



Office of the Independent Inspector General

“[T]o detect, deter and prevent corruption, fraud, waste, mismanagement, unlawful political discrimination or misconduct in the operation of County government.”

Quarterly Report
3rd Quarter 2025

October 15, 2025

INSPECTOR GENERAL'S INTRODUCTION

The Office of the Independent Inspector General (OIIG) Quarterly Report serves as a forum to communicate to the OIIG stakeholders matters involving our investigative activities and other concerns affecting our mission pursuant to the OIIG Ordinance. In pursuit of greater transparency, accountability, and public trust, the OIIG has repeatedly requested the enactment of a proposed ordinance aimed at strengthening oversight mechanisms within our jurisdiction. This initiative reflects the OIIG's commitment to ensuring that government operations remain efficient, ethical, and responsive to the needs of the community. Currently, we have received public support for our budgetary floor from the National Association of Inspectors General, the First Church of the Brethren, the Wellington United Church of Christ, Michael L. Shakman, Alisa Kaplan (Reform for Illinois), and Dr. Dick Simpson. There also has been an Op-Ed published in the Chicago Tribune. We expect more public support from good government civic organizations, concerned citizens and media coverage as our Message continues to get circulated amongst our stakeholders.

The proposed ordinance seeks to expand staff and protect the OIIG from political control, interference or retaliation by creating a budgetary floor for the OIIG that is a certain percentage of the County's overall budget similar to what is in place for the City of Chicago Office of Inspector General. By introducing this legislation, the OIIG aims to close existing gaps in oversight and provide a more robust framework for preventing misconduct, waste, and political corruption. The OIIG's budget should be considered an investment and not a cost. As an example, the OIIG helped to identify and rectify managerial failures in the Healthcare system that resulted in approximately \$229 million of cost savings related to claim denials. Another example is that the OIIG helped Stroger Hospital receive remuneration for services to CountyCare members totaling approximately \$1.9 billion. These are only two results that the OIIG helped Cook County achieve.

In light of the work the OIIG has performed, we are respectfully making a call to action for lawmakers, stakeholders, and citizens alike to reaffirm their dedication to good governance. The OIIG stands ready to collaborate with legislative bodies to shape a policy that reflects the highest standards of integrity and service. The OIIG respectfully asks for at least one Cook County Commissioner to sponsor the OIIG Budgetary Floor Amendment and present this matter to the entire Cook County Board of Commissioners for public participation and vote.

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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

Tirrell J. Paxton, Inspector General

69 West Washington Street | Suite 1160 | Chicago, IL 60602 | (312) 603- 0350

October 15, 2025

Transmittal via email only

Honorable Toni Preckwinkle
and Honorable Members of the Cook County
Board of Commissioners
118 North Clark Street
Chicago, Illinois 60602

Re: Independent Inspector General Quarterly Report (3rd Qtr. 2025)

Dear President Preckwinkle and Members of the Board of Commissioners:

This report is written in accordance with Section 2-287 of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-52 (2007), to apprise you of the activities of this office during the time period beginning July 1, 2025, through September 30, 2025.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 226 complaints during this reporting period.¹ The OIIG initiated 12 new OIIG investigations during this period and still has a total of five matters under investigation. Additionally, 97 OIIG inquiries have been initiated during this reporting period while a cumulative total of 132 OIIG inquiries remain pending at the present time. We referred 62 complaints to management or outside agencies for further consideration. The number of open investigations beyond 180 days of the issuance of this report is four due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

New Summary Reports

During the 3rd Quarter of 2025, the OIIG issued 16 summary reports. The following provides a general description of each matter and states whether OIIG recommendations for

¹ Upon receipt of a complaint, a triage/screening process of each complaint is undertaken. In order to streamline the OIIG process and maximize the number of complaints that will be subject to review, if a complaint is not initially opened as a formal investigation, it may also be reviewed as an "OIIG inquiry." This level of review involves a determination of corroborating evidence before opening a formal investigation. When the initial review reveals information warranting the opening of a formal investigation, the matter is upgraded to an "OIIG Investigation." Conversely, if additional information is developed to warrant the closing of the OIIG inquiry, the matter will be closed without further inquiry.

remediation or discipline have been adopted. Specific identifying information is being withheld in accordance with the OIIG Ordinance where appropriate.

IIG22-0050 – Cook County Health. The OIIG received an allegation that a Cook County Health (CCH) employee was abusing Family and Medical Leave (FMLA) sick leave and violating CCH’s dual employment policy.

The preponderance of the evidence demonstrated that the employee was appropriately using approved intermittent FMLA sick leave to care for a family member with a serious medical condition. Therefore, the allegation related to abuse of FMLA leave was not sustained. The preponderance of the evidence also demonstrated that the employee engaged in several types of dual employment outside of his work for CCH. While he disclosed several to CCH, the employee failed to disclose a type of self-employment and a consulting role in 2023 and 2024. The allegation that the employee violated CCH’s dual employment policy was sustained. The OIIG recommended that CCH impose discipline on the employee consistent with factors set forth in CCH’s Personnel manual, including the system’s practice in recent similar cases. This report was issued September 29, 2025, and a response is not yet due.

IIG22-0125 – Assessor’s Office. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan)² to determine whether information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Personnel Rules. Based on this review, we discovered that an Assessor’s Office employee sought and was approved for two federal PPP loans totaling approximately \$11,000. On her loan application, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed the Assessor’s Office that she was engaging in secondary employment and otherwise complied with County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Assessor’s Office Employee Handbook Section 19(o) – Conduct unbecoming an employee of the Assessor’s Office. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. During her OIIG interview, the employee admitted that revenue she claimed from her businesses

² The CARES Act is a federal law enacted on March 29, 2020, to provide emergency financial assistance in connection with economic effects of the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through the PPP. The PPP allows qualifying small businesses and other organizations to receive loans with a maturity of two years and an interest rate of 1%. PPP loan proceeds must be used by businesses on payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses at least a certain percentage of the PPP loan proceeds on payroll expenses.

was not in line with the amounts indicated on her tax returns and the documents she provided during the loan process.

The preponderance of the evidence developed in this investigation also supports the conclusion that the employee violated Assessor's Office Employee Handbook Section 14 – Outside/Dual Employment. When interviewed by the OIIG, the employee acknowledged she failed to disclose her secondary employment owning and operating a business. Based on the serious nature of the misconduct, as well as other aggravating factors present, we recommended that the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 17, 2025, and a response is not yet due.

IIG22-0838 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling approximately \$42,000. On his loan application, the employee stated he was an independent contractor for a business. The OIIG conducted an investigation to determine if the employee informed CCH that he was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of the evidence gathered throughout this investigation demonstrates that the employee did obtain a PPP loan for a legitimate business. The OIIG found that the allegation of CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System, is not sustained. However, the preponderance of the evidence proves that he failed to report his dual employment status to CCH although he was operating as an independent contractor and was contracted by multiple telehealth agencies. Furthermore, the employee provided telehealth services while on duty with CCH. Considering these findings, the employee is found to be in breach of CCH Personnel Rules 8.03(c)(13), 8.03(c)(26), and 12.04(a)(3). Based on the nature of the misconduct involved, the OIIG recommends that the employee receive discipline consistent with factors set forth in CCH Personnel Rule 8.4, including the department practice in recent similar cases. CCH accepted the OIIG recommendation for discipline and is seeking termination of the employee.

IIG24-0037 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two SBA loans: one PPP loan for approximately \$9,000 and one under the Economic Injury Disaster Loan Grant (EIDL) program for approximately \$10,000. On her loan applications, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the

employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment. The employee did not disclose to CCH she was engaging in secondary employment working more than 20 hours per week while employed full-time with CCH. The employee also admitted that she had worked for another company and did not inform CCH of this employment. The preponderance of the evidence also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Finally, during the course of the investigation, the OIIG discovered a misdemeanor criminal conviction that the employee failed to disclose to CCH as required, in violation of CCH Personnel Rule 8.03(b)(12) – Conviction of a criminal offense.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 26, 2025, and a response is not yet due.

IIG24-0501 – Cook County Health. The OIIG conducted an investigation into allegations that a CCH employee was involved in a pass-through scheme with a CCH vendor in order to circumvent the County’s Ethics rule prohibiting County employees from having a financial interest in County contracts, work, or business.

The preponderance of the evidence demonstrates that the employee enlisted the assistance of an individual (Individual A) to provide services to CCH. The employee prepared Individual A’s invoices with the name of a company owned by the employee’s mother. Individual A received payments from CCH and transferred the bulk of the funds to the employee the same day or a few days later. Individual A had no direct communication with CCH personnel; rather, it was the employee who engaged in multiple email exchanges with those County employees, where she discussed services, provided quotes and documentation, inquired about payments, and thanked them for the business.

The OIIG found the employee violated CCH Personnel Rule 8.03(c)(13) which references the County Ethics Ordinance Sec. 2-581(a)(1) – No elected official or employee shall have a financial interest in their own name or in the name of any other person in any contract, work or business of the County. Also, by placing her personal gain ahead of her fiduciary duty to CCH, the employee was found to be in breach CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH.

Based on the serious nature of the misconduct involved, the OIIG recommends that the employee be terminated and that CCH place her on its *Ineligible for Hire List*. The OIIG further recommends that CCH should improve internal controls for the informal procurement process:

1. Ensure no single employee has end-to-end control over vendor selection, approval, and payment processing.
2. Run automated or manual checks to flag potential employee-vendor connections before contracts are awarded.
3. Implement a process requiring employees involved in the engagement to certify, before procurement or payment, that they have no personal interest in the transaction.

This report was issued September 15, 2025, and a response is not yet due.

IIG25-0059 – Clerk’s Office. The OIIG received an allegation that a Clerk’s Office seasonal employee has been engaged in benefits fraud because she has been receiving Supplemental Nutrition Assistance Program (SNAP) and childcare benefits from the Illinois Department of Human Services (IDHS) for several years. Additionally, the employee allegedly concealed earned income received from the Board of Elections to the IDHS, enabling the employee to receive financial benefits that she would not otherwise be qualified to receive. The OIIG conducted an investigation to determine if the employee was employed by the Clerk’s Office during the time she denied receiving earned income.

The preponderance of the evidence gathered during this investigation shows that the employee has been a seasonal employee with the Clerk’s Office since 2017, earning \$1,400 in August 2024 and \$4,875 in November 2024. However, on September 10, 2024, the employee applied for SNAP benefits and declared she had earned no income in the last 30 days. The employee also failed to update IDHS about her income for November 2024, as required. The employee’s intentional omission in her September 2024 application and failure to report her change of income in November 2024 affected the IDHS’s determination of her eligibility for SNAP benefits and resulted in an overpayment of SNAP benefits to the employee in the amount of \$965.

Considering these findings, the employee is found to be in breach of the Clerk Code of Conduct Section V-D(q)(2)(t) – “Conduct unbecoming of a Clerk Employee: which means violation of law or policy that bring into question the integrity of the Employee and reflects negatively on the Clerk or engaging in criminal conduct that otherwise publicly and negatively reflects poorly on the Clerk.” Based on the serious nature of the misconduct involved, the OIIG recommended that her employment with the Clerk’s Office not be renewed and that she be placed on the Clerk’s *Ineligible for Hire List*. This report was issued August 28, 2025, and a response is not yet due.

IIG25-0098 – Assessor’s Office. This investigation was initiated by the OIIG based on a complaint alleging that, despite receiving several notifications that a property located in Cook County was erroneously classified 2-05 (two-or-more story residence, over 62 years of age up to 2,200 square feet), the Assessor’s Office continued to erroneously classify the property. It was

further alleged that the property was built in 1990 and should have been classified 2-78 (two-or-more story residence, up to 62 years of age, 2,001 to 3,800 square feet).

The preponderance of the evidence in this investigation supports the conclusion that the Assessor's Office did not comply with the requirements of section 9-85 of the Property Tax Code when it failed to act on the authority granted by the code and revise the tax assessment pertaining to the property when a concerned taxpayer provided notice that the property was erroneously classified 2-05 since 1990. Additionally, the OIIG determined the Assessor's Office lacks a centralized complaint tracking system that effectively ensures complaints received are adequately stored, tracked, categorized, and acted upon in a timely manner.

The OIIG acknowledges that the Assessor's Office has corrected the problem related to this property. Nonetheless, based on our findings above, this office respectfully recommended that the Assessor's Office review the erroneous assessment history of the subject property. In doing so, the Assessor's Office should consider the feasibility of pursuing legal remedies to recoup monies that were forgone due to the misclassification error. We further recommended the Assessor's Office conduct an evaluation of its complaint intake process. As part of the evaluation, the Assessor's Office should consider assigning complaints an appeal number, which would allow the Assessor's Office to adequately track the progress and timeliness of complaints and ensure staff can document the status and disposition of the complaint. This report was issued September 19, 2025, and a response is not yet due.

IIG25-0116 – Land Bank. The OIIG initiated a review to determine if the Land Bank's procurement code is sufficient and whether the Land Bank follows its own rules when awarding contracts and procurements.

During the course of this review, the OIIG reviewed contracts and procurements from the past two years in the following categories:

1. Contracts and Procurements of \$150,000 or more;
2. Contracts and Procurements of less than \$150,000 but more than \$5,000;
3. Contracts and Procurements of less than \$5,000 ("Small Procurements");
4. Sole Source Contracts and Procurements; and
5. Emergency Contracts and Procurements.

The OIIG also requested the last five bid protests and related written decisions in the last two years. The Land Bank tendered documents related to a total of 24 contracts: one sole source contract, three emergency contracts, and twenty contracts awarded by a competitive bidding method, either by a request for proposal (RFP) or a request for qualifications (RFQ). The Land Bank stated it did not have any small procurements, nor any bid protests in the last two years.

The OIIG reviewed the documents provided by the Land Bank, as well as its procurement code, as amended on June 13, 2025. After review, the OIIG determined the 24 contracts reviewed

all appear to be awarded in accordance with the Land Bank's procurement code. The Land Bank's procurement code, including its recent amendments, closely mirrors the County's procurement code and appears to be sufficient. No recommendations were made by the OIIG.

IIG25-0137 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program (PPP loan) loans to determine whether information submitted by County employees for the PPP Loans was consistent with Cook County records and/or in violation of any County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought one federal PPP loan totaling approximately \$20,000. On her loan application, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Facilities Management that she was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of the evidence developed in the investigation supports the conclusion that the employee violated Cook County Personnel Rule 13 – Dual Employment. The employee did not report that she was the sole proprietor of a business and a worker paid by another governmental entity. The preponderance of the evidence also supports the conclusion that the employee violated Cook County Bureau of Human Resources Personnel Rule 8.2(b)(36), Conduct unbecoming an employee or conduct which brings discredit to the County. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 29, 2025, and a response is not yet due.

IIG25-0138 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought two federal PPP loans totaling approximately \$42,000. On his loan application, the employee stated he was a business consultant. The OIIG conducted an investigation to determine if the employee informed Cook County that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Cook County Personnel Rule 13 - Dual Employment. The evidence shows the employee did not report that he was working for two outside employers while engaged in full-time Cook County employment. The preponderance of evidence developed in the investigation also supports the conclusion that the employee violated Cook County Rule 8.2(b)(36) - Conduct

unbecoming an employee or conduct which brings discredit to the County, because he applied for and received approximately \$42,000 in federal PPP loans for an admittedly fictitious business.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 26, 2025, and a response is not yet due.

IIIG25-0140 – Facilities Management. The OIIG conducted a review for dual employment compliance in connection with Cook County employees. The OIIG initiated this investigation to determine if a Facilities Management employee informed the County that he was engaging in secondary employment.

The preponderance of the evidence demonstrated that the employee held dual employment during the time he was employed by Cook County for which he did not have approval by management nor which he reported to the County, in violation of Cook County Personnel Rule 13. The OIIG recommended the employee receive discipline consistent with the factors set forth in Cook County Personnel Rules 8.3, including the department's practice in recent similar cases. This report was issued September 29, 2025, and a response is not yet due.

IIIG25-0147 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought one federal PPP loan totaling approximately \$19,000. On his loan application, the employee stated he was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Cook County that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Cook County Personnel Rule 8.02(b)(36) - Engaging in Conduct that Reflects Adversely or Brings Discredit to Cook County. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of his purported business and its income when he submitted the application for a federal PPP loan. The investigation determined the employee was not the sole proprietor of a business and the information about the business' income was false. The employee acknowledged that he knowingly submitted information to the SBA and other financial institutions that he did not understand or properly read and accept. These statements were made to secure approximately \$19,000 in a federal loan.

The preponderance of the evidence developed in this investigation also supports the conclusion that the employee violated Cook County's Personnel Rule 13 - Report of Dual Employment. When interviewed by the OIIG, the employee acknowledged he failed to disclose

his secondary employment by owning and operating a business that generated self-employment income. Based on the serious nature of the misconduct, as well as other aggravating factors present, we recommended that the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 5, 2025, and a response is not yet due.

IIG25-0200 – Clerk’s Office. The OIIG initiated this investigation based on a complaint that a Clerk’s Office employee frequently leaves her assigned area of work after she signs in at the start of her shift. It was further alleged that the employee fails to clock in or out of work, resulting in her submitting multiple Automated Time Clock Correction Forms (ATC) to her supervisor.

The preponderance of the evidence does not support the allegation that the employee clocks in and leaves her assigned area of work. Both video footage and witness statements refute the allegation. Therefore, the violation of Clerk’s Office Policy Manual Section IX(B) – Time and Attendance is not sustained. However, the preponderance of the evidence does support the conclusion that the employee violated Clerk’s Office Policy Manual Section V(D)(1)(b) by failing to swipe 42 times in a five month period, and Section IX(C) for using the web-based dashboard to clock in via Cook County Time (CCT) rather than a stationary clock when she was not at an alternative work site.

The preponderance of the evidence also supported the conclusion that the supervisor violated Clerk’s Office Policy Manual Section V(F)(1) – Issuing Discipline, when he failed to enforce the office’s timekeeping policies. The employee submitted 25 ATC forms for 42 missed swipes during her first five months at this assignment. Clerk’s Office policy calls for discipline when an employee fails to swipe three or more times within a pay period.

Based on the foregoing, the OIIG recommended the Clerk’s Office impose discipline on the employee and the supervisor. When assessing the appropriate level of discipline, we recommended that consideration be given to the factors set forth in the Cook County Clerk’s Office Policy Manual, Section V(D)(1), including department practices in recent similar cases. The OIIG also recommended management ensure the employee has a working key fob to enter her place of work and confirm that the previous supervisor’s key fob has been collected. This report was issued August 29, 2025, and a response has not yet been received.

IIG25-0256 – Human Resources. The OIIG initiated this investigation after an OIIG official saw a Human Resources employee taking pictures of Cook County employees attending New Employee Orientation (NEO) training with his personal cell phone.

After investigation, the OIIG found that, while not strictly illegal or violative of County policy, the practice of photographing attendees or presenters at NEO sessions presents the risk that attendees, especially those on their first day of employment with the County, might feel intimidated or uncomfortable having their images captured without prior notice to them or without their consent. While Human Resources management was generally aware of the employee’s practice of photographing employees at Human Resources events, the employee took the NEO

photographs without the express request or authorization of BHR management, using his own cell phone. The employee maintained sole control over the images. It is inappropriate for a County employee to capture images of other County employees in the workplace without the express authorization of management and notice to the employees to be photographed.

Additionally, during the course of the investigation, the OIIG requested an interview of a Human Resources employee and asked that the request remain confidential. The OIIG received a response from a Human Resources official. The Human Resources official asked whether the OIIG's request was connected to an official investigation. When the OIIG could not comment on whether there was an active investigation, the Human Resources official asked the OIIG to provide justification to interview the Human Resources employee and to request confidentiality. OIIG reminded Human Resources that the OIIG has explicit authority to interview County employees pursuant to the OIIG ordinance and has an obligation to maintain confidentiality. Lack of confidentiality can jeopardize the efficacy of an investigation, unnecessarily hinder the full cooperation of witnesses, and damage the reputation of the accused. If the person to whom the OIIG makes a request has a question about the purpose of the request, they should address it with the OIIG directly.

The OIIG recommended Human Resources establish a policy that requires management approval before employees are allowed to take photos of any future Human Resources programs, trainings, events, or regular business operations. We also recommended photos be taken with County equipment and employees be notified when possible.

Further, we recommended that Human Resources management should refrain from potential interference with OIIG investigations. In regard to witnesses and interviews, any Human Resources employees who seek assistance from Human Resources management in response to an OIIG request should be directed to address those questions to the OIIG. Alternatively, Human Resources employees could seek advice from a union representative, if applicable, or private legal counsel. For document requests, we recommended that Human Resources explore the option of designating a Human Resources employee who will be responsible for OIIG document productions which was the established practice before 2016. Human Resources management and other Human Resources employees should not, as a group, be informed about OIIG investigations. OIIG investigations must be kept confidential, meaning that information should only be revealed on a need-to-know basis. This report was issued September 25, 2025, and a response is not yet due.

IIG25-0426 – Human Resources. This investigation was initiated by an anonymous complaint to the OIIG alleging that a director-level Bureau of Human Resources Official (BHR Official A) made a harassing comment directed at an employee of Hispanic ethnicity about deportation, anointed the doors of employees within a Department in BHR (Department A) with oil crosses, used profane and demeaning language on a phone call about her employees, and generally bullied employees within Department A. During the course of the investigation, the OIIG reviewed communications between employees and interviewed current and former employees who work at all levels of Department A.

Based on the information obtained in the investigation, the preponderance of the evidence does not support the conclusion that BHR Official A engaged in harassment based on race, national origin, or religion. There is no evidence that BHR Official A made the deportation statement or that she was involved in the oil-stained cross incident. The preponderance of the evidence also does not support the conclusion that BHR Official A engages in bullying in violation of Cook County policy. The incidents described in the complaint were either not corroborated and/or were not sufficiently severe to amount to a violation of the County's anti-violence policy. Rather, most of the impolite or rude statements identified by the witnesses seem to be isolated instances rather than consistent bullying with the intent to force anyone into any particular action. However, the witnesses consistently described BHR Official A as mercurial, terse, brusque, condescending, and rude. Although these issues are not a violation of any law or County policy, they appear to be the cause of low morale, which hinders the important work of Department A, and may have led to unnecessary turnover among Department A staff. Based on the foregoing, the OIIG recommended the following:

1. BHR Official A should self-reflect on her communication style and approach with her staff to improve morale within Department A and ensure its efficient functioning.
2. BHR Official A should undergo management training specifically designed towards improving her management style in the workplace.
3. The BHR should also consider whether BHR Official A needs to complete an anger management course.

BHR adopted these recommendations.

IIG25-0593 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought a federal PPP loan for approximately \$21,000. On her loan applications, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rules. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. The employee gave conflicting stories about whether she applied for the loan with another person or provided her personally identifying information to another individual who assisted with the application. She admitted that the personal identifying information, including digital photographs of herself (selfies), included in the loan application are all hers. She admitted that she does not own the business and did not generate the income listed on the loan application. The OIIG determined

that, due to an account error when the loan servicer attempted to distribute the PPP loan funds to the employee, the loan was ultimately cancelled after two attempts to disburse the funds were made. Although the employee did not receive the PPP funds, she did attempt to defraud the federal government by submitting a false PPP loan application.

The preponderance of the evidence also supports the conclusion that the employee violated CCH policy governing dual employment for failing to disclose ownership of a business, unrelated to the purported business for which she applied for the PPP loan. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 15, 2025, and a response is not yet due.

Responses to Recommendations from Prior Quarters

In addition to the new cases being reported this quarter, the OIIG has followed up on OIIG recommendations for which no response was received at the time of our last quarterly report. Under the OIIG Ordinance, responses from management are required within 45 days of OIIG recommendations or after a grant of an additional 30-day extension to respond to the recommendations. Below is an update on responses we received during this quarter to recommendations made in prior quarters.

IIIG22-0833 – Cook County Health. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Cook County Health (CCH) employee sought two federal PPP loans totaling almost \$50,000. On her loan applications, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Cook County that she was engaging in secondary employment and otherwise complied with CCH Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) - Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The employee provided false and misleading information to the SBA about her purported business and its income when she submitted the application for two federal PPP loans. The investigation determined the employee was not the sole proprietor of a catering business and the information about the business's income was false. The employee acknowledged that she knowingly submitted information to the SBA and other financial institutions that she knew to be false to secure almost \$50,000 in federal loans for her brother's business, in which she does not materially participate. The preponderance of the evidence developed in this investigation also supports the conclusion that the employee violated CCH's Personnel Rule 12 - Report of Dual Employment. When interviewed by the OIIG, the employee acknowledged she failed to disclose her secondary employment by selling life insurance for a private company. Based on the serious nature of the misconduct, the OIIG recommended that the

employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG22-0889 – Public Defender. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Cook County Office of the Public Defender employee sought two federal PPP loans totaling over \$14,000. On his loan applications, the employee stated he was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Cook County that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of the evidence developed in this investigation supports the conclusion that the employee violated the Cook County's Personnel Rule 13.2(a) - Report of Dual Employment. The employee failed to disclose his compensated outside employment providing legal counsel at a family business from 2018 to 2023. However, the preponderance of evidence developed in this investigation did not support the conclusion that the employee violated Cook County Personnel Rule 8.2(b)(36) - Conduct Unbecoming. The employee did, in fact, work as an attorney and legal consultant for his father's company as demonstrated by the documents included as proof of compensation with his SBA PPP loan application submission. The supporting tax documentation provided by the employee showed that he utilized PPP funds for payroll expenses in accordance with the program requirements. The OIIG recommended that the Office of the Public Defender impose discipline on the employee for failure to file a dual employment form consistent with factors set in the Public Defender's employee manual and the Cook County Personnel manual including the department's practice in recent similar cases. The Public Defender's Office issued an oral reprimand to the employee.

IIG24-0244 – Cook County Health. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought a federal PPP loan totaling over \$20,000. On her online loan application and supporting documentation, the employee stated she is a sole-proprietor and the only employee of a personal services business. The OIIG conducted an investigation to determine if the employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of the evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12.03 - Report of Dual Employment. According to CCH records, she has not filed a Report of Dual Employment form since 2008. When interviewed by the OIIG, the employee admitted she had secondary employment from 2022 - 2023

as a produce worker and currently works secondary employment cleaning a daycare. In both instances the employee failed to disclose her secondary employment to CCH.

The preponderance of evidence developed in this investigation also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the employee engaged in fraud against the federal government by knowingly receiving and distributing SBA PPP loan funds deposited into her personal bank account for a business that did not exist in the amount of over \$20,000. When interviewed by the OIIG, the employee denied personally applying for the PPP loan, but did admit that “her child” applied for the loan using her information. In addition, she admitted after she learned that the PPP loan funds had been deposited into her account, she did not make any attempts to return or notify SBA or her bank of the deposit, but instead gave all the funds to her son and daughter. Although the employee denied submitting the application, she had prior knowledge of the intent to defraud the government through prior conversations with her children and in furtherance of the fraud, received and distributed the funds deposited into a personal account that only she had access. Based on the serious nature of the misconduct and the employee’s placement in government, as well as other aggravating factors present, the OIIG would have recommended that her employment be terminated. Due to her resignation from CCH, we recommended she be placed on the *Ineligible for Hire List*. CCH provided information that the subject employee will not re-enter the workforce again, which negated the need for CCH to add her to the *Ineligible for Hire List*.

IIG24-0433 – Board of Review. This office received an allegation that a Board of Review (BOR) Official A omitted required disclosures in their 2022 and 2023 Statements of Economic Interests, and that they failed to disclose the value of certain contracts they had with various units of another government. We also received allegations that BOR Official A made hiring decisions at the BOR which constituted conflicts of interest.

The preponderance of evidence developed during this investigation supports the conclusion that BOR Official A failed to disclose their position with another state government in their 2022, 2023, and 2024 Statements of Economic Interests as they were required to do under the Illinois Government Ethics Act. This failure constitutes a violation of Section 2-571 of the Cook County Ethics Ordinance, which provides that “the fiduciary duty owed [to the County] by officials... includes... the following duties: ...(2) Comply with laws and regulations by avoiding both the violation of any applicable law or regulation....” The BOR has its own Ethics Policy which states that officials and employees owe a fiduciary duty to the BOR.

The preponderance of the evidence also supports the conclusion that BOR Official A failed to disclose their position as a contractor with two municipalities in their 2022 Statement of Economic Interests as they were required to do under the Illinois Government Ethics Act. BOR Official A also failed to disclose their position as a contractor with two other municipalities in their 2023 and 2024 Statements of Economic Interests as they were required to do under the Illinois Government Ethics Act. While BOR Official A disclosed “Business [the name of BOR Official

A's LLC]" on their 2024 Statement of Economic Interest, question 4 asks filers to identify "each unit of government of which you... were... a... contractor...." BOR Official A, who, other than the occasional contractor, is the only employee of their LLC, should have disclosed their contracts there. These failures constitute a violation by BOR Official A of Section 2-571 of the Cook County Ethics Ordinance and constitute a breach of their fiduciary duty to the County.

The OIIG received an allegation that BOR Official A did not disclose on their Statement of Economic Interests dollar amounts they received from services provided by Official A's LLC, and that this omission was a violation of the Illinois Government Ethics Act. We do not find this omission was a violation of the Act. The Act provides only that the filer disclose "each source of income in excess of \$7,500 during the preceding calendar year...." The Act provides that a filer must identify the unit of government with whom the filer has contracted. The Act does not require the disclosure of specific dollar amounts or values of reported financial interests.

We received allegations that BOR Official A's hiring of three employees to work at the BOR constituted "conflicts of interest." We cannot sustain these allegations by a preponderance standard. While the complaints we received alleged "conflicts of interest" in three hirings, the County's Ethics Ordinance's conflict of interest provisions forbid an official or employee from taking an official action in which they or a family member have a current, past, or future economic interest that is distinguishable from that of the general public in the County. An act of hiring does not by itself carry a current, past, or future economic interest for the hirer (absent evidence of a kickback arrangement, concerning which we have none). The County's Ethics Ordinance requires more than the possibility that an official act could result in a financial benefit—it requires income or compensation to have in fact been produced by the official hiring action or carry with it the reasonable expectation that the official hiring action will produce income for the hirer. Our office has no evidence that BOR Official A made an official decision regarding the three employees which produced compensation to BOR Official A within the 12-month window preceding or following the official decision, as prohibited by law. Similarly, the investigation revealed no evidence that BOR Official A violated the BOR's Ethics Policy. It is apparent that BOR Official A has hired people to work at the BOR to whom they have previous professional and business connections based on their background in other state government agencies. That, however, does not by itself mean their hiring of people with whom they share such connections violates the BOR's Ethics Policy or the Cook County Ethics Ordinance. We have no evidence that a *quid pro quo* arrangement existed. Mere appearances are not sufficient to constitute a violation of these provisions.

The OIIG recommended BOR Official A submit to the Cook County Clerk amended Statements of Economic Interests for years 2022, 2023, and 2024, in which they disclose both their former position with the other state's government agency, and the municipal government units with whom they had contractual relationships to provide services which were reportable on their Statements of Economic Interests. BOR Official A declined the OIIG recommendation because BOR Official A and BOR Official A's counsel disagreed with the OIIG's analysis.

IIG24-0618 – Board of Commissioners. The OIIG initiated this investigation based on two Political Contact Logs submitted to the OIIG. The Political Contact Logs alleged that Commissioner A reached out to a Cook County Bureau of Human Resources (BHR) official and a CCH official requesting assistance in correcting a job title for a specific CCH employee.

The OIIG received two Political Contact Logs relating to how Commissioner A requested assistance to fix a specific CCH employee's job title. Our office interviewed one Cook County employee and one CCH employee, both of which stated that they received direct contact from Commissioner A requesting assistance with the CCH Employee's job title. The OIIG also interviewed CCH Official B who clarified that the CCH Employee is currently working in the job title for which she was hired but because of her increased responsibilities, he sought a reclassification of CCH Employee's job title. CCH Official B said that he filled out the required paperwork and submitted it approximately "two years ago" and has not heard anything but also has not followed up on his request.

Commissioner A told us that he contacted both BHR Official A and CCH Official A for assistance regarding a specific CCH Employee to "clear the red tape" and get the issue resolved. Commissioner A said that he did not think that his communications with BHR Official A and CCH Official A violated the Employment Plan because he did not ask them to "take action," he only asked them to "look into it" and respond to peoples' complaints. However, when a public office holder seeks to facilitate a specific employment action, resulting in a specific outcome, for a specific employee, in which they have no official role, improper influence occurs. Although Commissioner A declared that he did not ask the officials to "take action," it is clear from his communications with the officials that he wanted them to help expedite this job title process for CCH Employee. Commissioner A asked the officials to act and help get the job title changed for CCH Employee when he said, "Can you help me get this fixed asap," and "Could you help expedite this process and clear the red tape."

Although Commissioner A may have had good intentions, his communication is a violation of the *Shakman* related policies and protocols that have been put in place in response to the *Shakman* litigation and because of these communications, Commissioner A violated the Commissioner Code of Conduct Sec. 2-73(a)(5). The preponderance of evidence developed during this investigation supports the allegation that Commissioner A violated the Cook County Commissioner Code of Conduct by failing to inject the prestige of his office into his dealings with certain Cook County and CCH employees by requesting their assistance with an employment action for a specific employee. The OIIG recommended that Commissioner A participate in training related to the provisions contained in Cook County Code Section 44-56 and the Cook County and CCH Employment Plans. The Commissioner accepted this recommendation and has agreed to participate in the required training.

IIG25-0107 – Department of Emergency Management and Regional Security. The OIIG received a complaint alleging that a Department of Emergency Management and Regional Security

(DEMRS) manager allowed his employees to leave early on Fridays and finish their workdays at home despite not being eligible for telecommuting.

The County's Telecommuting Policy states that employees who must be on-site to operate specific equipment or perform essential job duties may not be eligible for remote work. DEMRS determined that the employees at issue have roles which require them to be on-site to manage and distribute emergency equipment and meet with clients from other agencies and municipalities, making them ineligible to telecommute. In his OIIG interview, the manager admitted he let employees leave early on Fridays to improve morale after the long hours they worked during the COVID pandemic, with the understanding that they must report back to work if they were called back to the office after leaving. By allowing his employees to leave early and essentially be on-call, knowing they may have to return to work, the manager was essentially allowing them to work remotely. While the manager explained that he did not know this practice was a potential violation of County policy and allowed it because he believed it was good for employee morale and lowered absenteeism, the practice is a violation of the Telecommuting Policy. Therefore, the allegation that the manager violated Cook County Personnel Rule 8.2(b)(13) – Negligence in Performance of Duties is sustained.

The OIIG recommended that the manager discontinue the practice of permitting early dismissal of his employees. This office also recommended that the County impose discipline on the employee. When assessing the appropriate level of discipline, we recommended that consideration be given to the factors set forth in Cook County Personnel Rule 8.3(c)(5), including department practices in recent similar cases. We also recommended that the DEMRS Executive Director consider as a mitigating factor the heavy workload the employees conducted during the national COVID pandemic. DEMRS issued an oral reprimand to the manager and the practice of permitting early dismissal was discontinued.

IIIG25-0154 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought one federal PPP loan totaling over \$20,000. On his loan applications, the employee stated he was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Facilities Management that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Cook County Personnel Rule 8.02(b)(36) – Engaging in Conduct that Brings Discredit to the County. The records obtained in this investigation and the employee's statements during his OIIG interview prove that he provided false and misleading information to the SBA about the nature of the business and actively being involved in generating business revenue when he submitted the application for a federal PPP loan. A search of the Illinois Secretary of State

website showed evidence that the employee owned a business which was not listed on his PPP loan application. After the employee received the PPP funds, he improperly spent those funds on equipment, supplies, a motor vehicle, and a loan repayment and not payroll and personnel expenses as he claimed in his application. The preponderance of evidence gathered during our investigation also proves that the employee violated Cook County Personnel Rule 13(a), Dual Employment. He received approval to work as a secondary job as a “Care Giver” but documented that he only worked 20 hours a week. Evidence gathered in this investigation determined that the employee worked an average of 32 hours a week in 2024. Based on the serious nature of the misconduct the OIIG recommended that the employee be terminated and placed on the *Ineligible for Hire List*. The employee voluntarily resigned and was added to the *Ineligible for Hire List*.

IIIG25-0220 – Facilities Management. The OIIG received a complaint alleging a Facilities Management employee submitted a fraudulent high school diploma when applying for his job. The OIIG reviewed the employee’s submitted diploma, which contains a typographical error, was missing the principal’s signature, and displays the name of the President of the Board of Education for Chicago Public Schools (CPS) who did not serve in that role in the year the employee’s diploma was purportedly issued. The OIIG interviewed the employee, who could not remember the exact year he graduated from high school and refused to provide consent for the OIIG to obtain his records from CPS. The preponderance of the evidence in this investigation supports the conclusion that the employee violated the Cook County Personnel Rules by submitting a fraudulent high school diploma in connection with his employment application to the County. Based on the serious nature of the misconduct involved, and the fact that without a valid high school diploma the employee does not meet the minimum qualifications for his County job, the OIIG recommended that the employee be terminated and placed on the *Ineligible for Hire List*. Facilities Management adopted the OIIG recommendations.

Failure to Respond to OIIG Recommendations from Prior Quarters

There are currently no recommendations from prior quarters for which the OIIG has not received a response from the government agency or department to which they were made.

Activities Relating to Unlawful Political Discrimination

In April of 2011, the County implemented the requirement to file Political Contact Logs with the Office of the Independent Inspector General. The Logs must be filed by any County employee who receives contact from a political person or organization or any person representing any political person or organization where the contact relates to an employment action regarding any non-Exempt position. The OIIG acts within its authority with respect to each Political Contact Log filed. From July 1, 2025, to September 30, 2025, the Office of the Independent Inspector General has received four new Political Contact Logs.

New UPD Investigations not the result of PCLs

The OIIG received no new UPD inquiries during the last reporting period. The OIIG also continues to assist and work closely with compliance personnel in the BHR, FP, CCH, and Assessor by supporting the compliance personnel whenever they need assistance to fulfill their duties under their respective Employment plans.

Employment Plan – Do Not Hire Lists

The OIIG continues to collaborate with the various County entities and their Employment Plan Compliance Officers to ensure the lists are being applied in a manner consistent with the respective Employment Plans. The agencies that have Do not Hire Lists include OUP, CCH, Clerk of Circuit Court, FP and the Cook County Assessor's Office. The agencies that do not currently have a Do Not Hire List include the Office of the Chief Judge, Cook County States's Attorney, Cook County Sheriff's Office, Cook County Treasurer, Cook County Clerk, and the Board of Review.

OIIG Employment Plan Oversight

Per the OIIG Ordinance and the Employment Plans of Cook County, CCH, and the Forest Preserves, the OIIG reviews, inter alia, (1) the hiring of *Shakman* Exempt and Direct Appointment employees, (2) proposed changes to Exempt Lists, Actively Recruited lists, Employment Plans and Direct Appointment lists, (3) disciplinary sequences, (4) employment postings and related interview and selection sequences and (5) Supplemental Policy activities. In the last quarter, the OIIG has reviewed and acted within its authority regarding:

1. Eight proposed changes to the Cook County Actively Recruited List;
2. Three proposed changes to the *Shakman* Exempt List,
3. Seven proposed amendments to the Cook County Employment Plan;
4. One proposed change to the Cook County Public Defender's Direct Appointment List;
5. Two Exempt Certifications for the Forest Preserves;
6. The hire of eleven CCH Direct Appointments;
7. One proposed change to the CCH Direct Appointment List;
8. One Emergency Hiring Certification for CCH.

Monitoring

The OIIG currently tracks disciplinary activities in the Forest Preserves, CCH and Offices under the President. In this last quarter, the OIIG tracked twenty-one disciplinary proceedings including Employee Appeals Board and third step hearings. Further, pursuant to an agreement with the Bureau of Human Resources, the OIIG tracks hiring activity in the Offices under the President, conducting selective monitoring of certain hiring sequences therein. The OIIG also is tracking and selectively monitoring CCH hiring activity pursuant to the CCH Employment Plan.

Other Important Matters

OIIG Midyear Budgetary Hearing

In July 2025, the OIIG appeared before the Cook County Board of Commissioners Finance Committee for the Midyear Budgetary Hearings. During the OIIG hearing, the OIIG reiterated the need to implement a budgetary floor set at .14% of the County's overall budget to ensure adequate funding for the OIIG. Further, a budgetary floor ensures the OIIG would be free from political control, interference or retaliation. At the OIIG hearing, Michael L. Shakman, Dr. Dick Simpson, and Alisa Kaplan (Reform for Illinois) appeared with the OIIG and made statements in support of the OIIG Budgetary Floor amendment.

MWRD

On May 16, 2025, the Intergovernmental Agreement ("IGA") between the MWRD and the OIIG expired and the OIIG no longer has jurisdiction over the MWRD. On May 17, 2025, Patrick Blanchard officially became the MWRD's Interim Inspector General.

The MWRD passed Ordinance O25-10 entitled "Office of the Interim Inspector General." The OIIG has identified a problematic section in the MWRD Interim Inspector General Ordinance ("MWRD IIGO"). Specifically, the MWRD IIGO states:

*ARTICLE XII FACILITATING THE TRANSFER OF FILES AND EVIDENCE FROM THE OIIG
TO THE INTERIM INSPECTOR GENERAL*

In accordance with the IGA, the OIIG shall transfer all open and closed files and related materials to the Interim Inspector General using best practices and maintaining confidentiality.

While we believe the passage of this ordinance is a good start, we must note that this provision in the ordinance should be removed as it is inaccurate and misleading and is contrary to controlling law on the issue. There actually are no provisions in the Intergovernmental Agreement between the MWRD and the OIIG that require the OIIG to transfer its confidential investigative files to an MWRD Interim Inspector General or anyone else. The relevant language from the IGA states the following:

XIII. Termination

Upon expiration or termination of this Agreement, the Independent Inspector General shall cease any pending MWRD-related investigations and at his discretion may refer such investigations to MWRD's General Counsel for further handling. The Independent Inspector General in his discretion may also provide MWRD with its MWRD-related investigation files, including closed files.

Honorable Toni Preckwinkle
and Honorable Members of the Cook County
Board of Commissioners
October 15, 2025
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Moreover, the rules regarding the release of any OIIG confidential investigatory files are governed by the Cook County Code, not MWRD Ordinance, and Article XII of the new MWRD ordinance is contrary to the Cook County Code on this issue. The relevant section of the Cook County Office of the Independent Inspector General Ordinance states:

Sec. 2-289. Confidentiality; public statements.

Investigatory files and summary reports concerning alleged corruption, fraud, waste, mismanagement, unlawful political discrimination or misconduct by any person shall be confidential except as provided below or required pursuant to the Supplemental Relief Order entered in the Shakman Case.

(b) Investigatory files shall be confidential, however said files may be divulged with the summary report to the Board of Ethics, the Chief of the Bureau of Human Resources and the head of any department or bureau and elected official to whose office the investigation pertains in order to effectively address matters of discipline or ethical violations. Notwithstanding the foregoing, information or evidence obtained by the Independent Inspector General which pertains to possible criminal activity may be promptly provided to the appropriate law enforcement authorities.

Even though Article XII of the new MWRD ordinance is unenforceable, we believe it is necessary for the OIIG to consistently maintain a policy of transparency. Accordingly, we notified the MWRD Board of this issue and recommended it amend the ordinance to remove Article XII in order to avoid any confusion among the public or cause any potential problems over document production. In the meantime, the residents of Cook County can be assured that the OIIG will maintain and protect the confidentiality of its investigatory files in accordance with the Cook County Code. Finally, although our confidential files will not be transferred, our office can and will assist Mr. Blanchard in other ways as he transitions into his new role.

Conclusion

Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Very truly yours,



Tirrell J. Paxton
Independent Inspector General

cc: Attached Electronic Mail Distribution List

Office of the Independent Inspector General Quarterly Report
Electronic Mail Distribution List

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