible for identifying all use of force incidents to which the Policy applies and publicly releasing the related materials. CPD’s Crime Prevention and Information Center (CPIC) is responsible for notifying COPA of all relevant incidents. COPA relies on other agencies, notably CPD and the Office of Emergency Management and Communications (OEMC), to provide it with video and audio files subject to disclosure under the Policy.

In 2020, OIG found that COPA was not in compliance with the Policy’s requirements regarding timely video release, with a significant share of incidents being released after the deadline. This condition was exacerbated by delays in OEMC’s provision of materials to COPA and confusion about CPD’s responsibility to notify COPA of incidents covered by the Policy.

Based on its original findings, OIG made 11 recommendations addressed to COPA, OEMC, CPD, and the Mayor’s Office, suggesting changes aimed at improving the City’s compliance with the VRP. Regarding the timeliness of video release, OIG recommended that COPA use the date of an incident, rather than the date upon which COPA was notified of an incident, to calculate release deadlines; that COPA implement a quality control process to ensure timely release of materials; that COPA and OEMC collaborate to ensure expedited transfer of materials from OEMC to COPA in cases where such materials might be eligible for release; that the Mayor’s Office, COPA, and

¹⁵ Published December 20, 2023. See <https://iqchicago.org/publications/follow-up-review-of-compliance-with-the-citys-video-release-policy/>.

¹⁶ Police Accountability Task Force, “Recommendations for Reform: Restoring Trust between the Chicago Police and the Communities they Serve,” April 2016, accessed December 14, 2023, https://chicagopatf.org/wp-content/uploads/2016/04/PATF_Final_Report_4_13_16-1.pdf.

OEMC develop binding directives governing the timeline of the release of OEMC materials to COPA; that the City conduct a needs assessment for OEMC to ensure timely release of materials; and that, if necessary, COPA personnel be given direct access to OEMC data needed to assess whether an incident is eligible for release.

Further, regarding the finding that CPIC personnel at CPD may not adequately notify COPA of the full universe of relevant use of force incidents, OIG recommended that CPD replace its notification matrix document with binding directives regarding when and how CPD members are to notify COPA of incidents covered by the Policy; that CPIC notify COPA when unsure if a death or injury in police custody resulted from police action; that CPD train CPIC members on their notification duties; and that CPIC and COPA collaboratively develop quality assurance measures to ensure COPA is notified of all eligible incidents.

Finally, after finding that COPA's discretion may be inadequately guided on the question of releasing videos related to incidents not explicitly covered by the Policy, OIG recommended that the Mayor's Office and the Department of Law (DOL) update the Policy to reflect whether discretionary releases by COPA are allowed and, if so, what guidelines should govern the exercise of that discretion.

In their respective responses to the original report, the four agencies described the corrective actions they would take, largely concurring with OIG's recommendations.

In its follow-up, OIG inquired about the status of corrective actions taken by the agencies in response to its recommendations. Based on their responses, OIG concluded that there were different levels of implementation among the responding departments.¹⁷

Specifically, COPA significantly improved its on-time posting of relevant incidents, fully addressing the problem of calculating release deadlines; took steps toward implementing an internal process to ensure timely release of all materials, beyond calculating release deadlines correctly; and successfully collaborated with OEMC to ensure COPA's video requests were expedited. However, this inter-agency cooperation did not result in binding directives prescribing a timeline for OEMC production of materials to COPA. Further, COPA did not demonstrate progress toward collaborating with CPIC to develop quality assurance measures to ensure that CPIC notifies COPA of all appropriate incidents.

OEMC addressed most of the concerns raised in OIG's review by working with COPA and the Office of Public Safety Administration (OPSA) to ensure COPA requests are expedited: COPA adds due dates to its requests, allowing OEMC to appropriately prioritize requests, and OEMC logs the request and its due date into GovQA, a software system that documents and tracks records requests, which then allows OPSA to pull video and deliver it to COPA. Although this process alleviated the agency's backlog of requests from COPA, OEMC did not provide evidence of working with the Mayor's Office to conduct a formal staffing and technology needs assessment nor did it, as noted above, work with COPA to develop binding directives formalizing the timeline for video requests.

¹⁷ City of Chicago Office of Inspector General, "OIG Review of Compliance with the City of Chicago's Video Release Policy for Use of Force Incidents," September 15, 2020, 27-39, <https://igchicago.org/wp-content/uploads/2020/09/OIG-Review-of-Compliance-with-the-City-of-Chicagos-Video-Release-Policy-for-Use-of-Force-Incidents.pdf>.

CPD fully implemented one OIG recommendation by including a provision in a CPIC directive that requires CPIC personnel to notify COPA of any in-custody death or injury. CPD partially implemented another recommendation by enacting binding directives governing CPIC's process for notifying COPA of Policy-covered incidents. The process details the incidents CPIC must report, along with the mechanisms by which CPIC should report the information. CPD also reported it was testing out a software solution to further facilitate timely notifications from CPIC to COPA.

CPD, however, did not address the second component of the recommendation, in that the directives still rely on the notification matrix document that OIG recommended replacing. Further, CPD did not implement OIG's two remaining recommendations, related to training CPIC members on their notification duties to COPA and developing quality assurance measures with COPA to ensure reliable notification of all incidents covered by the Policy.

Finally, then-Mayor Lori Lightfoot's Office reported increasing COPA's budget to allow for the hiring and detailing of staff to OEMC if necessary. However, it did not demonstrate progress toward developing binding directives regarding the timeline of OEMC's production of materials to COPA; nor did it provide evidence of having conducted a needs assessment to determine whether OEMC's staffing and budget are sufficient to address the total volume of requests they receive. Lastly, the Mayor's Office did not report that it worked with DOL to update the Policy to reflect how COPA may or may not exercise discretion to release materials related to incidents not specified in the current language of the Policy.

While the steps the four agencies took by the publication of OIG's report were promising and appeared to address the problem of late releases for the short-term, resilient compliance with the City's Video Release Policy will require more substantial process updates, which did not appear to have been implemented as of the publication of OIG's report. OIG urged the City departments involved to fully implement corrective actions.

B | Review of Closed Disciplinary Investigations

Pursuant to its obligations under MCC § 2-56-230(c), 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 311 closed disciplinary cases and opened 25 for in-depth review.

Table 9: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	120	6
COPA	191	19
Total	311	25

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG found two COPA investigations that contained deficiencies materially affecting their outcomes, and sent letters of recommendation to reopen both investigations. COPA declined to reopen one of the investigations; the second investigation is pending a response.

Below are summaries of investigations that have reached a final disciplinary decision.

a | Recommendation to Reopen to Investigate All Appropriate Allegations (C2023-000000242)

OIG reviewed a COPA investigation alleging that a CPD member used excessive force against the complainant when they tased the complainant during their arrest. The complainant also alleged the inappropriate touching of their genital area by an unidentified CPD member.

According to CPD's case report, on November 21, 2020, CPD members initiated a traffic stop after observing inoperable headlights and no front or back plates on a white Cadillac. The accused CPD member approached the complainant and asked for their information, but the complainant refused. The accused CPD member ordered the complainant out of the vehicle multiple times. A passenger located in the backseat passenger's side of the car suddenly jumped towards the front driver console and attempted to move the vehicle. At the same time, another CPD member observed the passenger manipulate their right hip with their hand. That CPD member yelled "gun" suspecting the passenger may be armed. The accused CPD member fired their Taser and struck the passenger suspected to be armed in their lower left back. The passenger who had been struck with the Taser exited the vehicle and fled on foot. The other occupants of the vehicle, including the complainant, remained at the scene.

During their interview with COPA, the complainant alleged that they were searched by a CPD member at the district station. While in the holding cell, the complainant asked a female CPD member if they could take them to the restroom. The female CPD member entered the holding cell and told the complainant they had to be checked again. The complainant alleged that the female CPD member became aggressive by throwing them against the wall, kicking their legs open, and fondling them in a "sexual harassing manner." The complainant further stated that the female CPD member reached into their bra and inside their pants and underwear, groping them on their breast and genital area. The female CPD member then moved their hands quickly across the complainant's buttocks before moving their hand around the front and placing their hand on the complainant's vagina.

COPA administratively closed this investigation as a non-disciplinary closure under its Timeliness Initiative Project (TIP). According to COPA's Timeliness Initiative Project policy, "[a]ll investigations that will exceed the 18-month timeframe or have no reasonable certainty of concluding within 18 months are eligible for closure under the TIP, unless there are viable allegations..." COPA lists several viable allegations that would disqualify an investigation from a non-disciplinary closure,

including sexual misconduct. COPA made no record of whether it conducted any additional investigation to identify the CPD member who allegedly groped the complainant.

OIG recommended that COPA reopen the investigation, investigate appropriate allegations, and close the matter in accordance with policy; however, COPA declined OIG's recommendation stating that they were "unable to corroborate the complainant's accusations."

[b | Recommendation to Reopen to Address Potential Violations of All Involved CPD Members \(C2022-000044121\)](#)

OIG reviewed an investigation conducted by CPD's BIA involving a CPD member who engaged in an unjustified verbal altercation with a civilian, removed their body armor, and unnecessarily displayed their firearm for no police purpose.

CPD members responded to a dispatch of a person wanted for assault. Upon their arrival to the location, the CPD members learned that the offender fled on foot. CPD members toured the area on foot but were unable to locate the offender. The accused CPD member, while on foot, encountered an unknown person in a backyard and requested that the unknown person open a locked gate that led into the backyard of a residential building. The unknown person refused to open the gate, and the accused CPD member told the unknown person to text "his buddy," the offender, that "[they're] caught," and "[They] ain't gone make it home." The unknown person called the accused CPD member a "clown," and the accused CPD member responded, "Open the gate and show me I'm a clown," "Get your bum-ass out of here," "You ain't about that life," and, "Open the gate if you so tough. If you were tough, you wouldn't be talking from behind that gate," "You tough but you walking away. You'll fight a [person], but you won't fight no real [person]." It is inaudible what the unknown person stated, but the accused CPD member replied, "Okay, open the gate and knock me the fuck out. It's just us back here. Open the gate. Let's get it. I'll beat your ass while I'm on duty. You a bitch." The verbal altercation continued for several minutes when the unknown person stated, "You take that badge and gun off, I'll show you." The accused CPD member's Body Worn Camera (BWC), at the 18:11 mark, captured the CPD member taking their gun out of the holster, and stating to another CPD member, "Come hold this. I'm about the beat the fuck out this [person]." The CPD member also took off their vest and threw it to the ground. Another CPD member is heard telling the accused CPD member, "Hey, not worth it. Not worth it." The accused CPD member continued to entice the unknown person to a fight and told a witness at the scene to "Shut up," because they did not know what they were talking about. As the accused CPD member put their vest back on, the accused CPD member told the unknown person, "I'll come back off-duty, motherfucker, what you going to do? I know where you stay at, goofy." The accused CPD member and the unknown person continued their exchange for a few more seconds before the accused CPD member turned off their BWC.

A CPD member who was on scene captured the verbal altercation and the interaction between CPD members on their BWC. After the unknown person walked away from the gate toward the apartment building, a neighbor opened the gate. A CPD member entered the backyard and walked up to the third floor where they told the unknown person, who was engaged in the verbal altercation with the accused CPD member, to put their hands behind their back because they were under arrest for assault against an officer.

The arrest report and tactical response report (TRR), stated that the subject became verbally abusive, which placed the accused CPD member in a “reasonable apprehension of receiving a battery.”

BIA sustained allegations that the accused CPD member engaged in an unjustified verbal altercation with a citizen, removed their body armor while on duty and in the performance of their duties, and displayed their prescribed firearm by removing it from their holster for no police purpose. The accused CPD member entered a mediation agreement and received a ten-day suspension. BIA interviewed one CPD member as a witness but did not identify or interview the other CPD members who were at the scene of the incident. It was unclear whether the other CPD members who witnessed the verbal altercation reported the misconduct to a supervisor as required by CPD Directive, Complaint and Disciplinary System, G08-01 V.D (2), and by Rule 22 of CPD’s Rules of Conduct.

OIG recommended that BIA reopen the investigation, or alternatively, open a separate investigation to identify the CPD members who witnessed the accused CPD member’s misconduct, and determine whether they reported their observations in compliance with Rule 22 and other applicable directives.

BIA accepted OIG’s recommendation and reopened the investigation. On October 4, 2023, BIA closed the investigation. It is unclear from the investigative file whether BIA took additional steps to address the identified deficiencies.

2 | Recommendations to Inform and Improve Investigations

OIG’s Investigative Analysis Unit may identify deficiencies in one or more investigations or an investigative practice that may or may not materially affect the outcome of an investigation, but may affect the thoroughness and objectivity of the investigation. In these instances, OIG will make recommendations to inform and improve future investigations to the respective agencies. Below is a summary of the Recommendation to Inform and Improve letter published this quarter.

Below are summaries of investigations that have reached a final disciplinary decision.

a | Recommendations to Inform and Improve Police Board Decisions¹⁸

During its review of decisions made by the Police Board, OIG identified an inconsistency concerning the Police Board’s Findings and Decisions in 21 PB 2994. At issue in that matter were allegations involving the use of a chokehold by a CPD member and the failure to report the chokehold by two CPD supervisors.

The Police Board found a CPD member guilty of seven rule violations stemming from their unjustified use of a chokehold. Two CPD supervisors faced allegations that they failed to report that the CPD member used excessive force and that they failed to adequately address the CPD member’s incomplete Tactical Response Report. Both supervisors were charged with violating Rule 3 of CPD’s Rules of Conduct, which prohibits any failure to promote the Department’s efforts to implement its policy or accomplish its goals, and Rule 22, which prohibits failure to report misconduct.

¹⁸ Published October 3, 2023. See <https://igchicago.org/publications/recommendations-to-inform-and-improve-police-board-decisions/>.

In the Police Board's decision, the Police Board acknowledged that both supervisors reviewed video footage of the incident on more than one occasion; however, neither CPD supervisor identified the misconduct that the Police Board itself identified in its review of that same video. The Police Board wrote in its decision that the two CPD supervisors had "no reason to suspect an illegal chokehold"—despite themselves finding evidence of an illegal chokehold—and found the two CPD supervisors Not Guilty of all charges.

OIG found the Police Board's decision as related to the CPD supervisors' alleged misconduct to be inconsistent with its decision related to the misconduct of the CPD member based on its review of the same video.

To inform and improve future decisions, OIG recommended that the Police Board ensure internal factual consistency across findings in a case, and that it thoroughly enforces CPD's rules and policies requiring its members to report misconduct.

In response to OIG's recommendation, the Police Board agreed generally that it should strive 'to ensure internal factual consistency across findings in a case, and ensure that it thoroughly enforces CPD's rules and policies requiring its members to report misconduct, but noted that the Police Board's decision was its "best and final reasoning."

V | Reports and Monitoring Activity

A | Audits and Follow-Ups

Separate from its confidential investigative work, OIG's Audit & Program Review (APR) section produces a variety of public reports including independent and objective analyses and evaluations of City programs and operations with recommendations to strengthen and improve the delivery of City services. These engagements focus on the integrity, accountability, economy, efficiency, and effectiveness of each subject. The following summarizes one such report published this quarter.

1 | [Follow-up to OIG's Audit of the City's Compliance with the TIF Sunshine Ordinance and TIF Surplus Executive Order \(#C2023-000000113\)](#)¹⁹

OIG completed a follow-up to its January 2022 audit of the City's compliance with the Tax Increment Financing (TIF) Sunshine Ordinance and TIF Surplus Executive Order. TIF is the City of Chicago's primary funding vehicle for economic development; the program uses local property taxes to finance public and private projects designed to reduce urban blight by improving infrastructure, expanding the tax base, and/or fostering economic development.

In the original audit, OIG found that the City had not provided the public with all of the data required by the TIF Sunshine Ordinance. OIG also found that the City declared a 2020 TIF surplus in compliance with the Executive Order, but limited the amount considered for surplus declaration because of recording errors, lack of consistent project review, and stagnating unspent funds.

Based on responses from DPD and the Office of Budget and Management (OBM), OIG concludes that DPD has fully implemented three of four corrective actions recommended in OIG's 2022 audit related to the TIF Sunshine Ordinance and substantially implemented one; OBM has fully implemented one of four corrective actions related to the TIF Surplus Executive Order and partially implemented the remaining three.

- DPD has made all TIF data required by the Sunshine Ordinance available on a public-facing website that refreshes nightly with updates from its relaunched project management system and assigned a staff member to audit project documentation on a quarterly basis. DPD has not yet deleted duplicative legacy pages containing TIF data from its website but stated that doing so remains an "important goal."
- OBM has developed guidelines to better define what expenses constitute project commitments. OBM stated that it continually reviews planned TIF expenses in collaboration with requesting departments, but it has not formalized the review process using written guidance. Lastly, while OBM identified existing budget documents that describe the City's TIF surplus methodology and the amount of surplus by district, it has not released an annual TIF surplus report specific to the TIF surplus process. OBM had committed to developing such a report in both its response to the original audit and its response to the follow-up inquiry.

OIG urged DPD to fully implement the remaining changes to its website and OBM to proceed with its commitment to developing an annual report specific to the TIF surplus process.

¹⁹ Published November 29, 2023. See <https://igchicago.org/wp-content/uploads/2023/11/UPDATED-OIG-Follow-up-to-TIF-Sunshine-and-Surplus-Audit.pdf>.

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 four notifications this quarter.

1 | DOF Outdated Payment Processing Systems (C2022-000043810)

An OIG investigation established that DOF uses outdated point-of-sale technology for in-person payments, which has had the effect of thwarting the City's stated goal to transition to passing along certain transaction fees to consumers because the outdated technology does not support such a change. Information provided by DOF indicated that the City has paid \$12,204,304 in in-person transaction fees from 2017 to 2022—fees that, had DOF timely secured updated processing technology, would have been shifted to patrons but that now represent a cost to the City. Moreover, such outdated technology exposes the City and its payors to fraudulent charges.

OIG found that, despite ongoing efforts, DOF still has not secured a contract to update the City's point-of-sale technology or otherwise rectify the losses and fraud concerns of using outdated technology.

OIG notified DOF of its findings and recommended that DOF revisit the timeline for, and proceed with deliberate haste in, implementing modernized software and equipment to capture processing fees for in-person transactions consistent with online transactions, as well as to mitigate the City's potential liability for fraudulent charges. In response, DOF explained that its contractual relationship with a point-of-sale hardware vendor disintegrated and that as of October 2023, DOF "expects to have a formal agreement with a vendor" to update its point-of-sale technologies by the end of 2024.

2 | CPD Traffic Crash Reports (C2022-000043880)

OIG notified CPD and the Department of Assets, Information, and Services (DAIS) regarding deficits in protecting private information contained in Traffic Crash Reports and limiting access to publicly available data on the Chicago Data Portal.

In the course of an investigation, OIG learned that CPD's Traffic Crash Reports website allowed members of the public to purchase unredacted crash reports, and it provided two ways for the public to search for crash reports: via a combination of RD number and crash date or via a combination of the name of a person involved and crash date. Previously, crash reports could also be searched by providing the crash location and crash date.

While crash reports could be located and purchased by the general public, CPD did not redact any personal information in reports before they were accessed by third parties. Moreover, members of the public, even without prior knowledge of a crash, could easily access crash reports using information from the Chicago Data Portal, which included a table of traffic crash information that included the RD number and crash date. By entering the RD number and crash date listed in the Chicago Data Portal, anyone could obtain the corresponding, unredacted crash report via CPD's Traffic Crash Reports website. During the time of OIG's investigation, the data portal was modified to state that the RD number column is blank for recent crashes, but it appeared that third parties only needed to wait 15 days before they could access RD numbers.

Crash Reports include a wealth of personal information, including full names, dates of birth, addresses, telephone numbers, and driver's license numbers. Unredacted information from crash reports gives strangers access to personal information that may be abused. OIG accordingly recommended that CPD, working with other City departments as necessary, should ensure that the Chicago Data Portal cannot be used by third parties to obtain personal information and solicit individuals involved in motor vehicle accidents. OIG also indicated that CPD should evaluate its policy for redacting crash reports, and ensure that personal information is redacted, consistent with the Freedom of Information Act, before it is released to a third party.

In response, CPD indicated that it would work with other City departments to determine how personal information contained in traffic crash reports can be removed from the Chicago Data Portal. CPD also indicated that it is in the process of revising the manner in which traffic crash reports are released to the general public. CPD is working to adopt a method of responding to requests similar to that used by the Illinois State Police, which will only provide an unredacted copy of a traffic crash report if the request is accompanied by a subpoena or an order signed by a judge. CPD is further exploring making unredacted versions of such reports available to persons who are involved in the accident, their counsel, and their insurance company, by using a verification system currently used by CPD's FOIA Unit for purposes of providing unredacted or less redacted versions of other police reports. CPD expects this process to balance the needs of persons involved in a traffic accident to access information with the need to restrict access to personal information.

DAIS responded that it conducted an immediate review of the dataset available in the Chicago Data Portal and that, on November 21, 2023, the RD number column was removed from the dataset.

[3 | Walsh Construction False Claims Settlement \(C2023-000000162\)](#)

OIG notified DPS that on March 31, 2023, Walsh Construction Company, an affiliate of which holds a significant contract on the O'Hare Modernization Project, entered into a settlement with the United States for submitting or causing the submission of false claims for payment to the Massachusetts Department of Transportation (MassDOT) and U.S. Department of Transportation (USDOT) under USDOT's Disadvantaged Business Enterprise (DBE) program. As part of the settlement agreement, Walsh admitted that it assisted with certain work functions for DBEs on a MassDOT project but claimed DBE participation credit for the work of at least one DBE where Walsh assisted in the work.

DPS responded that given the nature of the allegations and the necessity of maintaining critical infrastructure and development work, DPS does not, at this time, intend to begin debarment proceedings. Instead, DPS intends to closely monitor the situation and work with the DPS Compliance Unit to closely review any compliance plans and certified payroll reporting submitted by Walsh. Information submitted by Walsh and its affiliates will also be scrutinized by the DPS Compliance Unit at contract close-out. Should DPS discover any evidence of wrongdoing on City contracts by Walsh or its affiliates, DPS is prepared to take action and begin debarment proceedings.

[4 | OEMC Mistreatment \(C2023-000000188\)](#)

OIG notified the Office of Emergency Management and Communications (OEMC) regarding an instance wherein an OEMC Police Communications Operator (PCO) mistreated a member of the public who called 911 to report that a man was threatening a gas station attendant. The caller

informed the PCO that she was at a Costco gas station on a specific street and that a man was threatening a gas station employee. The PCO asked for a more specific location in a manner that immediately sounded frustrated with the caller. When the caller provided additional location information but not a specific address, the PCO chastised the caller and eventually appeared to hang up on the caller. OIG did not investigate the incident, but instead notified OEMC that the incident occurred and directed it to the call recordings in its possession that captured the incident so OEMC could take any action it deemed appropriate. In response, OEMC identified the PCO who handled the call and gave the PCO a written counseling session report addressing the incident.

C | Other Reports and Activities

In the service of its mission to promote economy, effectiveness, efficiency, and integrity, OIG may periodically participate in additional activities and inquiries, outside of the other categories identified here, to improve transparency and accountability in City government, and may from time to time issue additional reports.

OIG issued one additional report this quarter.

1 | Understanding the City of Chicago’s Response to Sewer Cave-in Complaints: An Explainer (#C2022-000043600)²⁰

The Department of Water Management (DWM) is responsible for maintaining the integrity of Chicago’s water and sewer system. When Chicagoans notice “sinkholes” or other road issues, they sometimes report them to Chicago’s 311 system—the City’s system for registering public complaints and requests for City services—as “sewer cave-ins.” With this report, OIG aimed to provide Chicagoans with basic information about sewer cave-ins, the City’s 311 system, and DWM’s response to this type of complaint.

Sewer cave-ins take many forms—from a slight depression in the pavement to a large hole in the street—and complaints to 311 involve a multi-step process that can involve multiple departments before the complaint can be closed. Community members who report sewer cave-ins can experience confusion and frustration when they see the issue still exists, yet their service request is closed. Although the public 311 system is meant to provide transparency regarding the City’s response, it may not always provide enough information for complainants to follow and understand the subsequent steps taken by DWM—for example, whether a complaint is a duplicate or why it was canceled. DWM reports that it is currently pursuing a technology solution for this issue, and OIG’s draft 2024 annual audit plan includes a possible future project related to the functionality of the 311 tracking system.

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 the Chicago Fire Department (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

²⁰ Published December 18, 2023. See <https://igchicago.org/wp-content/uploads/2023/12/OIG-Explainer-Citys-Response-to-Sewer-Cave-in-Complaints.pdf>.

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.

OIG 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. OIG may choose to review any solicitation documents, draft agreements, final contracts, or agreement terms to assess whether they are in compliance with the Contractor Policy. This review includes analyzing contracts for common-law employee risks and ensuring the inclusion of *Shakman*-related boilerplate language.

This quarter, OIG did not review any contracts.

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. During this quarter, OIG received no notifications of direct contact occurrences.

b | Contacts by the Fire Department

OIG tracks all reported or discovered instances in which CFD contacted DHR or OPISA's human resources function (OPISA-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. During this quarter, OIG received no notifications of direct contact occurrences.

c | Chicago Police Department Intervention

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

e | Exemptions

OIG reviews adherence to exemption requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²¹ During this quarter, OIG received notification of 57 exempt appointments.

f | Senior Manager Hires

OIG may review in-process Senior Manager hires pursuant to Chapter VI of the City's Employment Plan, Chapter VII of the City of Chicago Police Department Hiring Plan for Sworn Titles, and Chapter VI of the City of Chicago Fire Department Hiring Plan for Uniformed Positions each covering the Senior Manager Hiring Process. During this quarter, OIG reviewed five Senior Manager hiring packets and found no violations. Two additional Senior Manager hiring packets are pending review.

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 audits 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 arbitration decisions that may impact the procedures outlined in the City's Employment Plans.

²¹ An exempt position is a City position to which the requirements governing Covered Positions do not apply. These positions are cataloged on the Exempt List which is publicly available on the Department of Human Resources website.

i | Modifications to Class Specifications,²² Minimum Qualifications, and Screening and Hiring Criteria

OIG may review modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG received notification that the following hiring departments proposed modifications to the minimum qualifications for five titles within CDPH, CDA, and Office of Budget and Management. OIG reviewed the proposed changes 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 audit this list by examining a sample of referral lists and notifying DHR when potential issues are identified. This quarter, OIG did not audit any referral lists.

k | Chicago Police Department Written Rationale

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

l | Chicago Fire Department Written Rationale

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

m | Chicago Police Department Emergency Appointments

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

2 | Hiring Related Audits Performed by OIG

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

This quarter, OIG completed audits of nine hiring sequences across five City departments that were completed within the quarter. OIG selected these hiring sequences based on risk factors such as past errors and complaints.

²² According to the Employment Plan, "Class specifications" are descriptions of the duties and responsibilities of a class of positions that distinguish one class from another. They are, in effect, the general descriptions utilized to determine the proper level to which a position should be assigned, and they include the general job duties and minimum qualifications of the position. Class specifications shall include sufficient detail so as to accurately reflect the job duties.

Each quarter, OIG may audit in-process and completed hiring sequences conducted by the following departments or their successors: AIS, CDA, DOB, DSS, CDOT, DWM, and six other City departments selected at the discretion of OIG. For 2023, OIG selected the following six additional departments: Chicago Treasurer’s Office, Office of the City Clerk, CDPH, OPSA, OEMC, and DFSS. The table below details the hiring sequences audited by OIG this quarter.

Table 10: Hiring Sequences Audited in Q4 Pursuant to the City of Chicago Employment Plan

Department	Title	Findings	OIG Recommendation	Department Action
Department of Assets, Information, and Services	Director of Security	No violations or errors were found.	N/A	No response is required.
Chicago Department of Public Health	Director of Planning, Research & Development – Emergency Preparedness	No violations or errors were found.	N/A	No response is required.
Chicago Department of Public Health	Medical Director	No violations or errors were found.	N/A	No response is required.
Department of Water Management	Filtration Engineer – IV	No violations or errors were found.	N/A	No response is required.
Department of Finance	Projects Administrator – Payroll Division	No violations or errors were found.	N/A	No response is required.
Department of Finance	Project Manager	No violations or errors were found.	N/A	No response is required.

b | Examinations Covered by the City of Chicago Employment Plan

OIG may conduct an audit of DHR test development, administration, and scoring each quarter. This quarter, OIG did not initiate any new test administration audits.

c | Chicago Police Department Testing

OIG is required to conduct audits of CPD testing including test administration and scoring. This quarter, no tests were administered 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, no tests were administered 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 four 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 completed one audit of CPD hiring sequences and found no violations or errors.

g | Selected Chicago Fire Department Hiring Sequences

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

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

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

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

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

j | Chicago Police Department Candidate Lists

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

k | Chicago Fire Department Referral Lists

OIG is required to conduct audits of CFD referral lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG conducted one audit of a CFD referral list and found no violations or errors.

l | Chicago Police Department Acting Up

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

m | Chicago Fire Department Acting Up

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

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

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

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

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

3 | 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 40 hiring sequences across 14 City departments. The table below shows the breakdown of monitoring activity by department.²³

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

Table 11: Hiring Sequences Monitored in Q4

Department	Intake Meetings Monitored	Tests Monitored ²⁴	Interview Sets Monitored ²⁵	Consensus Meetings Monitored	Violations
Chicago Department of Aviation	0	1	0	1	0
Chicago Department of Transportation	0	1	0	0	0
Chicago Department of Public Health	1	1	5	2	0
Department of Family and Support Services	0	0	0	1	0
Chicago Police Department	0	0	5	1	0
Department of Assets, Information and Services	0	0	2	2	0
Office of Inspector General	0	0	3	1	0
Office of Public Safety Administration	0	0	0	1	0
Department of Law	0	1	1	0	0
Department of Finance	0	0	2	1	0
Department of Buildings	0	1	0	0	0
Department of Water Management	0	1	1	0	0
Department of Housing	0	0	2	1	0
Chicago Public Library	0	0	1	0	0

b | Escalations

Recruiters, classification analysts, and testing administrators in DHR must escalate concerns regarding improper hiring by notifying OIG. In response to these notifications, OIG may take one or more of the following actions: investigate the matter, conduct a review of the hiring sequence, refer the matter to the DHR commissioner or appropriate department head for resolution, or refer the matter to the OIG Investigations section.

This quarter, OIG received three new escalations. Four escalations from the previous quarter have been resolved and summaries of the escalations are provided below. Two escalations are still pending.

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

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

1. Chicago Department of Public Health (CDPH), Clinical Therapist II

On August 31, 2023, a DHR Recruiter informed OIG that CDPH sought to add applicants who did not meet minimum qualifications to the Clinical Therapist II Referral List. During its review, OIG found that CDPH requested to remove required licensures established by the City of Chicago Job Specifications from the job criteria. OIG notified CDPH about the necessity of meeting the minimum qualifications of DHR's Job Specifications pursuant to Chapter V of the City of Chicago Employment Plan. The DHR Recruiter screened applicants per the minimum qualifications of the Job Specifications and allowed CDPH to continue with applicant interviews.

2. Chicago Department of Public Health (CDPH), Administrative Assistant II

On September 11, 2023, OIG received notice from the Director of Assessment and Selection Methods with DHR that the Chicago Department of Public Health (CDPH) failed to administer a written skills assessment to any of the candidates for the Administrative Assistant II as planned by the Hiring Manager. The Consensus Meeting had already occurred, and the selected candidate was set to begin on September 13, 2023. OIG found that no hiring violation occurred and allowed the hiring sequence to continue.

3. Chicago Fire Department (CFD), Commander – Quinn Training Academy

On September 13, 2023, OIG received communication from a DHR Recruiting Coordinator on behalf of the CFD Fire Commissioner. The CFD Fire Commissioner notified the DHR Recruiting Coordinator that they wished to hire a different candidate than the Hiring Manager had selected. Pursuant to Chapter V(11) of the CFD Hiring Plan, "the selection process for interviewed Positions shall be based on a Consensus Meeting led by a DHR Recruiter and attended by all interviewers, along with the Hiring Manager for the Position." Therefore, OIG notified CFD that the Fire Commissioner could not change the selected candidate.

4. Chicago Police Department (CPD), Project Administrator

On October 25, 2023, an OPSA Administrative Services Officer notified OIG of CPD's intention to conduct a second round of interviews for its Project Administrator hiring sequence. OIG met with the OPSA Managing Deputy Director of Human Resources who confirmed that the Commanding Officer of the interviewing unit wished to add two additional candidates from the Referral List. OIG informed the Hiring Managers that the interviewers must remain the same pursuant to Chapter II of the CPD Hiring Plan. CPD agreed and allowed the hiring sequence to continue with the additional scheduled interviews.

5. Department of Housing (DOH), Housing Development Coordinator

On November 20, 2023, a Department of Housing (DOH) HR liaison escalated the Housing Development Coordinator hiring sequence due to pre-selection concerns. OIG monitored the candidate interviews as well as the consensus meeting. During real-time monitoring, OIG found that no improper candidate pre-selection occurred in the hiring sequence.

6. Office of Public Safety Administration (OPSA), Supervisor of Grant Administration

On November 22, 2023, an OPSA Administrative Services Officer notified OIG of their intention to remove a candidate from the Supervisor of Grant Administration Referral List. OIG met with the Hiring Manager of the Position who alleged that the candidate did not meet minimum qualifications for the position. During its review, OIG found that the DHR Recruiter correctly screened the applicant and determined that their experience was relevant and suitable. Additionally, since the Supervisor of Grant Administration is not a Senior Manager title, departmental hiring managers do not need to conduct preliminary or additional screening after the Referral List has been sent. Based on this information, OIG recommended that the applicant be interviewed as scheduled.

Table 12: Escalations Received in Q4 2023

Escalation Status	Number of Escalations
Newly Initiated	4
Pending	3
Closed with Investigation	5
Closed without Investigation ²⁶	1

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 13: Hiring and Employment-Related Complaints Received in Q4 2023

Complaint Status	Number of Complaints
Newly Initiated	31
Pending	31
Closed ²⁷	9
Declined	1

²⁶ Escalations categorized as Closed without Investigation are received by OIG with a self-initiated remedy from the DHR Commissioner. 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.

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



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

For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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