

Office of Executive Inspector General for the Agencies of the Illinois Governor

Ethics | Integrity | Illinois

ANNUAL REPORT | FISCAL YEAR 2008

ETHICS INTEGRITY ILLINOIS



Report Waste, Fraud, Abuse

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FY 2007 OEIGG ANNUAL REPORT
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AN INTRODUCTION TO THE OFFICE OF EXECUTIVE INSPECTOR GENERAL FOR THE AGENCIES OF THE ILLINOIS GOVERNOR ("OEIGG")

Established in 2003, the OEIGG is an independent, non-partisan State agency dedicated to ensuring accountability in the operation of State government. OEIGG authority and jurisdiction are set forth by Administrative Order Number 3, Administrative Order Number 6, and by Article 20 of the Illinois State Officials and Employees Ethics Act (5 ILCS 430, *et seq.*, hereinafter, the "Ethics Act"). Together, they set out the OEIGG's mission: To receive and fairly investigate, as appropriate, complaints of fraud, waste, abuse and misconduct by employees of State agencies under its jurisdiction and those doing business with those agencies. In addition to its investigative function, the OEIGG is responsible for promoting and coordinating the State's ethics initiatives for agencies under its jurisdiction.



Notably, the Ethics Act empowered the public, including State employees, to report wrongdoing and misconduct in the operations of State government to the five separate Offices of the Executive Inspectors General for investigation. The enactment of this legislation was a great step toward establishing accountability in the operation of State government.

Through the authority granted this Office by the Ethics Act, we have made significant progress in identifying and successfully investigating alleged misconduct. For Fiscal Year 2008, 43% of our investigations resulted in substantiated complaints – the highest single-year percentage ever achieved by the OEIGG, and nearly three times that of the prior reporting period. Further, our FY 2008 Founded cases have increased 66% over those for FY 2006 and were up 26% over FY 07. Clearly, the current Ethics Act has launched an unstoppable movement towards restoration of accountability and ethical conduct in the operations of Illinois State government.

However, the Ethics Act has fallen short on building integrity and public confidence in State government because it does not permit public disclosure of the findings of the Inspectors' General investigations.

The OEIGG operates under strict statutory restrictions that prohibit disclosure of OEIGG investigative reports and files to anyone other than an Ultimate Jurisdictional Authority (usually the Governor) and the head of the agency affected by the misconduct. The OEIGG may not release case information to the public, nor to the legislature. We may not accept anonymous complaints. And we cannot initiate an investigation on our own; we must have a complaint from outside our agency.

Fortunately, these constraints do not render our investigations less effective. However, the consequence of these constraints precludes you – the public – from learning about the investigations conducted by this Office and the actions taken to address the identified misconduct.



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As the State's chief ethics and misconduct watchdog, the OEIGG - which has jurisdiction over more than 160,000 State employees and entities doing business with the State - cannot detail for the public or the General Assembly the effectiveness of its work in addressing the more than 6,000 complaints it has received since July 2004. Indeed, the Ethics Act (5 ILCS 430/20-95(d)) does not permit us to disclose to the public anything of substance about our reports and investigative files.

Clearly, this non-disclosure significantly contributes to the public's suspicion that employee wrongdoing is not being addressed, but rather is being "swept under the rug." Until our reports are given more transparency, not only will citizens continue to distrust the manner in which all public employees and officials carry out their duties, they will doubt the integrity of the OEIGG and the other Offices of Executive Inspectors General, the very entities created to bring about greater accountability and trust in State government.

Our experience has shown that the majority of State workers are good, hard working individuals who continue to serve the public with honesty and integrity. To assist these public servants, the Ethics Act empowered public employees of Illinois and the citizenry to report allegations of fraud, waste, abuse and misconduct. And many have shown the courage to file complaints of misconduct with our Office. For their courage, however, the Ethics Act keeps them in the dark and provides them with no sense of resolution. This is an untenable situation – one that breeds mistrust in management and in turn, poor morale.

"Transparency" is the premise by which the OEIGG can demonstrate to the courageous State employees, and the public, in general, that those individuals and businesses that are committing misconduct are being held accountable for their actions. Presently, there is no mechanism to permit disclosure of our investigative work, and thus, no concrete proof that the OEIGG is fulfilling its mission to receive and fairly investigate complaints of fraud, waste, abuse, and misconduct, and recommend corrective action. Consequently, we have, and shall continue to advocate for full public disclosure of our Final Reports or summaries of those Final Reports. Further, we continue to advocate for the right to investigate matters upon our own initiative, and the right to accept anonymous complaints.

Notwithstanding the strict statutory restrictions against public reporting of our findings, this annual report is offered in the spirit of accountability to let you – the general public – know who we are, what we have done, and how to contact us to report misconduct.

Though some may challenge whether ethical government reform is achievable in Illinois, I ask that you do not succumb to this cynicism. You have my enduring and solemn promise that the OEIGG will perform its duties diligently and fairly, and without bias or influence from any source whatsoever, and that we will pursue our investigations wherever and to whomever they may lead.

With your vigilance and assistance we can, and will, establish and maintain integrity and accountability in the operation of State government. Together – the OEIGG and you – absolutely can achieve a level of comprehensive ethical reform that cannot be subverted and will serve as a model to other organizations and municipalities.

James A. Wright, Esq.
Executive Inspector General



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PREFACE

This Annual Report for Fiscal Year 2008 reflects the activities conducted by the Office of Executive Inspector General for the Agencies of the Illinois Governor ("OEIGG"), from July 1, 2007, through June 30, 2008.

The most valuable, and most fleeting, asset held by State government is the Public's Trust. When it exists, those who govern do so most effectively and their service is accepted by the people of Illinois as being in their best interests. But once eroded, there is no greater cause for distrust, suspicion and dissatisfaction.

Under this premise, it is important to view the number of complaints made to the OEIGG in its proper perspective. Consider that despite the very large number of State business and personnel transactions occurring during Fiscal Year 2008, only 1,247 complaints were made to the OEIGG. The Executive Inspector General ("EIG") encourages the public to view this as indicative of the fact that the vast majority of the individuals who work for and with the State of Illinois do so with integrity, honesty, and a true appreciation of their responsibility to the people of Illinois.

The dual missions of the OEIGG are to restore public confidence in the integrity of state government through the diligent, unbiased and responsible investigation of misconduct, and to promote an ethical framework for the conduct of State business. However, achieving the investigatory goal is much simpler than rebuilding the public's faith. The citizens of Illinois, and in particular the employees of State government, deserve much credit for the success of OEIGG efforts to date. The number of complaints received in FY '08 continued at the high level experienced over several successive years. Moreover, the number of complaints substantiated through investigations rose significantly in FY '08 to represent 43 percent of all completed investigations, compared to the prior fiscal year.

Notwithstanding the belief that full achievement of the public's confidence in the OEIGG is impeded in large part by our inability to publicly disclose the results of investigations, the EIG opines that statutory prohibition against public disclosure does not preclude all discussion into the extent and nature of wrongdoing investigated by this Office.



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Therefore, in lieu of full disclosure of misconduct investigated by the OEIGG, this annual report offers a statistical view of the types and quantities of misconduct complaints made against Illinois agencies, officials and employees, and those doing business with the State, as well as of those complaints that have been substantiated through fair and thorough professional investigations.

This report also serves as evidence of the diligence and professionalism of this independent Office in investigating allegations of misconduct wherever and to whomever they lead. However, the OEIGG's continued success toward satisfying its mission depends upon State employees' desire to work in an ethical environment, and thus, having the vigilance and courage to report misconduct no matter who the perpetrator.



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THE VISION

The Office of Executive Inspector General strives to identify, promote and attain the highest standards of ethical conduct, integrity and accountability throughout State government.

THE MISSION

The Office of Executive Inspector General is an independent State agency dedicated to ensuring accountability in state government. The OEIGG receives and fairly investigates complaints of fraud, waste, abuse and misconduct, and recommends corrective action. In addition, the OEIGG promotes and coordinates the State's ethics initiatives for the agencies under its jurisdiction.

The OEIGG is an independent administrative investigation agency that works to detect, identify, eliminate, and prevent waste, fraud, abuse and corruption by employees of, and those who do business with, the entities under its authority. This includes the agencies, boards and commissions under the authority of the Governor, the Office of the Lieutenant Governor, and the state public universities.

Although the OEIGG is prohibited by state law from accepting anonymous complaints or initiating investigations on its own initiative, this Office does accept confidential complaints and keeps confidential the identity of the person filing the complaint to the fullest extent permissible under the law. The OEIGG receives many of its complaints through its toll-free Ethics Hotline, at 1-866-814-1113 (TTY 1-888-261-2734). Complaints also come to the office by facsimile transmission to 1-312-814-5479, and by personal and mail deliveries.

The OEIGG has the authority to acquire information from any person or entity when relevant to its investigation, and when appropriate will issue subpoenas to obtain records and/or testimony. State employees under its jurisdiction have a duty to report misconduct and to cooperate fully in OEIGG investigations. In order to facilitate the collection of information during its inquiries, trained and highly experienced investigators and attorneys interview witnesses, acquire documents, analyze financial records, conduct surveillance, perform forensic examinations of computers and electronic files, and utilize a variety of other sophisticated investigatory tools and techniques.



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BACKGROUND

The Office of Executive Inspector General (“OEIGG”) was established by Administrative Order 3 on January 23, 2003, as the primary Illinois agency charged with upholding responsible and ethical conduct in the administration of state business. With the December 2003 legislative enactment of the State Officials and Employees Ethics Act (5 ILCS 430, *et seq.*), the OEIGG became empowered statutorily to investigate alleged violations of the Ethics Act and of any law, rule, regulation or policy by any state employee under its authority, including vendors and others doing business with an agency under OEIGG jurisdiction.

The legislation also created separate and independent offices of Executive Inspectors General for the Constitutional Offices of Treasurer, Comptroller, Secretary of State, and Attorney General. A statutory OEIG also was created for the Legislature. This new Ethics Act outlined specific ethical rules and guidelines for state employees and state contractors to follow, and created comprehensive enforcement mechanisms.

In March 2003, the development of the OEIGG began with a handful of employees. In the ensuing months the number of staff increased, as did the number of investigations. Since opening its doors in May 2003, the OEIGG has received approximately 6,900 complaints and has conducted nearly 3,600 investigations. Currently, the agency has a workforce of more than 60 employees, including investigators, computer forensic examination experts, attorneys, paralegals, accountants, administrative professionals and support staff. The OEIGG has offices located in Chicago and Springfield, and has conducted interviews and investigations in nearly every county in the State of Illinois.

The OEIGG has jurisdiction to investigate waste, fraud, misconduct, mismanagement, misfeasance, nonfeasance, malfeasance, and Ethics Act violations by the Governor, Lieutenant Governor, employees of approximately 40 state agencies, the state public universities, and approximately 300 boards and commissions, plus the individuals conducting business with those entities. The OEIGG also oversees annual ethics training for the state employees and appointees under its jurisdiction, and it operates a toll-free Ethics Hotline. During FY ‘08 more than 166,000 participants took part in ethics training programs offered under OEIGG oversight.

The Executive Inspector General is James A. Wright.



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FY 2008 ACTIVITY OVERVIEW

This report examines OEIGG activity in cases that fall into one of two statistical categories:

- 1) Complaints received in Fiscal Year 2008, and
- 2) Cases opened in a prior fiscal year that continued into FY 2008.

Complaints Received in FY '08

From July 1, 2007, through June 30, 2008, the OEIGG received 1,247 complaints comprised of 1,631 allegations. Each allegation was reviewed to determine whether the complaint met OEIGG criteria for investigation: jurisdiction over the subject and subject matter; identifiable complainant; sufficient information to investigate; appropriateness; and a reasonably credible assertion.

During FY 2008, the OEIGG opened 186 investigations, conducted 399 investigations and concluded 245, with the remainder carrying over to FY '09. Approximately 85 complaints were "Closed Without Report" for administrative reasons after it was determined that the subjects were outside OEIGG jurisdiction, legal action was pending, or the agency affiliated with the subjects already had imposed discipline. Investigation was "Declined" on about 198 complaints for reasons that included anonymous complaints, duplicate cases, or allegations that failed to name an entity or subject under OEIGG jurisdiction. Approximately 732 complaints were "Referred," most without OEIGG investigative activity, to an appropriate State entity such as another Executive Inspector General or to another State governmental unit for its own action. Two cases were miscategorized in our database, one of which ultimately was declined, while the other was Unfounded. Complaints involving criminal conduct were forwarded to criminal prosecutors or other law enforcement agencies.

The decision to decline to investigate a complaint follows careful evaluation of the allegation and the laws that govern OEIGG activity. The greatest degree of deference is given to the complainant because it is the policy of this Office to conduct investigations whenever possible and not to turn away opportunities to do so unless presented with specific and compelling reasons. For example, Illinois statute precludes the OEIGG from investigating anonymous allegations or, absent special circumstances, those involving violations more than one year old. When feasible, such allegations will be referred to State or outside officials for investigation. However, if another investigatory entity already has commenced its investigation, or if legal or grievance action is pending, the OEIGG will decline to investigate to avoid conflicts between jurisdictions.



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Cases Opened in Any Fiscal Year, but Closed in FY '08

Overall, findings were issued in 206 investigations during FY '08. Note that some complaints are closed as Referred or Declined following brief preliminary investigation, but since they were looked into they are counted as investigations even though no finding was issued. This included investigation of complaints received during FY '08, as well as some continuing investigations commenced in a prior fiscal year. Of these investigations, 106 complaints were Founded and 100 were determined to be Unfounded. In each Founded case, a final summary report was issued to the agency involved, to the Ultimate Jurisdictional Authority, and in some cases to outside authorities. In Founded cases, the OEIGG reports included directives for discipline, agency rule/policy creation or modification, or other corrective actions.

The OEIGG has been advised of the following disciplinary or corrective actions resulting from OEIGG investigations.

Discipline	FY 2006	FY 2007	FY 2008
Discharged	13	15	17
Resigned		5	22
Suspended	unk.	16	29
Made Restitution	unk.	5	10
Reprimanded	unk.	19	32
Change in Agency Policy and/or Training	unk.	21	42

One example of restitution paid to the State came in a recent criminal case against two defendants who were first the subjects of an OEIGG administrative investigation. The criminal trial made public the details of the OEIGG investigation. Public court records show that the subjects, former State employee Martha Juarez, 44, who was a coordinator for the Illinois Department of Human Services Bureau of Blind Services at its Milwaukee Avenue office in Chicago, and her husband, Carlos, 46, had perpetrated a fraudulent scheme to receive payments for services never rendered.



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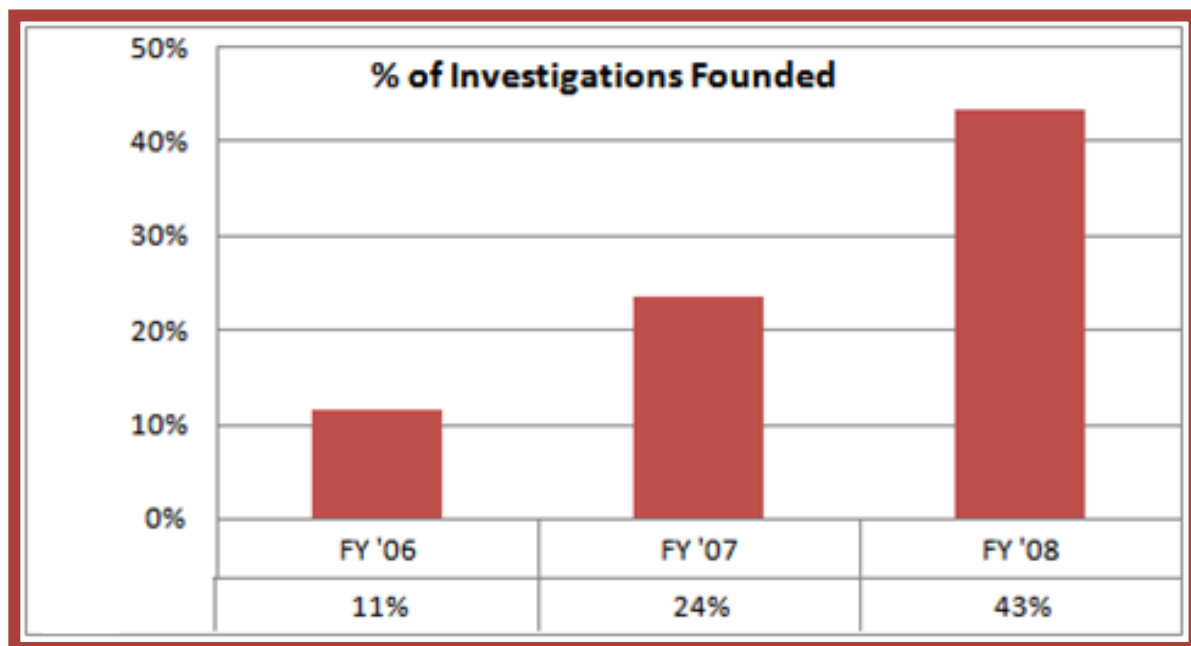
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As the OEIGG neared completion of its misconduct investigation, the evidence pointed to the need to refer the case to law enforcement authorities. On that basis, the case was referred to the office of the Cook County State's Attorney's Office.

Court records show the OEIGG investigation found that from 2001 to 2005, Martha Juarez, on behalf of her husband, submitted 483 fraudulent reimbursements requests of up to \$300 each and totaling \$117,000 for transportation services to visually impaired DHS clients that he never provided. The scheme began to unravel when Martha Juarez, who approved the payments on behalf of DHS, contacted an agency official to complain that payments to one of the DHS service providers (her husband) were late in arriving.

The OEIGG investigation, and subsequent criminal prosecution, resulted in restitution of \$115,000 by Martha and Carlos Juarez to Illinois.

THE PERCENTAGE OF COMPLETED OEIGG INVESTIGATIONS THAT WERE FOUNDED IN EACH FISCAL YEAR





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In addition, the number of Founded cases has increased 66%, from 64 in FY 2006 to 106 in FY 2008.

- ✓ 361 Founded cases from July 2004 - July 2008.
 - 66% increase in Founded investigations in FY '08 compared to FY 06.
 - 26% increase in Founded investigations in FY '08 compared to FY 07.
 - In FY 2008 (July 1, 2007 through June 30, 2008), the OEIGG achieved the HIGHEST percentage of Founded cases ever: 43% of completed OEIGG investigations were Founded.

Law Enforcement Referrals

Since July 2005, the OEIGG, on its own initiative, has referred approximately 220 cases to outside law enforcement agencies for possible criminal investigations.

Of those cases, 33 were referred to the Illinois district offices of the U.S. Attorney, the FBI, and to other federal law enforcement agencies; 54 were referred to the Office of Attorney General ("OAG"); 115 were sent to the Illinois State Police; and 18 to local law enforcement and prosecutorial agencies. Of the 54 cases referred to the Office of Attorney General, nearly half were referred following a full administrative investigation.

The list of receiving agencies includes: the Northern, Central, and Southern District Offices of the U.S. Attorney; Federal Bureau of Investigation; Illinois Attorney General; Illinois State Police Division of Internal Investigation; Illinois State Police; Cook County State's Attorney; DuPage County State's Attorney; U.S. Immigration and Customs Enforcement; and U.S. Marshal. Additional cases were referred to the Offices of Inspectors General for the U.S. Postal Service, U.S. Department of Human Services, U.S. Department of Labor, Illinois Auditor General, and to the OEIGs for other State Constitutional Officers.

Notwithstanding the OEIGG investigation of alleged Ethics Act violations (5 ILCS 420; 5 ILCS 430), in FY 2008 the Executive Inspector General filed six Ethics Act cases with the Illinois Attorney General's Office, which must review petitions for ethics violation hearings by the Executive Ethics Commission ("EEC"). In FY 2008 two EEC hearings were conducted.



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<u>OEIGG Activity Report:</u> <u>FY 2006 - FY 2008</u>			
	FY '06	FY '07	FY '08
Complaints	1278	1270	1247
Allegations *	— —	1615	1631
Investigations Opened	622	209	186
Investigations Completed **	564	357	245
Investigations Conducted **	911	563	399
Founded	64	84	106
Unfounded	172	209	100
OEIGG Hotline - Completed Calls Received ***	2920	2635	4696[†]

* Separate allegations were not counted in prior years.

** Includes partial investigations conducted prior to referral or other disposition.

*** The number of Hotline calls is less than the number of filed complaints because many callers make general inquiries or only seek agency referral and contact information.

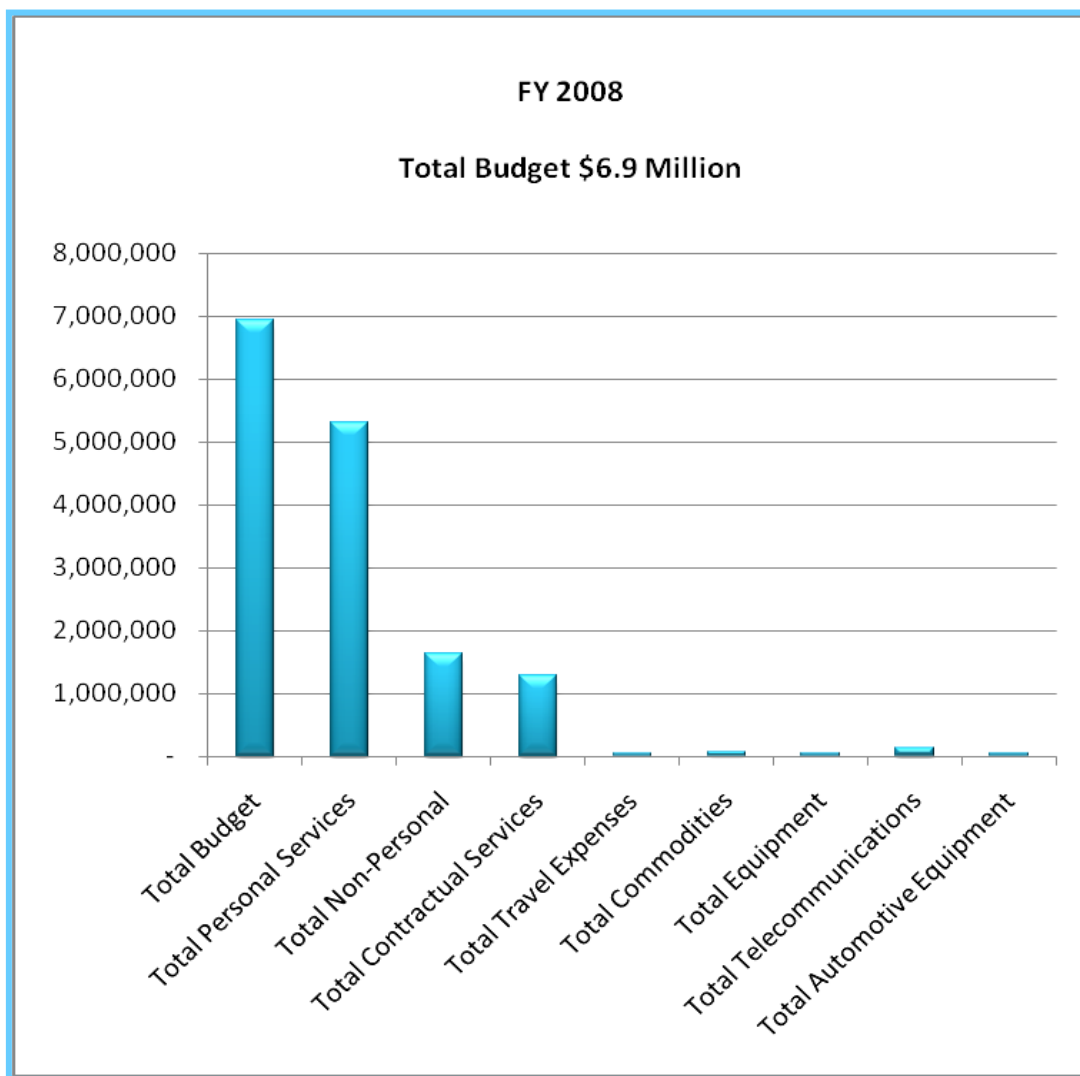
† The 2008 total includes approximately 2000 heating complaint calls that were referred to the Low Income Home Energy Assistance Program ("LIHEAP").



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FY 2008 Budget





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OEIGG OPERATIONS

The Office of Executive Inspector General (“OEIGG”), which operates offices in Chicago and in Springfield, is organized into investigative, legal, ethics training and compliance, and administrative units. When a complaint is registered with the OEIGG, administrative and paralegal personnel in Chicago create a file and organize related documents to prepare the complaint for review by the Director of Investigations (“DOI”). Initial research is conducted to assist in determining whether to open an investigation, and preliminary case details are entered into the OEIGG case management system.

Investigation Unit

The DOI scrutinizes the complaint for criteria suggesting imminent risk to life or State property; abuse of minors or the elderly; and for issues regarding jurisdiction, timeliness, credibility, duplication, pending legal action, and criminal conduct, among other criteria. These considerations help determine whether to open a case, refer it to an appropriate governmental agency or law enforcement office, or decline to investigate the allegation. Only one approval is necessary to open an investigation; any other disposition requires the unanimous agreement of the DOI and the First Deputy Inspector General.

Under the State Officials and Employees Ethics Act (“Ethics Act”) and Administrative Order Number 6, the OEIGG is responsible for investigating complaints of violations of agency policies and rules, State statutes, and violations of the Ethics Act by or involving any employee, agency, board or commission under the authority of the OEIGG. This jurisdiction extends to vendors and others doing business with these entities. However, the Ethics Act also places restrictions on OEIGG authority. For example, pursuant to Illinois statute, the OEIGG may not initiate complaints or investigations on its own, nor may it investigate anonymous complaints.

To operate within the law, the OEIGG must have a complaint from an identifiable individual. Furthermore, in most cases an OEIGG investigation must begin within one year of the most recent act of alleged misconduct. Complaints that do not meet these criteria are often referred for internal investigation to the state agency that employs or is doing business with the subject. When appropriate, such allegations are referred directly to federal, State or local prosecutors and law enforcement agencies.

Once an investigation is initiated, the DOI assigns the case to an investigation supervisor in Chicago or Springfield. At the same time, a Deputy Inspector General in the Legal Unit assigns an Assistant Inspector General attorney to the case. The investigative process requires interviews and the acquisition of documents or other evidence and also may employ physical and/or video surveillance, expert forensic examination of electronic evidence, and other sophisticated investigative techniques.



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Employees under OEIGG jurisdiction are required by law, and have an administrative duty, to report misconduct and to cooperate fully with an OEIGG investigation. Those doing business with these entities also must cooperate in an investigation. The OEIGG has the authority to enter upon the premises of any State agency, board or commission within its jurisdiction, without notice, to obtain evidence located there. This Office also may issue subpoenas to require testimony and the production of evidence. Investigation subjects and witnesses, and affected State agencies, have certain administrative rights that are explained to them when the occasion arises.

At the conclusion of the field investigation, the case and evidence are reviewed by an investigation supervisor, by the Deputy Director of Investigations, and by the DOI to evaluate the factual sufficiency of the case. They also determine whether additional work is required and whether any entity needs to be immediately notified of the evidence obtained to that point. Ultimately, the file is referred to the Legal Unit for an analysis of legal sufficiency and final review.

Legal Unit

Completed investigations are assigned by a Deputy Inspector General to an Assistant Inspector General for an analysis of the legal sufficiency of the evidence obtained, and of applicable rules, policies and laws. The attorney reviews the file in all its particulars and with the assistance of paralegal personnel researches State agency rules, procedures and policies, contracts, operating agreements, audit and other reports, department manuals, State and federal statutes, and case law to thoroughly evaluate the often complex interactions between the sources of law that bear upon the conduct that was the subject of the allegation.

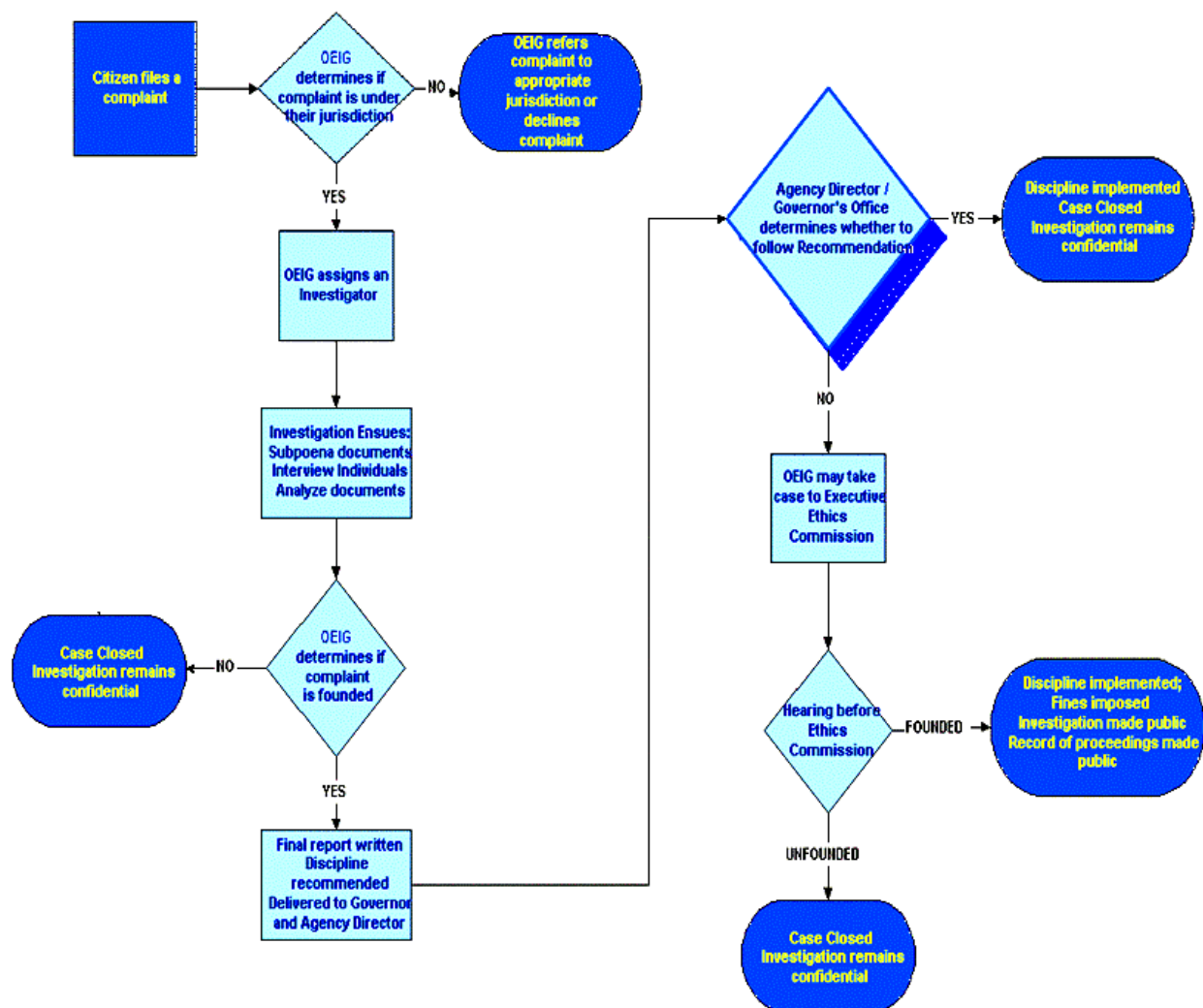
At the conclusion of this legal analysis, an Assistant Inspector General prepares a detailed preliminary report on the case, along with any recommendations for discipline and/or corrective action. These reports are sent to a Deputy Inspector General for further review and refinement, and when necessary, for consideration of policy advisories that may appropriately be made to the State agency at that stage. The deputies then prepare a draft Final Report that is sent to the First Deputy Inspector General and Executive Inspector General for final review and official case closure.



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What Happens to a Complaint?





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TYPES OF ALLEGATIONS [†]

The complaints submitted to the OEIGG allege a wide range of wrongdoing. Many complaints allege more than one type of misconduct by an individual or entity. Some of the most prevalent types of allegations are:

- **Fraud**: These allegations include double-billing of the state, services provided by unlicensed providers, and similar allegations.
- **Misconduct**: Such as prohibited communications during a procurement process or providing false information during an investigation.
- **Personnel**: These allegations range from an individual providing false information on their employment application to an individual being hired for a position for which they are not qualified.
- **Harassment**: Actions ranging from sexual harassment to workplace violence situations.
- **Mismanagement**: Includes misuse of State dollars, waste, poor use of State labor force, and lack of necessary policies or policy enforcement.
- **Unethical practices**: Such as conflict of interest situations or violations of the Gift Ban Act, Prohibited Political Activity, Revolving Door Prohibition, Retaliation, and Failure to Cooperate in an OEIGG investigation.
- **Abuse of time**: Allegations of falsified time records and misuse of overtime or compensatory time.
- **Abuse**: Allegations such as misusing one's position with the state for personal gain.
- **Waste**: Misuse of State resources, such as lack of accountability practices for State property.
- **Theft**: Includes not only theft of State property, but of State dollars, time, and resources.

[†] Under the Ethics Act, the OEIGG is not allowed to disclose the identity of a complainant, or to release any investigative file or report. 5 ILCS 20-90, 20-95(b), 20-95(d).



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TYPES OF RECOMMENDED DISCIPLINARY ACTION †

In most of the 106 founded complaints for Fiscal Year 2008, the OEIGG recommended disciplinary action. These actions can be organized in six broad categories:

Discharge: Based upon the evidence, the OEIGG may strongly recommend that the subject be discharged with no right to reinstatement with any state agency, or face such other discipline as is commensurate with the extremely serious nature of the misconduct and violations. As part of this recommendation, the OEIGG advises that any separation agreement reached with the subject should state that he or she “agrees never to apply for, nor to accept, employment with the State.”

Discipline: Recommend disciplinary actions ranging from retraining, reprimand or suspension, to demotion or discharge.

Policy Changes: Recommend that the agency create or strengthen a policy to explicitly prohibit a certain type of activity, that it enforce an existing policy, or that the agency conduct a certain type of training for its employees to teach them the appropriate behavior.

Reimbursement to the State: In cases of abuse of State time or State resources, the OEIGG may recommend that the State employee or contractor reimburse the State for the lost funds.

Vendor Debarment: Recommend that the vendor no longer be allowed to do business with the State.

Referral for Criminal Prosecution: For the most serious cases of wrongdoing, the OEIGG directly refers the matter for criminal prosecution.

Resignations During Course of the Investigation: In some cases, the State employee being investigated by the OEIGG may have resigned his or her position of employment during the investigation.

† Under the Ethics Act, any investigatory reports created by OEIGG are confidential and shall not be disclosed except to an appropriate law enforcement authority, the Ultimate Jurisdictional Authority, the Executive Ethics Commission, or to another EIG. 5 ILCS 430/20-95.



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FY 2008

FOUNDED COMPLAINTS (BY AGENCY) ^{1 †}

Agency	FY '06 Complaints Founded	FY '07 Complaints Founded	FY '08 Complaints Founded
Aging	0	0	2
Agriculture	1	1	1
Board of Education	1	1	0
Capital Development Board	1	0	1
Central Management Services	7	6	3
Children and Family Services	2	3	5
Commerce and Economic Opportunity	0	1	0
Commerce Commission	0	2	0
Corrections	3	2	9
Criminal Justice Information Authority	0	1	0
Emergency Management	0	0	1
Employees Retirement System	0	2	0
Employment Security	4	4	10
Environmental Protection Agency	0	1	1
Financial And Professional Regulation	1	5	1



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Agency	FY '06 Complaints Founded	FY '07 Complaints Founded	FY '08 Complaints Founded
Fire Marshall	1	1	1
Governor's Office	0	2	2
Governor's Office of Management and Budget	1	0	0
Governors State University	0	0	1
Guardianship and Advocacy Commission	1	0	1
Historic Preservation Agency	1	0	0
Human Services	21	20	35
Industrial Commission	1	0	0
Juvenile Justice	0	0	1
Labor	1	1	2
Liquor Control Commission	0	1	0
Natural Resources	2	4	2
Northeastern Illinois University	0	1	0
Non-State Agency (e.g. city, county and federal government offices.)	0	1 *	0
Northern Illinois University	0	1	0
Public Health	1	1	4



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Agency	FY '06 Complaints Founded	FY '07 Complaints Founded	FY '08 Complaints Founded
Revenue	4	3	5
Southern Illinois University - Carbondale	1	0	0
State Police	1	3 ‡	4
Transportation	5	10	9
Truman College	0	1	0
University of Illinois	1	2	0
University of Illinois at Chicago	0	0	0
Unknown	1	0	0
Vendor	0	0	3
Veterans Affairs	1	3	0
Worker's Compensation Commission	0	0	2
Grand Total	64	84	106

¹ Note that complaints made against an agency employee are shown under the agency's name but may not involve allegations against the agency itself.

[†] This table consolidates information relating to all OEIG investigations conducted during Fiscal Year 2008, regardless of the year in which the complaint was received. Only agencies with Founded complaints are listed.

[‡] One complaint attributed in FY '07 to State Police as Founded was, in fact, Unfounded, but because an OEIG Final Report was issued the OEIG counted the case as substantiated. Generally, OEIG Final Reports are issued only in Founded cases.

* Subject was former State employee, but at time of investigation subject worked for a non-state agency.



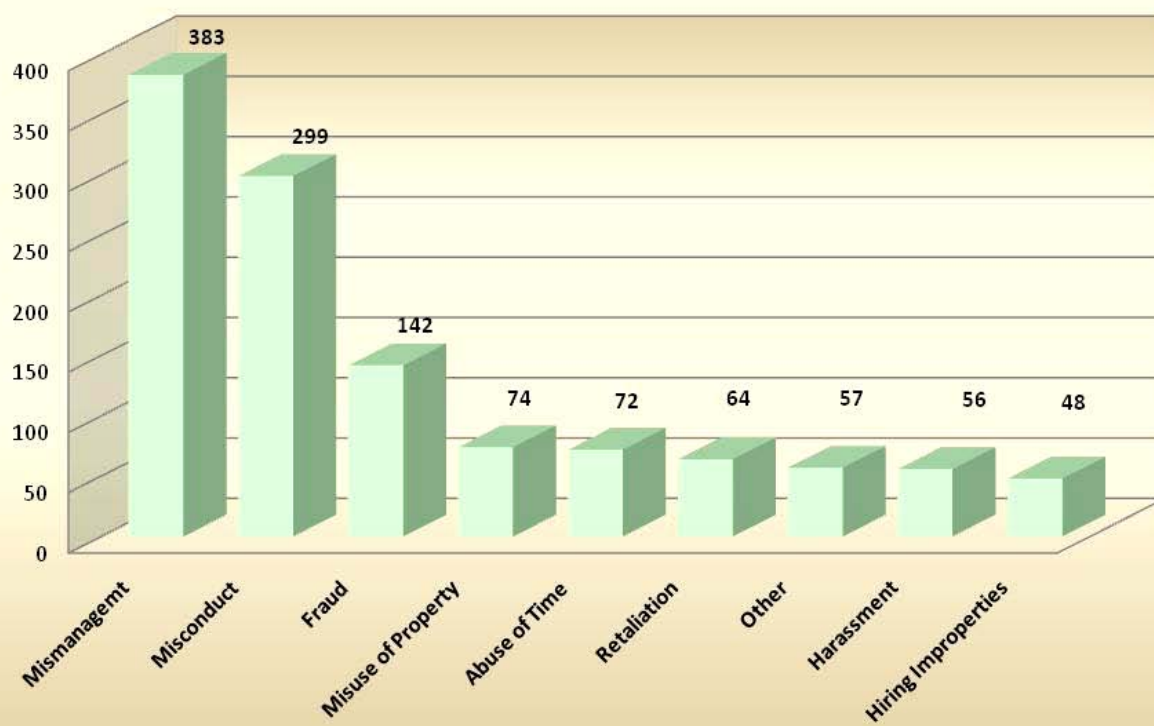
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FY 2008

Most Frequently Reported Allegations

(Total Allegations: 1,631)





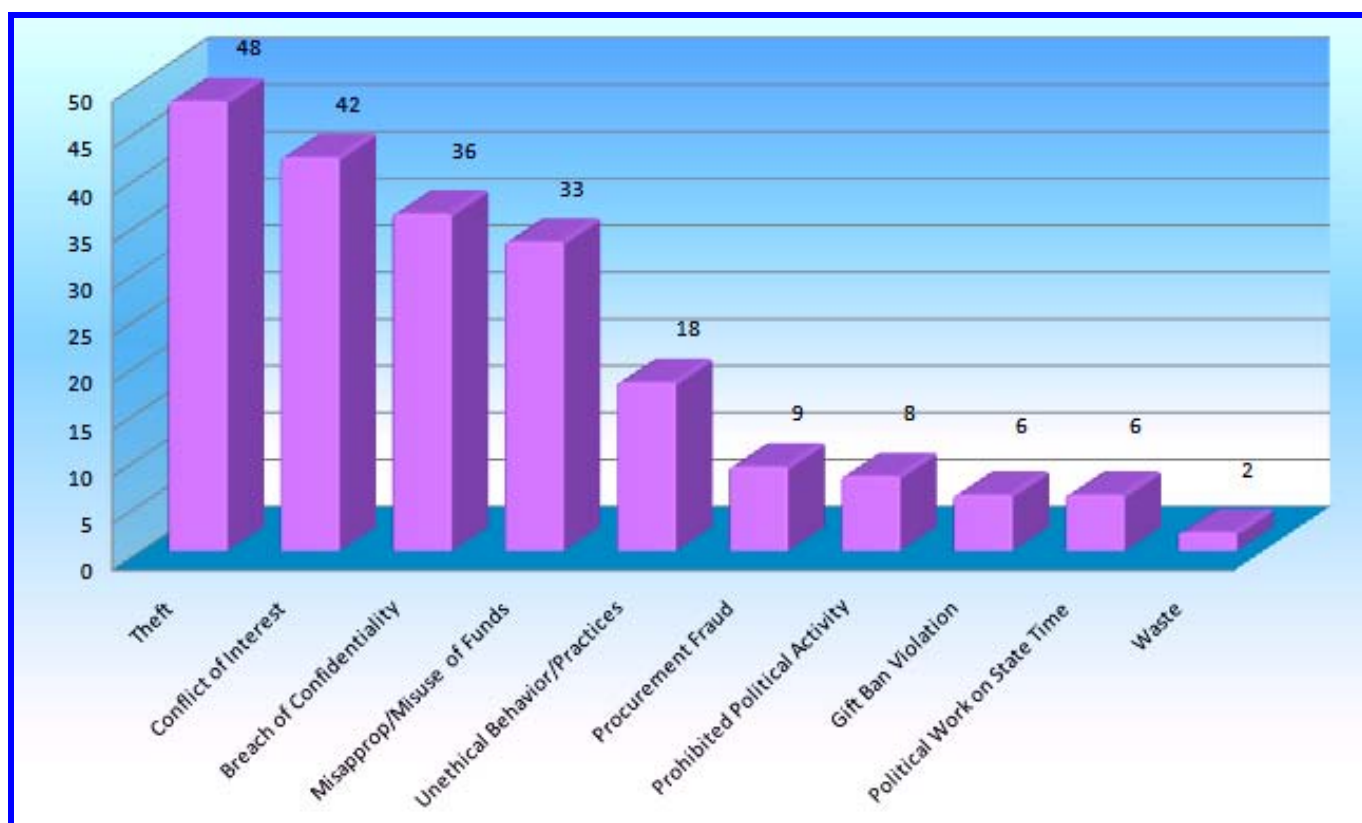
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FY 2008

Frequency of Various Other Allegations

(Total Allegations: 1,631)





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Employee Ethics Training Program Overview

Summary

Pursuant to the State Officials and Employees Ethics Act (“Ethics Act”), ethics training is a mandatory requirement for all employees, officials and appointees under the jurisdiction of the OEIGG. During FY ‘08 more than 166,000 participants took part in ethics training courses offered under the oversight of this Office. These courses are intended to inform employees about their ethical obligations as State employees and to provide instructional materials intended to teach employees to identify and properly address ethics-related work issues.

Basic Legal Requirements

- Under the Ethics Act, State employees, officials and appointees are required to complete ethics training at least annually (i.e., once each calendar year). New employees are required to complete training within six months of initial employment.
- The Ethics Act requires that this training be overseen by the appropriate ethics commission and Executive Inspector General, in consultation with the Office of the Attorney General. Furthermore, the Ethics Act requires the Executive Inspector General to set standards and determine the hours and frequency of training necessary for each position or category of positions.
- Ethics training requirements apply to any person employed full-time, part-time or pursuant to a contract; as well as any appointee.

Primary Training Objective

The primary objective of ethics training conducted under the oversight of the OEIGG is to promote an ethical culture within state government, wherein all official business is conducted in a manner that is consistent with the rule of law. Furthermore, ethics training promotes an environment where State employees, officials and appointees act with honesty, integrity and fairness at all times.



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Training courses are designed to provide participants with:

- A common understanding of ethics-related laws and rules.
- Knowledge concerning who to contact with ethics-related questions.
- Knowledge of where and how to report alleged violations of laws, rules, regulations or policies.

Administrative Objectives

Administrative procedures are designed to ensure that:

- Employee participation in training is accurately recorded and reported, to ensure compliance with the law.
- Training is cost efficient.

Benefits

Ethics training is believed to:

- Reduce the potential for employees to unintentionally violate the law.
- Discourage and/or deter employees from willfully violating laws, rules, regulations and policies.
- Encourage reporting of violations of the law.
- Improve the integrity of State government.
- Promote dialog between employees, supervisors and ethics officers concerning ethics matters.

Training Alternatives

Most employees under the OEIGG's jurisdiction complete annual training by means of Internet-based course materials. These interactive, self-paced annual courses typically require approximately 30 to 60 minutes to complete. They generally consist of reading materials, scenarios that depict ethics-related work situations, self-assessment questions and links to various references and resources. New course materials are developed each year.



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The OEIGG's learning management system, which serves as the platform for delivery of online training, provides for automated tracking and reporting of those individuals who complete course work and, therefore, it provides an efficient means of validating employees' understanding of and compliance with the law.

Additional resources are made available by the OEIGG to ethics officers for the administration of training in instances where online training is either inappropriate or impractical. Specialized courses are made available for temporary employees, appointees to state boards and commissions, and newly hired State employees. Additionally, offline course materials are furnished for use by employees who are unable to use computer-based course materials, and those who, for example, require materials in a Spanish-language or Braille format.

Examples of Conflict of Interest

Many state agencies have their own policies concerning conflicts of interest. Common elements of these programs often include, as in the Investigative Example you just read, the need for state employees to avoid not only actual conflicts of interest, but also the appearance of a conflict of interest.

You may also be required to disclose any potential conflict of interest to your state agency, including, but not limited to, secondary employment (that is, any job that you have in addition to your position with the state).

For Example

The Illinois Department of Revenue, like many state agencies, has a conflict of interest policy for its employees. Its policy, among other things, states that, "A conflict of interest occurs when an employee's private interest, usually of a personal, financial or beneficial nature, conflicts or appears to conflict with public duties and responsibilities. Any conduct that would lead a reasonable person, knowing all the circumstances, to a conclusion that you might be biased, is unacceptable." (Illinois Department of Revenue Employee Handbook, Chapter 4, Page 54)

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FY '08 On-line Employee Training Content

The subject matter and content of ethics training courses are developed under the oversight of the OEIGG and the Executive Ethics Commission, and in consultation with the Office of the Attorney General.



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FY '08 on-line training courses generally addressed the following subject matter:

- Conflicts of interest
- Gift ban
- “Revolving Door” restrictions
- Prohibitions on certain political activities while working for the State
- Time reporting and personnel policies
- Appropriate use of state resources
- Duty to report violations
- Duty to cooperate in investigations
- Confidentiality of reported violations and related investigations
- Penalties for violations of the law
- Whistle blower protections
- Functions of the Executive Ethics Commission
- Functions of the Executive Inspector General
- Compliance with state agency policies

Summary of Training Results

- ✓ Number of employees trained online : 129,666
- ✓ Number of employees trained offline : 36,616
- ✓ Number of State entities trained: 341

Training Effectiveness

Approximately 60,400 online training participants provided formal feedback concerning their use of the OEIGG’s training programs during FY ‘08. Approximately 88% of end-of-course survey respondents indicated that they probably or definitely intended to use what they had learned in the course on their jobs. Furthermore, approximately 88% of respondents indicated that they probably or definitely had a better understanding of the subject because of the online course which they completed.



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FISCAL YEAR 2008 LEGISLATIVE REPORT

In Fall 2008, the Illinois House of Representatives and Senate passed House Bill 4189, which excluded community college districts from the definition of “State agency” found in the State Officials and Employees Ethics Act (“Ethics Act”). HB 4189 became law when the General Assembly overrode the Governor’s veto. Since community colleges are no longer State agencies, neither Office of Executive Inspector General for the Agencies of the Illinois Governor (“OEIGG”) nor the Executive Ethics Commission has jurisdiction over community college districts. The OEIGG neither supported nor opposed HB 4189. A similar bill, House Bill 3504, was vetoed by the Governor earlier in Fiscal Year 2008, and the General Assembly took no further action on it.

The General Assembly also overrode the amendatory veto of the Governor to pass House Bill 824, which became effective on January 1, 2009. Earlier versions of the Bill contained proposed amendments to the Ethics Act, including a procedure in which redacted summaries of OEIGG Final Reports would be made available to the public. None of the proposed amendments to the Ethics Act were incorporated into the final version of the Bill. HB 824, as enacted, requires vendors who have \$50,000 or more worth of business with the State to register with the State and prevents State officials who are responsible for awarding State contracts involving such vendors from accepting political contributions from these vendors.

In addition to House Bills 824 and 4189, there were two other bills that were considered during Fiscal Year 2008 which would have amended the Ethics Act. Neither of these Bills passed both the House and Senate, and both were ultimately referred to their respective chamber’s Rules Committee.

1) Senate Bill 1305 would have expanded the definition of State employee to include elected commissioners, trustees, directors, and board members of State agencies. The Bill also would have amended the definition of the term “Gift” under the Gift Ban Act to allow prohibited sources to provide not-for-profit organizations with anything of value on behalf of a State employee.

Under the terms of this proposed Bill, the Executive Ethics Commission and the Attorney General would no longer have an oversight or consultation role with respect to ethics training. The revolving door prohibition would have been revised to make it clear that the provision applied to current, as well as, former State employees and extended the prohibition to two years for current State employees. Additionally, the person seeking the waiver would have to show by clear and convincing evidence that the prospective employment or relationship did not affect the person’s judgment while working for the State.

2) House Bill 4330 similar to HB 4189 (which was enacted, see above), classified community college districts as units of local government, thereby excluding them from the definition of “State agency” in the Ethics Act.



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FISCAL YEAR 2008 OEIGG MATTERS BEFORE THE EXECUTIVE ETHICS COMMISSION

The OEIGG brought three matters before the Executive Ethics Commission (“EEC”) that resulted in published decisions in Fiscal Year 2008.

In *Novak* (07-EEC-010), the OEIGG accused John Novak, a former Chairman of the Illinois Pollution Control Board (“IPCB”), of violating the revolving door provision of the State Officials and Employees Ethics Act (“Ethics Act”). Under this provision, a former State employee is prohibited for one year from accepting employment or compensation from an entity if the State employee made a regulatory or licensing decision that directly applied to that entity during the year immediately preceding termination of State employment. While acting as Chairman of the IPCB, Novak made two regulatory decisions that affected Commonwealth Edison (“ComEd”) during the year immediately before he resigned his position. A couple of months after he resigned, he began lobbying work for ComEd and was compensated by the power company for his work. Novak neither sought nor obtained a revolving-door waiver from the EEC. The EEC fined Novak \$2,500 for violating the Ethics Act.

In *Shalabi* (08-EEC-003), the OEIGG asserted that Khalil Shalabi, a former employee for the Illinois Department of Human Services (“DHS”), violated the Ethics Act by engaging in prohibited political activity and failing to cooperate with the OEIGG investigation. The EEC concluded that Shalabi, while employed by DHS, had engaged in prohibited political activity by sending e-mails from his State computer on State time concerning fundraising activities for various political candidates. The EEC imposed a \$5,000 fine on Shalabi for violating the Ethics Act. With respect to the failure to cooperate charge, the EEC noted that since Shalabi was no longer a State employee, there was no need for it to make a recommendation for discipline.

In *Sprague* (08-EEC-008), the OEIGG complained that Marvin Sprague, a former employee of the Illinois Department of Natural Resources (“IDNR”), violated the Gift Ban section of the Ethics Act. The OEIGG investigation revealed that Sprague, while employed by the IDNR, had approached the president of a vendor of IDNR and asked him for a \$5,000 loan. The EEC determined that such conduct violated the Ethics Act and fined Sprague \$1,500.

Copies of the full Decisions in these and other OEIGG cases can be found on the EEC’s website: http://www.eec.illinois.gov/disciplinary_decisions.htm.



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FY 2008

AN INTRODUCTION TO OEIGG STATISTICAL REPORTS

The Office of Executive Inspector General (“OEIGG”) records its cases in an information database to facilitate statistical analysis and reporting. The tables presented in this report are drawn from this data.

A cautionary note: the various metrics shown here in combined tables are presented in this manner for convenient viewing, and no relationship among the separate columns or tables should be presumed. One reason for this is because different tables combine data for complaints received or investigations concluded within different time frames. For example, the tables *Founded Complaints (By Agency)* and *Appendix B – FY 2008 Founded Complaints by Type of Misconduct*, examine all founded cases that were concluded during Fiscal Year 2008, regardless of the fiscal year in which the complaint was received. Contrast *Appendix A – Total Complaints (Received in FY 2008) by Type of Misconduct Alleged*, which references only those allegations received in FY ‘08.

Note also that a “complaint” or “allegation” is simply an accusation of misconduct yet to be proved or disproved. That some State agencies will be seen to have been the subject of high, or low, numbers of complaints, in itself is demonstrative neither of culpability, nor of virtue. Therefore, absent detailed study, no particular importance should be attached to the number of allegations involving certain State agencies.

A complaint is “Founded” when the evidence acquired during an investigation, after careful factual and legal analysis, is determined to give rise to a reasonable belief by the OEIGG that a violation was committed by a subject. Moreover, this determination requires that there have been in existence a rule, policy, procedure or law proscribing the conduct that was the subject of the complaint. On occasion, an investigation will reveal the absence of such a rule, in which case the OEIGG will direct the agency to implement one. At times, single complaints can give rise to multiple allegations, each of which can be founded or unfounded. Therefore, the number of “founded complaints” always is less than the number of “founded allegations,” which are not reflected in these tables but are addressed individually in OEIGG Final Reports.

The data in this report is offered as evidence that the OEIGG, an independent administrative investigation agency of the State of Illinois, is in diligent pursuit of its mission to investigate and prosecute waste, fraud, misconduct, mismanagement and unethical behavior committed within and upon the State entities under its jurisdiction.



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APPENDIX A

**TOTAL ALLEGATIONS RECEIVED
 BY TYPE OF MISCONDUCT ALLEGED ¹**

Category of Misconduct	FY '06 # Complaints Received ²	FY '07 # Allegations Received ³	FY '08 # Allegations Received ³
Abuse	53	56	33
Abuse of Time	52	75	72
ADA	0	6	0
Bid-rigging	3	2	2
Breach of Confidentiality	0	26	36
Bribery	4	16	17
Child Support	3	12	0
Conflict of Interest	20	53	42
Corruption	8	13	3
Discrimination	26	41	29
Extortion	2	3	0
Failure to Follow Department Policy	25	48	24
False Employment Application	4	4	3
Fraud	105	184	142
Failure to Cooperate	0	0	46
Failure to File SEI	0	0	2
Ghost Payrolling	0	4	4
Gift Ban Violation	0	7	6
Harassment	31	90	56
Hiring Improprieties	17	66	48
Improper Political Promotion	1	1	3



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Category of Misconduct	FY '06 # Complaints Received ²	FY '07 # Allegations Received ³	FY '08 # Allegations Received ³
Misappropriation/Misuse of Funds	20	25	33
Misconduct	497	313	299
Mismanagement	26	212	383
Misuse of Property	22	64	74
None	17	20	6
Other	137	43	58
Other Ethics Act	2	4	0
Patronage	9	6	0
Personnel	62	65	19
Political Work on State Time	12	18	6
Procurement Fraud	0	9	9
Prohibited Political Activity	1	14	8
Retaliation	31	34	64
Revolving Door Violation	1	3	3
Sexual Harassment	5	4	11
Theft	21	32	48
Unethical Behavior/Practices	35	15	18
Violence in Workplace	6	5	5
Waste	16	8	2
Wrongful Termination	3	13	17
Wrongfully Convicted	1	1	0
Total	1,278 ²	1,615 ³	1,631 ³

¹ Allegations/Complaints received July 1, 2007 through June 30, 2008.

² For FY '06 the OEIGG did not have data available to compute the total number of allegations in complaints with multiple allegations.

³ Data for initial complaints, some of which contained multiple allegations.



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APPENDIX B

FY 2008 - FOUNDED COMPLAINTS BY TYPE OF MISCONDUCT

Category of Misconduct	FY '06 # Complaints Founded	FY '07 # Complaints Founded	FY '08 # Complaints Founded
Abuse of Time	5	15	18
Misconduct	12	15	18
Fraud	9	10	18
Misuse of Property	4	13	7
Harassment	2	2	7
Prohibited Political Activity	0	2	5
Retaliation	1	0	4
Abuse	0	0	3
Unethical Behavior/Practices	5	4	3
Conflict of Interest	3	2	3
Procurement Fraud	2	1	3
Theft	3	1	3
Political Work on State Time	0	3	2
Failure to Follow Department Policy	1	2	2
Hiring Improprieties	0	2	2
Mismanagement	0	2	2
Patronage	0	0	2
Breach of Confidentiality	0	1	1
Ghost Payrolling	2	1	1
Other	6	0	1
Wrongful Termination	0	0	1
Abuse	2	2	0
Misappropriation / Misuse of Funds	2	2	0



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Category of Misconduct	FY '06 # Complaints Founded	FY '07 # Complaints Founded	FY '08 # Complaints Founded
Bid-rigging	0	1	0
Other Ethics Act	0	1	0
Sexual Harassment	0	1	0
Waste	1	1	0
Extortion	1	0	0
False Employment Application	1	0	0
Personnel	1	0	0
Violence in Workplace	1	0	0
Total	64	84	106



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APPENDIX C

FY 2008

NUMBER OF COMPLAINTS - BY AGENCY [†]

Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Aging	8	3	5	5
Agriculture	14	8	6	9
Appellate Court-Third District	0	0	1	1
Art Council	0	1	0	0
Attorney General	3	3	7	7
Auditor General	0	0	1	1
Carl Sandburg College **	0	1	0	0
Banks and Real Estate (See Financial and Professional Regulation)	3	1	0	0
Board of Education	7	10	2	3
Board of Elections	1	1	0	0
Board of Higher Education	1	0	0	0
State Board of Investment	0	1	0	0
Capital Development Board	3	0	0	0
Central Management Services	47	26	10	16
Chicago State University	1	5	6	8



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Children and Family Services	87	98	86	114
Children and Family Services – Inspector General	1	0	0	0
City Colleges of Chicago **	0	1	3	4
City Colleges of Chicago - Kennedy-King **	0	2	0	0
Civil Service Commission	1	0	0	0
College of DuPage **	0	1	0	0
College of Lake County	0	1	0	0
Commission on Human Rights	0	0	1	1
Community College Board	0	5	0	0
Commerce and Economic Opportunity	12	7	4	5
Commerce Commission	10	4	8	8
Community College Board **	2	0	0	0
Corrections	92	87	92	124
Comptroller	0	1	1	1
Criminal Justice Information Authority	7	1	0	0
Drycleaner Environmental Response Trust Fund	0	1	0	0
East St. Louis Advisory Authority	0	1	0	0



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Eastern Illinois University	1	9	3	5
Educational Labor Relations Board	0	3	0	0
Equal Employment Opportunity Commission	0	1	0	0
Emergency Management Agency	4	2	1	2
Employment Security	46	55	57	72
Employees Retirement System	3	1	0	0
Environmental Protection Agency	8	12	7	9
Executive Inspector General for the Agencies of the Illinois Governor	1	0	0	0
Financial And Professional Regulation	17	29	29	37
Fire Marshal	13	5	3	8
Gaming Board	1	0	0	0
Governor's Office	18	16	8	12
Governors State University	4	5	2	2
Guardianship and Advocacy Commission	7	6	1	2
Health Facilities Authority	1	0	0	0
Healthcare and Family Services (See Public Aid)	22	59	56	60



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Healthcare and Family Services – Inspector General	0	1	2	3
Historic Preservation Agency	4	1	7	13
Housing Development Authority	1	2	0	0
Human Rights	16	7	13	15
Human Services	367	350	377	497
Human Services - Inspector General	0	0	1	2
Illinois Law Enforcement Training Standards Board	0	1	1	1
Illinois State University	0	1	0	0
Illinois Student Assistance Commission	3	2	5	6
Illinois Technology Development Alliance	1	0	0	0
Industrial Commission	2	0	0	0
Insurance (See Financial and Professional Regulation)	3	0	2	3
Joint Commission on Administrative Rules	2	0	0	0
Joliet Junior College **	0	0	1	2
Judicial Inquiry Board	3	1	0	0
Juvenile Justice	0	11	14	19



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Labor	6	2	6	6
Labor Relations Board	2	1	1	1
Law Enforcement Commission	1	1	0	0
Law Enforcement Training and Standards Board	0	0	0	1
Legislative Council	1	1	0	0
Lieutenant Governor	1	2	1	2
Liquor Control Commission	0	0	3	3
Mental Health	1	0	0	0
Military Affairs	6	3	2	2
Natural Resources	17	16	16	19
Non-State Agency	84	134	98	109
None Given	10	5	3	3
Northeast Illinois Planning Commission	0	1	0	0
Northeastern Illinois University	5	2	6	9
Northern Illinois University	3	5	3	5
Other	6	2	4	5
Professional Regulation (See Financial and Professional Regulation)	6	8	1	1



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Office of Executive Inspector General	0	4	0	0
Property Tax Appeal Board	0	1	0	0
Public Aid (See Healthcare and Family Services)	28	0	0	0
Public Health	16	14	29	42
Racing Board	1	2	2	2
Rehabilitation Services	1	4	0	0
Revenue	22	18	18	20
Secretary of State	7	5	3	3
Senate	1	1	0	0
Southern Illinois University	0	0	7	9
Southern Illinois University - Carbondale	3	3	3	1
Southern Illinois University - Edwardsville	3	1	3	11
South Suburban College **	0	0	1	1
US Social Security Administration	1	1	0	0
State Appellate Defender Office	1	0	0	0
State Police	17	13	21	26
State's Attorney's Appellate Prosecutor	1	0	0	0



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Agency	No. Complaints Received in FY 06 ‡	No. Complaints Received in FY 07	No. Complaints Received in FY 08	No. <u>Allegations</u> Received in FY 08 *
Treasurer	0	1	1	1
Teachers Retirement System	1	1	1	1
Toll Highway Authority	11	11	13	14
Transportation	83	58	55	85
Truman College	0	1	0	0
Universities Retirement System	1	0	0	0
University of Illinois	32	14	28	50
University of Illinois at Chicago	1	0	0	0
Unknown	6	9	15	15
Vandalia Correctional Center	1	0	0	0
Vendor	10	45	52	74
Veterans Affairs	24	16	15	18
Western Illinois University	4	4	3	4
Workers Compensation Commission	3	10	10	12
Zion Police Department	1	0	0	0
Total	1,278	1,270	1,247	1,631

† Note that complaints made against an agency employee are shown under the agency's name but may not involve allegations against the agency itself.

‡ No. complaints received in FY 2005: 1,145.

* Total allegations are greater than total complaints because some complaints contain more than 1 allegation.

** Upon enactment of HB 4189 in August 2008, the community college districts were removed from the jurisdiction of the OEIGG. Accordingly, any shown OEIGG activity related to community colleges occurred prior to the enactment of HB 4189.



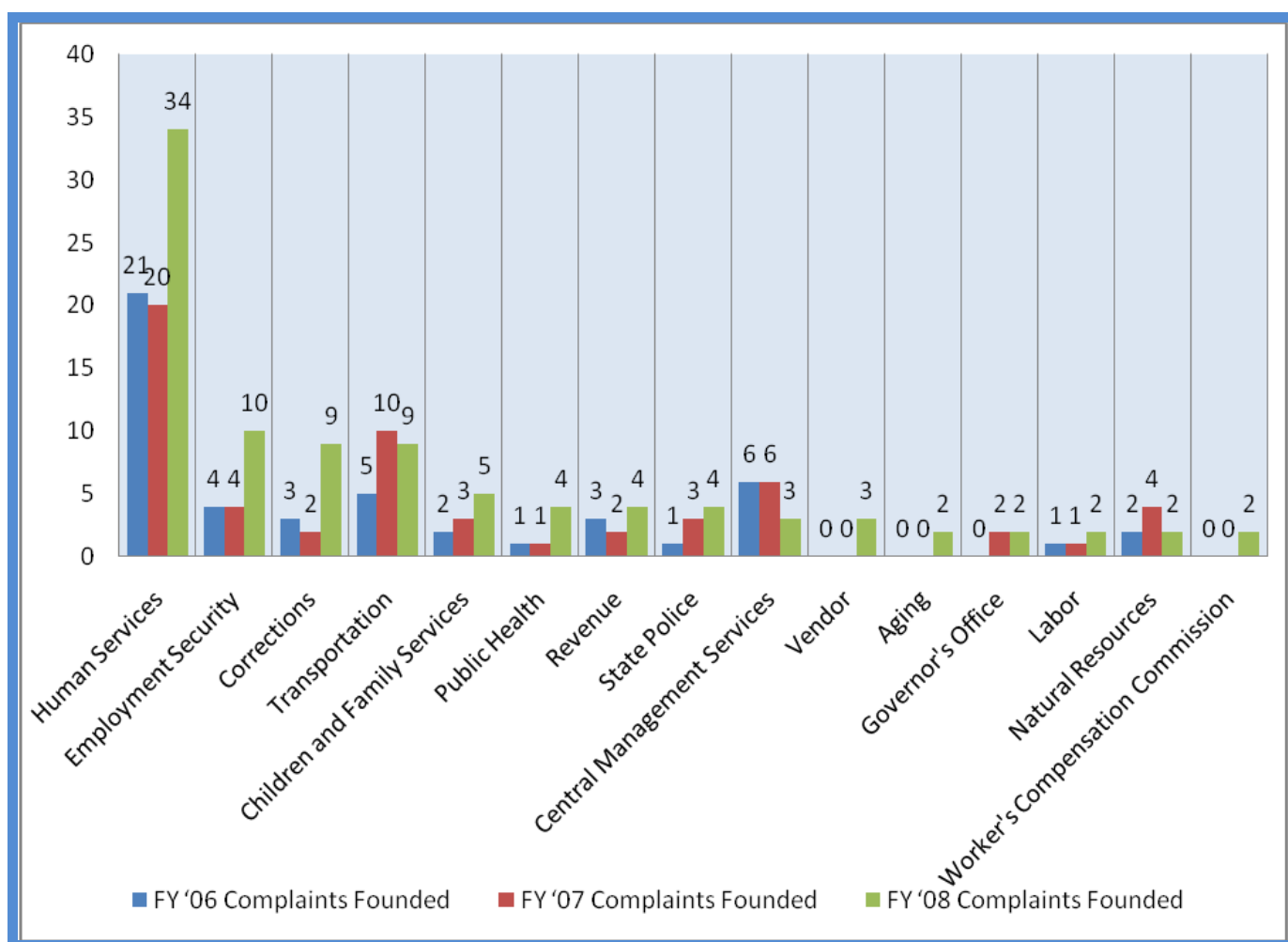
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APPENDIX D

FY 2006 – FY 2008

Highest Founded Complaint Totals By Agency





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APPENDIX E

James A. Wright, Executive Inspector General

On July 1, 2005, James A. Wright was appointed Executive Inspector General for the Agencies of the Illinois Governor. Mr. Wright's credentials include 26 years of public and private sector legal and professional experience. He has served as a Corporate Practices Attorney for the Office of the Comptroller of the Currency; Trial Attorney for the U.S. Department of Justice, Tax Division; Assistant U.S. Attorney in the U.S. Attorney's Office for the Northern District of Illinois; Manager of Commercial Litigation for the Law Department of the Chicago Board of Education; Chief of Staff to the Chicago Board of Education; Of Counsel in the Government Division of the Law Offices of Altheimer & Gray, practicing in the areas of municipal law, administrative law, government relations, contracts, minority/women business enterprise certification, and commercial litigation; and Inspector General for the Illinois State Toll Highway Authority. He possesses law licenses in Illinois, California, and Washington D.C., and is licensed to practice before the U.S. Supreme Court, 7th Circuit Court of Appeals, and the United States District Court of Illinois. In addition to being a licensed attorney, he is a Certified Public Accountant with five years experience with a public accounting firm. He possesses a Master Degree in Business Administration from the Northwestern University Kellogg Graduate School of Management. He is certified as an Inspector General by the Association of Inspectors General, and is a member of the national Board of Directors of the Association of Inspectors General.

Sydney R. Roberts, First Deputy Inspector General/Chief Operating Officer

Ms. Roberts works closely with the Executive Inspector General on policy, operations, and investigations. Prior to joining the OEIGG in 2005, Ms. Roberts worked with the Illinois Department of Human Services Office of Inspector General, where she served initially as Deputy Inspector General until her appointment as DHS Inspector General in 2003. She previously worked as a Lieutenant with the Essex County Prosecutor's Office in Newark, New Jersey, where she spent the majority of her tenure in internal affairs investigating police corruption, conducting background investigations, and administering polygraph examinations. Ms. Roberts also is a former suburban police commander. Her credentials include: B.S. Degree in Criminal Justice, University of Delaware; Juris Doctor Degree, Rutgers School of Law; Master's in Criminology and Criminal Justice, Oxford University, Oxford, England; and Graduate of the F.B.I. National Academy. Ms. Roberts also is certified as an Inspector General by the Association of Inspectors General, and as an ethics instructor by the National Institute on Ethics.

Sean Ginty, General Counsel

Mr. Ginty received his Bachelor of Science degree in Journalism from the University of Illinois/Urbana and his Juris Doctor degree from Chicago-Kent College of Law. He comes to the OEIGG with a wealth of experience in ethics, compliance and investigation. He began his legal career as an attorney with the Attorney Registration and Disciplinary Commission where he reviewed and investigated alleged attorney misconduct. He later joined the American Bar Association as an ethics research attorney. Most recently, Mr. Ginty was a conflicts attorney for the firm of Winston & Strawn, where he conducted conflicts of interest reviews, provided ethics training, and responded to auditor requests. His publications and presentations include: "A Split on Inadvertent Disclosure," ABA Journal eReport, Oct. 25, 2002;



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Speaker, ISBA Seminar on “Avoiding Malpractice in Setting Up a Business Entity,” April 2004; and panelist, “Hot Tips in Disciplinary Investigations” panel at National Organization of Bar Counsel, February 1999.

Deborah Ellis, Deputy Inspector General

Ms. Ellis is a former State’s Attorney and Assistant State’s Attorney in Ogle County, Illinois, where she prosecuted civil and criminal matters and served as the legal advisor to the county and its elected and appointed officials. She graduated Magna Cum Laude from Northern Illinois University College of Law in DeKalb in 1997, where she served on the NIUCOL Law Review. Ms. Ellis received a Bachelor of Arts degree in Communications from Sangamon State University (now the University of Illinois-Springfield) and worked as a broadcast journalist for many years in Illinois, Tennessee, and Florida. She is a native of Champaign, Illinois. She joined the OEIGG in early 2006.

Gilbert R. Jimenez, Deputy Inspector General for Special Operations

Mr. Jimenez’ credentials include 32 years of government and private sector legal, investigatory and journalistic experience in protection of the public interest. Since joining the OEIGG in August 2005, Mr. Jimenez has served as a Deputy Inspector General for legal review, as Acting Director of Investigations, and as head of Special Operations. He joined the OEIGG after serving as an Investigation and Special Projects Manager for the Chicago Board of Education Office of the Inspector General, where he conducted investigations and supervised a team of investigators who probed employee misconduct, as well as waste, fraud and mismanagement in the Chicago Public Schools’ capital, MBE/WBE and procurement programs. Mr. Jimenez’ investigative skill set includes legal analysis; case management; investigation of financial crimes and other misconduct; contract and document analysis; data analysis; interviewing; deception detection; report writing and presentation, and information technology management. For 24 years before entering government service, Mr. Jimenez was a reporter and editor with the Chicago Sun-Times newspaper, where a number of his investigations resulted in the resignations of public officials following disclosure of their illegal or unethical conduct. He formerly taught classes in reporting, Media Ethics, and First Amendment Law at Columbia College Chicago and the Northwestern University Medill Graduate School of Journalism. Mr. Jimenez, a licensed Illinois attorney for 21 years, also has been engaged in the private practice of law. He holds a Bachelor of Arts degree in Psychology from De Paul University, and a Juris Doctor degree from the John Marshall Law School. Mr. Jimenez is a Director of the Association of Inspectors General, Illinois Chapter, and frequently provides training and educational classes to its member investigators and Inspectors General.



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Millicent Willis, Deputy Inspector General

Ms. Willis is a graduate of Northwestern University and Howard University School of Law. She began her career as an Assistant Public Defender handling criminal litigation and appeals. During her twenty year legal career, Ms. Willis has held several governmental positions in which she supervised or conducted disciplinary investigations and hearings. As Counsel at the Illinois Attorney Registration and Disciplinary Commission, Ms. Willis investigated and prosecuted allegations of attorney misconduct. She also served as General Counsel and Acting Chief Administrator for the Chicago Police Department's Office of Professional Standards, where she made disciplinary recommendations to the Superintendent of Police. Ms. Willis was Senior Assistant Attorney for employee discipline for the Chicago Public Schools, the third largest school district in the nation. She is a former Senior Policy Analyst for the City of Chicago's Office of Emergency Management and Communications, where she was responsible for policy and legislative matters, conducted investigations and managed an investigative team. She was most recently Assistant Executive Director – Legal at the Cook County Department of Corrections. In addition to her legal and investigative work, Ms. Willis has significant experience in training and course design, having trained not only attorneys and investigators on a variety of topics, including report writing, statement taking and litigation skills, but also Ph.D. candidates in the areas of communication skills and conflict resolution.

James J. Bonk, Director of Investigations

Mr. Bonk joined the Office of Executive Inspector General as Director of Investigations in July 2008 with responsibilities for investigative operations, policies and procedures. He brings to OEIGG over 30 years of public and private sector experience in investigations, leadership and operations. Mr. Bonk's background as a strategic leader with a proven track record in the insurance fraud industry, coupled with his strong investigative knowledge and experience, operational skills and business acumen, brings extraordinary value to the OEIGG investigative operations. He began his career in law enforcement for two Chicago suburban police departments. Jim received numerous commendations and citations for the successful arrest and prosecution of several heinous criminal investigations. He then joined CNA Insurance Companies where he worked for approximately 20 years and led their nationwide Special Investigations Unit focused on the identification, investigation and prosecution of multi-line insurance fraud. Mr. Bonk rose to the position of assistant vice president at CNA. Most recently, he served as Senior Vice President of Operations for a nationwide provider of professional investigative services, surveillance and fraud awareness. He previously was an active board member with the Coalition Against Insurance Fraud, Washington, D.C. where he held positions of treasurer and co-chair. He graduated from National-Louis University with a Bachelor of Arts Degree in Applied Behavioral Science.



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Derick Love, Deputy Director of Investigations

Mr. Love joined the OEIGG as Deputy Director of Investigations in August, 2007. He comes to the OEIGG after serving 27 years with the McLean County Sheriff's Department. There, Mr. Love served as Detention Facility Superintendent and Chief Deputy. In the position of Detention Facility Superintendent, he was responsible for the oversight of the 205-bed detention facility and the correctional staff. Mr. Love also was responsible for the oversight and preparation of the facility's \$3 million budget. During his tenure as Chief Deputy, he was responsible for the administration and oversight of all functions of the Sheriff's Department and its 135 employees. His responsibilities included preparation and oversight of the department's \$7 million budget. Mr. Love also represented the department in contract negotiations and handled all personnel matters. Mr. Love provided direct supervision of the Support Services Commander, Patrol Division Commander, Criminal Investigations Commander and Detention Facility Superintendent. He holds a Bachelor of Science degree in Criminal Justice from Illinois State University.

David E. Keahl, Director of Ethics Training and Compliance

Mr. Keahl is responsible for the establishment of standards for and oversight of ethics training for the officials, employees, and appointees of the state agencies, departments, boards, commissions, and state public universities under the OEIG's jurisdiction as required by the State Officials and Employees Ethics Act. Prior to joining the OEIG, Mr. Keahl worked in the telecommunications industry for 27 years. There he directed activities related to corporate planning, accounting, finance, regulatory affairs, engineering and human resources, and has considerable experience in managing matters related to organizational governance, internal controls, and legal/regulatory compliance.

Rochelle M. Hardy, Chief Financial Officer

With a professional background and 30 years in management, accounting, finance, information technology and professional development of staff in both government and the private sector, Ms. Hardy brings a unique and valuable perspective to the Office of Executive Inspector General. She has been employed by the State of Illinois for the past 3-1/2 years, first serving 1-1/2 years as the Chief Fiscal Officer for the Illinois State Police and most recently for 2 years as Deputy Director of Administration creating the pilot Shared Service Public Safety Center, consolidating seven public safety agencies, and providing fiscal and HR business process redesign for statewide systems. Also, she created the Kenosha County data center and worked for six years as the Director of Information Systems for County of Kenosha (WI). Prior to joining State government, Ms. Hardy held various positions in the private sector including manager of accounting for L'Oreal USA; senior accountant/controller with Walgreens, and manager of consulting services with Washington, Pittman and McKeever. She received her Bachelor of Science degree in business administration with a concentration in accounting from Roosevelt University and her Master of Business Administration degree from Keller Graduate School of Business, with concentrations in information technology and finance. She is an active member of the National Association of Black Accountants ("NABA") and the National Black MBA Association ("NBMBAA").

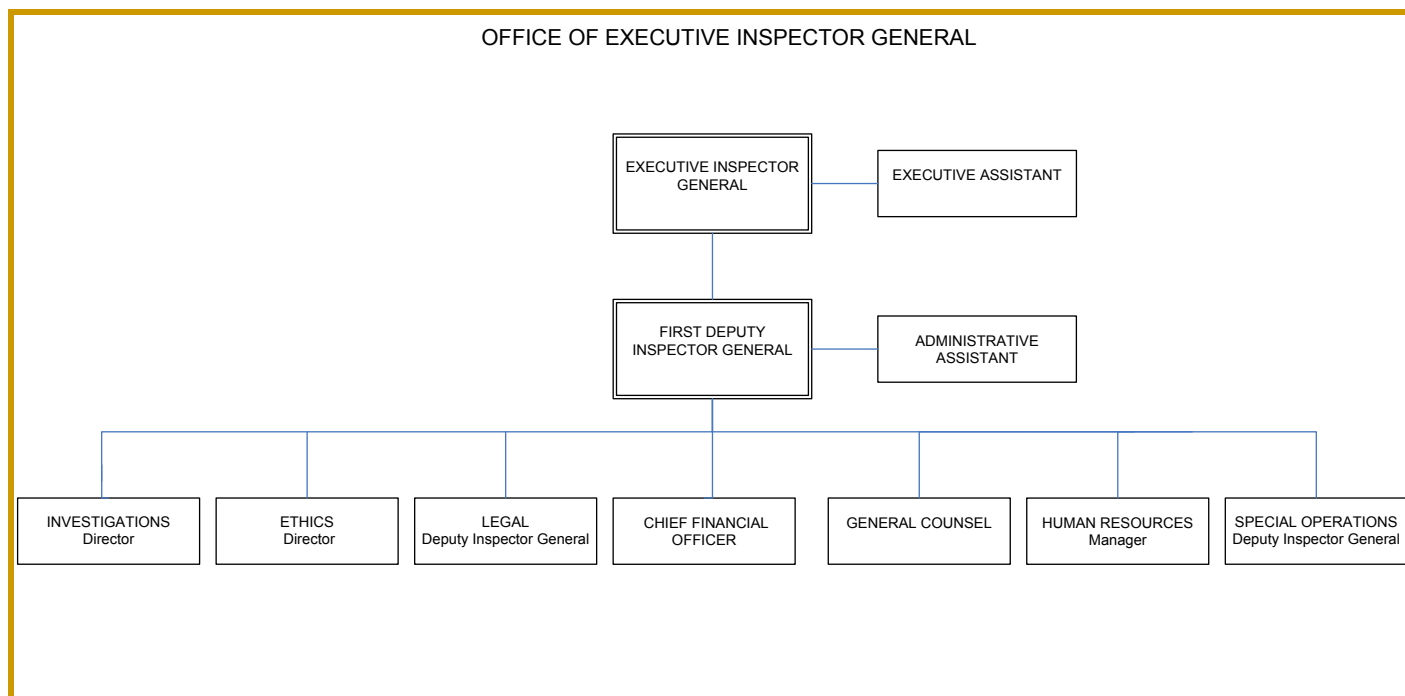


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OEIGG ORGANIZATIONAL CHART





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APPENDIX F

Illinois Freedom of Information Act

Information about the Office of Executive Inspector General for the Agencies of the Illinois Governor

Mission Statement:

The Office of Executive Inspector General for the Agencies of the Illinois Governor (“OEIGG”) is an independent State agency dedicated to ensuring accountability in State government. The OEIGG receives and fairly investigates complaints of fraud, waste, abuse and misconduct, and recommends corrective action. In addition, the OEIGG promotes and coordinates the State’s ethics initiatives for the agencies under its jurisdiction.

Functional Subdivisions: (See Attached Diagram)

OEIGG Operating Budget for FY '08: \$6,931,315.

OEIGG Offices:

32 W. Randolph, Suite 1900
Chicago, IL 60601-3414

607 E. Adams, 14th Floor
Springfield, IL 62701-1634

Number of OEIGG Employees: Approximately 65 full-time employees and no part-time employees

State Agency with Limited Oversight Role over the OEIGG: The Executive Ethics Commission

OEIGG FOIA Officer:

Sean Ginty
General Counsel
OEIGG
32 W. Randolph, Suite 1900
Chicago, IL 60601-3414

Photocopy costs for FOIA requests: 10 cents per page.



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LINKS

State Officials and Employees Ethics Act (5 ILCS 430, *et seq.*)

<http://tinyurl.com/s384a>

Executive Order No. 3 - Creating the Office of Inspector General and An Ethics Hotline

http://inspectorgeneral.il.gov/pdf/Executive_Order_3_2003.pdf

Executive Order No. 4 - Banning Retaliation Against Whistle Blowers

http://inspectorgeneral.il.gov/pdf/Executive_Order_4_2003.pdf

Executive Order No. 5 - Mandating Ethics Training for All State Employees

http://inspectorgeneral.il.gov/pdf/Executive_Order_5_2003.pdf

Administrative Order No. 6 - Creating Procedures for Investigating and Reporting Misconduct

http://inspectorgeneral.il.gov/pdf/Administrative_Order_6_2003.pdf

Quarterly Reports from all Ethics Act OEIGs

<http://www.eec.illinois.gov/qreport.htm>

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