

Office of Executive Inspector General

for the Agencies of the Illinois Governor



**2025
Annual
Report**



oeig.illinois.gov

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MESSAGE FROM EXECUTIVE INSPECTOR GENERAL SUSAN HALING

I am proud to present the extensive work of the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) detailed in the FY2025 Annual Report. This year the OEIG has received a record-breaking 3,907 complaints, completed 228 investigations, conducted numerous hiring reviews, and oversaw trainings by over 170,000 State employees.

Inspector General work is critical to preventing and detecting waste, fraud, and abuse. Furthermore, the OEIG's independent and objective oversight through its investigations, compliance work, and training promotes economy, efficiency, and effectiveness in State programs and operations. Each area of our Office strives to deliver the highest quality of public service. Our employees' commitment to quality and timely work makes us effective in our mission to make change and improve government systems.



While investigative reports may lead to the discipline and termination of bad actors, in many cases they also result in systemic, policy, and process changes to prevent similar conduct from occurring in the future. A few examples of this work in FY2025 include:

- After an investigation that revealed hiring improprieties, our Hiring and Employment Monitoring Division (HEM) worked extensively with that agency and the Governor's Office to review and develop a new hiring plan to ensure fair and competitive selection for investigative and intelligence roles at the State agency. This collaborative work culminated in an agency administrative directive that is now being implemented.
- An OEIG investigation revealed conflicts of interest and issues with reconciliation of vendor payments at a State agency. In response to the OEIG's recommendations, the agency is auditing that vendor's billings and reconciliations, and implementing new or updated policies and procedures for conflicts of interest, vendor billing, and travel expenses. In response, the Governor's Office also mandated a training for agency fiscal offices relating to reconciliation for vendor payments. (24-00353).
- An OEIG investigation uncovered that for five years, a transit agency paid over \$1,000,000 to employees to stay at home and not work at least two days a week. As a result of this investigation, the OEIG recommended statutory changes to increase oversight and transparency at the transit agencies. The agency also implemented OEIG's recommendations for changes to the CTA's telework policies and practices. (24-01140).

We are mindful that this work is a shared responsibility and collaborating across departments to ensure an ethical, efficient, and accountable State government is the best practice for real change. I encourage you to join us in our mission by learning more about our Office and reporting wrongdoing at oeig.illinois.gov.

Sincerely,

Susan M. Halting
Executive Inspector General

INTRODUCTION TO THE OEIG



The State Officials and Employees Ethics Act (Ethics Act), 5 ILCS 430/1, et seq., established the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) in 2003. The OEIG is an independent executive branch State agency that investigates, among other things, allegations of fraud, waste, abuse, mismanagement, misconduct, and violations of the Ethics Act (such as prohibited political activity, sexual harassment, the gift ban, revolving door, and retaliation) and other related laws, policies, and rules. The OEIG also investigates allegations of hiring improprieties and conducts compliance-based reviews of employment procedures and hiring decisions. In addition, the OEIG plays a vital role in reviewing Ethics Act-mandated trainings and making revolving door determinations.

The OEIG has jurisdiction over:

- more than **170,000** State employees, appointees, and officials, including the Governor and the Lieutenant Governor;
- more than **300** executive branch State agencies, departments, boards, and commissions;
- **nine** State public universities across a dozen campuses;
- **four** Chicago area Regional Transit Boards (the Regional Transportation Authority, the Chicago Transit Authority, Metra, and Pace);
- **eleven** Regional Development Authorities; and
- vendors, contractors, and grantees of any of those entities.

INVESTIGATIONS

The OEIG receives complaints from many different sources, including members of the public, State employees, law enforcement officials, contractors, and individuals requesting to remain anonymous.

The OEIG evaluates all new complaints to determine the appropriate action. To conduct investigations, OEIG investigators interview witnesses, collect documents, analyze records, conduct surveillance, perform computer forensics, and use a variety of other investigatory tools and techniques. The OEIG also has subpoena power to obtain information relevant to an investigation.

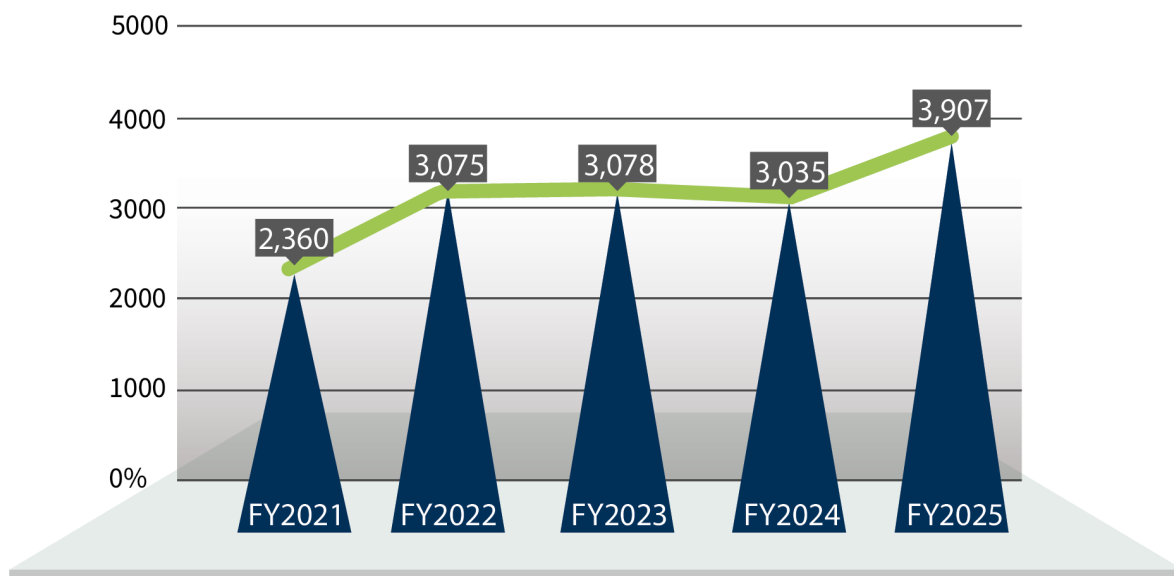
Complaints Received by the OEIG

The OEIG received a record high **3,907** complaints in FY2025.

This record-high number was an approximate **29% increase** over complaints received the prior fiscal year.

Complaints Received

FY2021-FY2025



Complaint Origins

The OEIG received these complaints through many different methods, including:

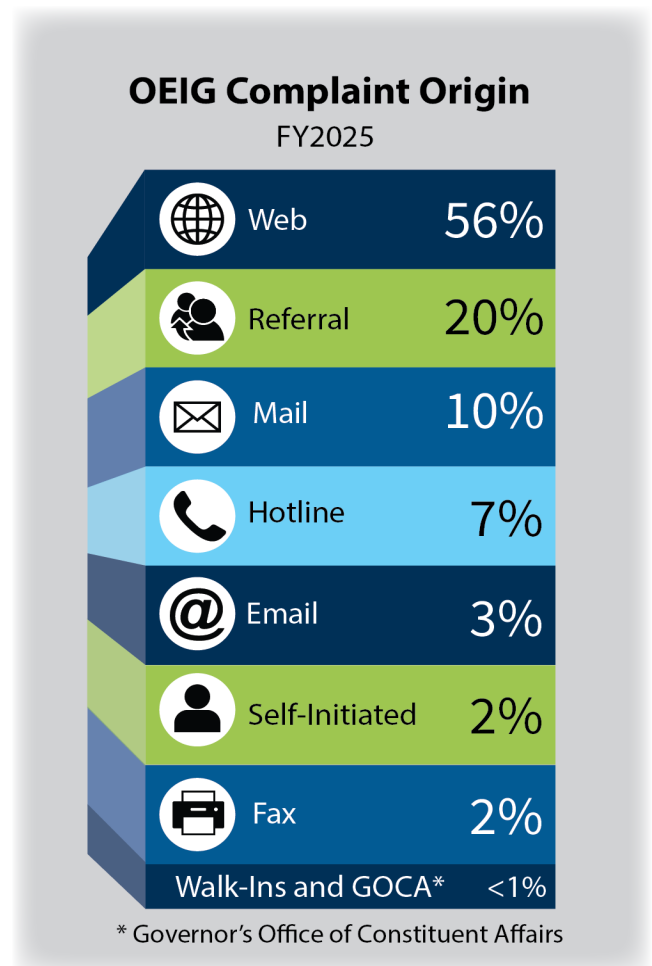
- online complaint forms filed through its website: oeig.illinois.gov;
- its toll-free hotline at 866-814-1113;
- U.S. mail; and
- via a telecommunications device for the deaf (TDD) at 888-261-2734.

Complaints about entities or persons under the jurisdiction of the OEIG may be submitted by anyone and may be submitted anonymously. However, a complaint must relate to the official conduct of:

- an employee of, or appointee to, an executive branch State agency, board, or commission under the jurisdiction of the OEIG;
- an employee of, or appointee to, a State public university;
- an employee of, or appointee to, one of the Regional Transit Boards (the Regional Transportation Authority, Chicago Transit Authority, Metra, or Pace);
- an employee of, or appointee to, one of the Regional Development Authorities; or
- a person or entity doing business with an entity under the jurisdiction of the OEIG, including, for example, vendors and grantees of State agencies.

Anyone who files a complaint should have a reasonable belief that the allegations being reported are true. In addition, anyone filing a complaint must provide sufficient detail about the allegations for an investigation to be initiated.

In FY2025, the OEIG received complaints from many different sources, including, for example, other State employees, private citizens, vendors, and law enforcement authorities. Some complaints were filed anonymously. The OEIG also self-initiated investigations based on public information or information learned in other investigations.



Complaint Evaluation Process

The OEIG
opened **211**
investigations in
FY2025.

The OEIG has 30 days after receiving a complaint to process it and decide how to proceed. Initially, the OEIG assigns each complaint a file identification number and inputs the information into the OEIG database. The OEIG determines whether any immediate action needs to be taken and then proceeds to evaluate the complaint for an appropriate disposition, which generally includes:

- opening an investigation;
- referring the complaint to an appropriate authority; or
- administratively closing the file.

Referrals are typically made to other agencies or appropriate entities, including law enforcement authorities. In some instances, when the OEIG refers the matter to another agency, the OEIG requests that the agency investigate the allegations and respond, summarizing the results of its investigation. The OEIG then reviews these agency responses to determine whether the agency adequately addressed the allegations or whether the OEIG should subsequently open an investigation and look into the matter further. In the absence of consent from a complainant, when referring complaints to others, the OEIG does not disclose the identities of complainants unless otherwise required by law.

In FY2025,
the OEIG
referred **3,374**
complaints.

In FY2025,
the OEIG also
administratively
closed **251**
complaints.

The OEIG administratively closed these complaints when, for example, the complaint was not within its jurisdiction; the complaint did not allege a violation of State law, rule, or policy; the alleged wrongdoing occurred a long time ago; or there were duplicate complaints about a matter.

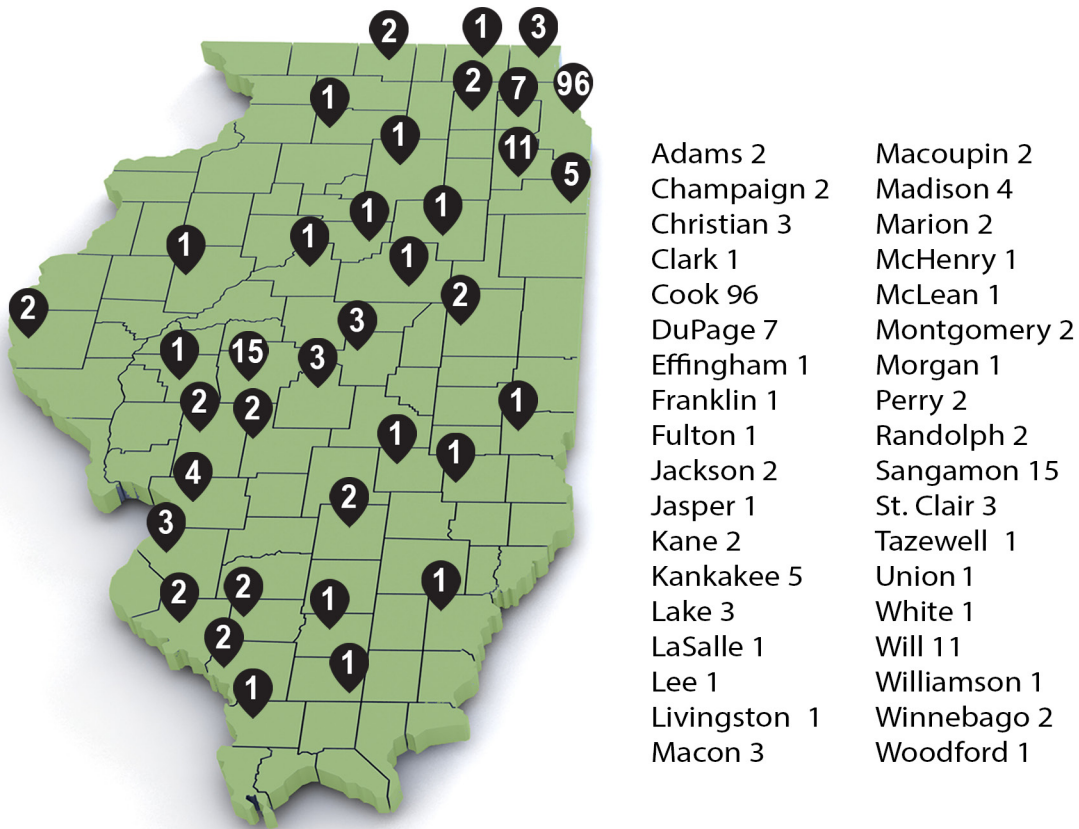
Concluded Investigations

Once an investigation is opened, the OEIG determines the appropriate means of investigation, which generally includes, for example, interviewing witnesses, obtaining and analyzing relevant documents through document requests and subpoenas, performing electronic forensic analysis, and/or conducting surveillance.

The OEIG
completed **228**
investigations
in FY2025.

The length of time required for an investigation depends on factors such as the nature of the allegations, the number of interviews to be conducted, the volume and complexity of records that must be obtained and analyzed, and the OEIG's staffing levels.

These investigations involved employees from all over the State, as generally depicted below, by county.



At the conclusion of an investigation, if the OEIG determines there is reasonable cause to believe that a violation of law or policy has occurred, it writes a founded summary report.

These reports document the following information:

In FY2025, the
OEIG issued
96 founded
summary reports.

- the allegations of wrongdoing;
- facts confirmed by the investigation;
- an analysis of the facts in comparison to the applicable law, rule, or policy;
- findings and recommendations; and
- any other information the OEIG deems relevant to the investigation or resulting recommendations.

In accordance with State law, the OEIG provides founded reports to the head of each agency affected by or involved with the investigation and the appropriate ultimate jurisdictional authority (UJA).

Publicly Disclosed Founded Reports

During FY2025, the EEC published a total of **153** OEIG founded reports.

Under the Ethics Act, within 30 days after receiving the initial agency response to a founded report, the OEIG must forward a copy of the report and agency response to the Executive Ethics Commission (EEC) unless the OEIG believes a complaint should be filed alleging a violation of the Ethics Act, as discussed below. The EEC reviews OEIG founded reports and determines whether each report will be published. The Ethics Act requires the publication of founded reports if a report resulted in a suspension of three or more days or termination of employment. The EEC can exercise its discretion to decide whether additional founded reports will be made public.

| Summary of Published Reports | | |
|------------------------------|--|---|
| Case No. | Agency | Nature of Violation |
| 24-00353 | Commerce and Economic Opportunity, Department of | Conflicts of Interest |
| 20-01425 | Human Services, Department of | Conflicts of Interest |
| 22-03077 | Children and Family Services, Department of | Misconduct Involving Secondary Employment |
| 22-00944 | Human Services, Department of | Misconduct Involving Secondary Employment |
| 23-02793 | Human Services, Department of | Misconduct Involving Secondary Employment |
| 21-00883 | Human Services, Department of | Misconduct Involving Secondary Employment |
| 22-02932 | Innovation & Technology, Department of | Prohibited Political Activity |
| 23-01321 | Environmental Protection Agency | Sexual Harassment |
| 24-02234 | Natural Resources, Department of | Sexual Harassment |
| 23-02054 | Illinois State Fire Marshal, Office of | Mismanagement |
| 23-02902 | Human Services, Department of | Mismanagement |
| 22-00077 A | Corrections, Department of | Document Falsification |
| 22-01400 | Mathematics and Science Academy | Revolving Door |
| 24-01140 | Chicago Transit Authority | Mismanagement |
| 19-02470 | Chicago Transit Authority | Hiring Improprieties |
| 138 Reports | Multiple Agencies | Improper PPP Loans |

Summaries of Published Founded Reports

Below are summaries of founded reports published in FY2025 related to the General Investigations Division. The redacted reports, in their entirety, can be found on the OEIG website: oeig.illinois.gov.

Conflicts of Interest

OEIG CASE NO. 24-00353

The OEIG investigated allegations that the Deputy Director of the Illinois Department of Commerce and Economic Opportunity (DCEO) Office of Tourism steered DCEO business to a company with which he had a personal connection, and that the company overbilled on its State contracts.

The Deputy Director began working at DCEO after being the owner and Chief Executive Officer of a communications agency (which was a DCEO vendor). The OEIG's investigation showed that when the Deputy Director was hired, he did not reveal to DCEO he was still being paid by the vendor and DCEO made only a cursory inquiry about his previous ownership of the company. After the Deputy Director started working at DCEO, he continued to receive earnout payments from his sale of the company and was actively involved in negotiations of the earnout amount. During the fiscal year after the Deputy Director began working at DCEO, he was involved in decisions to award work to the vendor, and there was an increase in the State's payments to the vendor under a contract directly with DCEO, and an increase in the vendor's billing for subcontracted work for the State.

In addition to the increase in State funds going to the vendor, a review of DCEO records showed that DCEO paid significant amounts of money to the vendor for years without supporting documentation or reconciliation of the expenses. Despite a requirement in the contract for the company to submit reconciliation reports, the evidence showed that it had not submitted any reconciliation reports since at least FY2021.

Furthermore, the investigation revealed that the vendor regularly paid for travel expenses even though this was not specified in the vendor's contract. At least some of the expenses raised red flags under the State travel rules, such as business or first-class flights and alcoholic beverages, and there was no advance written approval for the payments by the Executive Director of the EEC, as required by Executive Order 15-09.

“This lack of transparency and accountability is no way to ensure that the State funds paid to [the vendor] were appropriate, and is all the more disconcerting when the person in charge of overseeing such payments has personal and/or financial interests.”

As a result of the investigation, the Deputy Director was discharged and another DCEO employee's contract was terminated. In addition, DCEO reported that it was conducting an audit of the vendor's billings and reconciliations, and implementing new or updated policies and procedures for conflicts of interest, vendor billing, and travel expenses. The Office of the Governor also directed the Governor's Office of Management and Budget to develop training for agency fiscal offices relating to necessary documentation and reconciliation for vendor payments.

OEIG CASE NO. 20-01425

The OEIG received a complaint alleging that an Illinois Department of Human Services (DHS) Bureau of Civil Affairs (BCA) investigator had a conflict of interest when she investigated an internal harassment complaint submitted by an investigator with the DHS Office of Inspector General (DHS OIG).

The OEIG's investigation revealed evidence, such as phone records and interviews, that established a personal relationship between the two DHS investigators. Despite this, when the BCA investigator was assigned to the DHS OIG investigator's internal complaint, she accepted the assignment and did not disclose her potential conflict.

In addition, during their OEIG interviews, both DHS investigators made false statements and intentional omissions. For example, both denied speaking with each other on the phone outside of work, but their personal phone records showed that they called each other on daily or near-daily bases, including early in the morning and late at night. In addition, the DHS OIG investigator told the OEIG that no one assisted her in completing the internal complaint and filing it, and the BCA investigator said she did not provide any guidance to the other investigator about what to put in the complaint, but their emails showed that the DHS OIG investigator asked the BCA investigator to read a draft narrative of her allegations, and then the DHS OIG investigator subsequently submitted a significantly revised version of the narrative. Finally, phone records showed that the BCA investigator received a five-hour call from the DHS OIG investigator minutes after the OEIG finished interviewing the DHS OIG investigator, but the BCA investigator did not mention the call in her own OEIG interview when she was asked if she had contact with the other investigator.

Based on the evidence, the OEIG concluded that the BCA investigator failed to take appropriate action to disclose her conflict of interest before investigating the internal complaint, and that both investigators failed to cooperate with the OEIG's investigation. In response to this report, DHS discharged both employees and implemented new conflict of interest policies.

"As DHS investigators, . . . both hold positions of public trust, and the public they serve relies upon them to do their jobs with integrity. . . [A]n investigator's credibility is essential to being able to fully conduct their work with any reliability."

Misconduct Involving Secondary Employment

OEIG CASE NO. 22-03077

The OEIG received a complaint alleging that an Illinois Department of Children and Family Services (DCFS) Senior Regional Counsel improperly performed secondary employment at a bank on State time.



The OEIG reviewed timekeeping and payroll records, which revealed that for the first 12 weeks that the Senior Regional Counsel worked full-time for DCFS, she worked almost as many or more hours for the bank, including reporting 86 hours for the bank and 82.5 hours for DCFS in the same two-week period. Moreover, a review of phone records showed that the Senior Regional Counsel sent approximately 59 text messages over a seven-month period to a bank employee about bank matters during her DCFS work hours, including messages in which she described conducting bank work. Additionally, during her first two and one-half months of DCFS employment, 48 emails were sent from the Senior Regional Counsel's bank email account during her reported DCFS work hours.

In interviews with the OEIG, three bank employees said the Senior Regional Counsel trained a bank employee at the bank during timeframes after she began working for DCFS, and one of those bank employees said most of the Senior Regional Counsel's days were spent working on bank business. Another bank employee said that while the Senior Regional Counsel tried to limit her bank work to her DCFS lunches and breaks, maybe once or twice per week bank employees asked her questions for about 15 to 30 minutes at times that he believed were outside of her lunch or breaks.

The OEIG concluded that the Senior Regional Counsel permitted her secondary employment to interfere with her official DCFS duties; failed to take appropriate action to identify, disclose, and/or avoid the potential conflict of interest with her DCFS duties; and failed to refrain from conduct which could adversely affect the confidence of the public in the integrity of DCFS. In response to the OEIG's report, DCFS discharged the Senior Regional Counsel.

OEIG CASE NO. 22-00944

The OEIG investigated allegations that two DHS employees were conducting activities for a nonprofit organization that received State grant funds during DHS work hours. In its investigation, the OEIG reviewed grant documents, correspondence, timekeeping records, and personal and State phone records, and conducted interviews with relevant personnel. The

investigation revealed that both DHS employees engaged in secondary employment with the nonprofit organization on State time.

The investigation further revealed that one of the employees (an Internal Security Investigator) engaged in activities related to a separate cannabis business on State time, and that the other employee (a Social Services Program Planner) made excessive personal phone use during work hours. As such, the OEIG concluded, among other things, that both employees violated DHS policy, and the State of Illinois Code of Personal Conduct, by engaging in outside employment while on State time.

The Internal Security Investigator resigned from DHS after his OEIG interview; thus, the OEIG recommended that DHS retain a copy of its report in the event that employee sought future State employment. The OEIG recommended that DHS take appropriate disciplinary action against the Social Services Program Planner. In response, DHS reported that it had initiated disciplinary proceedings against the Social Services Program Planner, after which she resigned, and that it placed a copy of the OEIG's report in the Internal Security Investigator's personnel file.

In addition, because the OEIG identified concerns with oversight of the multiple grants issued to the nonprofit, which were administered by Illinois Criminal Justice Information Authority (ICJIA), the OEIG also made recommendations to ICJIA, specifically, that it improve grant oversight for grantees with multiple grant awards, and ensure that the nonprofit discussed in this report appropriately accounts for its use of grant funds before awarding it any further grants. In response, ICJIA reported that it had initiated a forensic audit of the nonprofit entity and was in the process of adopting grant management software and other monitoring steps to identify duplicative costs between multiple grants.

OEIG CASE NO. 23-02793

The OEIG received a complaint alleging that a DHS Local Office Administrator (LOA) was abusing State time by engaging in secondary employment based on his work managing a restaurant during State time.

During the investigation, the OEIG reviewed the LOA's State phone records, which showed that during a four-month period, the LOA's State phone was in the same location where he owned and managed a restaurant business and catering business on eight workdays at times before and/or after his permissible DHS lunch break. Further, the LOA's State phone made or received calls from locations other than his DHS facility on seven additional workdays during the same period, and his

“[Social Services Program Planner] took advantage of her ability to work remotely for DHS, sometimes performing her outside work directly from [the nonprofit organization’s] offices during remote DHS work hours. In addition, [Social Services Program Planner] admitted to hours of personal phone calls on top of the secondary employment, the sheer volume of which exceeded any permissible or reasonable use.”

personal phone records showed that he frequently used his personal cell phone for non-work calls during his State work hours while at the DHS facility.

The investigation also established that the LOA used DHS resources, including at a minimum, the email system, but also DHS personnel, computers, and printers, to conduct his restaurant business. Further, records revealed that the LOA failed to properly report his restaurant secondary employment for over one year and that when he did report it, he was dishonest about the hours to be worked, claiming to only work weekday evenings and weekends, which led his supervisor to conclude that there was no conflict with his DHS duties.

Based on the investigation, the OEIG concluded that the LOA violated the State of Illinois Code of Personal Conduct and DHS policy.

In responding to the OEIG's report, DHS agreed with the findings and initiated the disciplinary process; however, the LOA resigned from DHS before any discipline could be implemented.

OEIG CASE NO. 21-00883

The OEIG received an anonymous complaint alleging that a DHS Office Manager was working as a realtor showing houses during State time.



During her OEIG interview, the Office Manager admitted she had two businesses and was actively engaged in real estate work; nevertheless, DHS records revealed that she reported to DHS that she did not have secondary employment. The Office Manager further admitted that she received calls related to her real estate work during her DHS work hours, sent emails related to her real estate work to and from her DHS email, and used a State printer to print something related to her real estate work. The OEIG also discovered that the Office Manager frequently used her personal cell phone for personal calls during her State work hours, averaging approximately 21% of her State workdays (excluding lunch and break times) during the sample period spent on personal calls.

Because the Office Manager resigned from DHS after her OEIG interview, the OEIG recommended that DHS place this report in her personnel file and not rehire her. In response, DHS indicated that it agreed with the findings, put the report in the Office Manager's personnel file, and coded her as being ineligible for rehire.

Prohibited Political Activity

OEIG CASE NO. 22-02932

The OEIG received a complaint alleging that an Illinois Department of Innovation and Technology (DoIT) Public Service Administrator (PSA) had, while previously employed at the Illinois Department of Healthcare and Family Services (HFS), campaigned for an elected position while on State time and using State resources in violation of the Ethics Act.

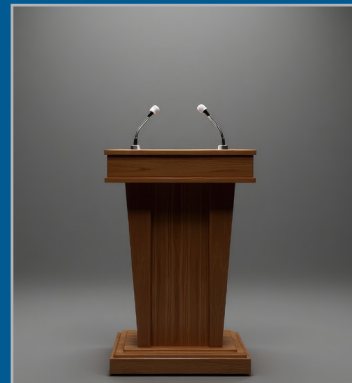
Interviews conducted during the investigation revealed that the PSA solicited and accepted a donation for his campaign from a coworker in his State office. The PSA's personal phone records also showed that he made or received 102 phone calls with his campaign manager, campaign treasurer, and other political contacts during State time in 2022, a year in which he was running for elective office. In his OEIG interview, the PSA eventually acknowledged that at least some of the calls made on State time may have been campaign related. Interviews of several of the PSA's coworkers also revealed that he discussed his campaign in the office, during State time, on several occasions.

The investigation also revealed that the employee remained politically active after transferring to DoIT, as an appointed and then elected local official, and that he worked remotely at least some of the time, compounding the risk of continued prohibited political activity in violation of the Ethics Act. As such, the OEIG recommended that DoIT take whatever action it deemed necessary with respect to the PSA to ensure that any future political activity he undertook remained separate from his State employment. In response, DoIT issued the PSA a reprimand, and directed him to complete ethics training and to submit requests for outside employment for all current and future elected or appointed positions.

Sexual Harassment

OEIG CASE NO. 23-01321

The OEIG first received a complaint alleging that a former Illinois Environmental Protection Agency (IEPA) Office Coordinator made unwanted advances toward an IEPA intern. The OEIG subsequently received three additional complaints alleging that the Office Coordinator gave unwanted compliments and made inappropriate comments to coworkers, sent repeated late-night emails to a coworker requesting to "hang out," and drank or stored alcohol at work.



“The evidence showed that [the Site Supervisor’s] conduct . . . was inappropriate on multiple occasions.”

During the investigation, the OEIG interviewed the intern and reviewed IEPA records regarding the incident, as well as records of prior investigations conducted by IEPA into allegations of inappropriate conduct between the Office Coordinator and other employees, including one where IEPA concluded the Office Coordinator violated sexual harassment policies and suspended him for the behavior. The OEIG also interviewed the Office Coordinator, who, while admitting to some of the conduct with the intern and other employees, also made it clear that he did not understand why such conduct was problematic, even though he had also been previously disciplined for similar conduct.

The OEIG’s investigation confirmed that, upon learning of the Office Coordinator’s unwanted communication with the intern, IEPA immediately separated the Office Coordinator and intern from working with one other, and started an investigation; shortly thereafter, the Office Coordinator resigned. The OEIG concluded that the Office Coordinator violated the State of Illinois Code of Personal Conduct and IEPA policy when he communicated in a sexual nature with an intern at work, which would reflect poorly upon IEPA and the State, and demonstrated a lack of integrity.

Because the Office Coordinator resigned when IEPA was initially investigating his conduct, the OEIG recommended that IEPA place the report in his personnel file and not rehire him for State service. In response, IEPA indicated that it agreed with the OEIG’s findings and would place the report in his personnel file and take measures to ensure he is not rehired with the State.

OEIG CASE NO. 24-02234

The OEIG received a complaint alleging that an Illinois Department of Natural Resources (DNR) Site Supervisor spoke in a sexually suggestive manner to a coworker and touched her inappropriately.

Based on various interviews and a review of message screenshots, the OEIG’s investigation revealed that on one occasion, the Site Supervisor put his hand on the coworker’s shoulder or arm and described a dream to her in which her breast touched his shoulder. On another occasion, the Site Supervisor sent the coworker a message describing a dream in which he touched her. The Site Supervisor also commented on the coworker’s appearance on other occasions. The coworker said this conduct made her uncomfortable at work.

The OEIG concluded that the Site Supervisor engaged in conduct unbecoming of a DNR employee, in violation of DNR policy and the State of Illinois Code of Personal Conduct. The OEIG recommended that DNR

take disciplinary action against the Site Supervisor and provide him with additional training regarding harassment.

In response to this report, DNR suspended the Site Supervisor for 15 days without pay, and indicated that it was identifying an anti-harassment training course for him.

Mismanagement

OEIG CASE NO. 23-02054

The OEIG received a complaint alleging that a manager and “senior staff” members in a division at the Illinois Office of the State Fire Marshal (OSFM) consumed alcohol while earning overtime to attend after-hours events at conferences, including at the Illinois Society of Fire Service Instructors (Fire Instructors) conference.

A review of timekeeping records and interviews conducted during the OEIG investigation revealed that seven OSFM employees received overtime for attending events held in the evening at the 2023 Fire Instructors conference, that included cash bars, a casino night, a karaoke event, and a dinner, and this overtime was approved by a Division Manager and the Bureau Chief of Operations. Additionally, 10 part-time employees were also paid for their time during the evening/social events. Alcohol was available during the evening conference events, and despite an OSFM policy prohibiting the consumption of alcohol on State time, at least some of the staff, including the Division Manager, consumed alcohol while they were on State time.

The OEIG investigation revealed that the OSFM division staff attended about 10 conferences each year, and most of those conferences had alcohol. Additionally, it appeared that no guidance was provided to staff that the consumption of alcohol on State time is prohibited, until after the OEIG investigation brought this issue to OSFM's attention. As such, the OEIG concluded that OSFM engaged in mismanagement by permitting employees to attend social events and consume alcohol on State time.

The OEIG recommended that OSFM ensure future guidance for events be considered and distributed to the entire agency. The OEIG further recommended that OSFM not pay any staff members for attending conference social events unless there was a clear work duty that altered the regular attendance status at the social event, such as an employee specifically working at a vendor booth. Finally, the OEIG recommended that the duty and timing of this role be scheduled ahead of the conference, and it be made clear that the employee remains on State time during this shift with all State policies applicable.

“While discussions of work-related issues undoubtedly arise at evening social events after a conference day, this alone does not equate to work hours especially when alcohol is being served, and games and social events taking place. Furthermore, there is no way to ensure employees are actually “working” during these social events and not drinking alcohol, which gives a strong appearance of time abuse.”

In response, the OSFM agreed to implement all the OEIG's recommendations and indicated steps had already been taken to do so, including issuing a new agency wide alcohol-free workplace directive emphasizing that alcohol is prohibited while conducting State duties and a revised agency wide procedure for overtime at conference social events.

OEIG CASE NO. 23-02902

The OEIG investigated allegations that DHS employees were improperly soliciting donations from other employees for a Christmas basket drawing (Christmas Basket Event) at a DHS developmental center (Center). The complaint further alleged that the Christmas Basket Event included alcohol as a prize, in violation of DHS rules and standards that set a "zero tolerance" approach prohibiting alcohol and drugs on the premises.

During its investigation, the OEIG interviewed the Center Director, who explained that she formed a committee to organize donation drives to fund activities that would benefit morale at the Center. During her OEIG interview, the Center Director confirmed there was a Christmas Basket Event where employees could donate money for chances to win various "Christmas Baskets" donated by staff, including one that included several bottles of wine.

Over the course of the investigation, the OEIG also learned that the committee, in less than a year of operations, had a balance of \$2,512.69, which it kept in cash on premises at the Center, and had no bylaws governing the use of these funds.

Although many Center employees were involved in running and organizing the Christmas Basket Event, the OEIG ultimately concluded that the Center Director engaged in mismanagement by approving the Christmas Basket Event in violation of the Raffle Act, 230 ILCS 15/, and by allowing alcohol on the premises in violation of DHS's "zero tolerance" policy toward alcohol and drugs.

The OEIG recommended that DHS take whatever action it deemed appropriate with respect to the Center Director, and to ensure its employees are aware of the requirements of the Raffle Act. The OEIG also recommended that the Center implement more formalized policies for cash collected by the committee to reduce the risk of misuse, theft, or other malfeasance. In response, DHS counseled the Center Director, updated its policies to specifically forbid raffles, and abolished the committee and deposited its funds into a Special Funds account, established to benefit Center residents.



Document Falsification

OEIG CASE NO. 22-00077 A

In this investigation, the OEIG examined whether an Illinois Department of Corrections (DOC) Stationary Fireman submitted false information on his job application for the Stationary Fireman position. The OEIG reviewed the Stationary Fireman's application, on which he listed that he had experience operating boilers at two companies. The OEIG reviewed the two previous job applications submitted by the Stationary Fireman for his prior State employment as a Correctional Officer Trainee and Correctional Locksmith. Both applications described his work at one company as assembly line work and his work at the second company as carpentry; neither application listed experience operating boilers. The OEIG also interviewed representatives from the two companies, who confirmed that their companies did not operate boilers on their premises during the Stationary Fireman's terms of employment. In his interview with the OEIG, the Stationary Fireman admitted it was possible that he did not have the two years of boiler operation experience required to be a Stationary Fireman.

The OEIG concluded that the Stationary Fireman knowingly provided false information and made misrepresentations about his work experience on State employment documents, in violation of DOC policy and the State of Illinois Code of Personal Conduct, and recommended that he be disciplined up to and including discharge. In response, DOC terminated the Stationary Fireman; the Illinois Department of Central Management Services (CMS) denied the grievance challenging the termination.



Revolving Door

OEIG CASE NO. 22-01400

The OEIG self-initiated this complaint after learning of a potential violation of the revolving door provision of the Ethics Act by a former Illinois Mathematics and Science Academy (IMSA) Chief Legal Officer/Chief Equity Officer when she failed to notify the OEIG prior to accepting a job offer with a non-State employer. The OEIG investigation revealed that the Chief Legal Officer was on the "c-list," which is a list of State employees who, by nature of their duties, may participate personally and substantially in the awarding or fiscal administration of contracts or in regulatory or licensing decisions. Per the Ethics Act, employees on the c-list must notify the OEIG

of any job offers prior to accepting such offer. The investigation showed that the Chief Legal Officer had been offered a position with a not-for-profit foundation in October 2021, resigned from IMSA in November 2021, and began employment with the foundation in January 2022. At no point did the Chief Legal Officer make the required revolving door notification to the OEIG, which would have allowed the OEIG to make the required determination of whether her acceptance of the new position would violate the Ethics Act.

Additionally, the OEIG obtained emails from the Chief Legal Officer's IMSA account in the months leading up to her resignation which reflected her opinion that IMSA's senior leadership team (which included her) should be on the c-list. The emails also contained a message to the senior leadership group in September 2021 that confirmed her c-list designation and information on the revolving door notification requirements.

The OEIG concluded that the Chief Legal Officer violated the notification requirement of the Ethics Act revolving door prohibition. As such, the OEIG recommended that IMSA place the report in her personnel file. In response, IMSA placed the report in her personnel file, along with a formal written warning.

PPP Loan Fraud

During FY2025, the OEIG continued to investigate State of Illinois employees who were alleged to have improperly obtained federal Paycheck Protection Program (PPP) loans and determined that there was reasonable cause to believe that many of these employees violated the State of Illinois Code of Personal Conduct and/or agency policy by obtaining PPP loans based on falsified information. Depending on each agency's policies, the OEIG often concluded that many of the employees also failed to report their outside business to the agency.

As of the close of FY2025, the OEIG has completed a combined total of **501** PPP investigations, with **378** resulting in founded reports.

If employees were still employed by the State at the time reports were issued, the OEIG recommended their termination from State employment. In response to these reports, the agencies pursued discipline. Many employees resigned in lieu of termination; for those who did not resign, they have either been terminated or the disciplinary actions are still ongoing. To-date, the Civil Service Commission (CSC) has upheld all appeals brought to them on the basis of a PPP investigation by the OEIG.

In addition, the Illinois Attorney General's Office has criminally prosecuted a number of individuals for their fraudulent receipt of PPP loans based on OEIG referrals. Some of these individuals have since pled guilty, and generally received probation, community service, and/or agreed to pay restitution in the full amount of the loans that were improperly received. Press releases related to many of these decisions can be found on the Attorney General's website: illinoisattorneygeneral.gov/News-Room/

In FY2025, **138** of the PPP-related founded reports were made public by the EEC.

The following chart contains information about the subjects of these PPP-related reports for State employees of agencies under the Governor. The full reports are available on the OEIG's website: oeig.illinois.gov.

| Case No. | Agency | State Job Title | Total PPP Loan Amount |
|----------|------------|--|-----------------------|
| 22-00015 | HFS | Human Services Caseworker | \$20,833 |
| 22-02069 | DPH | Health Facilities Surveillance Nurse | \$20,833 |
| 22-02070 | DPH | Management System Specialist | \$20,832 |
| 22-02164 | DNR | Volunteer Service Coordinator II | \$20,833 |
| 22-02522 | HFS | Child Support Specialist | \$40,448 |
| 22-02593 | HFS | Office Administrator IV | \$20,415 |
| 22-02602 | HFS | Executive II | \$20,416 |
| 22-02903 | DCFS | Child Protection Specialist | \$27,980 |
| 22-03134 | DCFS | Child Protection Specialist | \$22,795 |
| 22-03136 | DHS / DCFS | Recovery Support Specialist / Child Welfare Specialist | \$20,562 |

| Case No. | Agency | State Job Title | Total PPP Loan Amount |
|----------|------------|---|-----------------------|
| 22-03139 | DCFS | Child Protection Specialist | \$20,415 |
| 22-03140 | DCFS | Child Protection Investigation Team Supervisor | \$20,750 |
| 22-03142 | DCFS | Office Associate II | \$20,833 |
| 22-03143 | DCFS | Administrative Assistant I | \$20,833 |
| 22-03144 | DCFS | Child Protection Specialist | \$20,105 |
| 22-03145 | DJJ / DCFS | Juvenile Justice Specialist / Child Protection Investigator | \$20,645 |
| 22-03146 | DCFS | Child Protection Specialist | \$20,207 |
| 22-03148 | DCFS | Child Welfare Specialist | \$20,833 |
| 22-03149 | DCFS | Office Associate | \$20,415 |
| 22-03154 | DCFS | Child Protection Specialist | \$20,661 |
| 22-03167 | DCFS | Child Welfare Advanced Specialist | \$20,832 |
| 23-00051 | DHS | Licensed Practical Nurse II | \$20,072 |
| 23-00058 | DHS | Mental Health Technician I | \$41,666 |
| 23-00065 | DHS | Mental Health Technician II | \$20,833 |
| 23-00069 | DHS | Mental Health Technician II | \$20,832 |
| 23-00071 | DHS | Residential Services Supervisor | \$35,780 |
| 23-00075 | DHS | Security Officer | \$20,832 |
| 23-00078 | DHS | Residential Services Supervisor | \$20,832 |
| 23-00081 | DHS | Mental Health Technician II | \$20,832 |
| 23-00082 | DHS | Mental Health Technician II | \$41,230 |
| 23-00084 | DHS | Mental Health Technician III | \$20,833 |
| 23-00086 | DHS | Mental Health Technician I | \$20,832 |
| 23-00087 | DHS | Mental Health Technician II | \$20,832 |
| 23-00090 | DHS | Mental Health Technician II | \$31,879 |
| 23-00094 | DHS | Mental Health Technician II | \$20,832 |
| 23-00095 | DHS | Mental Health Technician II | \$20,832 |
| 23-00100 | DHS | Mental Health Technician | \$20,832.50 |
| 23-00101 | DHS | Mental Health Technician I | \$20,832 |
| 23-00102 | DHS | Mental Health Technician II | \$20,832 |
| 23-00104 | DHS | Mental Health Technician II | \$20,832.50 |
| 23-00105 | DHS | Residential Services Supervisor | \$20,832 |
| 23-00111 | DHS | Mental Health Technician | \$20,037 |
| 23-00114 | DHS | Mental Health Technician II | \$41,666 |
| 23-00115 | DHS | Mental Health Technician I | \$20,833 |
| 23-00117 | DHS | Mental Health Technician II | \$37,915 |
| 23-00118 | DHS | Residential Services Supervisor | \$20,415 |
| 23-00120 | DHS | Mental Health Technician I | \$20,832 |
| 23-00121 | DHS | Registered Nurse I | \$20,833 |
| 23-00122 | DHS | Mental Health Technician II | \$20,666 |

| Case No. | Agency | State Job Title | Total PPP Loan Amount |
|----------|--------|--------------------------------------|-----------------------|
| 23-00123 | DHS | Mental Health Technician | \$20,057 |
| 23-00124 | DHS | Mental Health Technician I | \$20,833 |
| 23-00129 | DHS | Habilitation Program Coordinator | \$20,000 |
| 23-00131 | DHS | Mental Health Technician III | \$20,832 |
| 23-00142 | DHS | Mental Health Technician II | \$20,832 |
| 23-00145 | DHS | Mental Health Technician | \$20,832 |
| 23-00146 | DHS | Mental Health Technician | \$21,338 |
| 23-00149 | DHS | Mental Health Technician | \$38,592 |
| 23-00151 | DHS | Mental Health Technician I | \$20,833 |
| 23-00153 | DHS | Mental Health Technician II | \$20,833 |
| 23-00156 | DHS | Mental Health Technician II | \$20,833 |
| 23-00159 | DHS | Mental Health Technician I | \$20,832 |
| 23-00161 | DHS | Mental Health Technician II | \$20,833 |
| 23-00261 | DHS | Mental Health Technician I | \$20,833 |
| 23-00263 | DHS | Mental Health Technician II | \$20,832 |
| 23-00268 | DHS | Mental Health Technician III | \$20,832 |
| 23-00271 | DHS | Administrative Assistant I | \$21,126 |
| 23-00311 | DHS | Mental Health Technician | \$20,615 |
| 23-00333 | DHS | Mental Health Technician | \$20,832 |
| 23-00343 | DHS | Human Services Caseworker | \$39,748 |
| 23-00451 | DCFS | Administrative Assistant II | \$36,134 |
| 23-00452 | DCFS | Field Review Supervisor | \$20,832 |
| 23-00463 | DOC | Leisure Time Services Specialist | \$20,120 |
| 23-00466 | DHS | Mental Health Technician II | \$20,832 |
| 23-00467 | DOC | Corrections Residence Counselor | \$20,832 |
| 23-00468 | DHS | Mental Health Technician II | \$20,477 |
| 23-00471 | DHS | Human Services Caseworker | \$20,833 |
| 23-00476 | DHS | Security Therapy Aide | \$20,833 |
| 23-00483 | DHS | Mental Health Technician IV | \$20,000 |
| 23-00485 | DHS | Human Services Caseworker | \$20,832 |
| 23-00497 | DHS | Human Services Caseworker | \$20,832 |
| 23-00499 | DHS | Mental Health Technician II | \$20,833 |
| 23-00515 | DHS | Assistant Local Office Administrator | \$20,735 |
| 23-00516 | DHS | Human Services Caseworker | \$20,000 |
| 23-00517 | DHS | Office Associate | \$37,120 |
| 23-00520 | DHS | Mental Health Technician | \$20,833 |
| 23-00522 | DHS | Office Clerk | \$20,833 |
| 23-00528 | DHS | Mental Health Technician I | \$20,745 |
| 23-00531 | DHS | Residential Services Supervisor | \$20,000 |
| 23-00534 | DHS | Human Services Caseworker | \$20,832 |
| 23-00627 | DHS | Human Services Caseworker | \$20,833 |

| Case No. | Agency | State Job Title | Total PPP Loan Amount |
|-----------------|---------------|---|------------------------------|
| 23-00628 | DHS | Executive I (Financial Recovery Coordinator) | \$41,666 |
| 23-00629 | DHS | Security Therapy Aide | \$20,829 |
| 23-00630 | DHS | Human Services Casework Manager | \$20,832 |
| 23-00632 | DHS | Senior Rehabilitation Counselor | \$20,832 |
| 23-00633 | DHS | Vocational Rehabilitation Counselor | \$20,832 |
| 23-00634 | DHS | Rehabilitation Services Advisor I | \$20,833 |
| 23-00636 | DHS | Human Services Caseworker | \$40,832 |
| 23-00637 | DHS | Executive I | \$20,832 |
| 23-00638 | DHS | Mental Health Technician | \$20,822 |
| 23-00639 | DHS | Human Services Casework Manager | \$20,102.50 |
| 23-00644 | DHS | Human Services Caseworker | \$20,000 |
| 23-00646 | DHS | Maintenance Worker | \$20,800 |
| 23-00647 | DHS | Administrative Assistant II | \$20,832 |
| 23-00650 | DHS | Human Services Caseworker | \$20,833 |
| 23-01196 | DHS | Mental Health Technician III | \$20,829 |
| 23-01314 | DHS | Client Services Administrator | \$20,790 |
| 23-01572 | DJJ | Juvenile Justice Specialist | \$20,833 |
| 23-01573 | DJJ | Educator | \$20,832 |
| 23-01582 | DJJ | Juvenile Justice Supervisor | \$20,832 |
| 23-01641 | DOC | Administrative Assistant II | \$20,000 |
| 23-01823 | DOL | Wage Claim Specialist | \$20,833 |
| 23-01832 | IDMA | Building Grounds Laborer | \$20,832 |
| 23-01837 | CDB | Administrator of Quality Assurance & Accountability | \$17,915 |
| 23-01843 | IDFPR | Health Services Investigator II | \$38,990 |
| 23-01844 | IHDA | Asset Manager | \$21,832 |
| 23-01850 | ICJIA | Private Secretary | \$20,000 |
| 23-01885 | DHS | Mental Health Technician IV | \$40,832 |
| 23-01950 | DJJ / DOC | Correctional Residence Counselor | \$20,465 |
| 23-01971 | DOC | Corrections Residence Counselor I | \$20,557 |
| 23-01979 | DHS | Office Administrator III | \$18,540 |
| 23-02111 | DOC | Correctional Sergeant | \$41,664 |
| 23-02125 | IDoA | Private Secretary II | \$18,750 |
| 23-02143 | DCFS | Daycare Licensing Representative II | \$16,665 |
| 24-00513 | DHS | Support Service Coordinator I | \$20,207 |

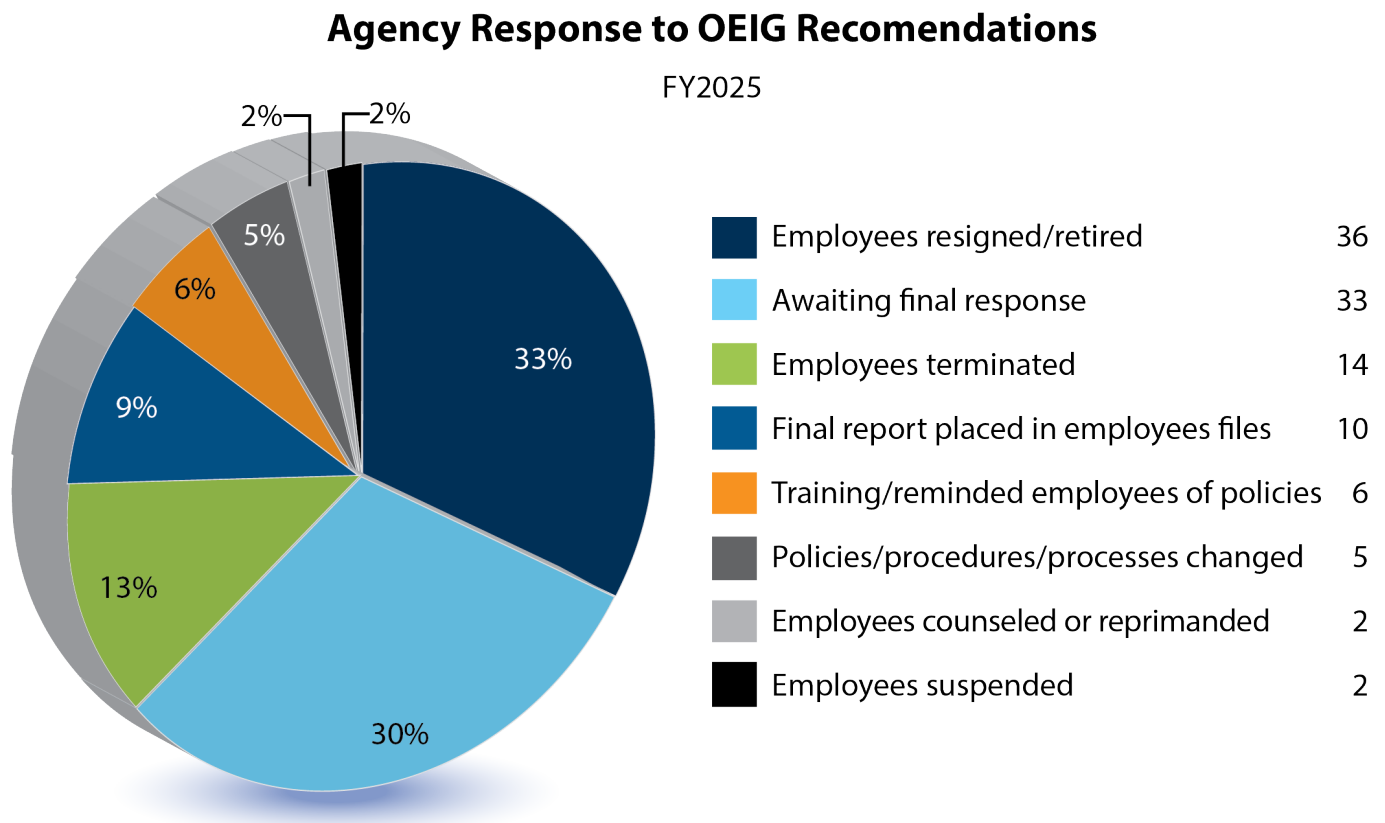
Agency Recommendations & Responses

As part of a founded report, the OEIG will issue recommendations to the affected agency. In FY2025, the OEIG's recommendations included, for example:

- terminating an employee;
- imposing other disciplinary action against an employee;
- placing a copy of the founded report in a former employee's personnel file;
- adjusting agency policies or procedures; and
- conducting appropriate training of employees.

It is the responsibility of the affected agency to take appropriate action after receiving an OEIG report and recommendations. Specifically, per the Ethics Act, within **20 days** after receiving a founded report from the OEIG, the appropriate agency head and/or UJA must respond to the OEIG about the report and describe any corrective or disciplinary actions being taken. Occasionally, the agency's final response may be delayed due to a protracted grievance or administrative review process.

The following chart displays reported agency actions taken in response to OEIG founded reports issued in FY2025.



Violations of the Ethics Act

If the OEIG conducts an investigation and determines that there is reasonable cause to believe that a violation of the Ethics Act has occurred — such as a revolving door or gift ban violation, prohibited political activity, sexual harassment, retaliation, or failure to cooperate with an OEIG investigation, the OEIG may also ask the Illinois Attorney General's Office (Attorney General) to file a complaint regarding this misconduct. After reviewing the OEIG's investigative materials, the Attorney General may file a complaint, on the OEIG's behalf, with the EEC.

If the EEC ultimately determines that a violation of the Ethics Act occurred, the EEC may impose an administrative fine or take other appropriate injunctive relief. The EEC's decision to impose a fine or injunctive relief is subject to judicial review. EEC decisions on Ethics Act complaints can be found on the OEIG website: oeig.illinois.gov. As of the close of FY2025, there were two Ethics Act cases that remained pending with the EEC based on investigations conducted by the OEIG.

In FY2025, the EEC publicly disclosed two decisions after the OEIG found reasonable cause to believe that violations of the Ethics Act revolving door provisions occurred, and the Attorney General brought complaints before the EEC on the OEIG's behalf. Below are summaries of the EEC's FY2025 decisions.

24-EEC-001

“There is no doubt that [the Director] played a critical role in guiding the State through the pandemic. However, a person's position or quality of service does not, nor should it, negate the applicability of governing rules and statutes.”

The OEIG investigated allegations that the former Director of the Illinois Department of Public Health (DPH) violated the Ethics Act revolving door provisions. As the head of DPH, and a person whose appointment was subject to the advice and consent of the Senate, the Director was classified as an “h-list” employee (pursuant to Section 5-45(h) of the Ethics Act), which meant that for one year after her departure from State employment, she was prohibited from accepting employment or compensation from an entity, if during the year immediately preceding that departure, the entity or its parent or subsidiary was a party to a State contract or contracts with a cumulative value of \$25,000 or more involving DPH, or was the subject of a regulatory or licensing decision involving DPH, regardless of whether she was personally and substantially involved in those actions.

The OEIG's investigation revealed that during the year preceding the Director's departure from State employment in March 2022, a Hospital Group was a party to at least six grant agreements involving DPH, totaling \$4.2 million. Additionally, during that same year, the Hospital Group was the subject of over 10 regulatory decisions and three licensing decisions involving DPH. In April 2022, the Director signed an employment agreement to become the president and chief executive officer of the Hospital Group, and in June 2022, the Director began working in that role and receiving compensation. The OEIG also concluded that the Director violated an executive order by negotiating for employment with the Hospital Group while she was still employed with DPH.

The OEIG, through the Illinois Attorney General, brought a complaint to the EEC alleging that the Director violated the Ethics Act when she knowingly accepted employment and received compensation from the Hospital Group. By stipulation, the Director admitted that she violated the h-list revolving door provision of the Ethics Act and agreed to pay a fine of \$150,000. The EEC granted the motion to approve the settlement agreement.

24-EEC-002

The OEIG received a complaint alleging that a former Illinois Department of Financial and Professional Regulation (IDFPR) Deputy Director for Cannabis Control may have violated the revolving door provision of the Ethics Act by accepting employment with a company he regulated shortly after leaving State employment in May 2022. The employee's State position was on the "c-list," which identifies State employees whose positions may have the authority to participate personally and substantially in regulatory decisions.

The OEIG's investigation revealed that during the year preceding his resignation from State employment, the Deputy Director had been personally and substantially involved with four inspections of cannabis dispensaries involving his future employer, which under the Ethics Act prohibited him from accepting a job with the employer for one year after leaving State employment.

The OEIG brought a complaint to the EEC through the Attorney General alleging a violation of the revolving door provision of the Ethics Act. The EEC granted the Attorney General's unopposed Motion for Summary Judgment, concluding that the Deputy Director had violated the revolving door provision by accepting employment and compensation from the employer during the year after his departure from State employment.

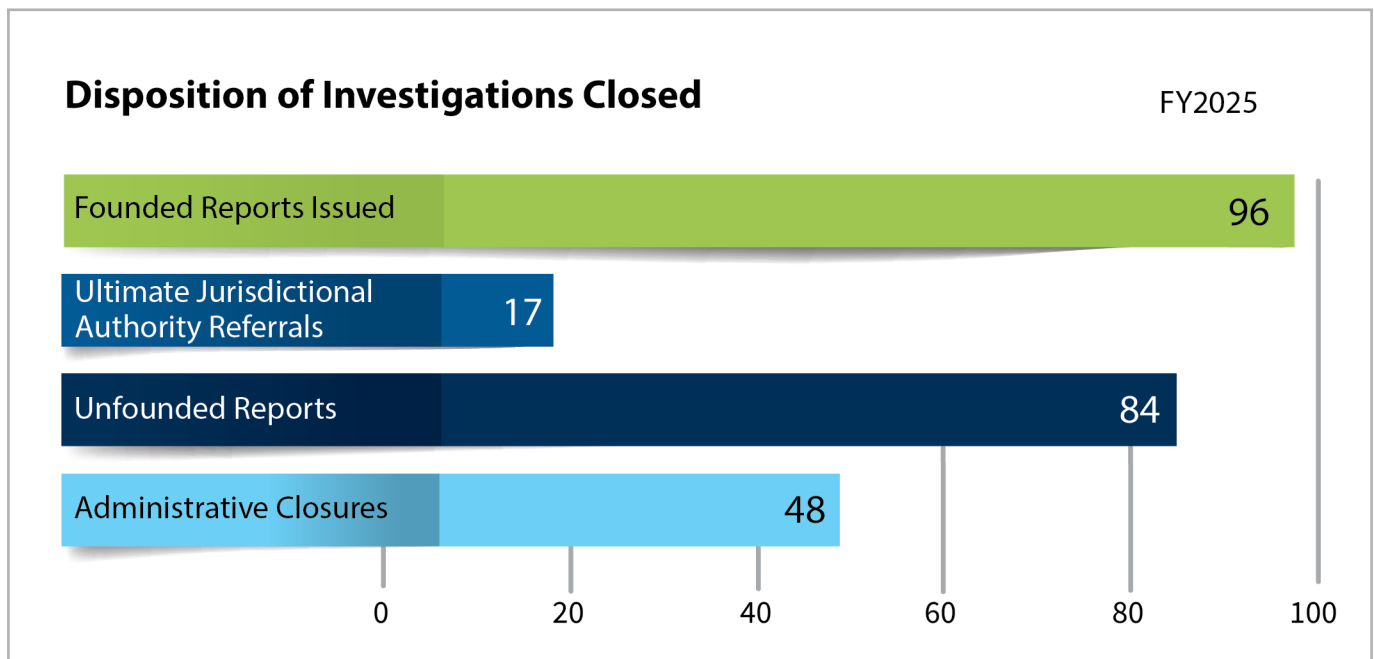
In assessing a fine amount, the EEC noted that although there was no evidence of a "premeditated quid pro quo arrangement" or of the "prospective employment affecting his regulatory decisions, the timeline of events ha[d] an appearance of impropriety" because one of the inspections occurred when the Deputy Director was negotiating the future employment. As such, after reviewing various factors, the EEC imposed a \$100,000 administrative fine on the Deputy Director.

"He supervised, reviewed, and personally approved inspection reports with material impacts upon [future employer]'s operations and potential success."

Closing OEIG Investigations without a Violation

If the OEIG determines there is insufficient evidence to reasonably believe that a violation of law or policy has occurred, it issues an unfounded report that consists of a written statement to the EEC summarizing its decision to close the matter. Alternatively, the OEIG may “administratively close” an investigation for various reasons, including, for example, when the agency has already adequately investigated and/or addressed all of the allegations, or the OEIG discovers a pending lawsuit or criminal investigation that involves the same allegations.

If after completing an investigation the OEIG does not make any findings of wrongdoing regarding an allegation, but the investigation has revealed procedural or systemic flaws that should be addressed, the OEIG may close the investigation and refer these issues to the UJA or relevant agency with recommendations to take administrative action.



Referrals to the Ultimate Jurisdictional Authority

In FY2025, there were **17** instances in which the OEIG made a UJA referral.

This is a referral at the end of an investigation that did not result in a finding of wrongdoing but the OEIG had recommendations for the agency. Fifteen of these UJA referrals were to the Governor's Office.

The following are summaries of referrals to which the OEIG requested a response from the Governor's Office:

- **OEIG Case No. 25-00031:** In this investigation, the OEIG examined allegations that a high-level manager of a State agency that administers wildlife laws killed a deer on another individual's property without permission, and that he shot the deer after legal hunting hours. The OEIG learned that before it received the allegations regarding the manager, his employing agency conducted its own investigation into the matter, and ultimately elected not to issue any citations to the manager. Although the agency articulated neutral reasons for exercising its discretion not to issue citations, and the OEIG did not uncover evidence that the matter had necessarily been dropped based on the manager's position, the agency's actions created at least the appearance of bias that could adversely affect public confidence in the agency's impartiality in enforcing wildlife laws. The OEIG recommended that the Governor's Office work with the employing agency to ensure that in instances of possible violations of the wildlife laws by an employee of that agency, the matter is immediately referred to another agency for investigation. The OEIG also recommended that the Governor's Office consider whether other action may be warranted regarding the manager, in light of his high-level position.

In response, The Governor's Office reported that the agency disseminated a policy that outlined a process for referring criminal allegations made against agency employees to an outside law enforcement agency for investigation. In addition, the Governor's Office stated that it held a meeting with the manager and the agency Director, in which the manager was reminded of the need to exercise impeccable judgement and absolute compliance with the wildlife laws.

- **OEIG Case No. 22-00326:** In this investigation, the OEIG initially examined two incidents of a hearing officer failing to conduct disciplinary hearings with respect to two employees after internal investigations were completed and referred to the hearing officer. As a result, the employees were able to evade discipline because the agency followed a practice that discipline would not be imposed if the discipline hearing was not held within a certain amount of time, based on their interpretation of an old grievance involving a union agreement provision. Through its investigation, the OEIG also discovered other incidents where a disciplinary hearing was not held by the assigned hearing officer, and thus, discipline was not imposed. The investigation revealed that the agency lacked a clear uniform process for: 1) tracking whether disciplinary hearings were held; 2) establishing deadlines for each stage of the hearing process; and 3) addressing potential conflicts of interest.

The OEIG recommended that the Governor's Office work with the agency to establish a more uniform practice for disciplinary hearings that addressed these issues and to train relevant

employees about these practices. In response, the Governor's Office reported that the agency formalized a 60-day timeline for holding disciplinary hearings, was creating a site to track disciplinary hearings and deadlines, including sending reminders about deadlines, and was updating its disciplinary hearing policies to address conflicts of interest.

- **OEIG Case No. 23-01031:** In this investigation, the OEIG examined allegations that an agency employee was improperly accepting donations as incentives to award leases of State property to a specific landlord. The OEIG's investigation revealed that while landlords often offer to donate office furniture as part of lease negotiations, agency employees were unaware of how to properly document the State's receipt of these donations (and how to inventory it upon receipt), or even whether it was at all permissible to accept these donations.

The OEIG recommended that the Governor's Office work with the agency (and others) to determine whether updates to donation and inventory policies were necessary, as well as training regarding these matters. In response, the Governor's Office reported that a standard operating procedure for accepting and documenting furniture donations was developed, and leasing staff received a memorandum regarding this new standard operating procedure.

- **OEIG Case No. 24-00750:** In this investigation, the OEIG examined allegations that an agency's employee was not working on State business while on State time. The OEIG's investigation revealed, among other things, that both supervisors and employees at the agency believed that employees were entitled to use one hour of State time to commute to work and one hour of State time to commute home from work, and if the employee's commute took less time, then the employee did not have to work during this time.

The OEIG recommended that the Governor's Office work with the agency to clarify its policy on commute time, specifically whether employees were entitled to use two hours of commuting time as time on the clock regardless of the length of their commute, and ensure staff were trained on this. In response, the Governor's Office noted that the agency confirmed that employees are not, in fact, entitled to two hours of commuting time regardless of the length of their commute, and reported that the agency committed to reminding employees about existing timekeeping policies and included this reminder in their annual training.

- **OEIG Case No. 24-00800:** In this investigation, among other things, the OEIG examined allegations that an agency's employees violated the Illinois Procurement Code by engaging in improper communications with the vendor and failing to report the communications to the Procurement Policy Board. The OEIG's investigation revealed that there was a lack of clarity with at least one employee on the Procurement Code's requirements for reporting vendor communications.

The OEIG recommended that the Governor's Office work with the agency to provide training to procurement staff on the Procurement Code's requirements surrounding the reporting of vendor communications. In response, the Governor's Office reported that the agency's ethics officer met with the employee to clarify procurement communication reporting requirements. It also reported that the agency's ethics officer and legal department provided additional training to procurement and legal staff on procurement communication reporting requirements.

REGIONAL TRANSIT BOARD INVESTIGATIONS DIVISION

In July 2011, the OEIG became the executive inspector general for the Chicago Transit Authority (CTA), Regional Transportation Authority (RTA), Metra, and Pace, which are collectively known as the Regional Transit Boards (RTBs). The OEIG's jurisdiction encompasses the employees, board members, officers, agents, and contractors of the RTBs. As of June 2025, the RTBs employed approximately 18,500 individuals.

In December 2011, the OEIG established a division specifically dedicated to investigating allegations of misconduct relating to the RTBs. The OEIG's RTB unit is funded through the Public Transportation Fund and has an authorized headcount of 13 that includes experienced investigators and attorneys.

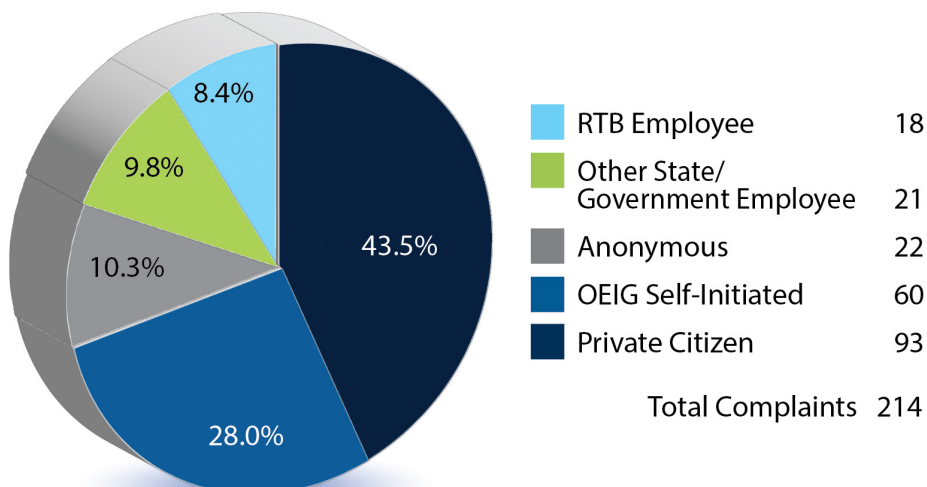
Since the OEIG assumed oversight of the RTBs, it has received a combined total of approximately **3,700** transit-related complaints, leading to 362 investigations of allegations involving procurement and hiring improprieties, conflicts of interest, misuse of agency resources, time abuse, secondary employment, and violations of agency policies, among other topics. Complaints involving customer-service issues are typically referred to the relevant RTB.

Fiscal Year 2025

As shown below, in FY2025, the OEIG received these complaints from various sources, including private citizens, RTB employees, and other State or government employees. Some complaints were filed anonymously. Of note, the OEIG only received 18 complaints combined from RTB employees, including general employees, as well as any ethics officers, legal counsel, or senior managers. The OEIG also self-initiated investigations.

RTB Complaint Origins

FY2025



In FY2025, the OEIG received **214** RTB-related complaints; opened **76** RTB-related investigations; and closed **65** RTB-related investigations.

In FY2025, the OEIG issued **50** founded summary reports and referred **2** closed investigations to the relevant UJA.

RTB Investigations FY2025 Founded Report Summaries

During FY2025, the EEC made **16** RTB-related founded reports available to the public.

Summaries of these reports are below. The full reports are available on the OEIG website: oeig.illinois.gov

Mismanagement

OEIG CASE NO. 24-01140

In response to a complaint, the OEIG investigated whether Chicago Transit Authority (CTA) Vault Operations (Vault) employees received payments for days not actually worked.

As described further below, the OEIG's investigation revealed that for five years, since the beginning of the COVID pandemic up to the issuance of the OEIG's report, the CTA paid over \$1,000,000 to Vault employees, primarily Money Handlers, to stay at home and not work at least two days a week.

The CTA Vault unit is responsible for packaging, shipping, and processing bulk currency that is obtained from CTA's fareboxes, and the Money Handler's main duty of processing fare money could only be performed at a secure facility.

The OEIG's investigation showed that in response to the COVID outbreak in March 2020, the CTA instituted a Telework Policy that allowed an employee to work from home if approved by their Department Chief and the employee signed a Telework Agreement. The policy stated that telework was an option if the employee was "able to work from home" and the manager determined it was "operationally feasible for the employee to perform the core duties of their job away from the worksite."

During its investigation, the OEIG nevertheless learned that beginning in March 2020, Vault employees, including the Money Handlers, "worked" various schedules with at least two remote days. A review of Vault employees' attendance records from May 2021 to early 2025 reflected that Vault employees worked eight hours every Monday, Wednesday, and Friday, while every Tuesday and Thursday was left blank. No Telework Agreements, existed, however, for any of the Vault employees. In this investigation the OEIG interviewed numerous witnesses, all of whom agreed that the Vault staff could not perform their CTA duties



while “working” remotely because no currency or other materials could be removed from the secure facility. In the words of one Money Handler interviewed by the OEIG, “there was nothing for us to do at home” and another described it as having Tuesdays and Thursdays off, even though they kept getting paid for those days.

In total, from March 23, 2020 to February 1, 2025, a review of timekeeping and payroll records showed that these employees were paid \$1,129,299.12 for being remote and not working, as detailed in the chart below:

| Employee | Hours Listed for Remote Work | Total Amount Paid for Remote Days |
|-------------------|------------------------------|-----------------------------------|
| [CTA Employee 10] | 5,952 | \$300,440.80 |
| [CTA Employee 8] | 4,991 | \$183,572.16 |
| [CTA Employee 11] | 4,424 | \$146,353.12 |
| [CTA Employee 12] | 3,238 | \$104,612.98 |
| [CTA Employee 13] | 2,912 | \$93,610.29 |
| [CTA Employee 14] | 2,399 | \$76,711.31 |
| [CTA Employee 7] | 2,168 | \$69,228.58 |
| [CTA Employee 9] | 2,128 | \$67,951.30 |
| [CTA Employee 15] | 1,775 | \$49,897.02 |
| [CTA Employee 16] | 1,480 | \$36,921.56 |
| Total | 31,467 | \$1,129,299.12 |

The investigation revealed that the inability of these employees to conduct work remotely was not hidden from CTA management. During their interviews with the OEIG, three levels of managers over the Vault unit admitted they were aware that no work was being conducted remotely. Attendance records properly documented no hours worked for the remote days of these employees and included a comment, written by the unit manager stating “Reduction in workforce” and noting the specific days the Money Handlers processed bills and coins.

Even when there was an agency-wide Return to Office date in May 2022, the CTA continued to pay the Vault employees for “remote” work. In fact, in January 2023, the Money Handlers’ three-day work week was increased to four days. However, after three weeks of requiring four days in the office—and being paid for five—there was a management decision to revert them back to only three days in the office. One manager interviewed by the OEIG explained that after Vault employees complained about the four-day work week, “nobody wanted to deal with it.” The Vault employees’ attendance records confirmed this unexplained return to a three-day work week while

“The failure of CTA management to appropriately address this issue amounts to mismanagement causing significant waste of CTA resources and funds.”

being paid for five days then continued for another two years. The amount paid for the remote days from May 9, 2022 to February 1, 2025 was \$303,932.13.

The OEIG concluded that CTA did not follow its own remote work policies and, more significantly, paid these employees for not working for five years, and that the failure of CTA management to appropriately address this issue amounted to mismanagement causing significant waste of CTA resources and funds.

Ultimately, the OEIG recommended that the retired managers responsible for the mismanagement not be rehired and that CTA determine whether any other employees in CTA management were aware of employees being paid for no work and take any appropriate disciplinary action. In addition, the OEIG recommended that the CTA review its teleworking policies and practices to ensure that: there were no other employees being paid to stay home when their duties could not be performed remotely; remote employees understood their duties when working remotely; and CTA require employee agreements acknowledging such understanding.

In its response to the report, CTA stated that it concluded that no other CTA manager was reasonably aware of employees being paid for no work, confirmed that the only employees who were teleworking now were doing so in accordance with CTA’s policies and procedures and had appropriate telework agreements, and accepted all of the OEIG’s recommendations relating to CTA’s telework policy and practices.

Hiring Improprieties

OEIG CASE NO. 19-02470

The OEIG investigated the hires of two relations of an Illinois State Senator by the Chicago Transit Authority (CTA) for positions within the Legislative Affairs & Government and Community Relations (Legislative Affairs) Department at a time when that department regularly worked with the Senator, who was Chairman of the Senate Transportation Committee.

During the investigation, the OEIG learned that the CTA’s standard hiring processes were not followed during the hire of either individual. Instead, the investigation showed that a now-former CTA Vice President steered the hiring of one of the Senator’s relations, including by selecting that person for an interview even though she had previously been deemed unqualified by Human Resources, and meeting with her before the

interview to discuss the position's requirements and expectations despite not doing this for others, all while the Vice President and other CTA officials were meeting and communicating with the Senator in efforts to gain support for significant legislation and funding for the CTA.

Similarly, the investigation revealed that the Senator's other relation was hired for an internship in the Legislative Affairs Department after numerous deviations from the CTA's standard internship hiring process. For example, documents and emails showed that the department's Internship Proposal was specifically tailored to the relation and named her as the intended intern despite the fact that she had not yet applied for an internship and the department had not yet been approved to have an intern; this relation was not sourced through the team that typically handles internship applications and instead came directly to the Vice President for an internship; and the relation was the only person interviewed for the position.

In addition, the investigation revealed that under the Vice President's leadership, the Legislative Affairs Department repeatedly failed to follow the CTA's Internship Guidelines with respect to other student internships and favored certain individuals during internship hiring processes, each of whom had notable connections to the CTA or an elected official. For example, these hiring processes also involved instances of the pre-selection of an intern outside of the hiring process, Internship Proposals being tailored to fit that specific student, postings being opened or re-opened for these specific candidates, and a lack of other candidates considered, as well as significant behind-the-scenes involvement from Legislative Affairs staff in an effort to facilitate these hires.

Ultimately, the OEIG concluded that the Vice President's actions and decisions in the hiring processes involving the Senator's two relations occurred because of their connection to the Senator and not only amounted to favoritism toward the relations, but discriminated against others who did not have the same political and influential connection, thus violating the Metropolitan Transportation Authority Act. The OEIG further found that the Vice President's conduct created an appearance of impropriety, and that he committed misconduct and mismanagement by deviating from the CTA's Internship Guidelines with respect to the other intern hires in order to improperly influence hiring processes in the Legislative Affairs Department during his tenure.

In response to the OEIG's report, CTA noted that since the Vice President left CTA employment during the investigation, it placed a copy of the OEIG's report in his personnel file. Additionally, the CTA indicated that it would provide additional training to the Legislative Affairs staff regarding relevant hiring procedures and processes and ethics rules, and had revised certain guidelines and processes relating to internships which it was—and would continue—training staff on.

"In the end, [the Vice President] favored certain individuals for Legislative Affairs positions because of their connections and, as such, discriminated against others who did not have these connections."

PPP Loan Fraud

The EEC made fourteen PPP-related founded reports involving RTB employees available to the public during FY2025. The following chart depicts information about the subjects of those reports and the loans they obtained.

| Case No. | Agency | State Job Title | Total PPP Loan Amount |
|----------|--------|--|-----------------------|
| 22-03021 | Pace | Bus Operator | \$20,000 |
| 22-03022 | Pace | Bus Operator | \$20,050 |
| 22-03023 | Pace | Bus Servicer | \$20,691 |
| 22-03024 | CTA | Bus Operator | \$19,790 |
| 22-03028 | CTA | Bus Operator | \$41,666 |
| 23-00988 | Pace | Dispatcher / Supervisor | \$15,000 |
| 23-01772 | Pace | Safety & Training Manager I | \$15,625 |
| 23-02115 | Pace | Dispatcher / Supervisor | \$20,833 |
| 23-02120 | Pace | Customer Assistance Facilitator / Receptionist | \$41,666 |
| 23-02121 | Pace | Dispatcher / Supervisor | \$39,519 |
| 24-01370 | Pace | Bus Operator | \$21,779 |
| 24-01376 | Pace | Bus Operator | \$41,500 |
| 24-01377 | Pace | Bus Operator | \$49,999 |
| 24-01753 | Pace | Bus Operator | \$20,832 |

HIRING & EMPLOYMENT MONITORING (HEM) DIVISION

The Executive Inspector General created the Hiring & Employment Monitoring (HEM) Division in 2016 to fulfill the OEIG's statutory mandate to "review hiring files and employment files of each State agency within its jurisdiction to ensure compliance with *Rutan v. Republican Party of Illinois* . . . and with all applicable employment laws." 5 ILCS 430/20-20(9). In accordance with this statutory authority and the State's Comprehensive Employment Plan (CEP), HEM conducts compliance-based, non-investigative reviews of State hiring and employment processes and decisions and provides recommendations. HEM also works with agencies to implement these recommendations.

Desk Audits and Hiring Sequence Monitoring

HEM utilizes several methods to evaluate whether the State's hiring practices and processes continue to comply with the CEP and other governing authority, including conducting desk audits and engaging in hiring sequence monitoring.

HEM selects hiring sequences to audit or monitor based on HEM's review of agency postings in SuccessFactors, from communication with CMS Compliance or State human resources personnel, or in relation to complaint referrals, discussed further below. Sequences are also selected in the course of HEM-initiated systemic reviews that may evaluate issues across agencies, or across divisions or sections within a particular agency.

This fiscal year,
HEM conducted
61 desk audits
of hires at **38**
different State
agencies.

When conducting a desk audit, HEM reviews all documentation related to the sequence - including relationship disclosures, validation and screening decisions, interview notes, candidate scores and rankings, bypass requests, and offers - to ensure the selection decision was merit-based and justifiable.

In 49 of these desk audits, HEM found that the hire was justifiable and did not make any recommendations. Additionally, in FY2025, HEM conducted desk audits at four State entities that had never been reviewed before: Illinois Deaf and Hard of Hearing Commission, Illinois Law Enforcement Training and Standards Board, Illinois Pollution Control Board, and Illinois Prisoner Review Board.

HEM monitored **13** hiring sequences at **12** different State agencies.

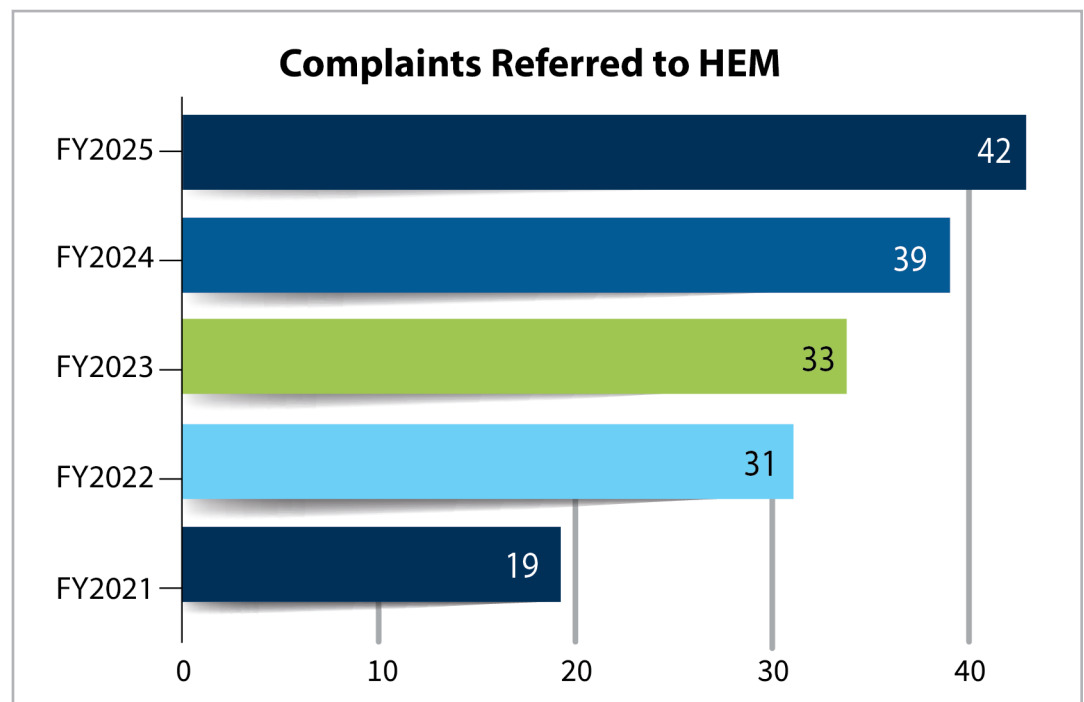
When monitoring a hiring sequence, HEM works with CMS and the agency to monitor each step in the hiring process. This includes reviewing the work that occurred before the agency posted the position, such as the position description, application questions, and interview questions. HEM then monitors the hiring process which may include CMS's minimum qualifications validation, the agency's Subject Matter Expert review that screens applicants further, the selection of the interview pool, the interviews, including scoring discussions, and the hire of the successful candidate.

Complaint Referrals

A complaint is often referred to HEM if it involves allegations of CEP violations or a breach of a hiring-related directive, procedure, or policy. HEM's compliance function and knowledge of State hiring procedures allow HEM to efficiently evaluate whether a hiring sequence was conducted appropriately. If a violation is discovered that may have impacted the outcome of a hiring sequence, HEM can and routinely does intervene before, during, or shortly after the violation occurred to remedy the issues and prevent further problems from occurring. This also allows HEM to help with implementing its recommended changes, which it did extensively this fiscal year as a result of a record-high number of complaint referrals:

In FY2025, **42** complaints were referred to HEM.

In FY2025, HEM issued **19** Advisories based on complaint referrals.



Summaries of those advisories can be found in HEM's quarterly and annual reports. A few highlights are described below.

- **22-HEM-0060—IDOC Intelligence Roles:** HEM worked extensively with IDOC in response to the OEIG's founded report in case no. 20-00408, to collaborate, review and develop a new hiring plan for employees assigned to investigative and intelligence roles to ensure fair and competitive selection. The new Administrative Directive setting forth this hiring plan was made effective September 1, 2024. IDOC also now provides HEM with lists of employees assigned to these posts on a quarterly basis.
- **22-HEM-0002 – DCFS Interview Materials:** HEM's review of several complaint referrals identified that DCFS was using the same interview questions and preferred responses across sequences within the Division of Licensing and Child Protection and Permanency, without evaluating which employees had access to these materials. As a result of HEM's review, DCFS took several steps to securely store and stop the repeated use of interview materials.
- **24-HEM-0018 – Stationary Engineers & Firemen:** Based on HEM's review of numerous complaints, HEM identified problems in the qualification language for these positions that caused confusion and inconsistent evaluation of applicants and subsequent hires. At HEM's request, CMS responded with changes that are in-process or anticipated, and accepted HEM's invitation to work together to implement these recommendations and meaningful changes.
- **24-HEM-0080 – IDVA Salary Offers:** In response to a complaint referral, HEM reviewed the hiring sequence for an Illinois Department of Veterans Affairs (IDVA) Grants Administrator position and found that the salary offers made to the candidates were inconsistent. Rather than pursuing a repost, HEM asked IDVA to extend the anticipated salary offer to the top-ranked candidate, and if declined, then to proceed to each candidate in order; IDVA agreed and did so.

Additional HEM Advisory summaries can be found in the HEM Quarterly and Annual Reports located on the OEIG website: oeig.illinois.gov

Exempt List Oversight

As required by the CEP, the State maintains an Exempt List, a finite and discrete list of positions for which hiring decisions may be made on the basis of political or other non-merit considerations, assuming the candidates in and for these positions meet the minimum qualifications and are performing the work set forth in the respective Exempt List position description.

HEM has two main functions when it comes to overseeing the Exempt List and the State's compliance with the CEP: reviewing all appointments to Exempt List positions; and vetting requests to change or modify it.

HEM reviewed
317 exempt
appointment
packets.

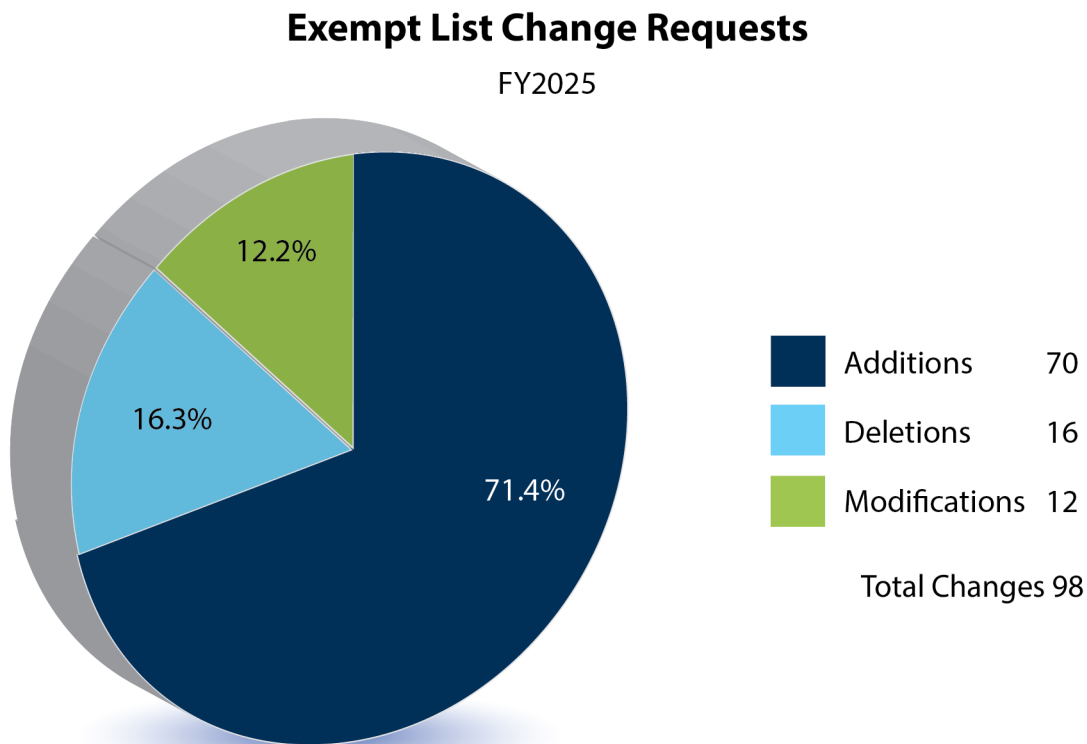
HEM vetted
98 Exempt List
change requests.

Prior to starting employment, HEM reviews all appointments of individuals to Exempt List positions, to ensure the proposed candidates meet the minimum qualifications of the specific position being filled. HEM also reviews and confirms, through the position descriptions provided with the respective exempt appointment packets, that the duties of these positions are set forth and previously agreed to qualify as exempt work.

Changes to the Exempt List are submitted by CMS, on behalf of the Governor's Office, and are often due to changing Administration priorities, new agency mandates, and/or agency reorganizations. HEM reviews all Exempt List modification submissions and recommends approval of or objection to the proposed change to the EIG. In vetting these submissions, HEM does not limit itself to a strict assessment of whether the duties are exempt in nature such that political affiliation is an appropriate consideration – it conducts an in-depth, comprehensive review of all available information related to the position and request, including the basis for the request, any related statutory or other authority, supervisory and subordinate reporting structures, and minimum and preferred qualifications. Prior to making a final recommendation, HEM routinely communicates or meets with agency staff regarding questions about the proposed position's history, duties, reporting structure, and necessity.

HEM also reviews the Exempt List to determine the agency's percentage of exempt positions. As reported by HEM in its CY2024 annual report, the State's overall exempt percentage is approximately 2.38%.

HEM made the following determinations regarding changes to the Exempt List in FY2025:

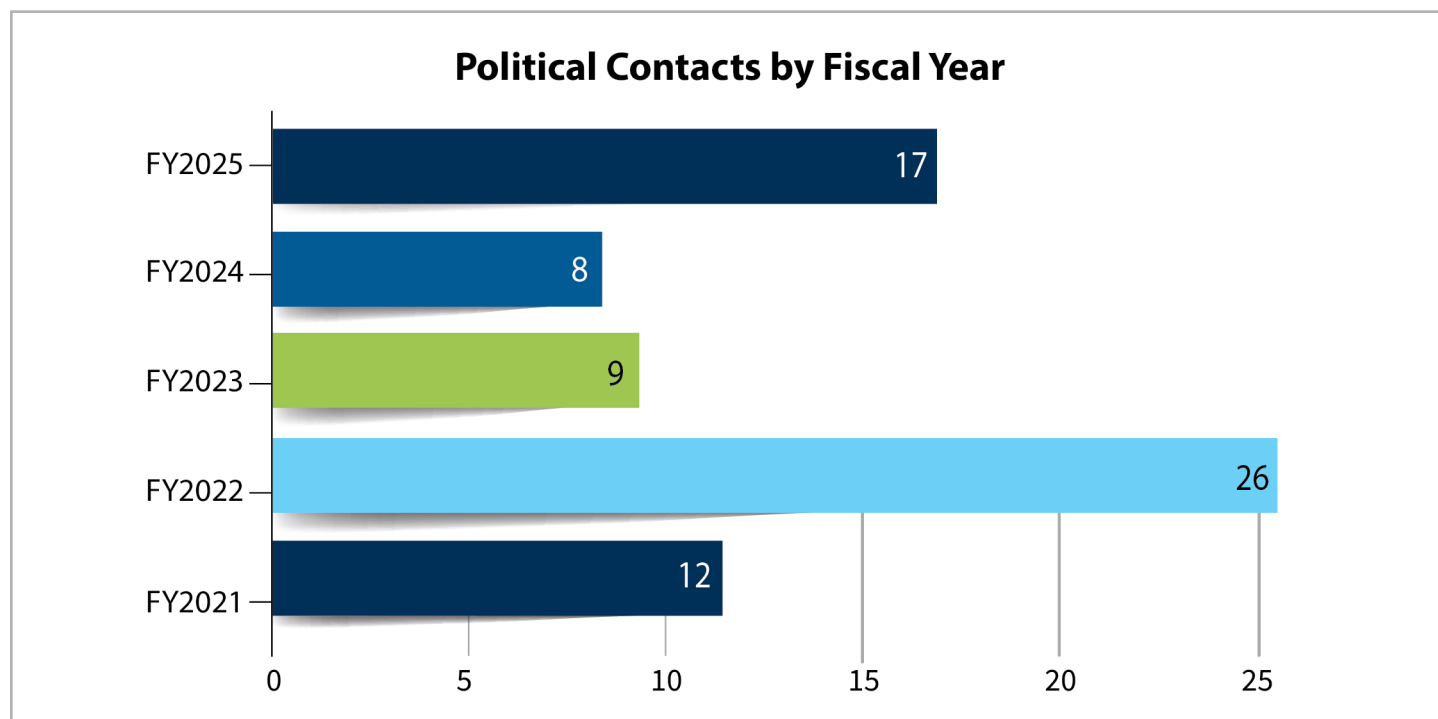


Political Contacts

The CEP defines a “political contact” as a communication by any means from or on behalf of an elected or appointed official of any political party attempting to influence any hiring or employment action for a non-exempt position. “Employment action” is also defined broadly as “[a]ny change (positive or negative) in the terms and conditions of employment . . .” Under the CEP, State employees have an obligation to report any political contact received to CMS or HEM within 48 hours of receipt. This requirement applies to all State employees and pertains to both communications received directly by the employee and those of which the employee becomes aware. CMS maintains a Political Contact Reporting portal, which State employees can access [here](#). HEM receives copies of all political contact reports submitted through the CMS portal. Anyone, including non-State employees, can report a political contact to the OEIG by submitting a complaint through the OEIG website: oeig.illinois.gov.

HEM received
17 political
contact reports
in FY2025.

Following is a chart reflecting the number of political contacts reported since the CMS portal was launched:



In June 2025, HEM issued Advisory 25-HEM-0037 to the Illinois Department of Transportation (IDOT) regarding a communication received by an IDOT legislative employee that was not reported in accordance with the CEP political contact reporting procedures. Because HEM’s conversations with IDOT staff identified some confusion as to the political contact reporting process, HEM recommended that IDOT develop internal guidance to help staff identify what a political contact is and understand reporting requirements.

HEM also reviewed political contact reporting by other agencies and found that since the CMS portal was launched in 2021, agencies reported the following number of political contacts.

| Agency | Total # of Political Contact Reports |
|--|--------------------------------------|
| Abraham Lincoln Presidential Library and Museum | 1 |
| Aging, Department on | 0 |
| Agriculture, Department of | 0 |
| Capital Development Board | 0 |
| Central Management Services, Department of | 16 |
| Children and Family Services, Department of | 0 |
| Commerce and Economic Opportunity, Department of | 0 |
| Corrections, Department of | 0 |
| Criminal Justice Information Authority | 0 |
| Emergency Management Agency | 0 |
| Employment Security | 1 |
| Environmental Protection Agency | 3 |
| Financial and Professional Regulation, Department of | 0 |
| Healthcare and Family Services, Department of | 0 |
| Human Rights, Department of | 0 |
| Human Services, Department of | 29 |
| Illinois Arts Council | 0 |
| Illinois Council on Developmental Disabilities | 0 |
| Illinois Deaf and Hard of Hearing Commission | 0 |
| Illinois Gaming Board | 1 |
| Illinois Guardianship and Advocacy Commission | 0 |
| Illinois Sentencing Policy Advisory Council | 0 |
| Illinois State Fire Marshal, Office of | 0 |
| Illinois State Police | 0 |
| Innovation & Technology, Department of | 2 |
| Insurance, Department of | 0 |
| Juvenile Justice, Department of | 1 |
| Labor, Department of | 0 |
| Lottery, Department of | 0 |
| Military Affairs, Department of | 0 |
| Natural Resources, Department of | 1 |
| Prisoner Review Board | 0 |
| Property Tax Appeal Board | 0 |
| Public Health, Department of | 1 |
| Revenue, Department of | 0 |
| Transportation, Department of | 19 |
| Veterans Affairs, Department of | 1 |
| Total | 76 |

As reflected in the table on the previous page, 25 agencies had not submitted any political contact reports as of the end of FY2025.

HEM followed up with the Human Resources Directors at the 11 largest agencies that had never reported a political contact to ask about their internal political contact policies and learned that none of the agencies had written policies or procedures specifically pertaining to political contact reporting. Therefore, HEM further recommended that CMS and the Governor's Office provide additional guidance and training on political contacts to all State agencies and ensure that the agencies disseminate this information and guidance to all of their employees.

Advisories

In FY2025,
HEM issued 85
Advisories.

At the conclusion of a hiring review, HEM issues a written Advisory to the hiring agency and CMS, and also forwards a copy to the Governor's Office. The Advisory includes a summary of the hiring sequence and any recommendations to the agency to improve compliance going forward. CMS uploads the Advisories to a SharePoint site available to agency human resources personnel so that all agencies can access and learn from HEM's recommendations.

More than half of these, 58 Advisories, resulted in HEM determining that the agency's selection for the position was merit-based and justifiable without any recommendations. The remaining 27 Advisories identified and addressed various hiring issues and made recommendations to the agency or CMS. Through HEM's Advisories, HEM reviewed hiring and communicated and worked with staff at 40 different agencies.

Quarterly and Annual Reports

As required by the CEP, HEM has issued 22 quarterly reports, five of which are combined in the HEM Annual Report, since FY2019. These reports contain more detailed information and data pertaining to HEM's and Investigation's hiring-related work during the calendar year reporting period, including but not limited to:

- Hiring-related reviews opened, desk audits completed, hiring sequences monitored, and hiring reviews transferred from HEM to Investigations.
- Advisories issued, and a summary of recommendations made, if any.
- Exempt positions approved for addition to or deletion from the Exempt list, and dispositions for all exempt Personal Services Contract (PSC) requests received.
- Hiring-related complaints received, and a breakdown of those referred intra-Office to HEM, referred to the subject agency or other appropriate entity or law enforcement authority, or opened by the OEIG Investigations Division.
- Status of investigations into hiring-related complaints as of the end of the applicable reporting period.

All of HEM's Quarterly and Annual Reports are available on the OEIG website.

REVOLVING DOOR

The revolving door provisions of the Ethics Act prohibit State employees from accepting non-State employment with, or receiving compensation from, a non-State entity, for “one year immediately after termination of State employment” if, within one year immediately prior to separation from State employment, the employee participated personally and substantially in the award or fiscal administration of State contracts, change orders, or grants with a cumulative value of \$25,000 or more to his or her prospective employer, or in a regulatory or licensing decision directly applicable to his or her prospective employer. 5 ILCS 430/5-45(a) and (b).

During FY2025,
the OEIG
made 207
revolving door
determinations.

OEIG Revolving Door Provisions for C-List Employees

Certain State employees whose positions may have the authority to participate personally and substantially in such decisions **must** seek a determination from the OEIG prior to accepting an offer of non-State employment. These employees are on what is known as the c-list (after subsection (c) of Section 5-45 of the Ethics Act). Ethics officers for agencies are generally responsible for maintaining and updating their agency’s c-list.

C-list employees should be notified in writing by their agency of their designation and obligations pursuant to the Ethics Act. The duty to seek a determination from the OEIG continues for one year after ending State employment.

Submitting an RD Application

In FY2025, the OEIG restricted 2 employees from accepting non-State employment, which is approximately 1% of the determinations made.

To notify the OEIG about a prospective job offer, employees should go to the OEIG website: oeig.illinois.gov and follow the revolving door instructions. Initially, the employee and their ethics officer must complete certain forms regarding the employee’s State duties and prospective employment (the “RD-101” and “RD-102” forms).

Within 10 calendar days of receiving the forms from both the employee and the ethics officer, the OEIG issues a determination indicating whether the employee “personally and substantially” participated in the award or fiscal administration of a relevant State contract or a regulatory or licensing decision that directly applied to the prospective employer or

its parent or subsidiary, and thus, whether the employee can accept the employment offer. In making a determination, OEIG staff will review information from these forms and may conduct interviews of the employee, the employee's supervisor, and others, as necessary. The OEIG also examines various records relating to any contracting, regulatory, or licensing decisions involving the employee.

Determinations were issued to employees from 39 State agencies, as shown to the right.

Appeal of OEIG Determination

The OEIG's determination may be appealed to the EEC by either the affected employee or the Attorney General no later than 10 calendar days after the date of the determination. The EEC must then issue its decision within 10 calendar days. Therefore, the OEIG's determination is not final until the time to appeal has expired or the EEC has made its decision on an appeal. Although OEIG's revolving door determinations are generally not public, when a determination is appealed to the EEC, the EEC's decision of the appeal is made public.

Revolving Door Determinations

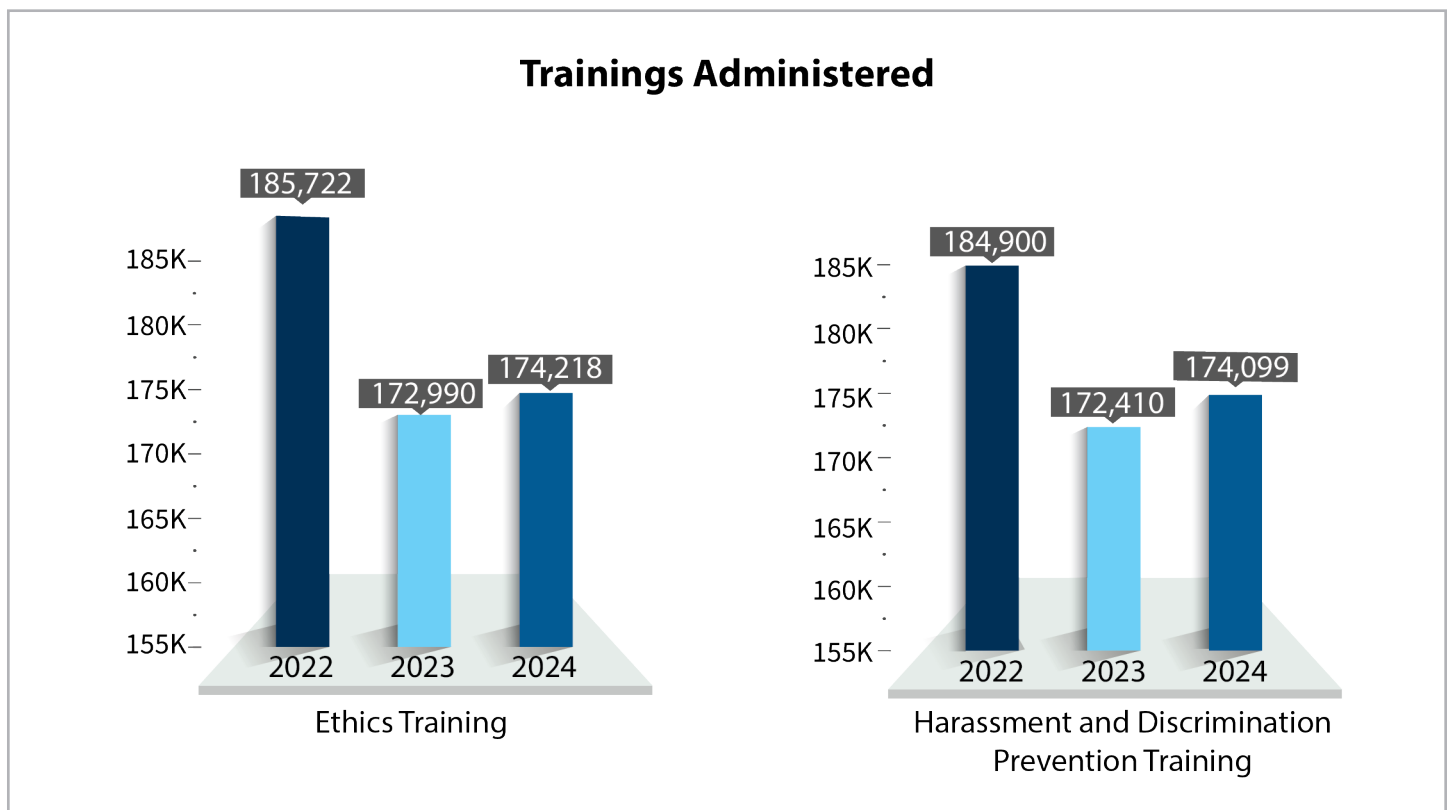
FY2025

| Agency | Per Agency |
|--|------------|
| Aging, Department on | 1 |
| Agriculture, Department of | 2 |
| Capital Development Board | 2 |
| Central Management Services, Department of | 1 |
| Chicago Transit Authority | 3 |
| Children & Family Services, Department of | 3 |
| Commerce & Economic Opportunity, Department of | 7 |
| Commerce Commission | 4 |
| Corrections, Department of | 3 |
| Criminal Justice Information Authority | 4 |
| Emergency Management Agency | 3 |
| Environmental Protection Agency | 15 |
| Financial & Professional Regulation, Department of | 9 |
| Governor's Office | 1 |
| Governors State University | 2 |
| Healthcare & Family Services, Department of | 5 |
| Human Rights, Department of | 1 |
| Human Services, Department of | 6 |
| Illinois Housing Development Authority | 5 |
| Illinois State Police | 3 |
| Illinois State University | 1 |
| Innovation & Technology, Department of | 5 |
| Insurance, Department of | 7 |
| Juvenile Justice, Department of | 1 |
| Labor, Department of | 2 |
| Mathematics and Science Academy | 1 |
| Metra | 2 |
| Natural Resources, Department of | 7 |
| Pace | 2 |
| Prisoner Review Board | 1 |
| Public Health, Department of | 9 |
| Regional Transportation Authority | 2 |
| Revenue, Department of | 3 |
| State Board of Education | 22 |
| Teachers' Retirement System | 1 |
| Toll Highway Authority | 3 |
| Transportation, Department of | 54 |
| University Retirement System | 3 |
| Western Illinois University | 1 |

STATE EMPLOYEE TRAINING

Mandatory Training Under the Ethics Act

Per the Ethics Act, the OEIG oversees the ethics training and harassment and discrimination prevention training for the entities under its jurisdiction. Each year, the OEIG oversees these two trainings for the agencies under the Illinois Governor, the nine State universities, Regional Transit Boards (RTBs), and the Regional Development Authorities who are required to take training annually. New employees, appointees, and officials are required to take these trainings within 30 days of commencing their employment.



Ethics Training

Each year, the OEIG drafts and designs the ethics training for the agencies under the Governor and the RTBs. The ethics training provides real-life examples to train on important topics such as revolving door, gift ban, hiring improprieties, procurement, fraud, secondary employment, prohibited political activity, and more. For agencies under the Illinois Governor, the OEIG directly provided more than 66,000 online ethics training sessions in calendar year 2024.

In addition to developing ethics training, the OEIG also drafts the ethics training standards to ensure quality training programs that cover relevant ethics laws and rules.

Further, the OEIG reviews ethics training programs created by entities under its jurisdiction and approves those trainings. In calendar year 2024, the OEIG reviewed and approved 27 ethics training programs. For all entities under the OEIG’s jurisdiction, it was reported that individuals completed over 174,000 ethics training sessions during calendar year 2024.

Harassment and Discrimination Prevention Training

Since 2022, the OEIG has overseen the harassment and discrimination prevention training for the agencies under its jurisdiction. As part of overseeing this training, the OEIG works closely with entities under its jurisdiction to ensure they understand the training requirements outlined in the Ethics Act, as well as any amendments to the Illinois Human Rights Act. For example, before the 2025 training commenced, the OEIG sent letters detailing the training requirements, recent legal changes that impact the training, and sample training materials to assist entities in drafting their trainings.

In calendar year 2024, the OEIG reviewed and approved 29 harassment and discrimination prevention training programs. For all entities under the OEIG’s jurisdiction, it was reported that individuals completed over 174,000 harassment and discrimination prevention training sessions during calendar year 2024.



External Training

The OEIG conducts training beyond what is specifically required by the Ethics Act. The following are examples of this training in FY2025.

Ethics Officer Conference

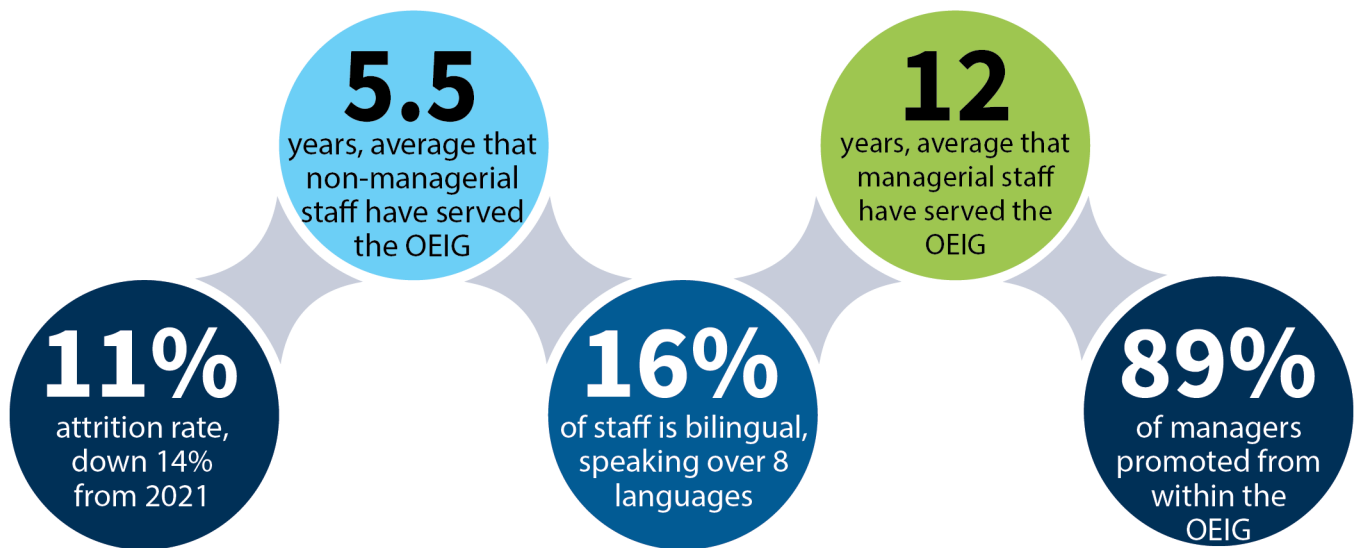
On September 25, 2024, OEIG staff presented at the Ethics Officer Conference hosted by the EEC. Deputy Inspector General Diana Zuver presented “A Year in the Life of an Ethics Officer,” wherein she and the panel discussed key issues that arise throughout the year for ethics officers and how to address those issues. General Counsel Neil Olson presented “Ten Things You Should Know About Revolving Door,” which provided a detailed overview about the revolving door provisions in the Ethics Act and the role of the ethics officer in revolving door compliance.

New Ethics Officer Orientations

In furtherance of the OEIG’s duty to assist and coordinate the ethics officers in the agencies under its jurisdiction, the OEIG continued to host orientation sessions for newly appointed ethics officers of agencies under the OEIG’s jurisdiction. In FY2025, the OEIG hosted orientation sessions for 14 new ethics officers.

The goal of these orientation sessions is to provide new ethics officers with information about their roles and the expectations of the OEIG. All recently-appointed ethics officers receive an invitation to attend a voluntary orientation session. During the sessions, the OEIG provides information and documents about the Ethics Act trainings, revolving door process, and OEIG investigations, among other things.

OEIG PERSONNEL



The Office of Executive Inspector General employs a dedicated group of public servants who are resolute in the agency's mission to serve the interests of the public by ensuring accountability in State government. The OEIG is devoted to the highest standards of quality and professionalism and is committed to safeguarding governmental operations, which directly impacts those we serve.

We are committed to creating a diverse, equitable, inclusive, and accessible workplace. That commitment establishes a workplace culture that values each employee and their part in creating better State government.

Examples of this dedication and commitment include:

- OEIG attrition rate is down 14% since 2021.
- OEIG non-managerial staff have served the OEIG for an average of 5.5 years.
- 16% of staff is bilingual, speaking over eight different languages, including Spanish, German, Russian, French, Polish, Italian, and Hindi.
- OEIG managers have served the OEIG for an average of 12 years.
- 89% of managers have been promoted from within the OEIG.

Diversity of Staff

While the OEIG focuses on investigative, compliance, and training work, our employees' various professional backgrounds and experiences bring diverse perspectives to our work. For example, many of our employees have completed degree programs in criminal justice and political science, but other areas of study have included biology, business, communications, East Asian studies, information technology, journalism, law, philosophy, and sociology.

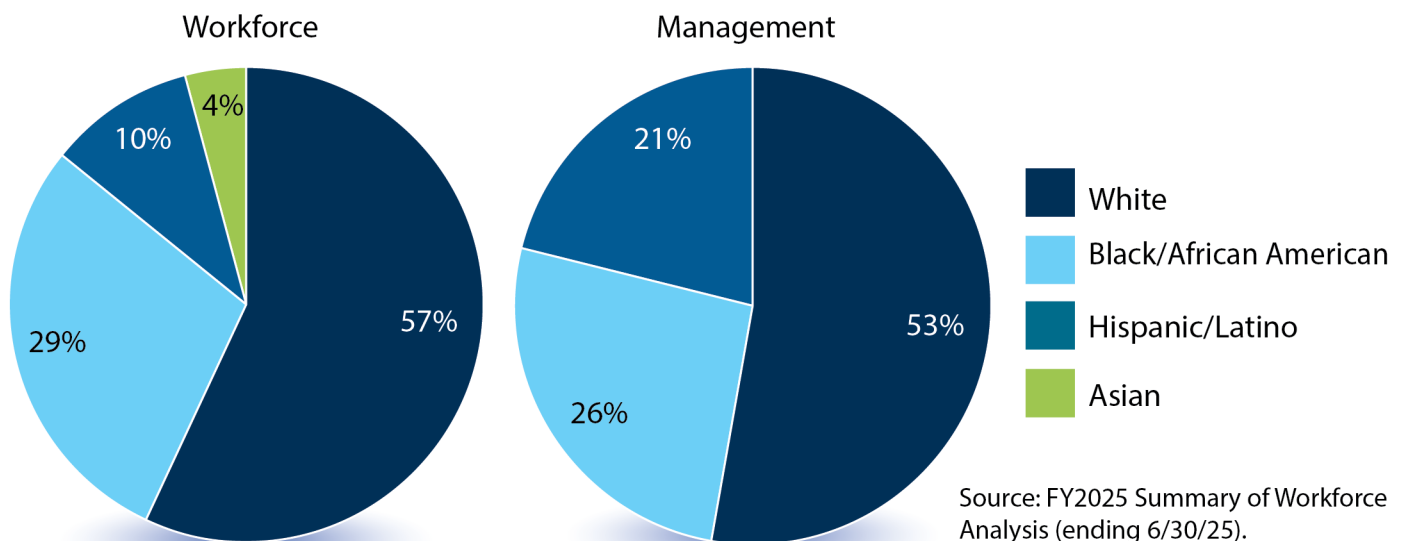
In addition, staff members, depending on their specific position, may have certificates as an Investigator, Interviewer or Fraud Examiner, or may be licensed as a paralegal or an attorney. Some OEIG current and previous employees have the following professional backgrounds and experiences:

- Judicial law clerk
- Law enforcement operations and administration
- Military
- Information technology
- Court advocates
- Attorney in private practice and the public sector
- Internal investigations in public and private sector
- Prosecutor
- Human resource professional
- Administrative law judge
- EEO investigator
- Accountant
- Probation officer

EEO/AA Report

In FY2025, our Equal Employment Opportunity/Affirmative Action report reflected the following Equal Employment Opportunity categories set forth in Illinois law.

OEIG Ethnicity Report



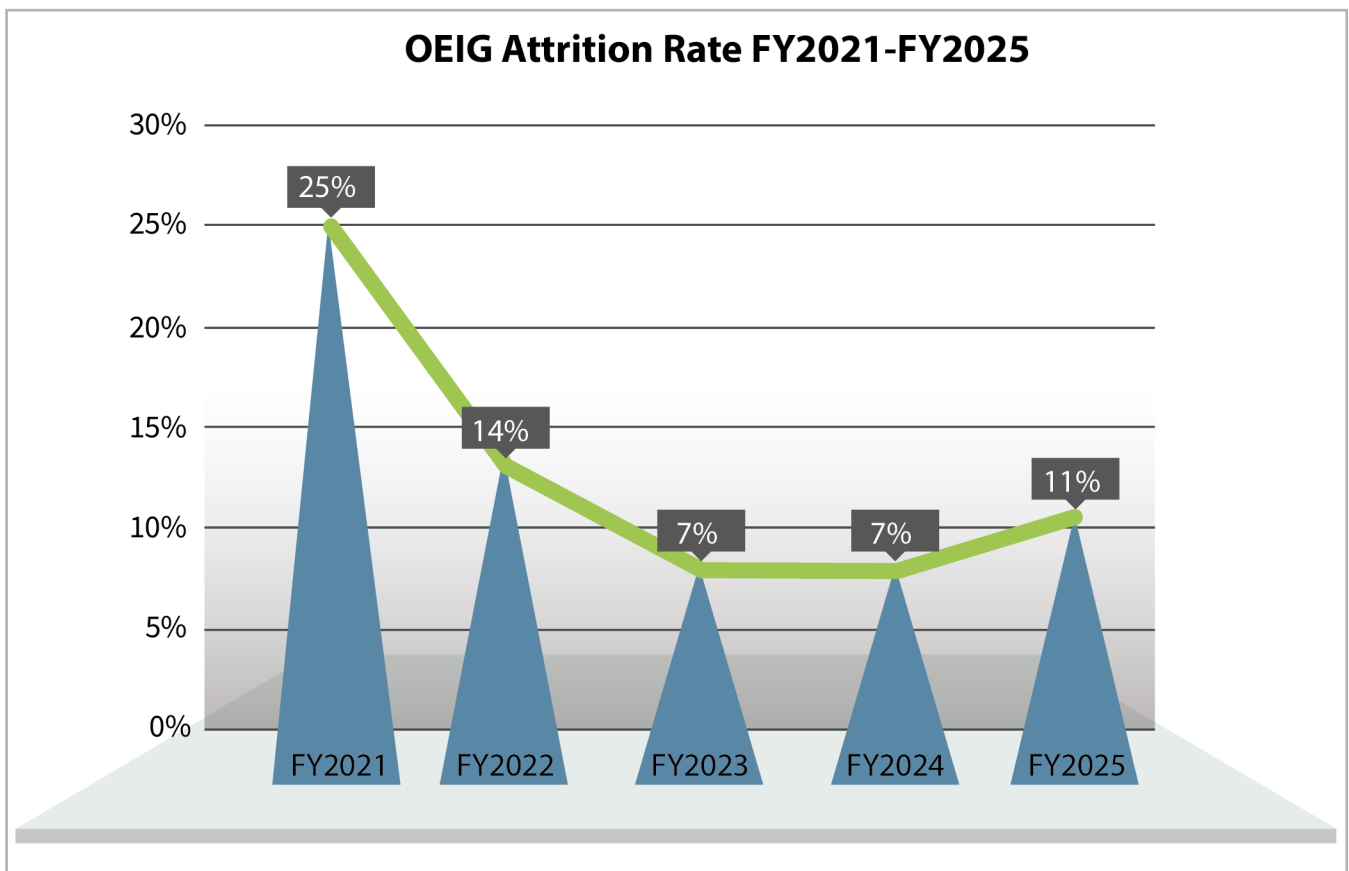
This limited information is compiled for purposes of complying with state, federal, and equal employment opportunity laws. The OEIG acknowledges that these categories are not inclusive of all identities, including, but not limited to, where employees identify with one or more races.

Language Fluency

OEIG staff have fluency in several languages. Indeed, 16% of staff is bilingual, speaking over eight different languages. Those languages include:

- Spanish;
- German;
- Russian;
- French;
- Lithuanian;
- Polish;
- Italian; and
- Hindi.

OEIG Attrition Rate



Over the past 5 years, OEIG has made significant strides in improving employee retention. By 2022, attrition dropped to 14%. In FY2025, the attrition rate was 11%. This positive trend underscores our commitment to retaining top talent and ensuring a stable and motivated workforce dedicated to upholding the integrity and mission of the office.

OEIG'S DIVERSITY, EQUITY, INCLUSION, & ACCESSIBILITY EFFORTS



The OEIG maintains an active internal Diversity, Equity, Inclusion, & Accessibility (DEIA) Working Group. This Working Group is comprised of OEIG employee volunteers from each division who work together to brainstorm, research, and implement steps to make the OEIG a more inclusive and equitable working environment that celebrates differences. The DEIA Working Group's focus areas include:

- 1) recruitment & hiring;
- 2) training;
- 3) mentorship & development; and
- 4) employee connection.

For more information about the DEIA Working Group, please see the OEIG website: oeig.illinois.gov/about/equal. It contains the DEIA Working Group's previous year-end reports, among other information.

Highlights of the DEIA Working Group



Updated OEIG position descriptions to ensure they are written with a focus on inclusivity.



Established an internal mentorship program that is open to all OEIG employees.



Standardized onboarding procedures for new employees to ensure inclusive connection in a hybrid work environment.



Developed OEIG Connect – a discussion group open to all employees that meets to discuss issues related to marginalized groups.



Attended job fairs and expanded where the OEIG posts employment opportunities.



Researched best practices for accessibility and made updates to our website, employment application, and processes.



Hosted events that allow staff to share more of their identity and connect with each other. For example, an office heritage potluck.



Provided leadership training to managers. This training included breakout rooms and thoughtful discussions about how we lead.



Created strategic plans for the DEIA Working Group to effectively align our resources with our goals.



Developed a New Employee Day to allow connections with senior staff and colleagues, and learn more about the OEIG's history.



Established a monthly internal newsletter featuring holidays, cultural events, and important dates of recognition.



Coordinated DEIA training workshops led by external experts for all staff.

Recruitment & Hiring

During FY2025, the Working Group brought DEIA best practices to recruitment and hiring efforts. We continued to implement our inclusive onboarding plan, expanded recruitment efforts, and hiring process plan.

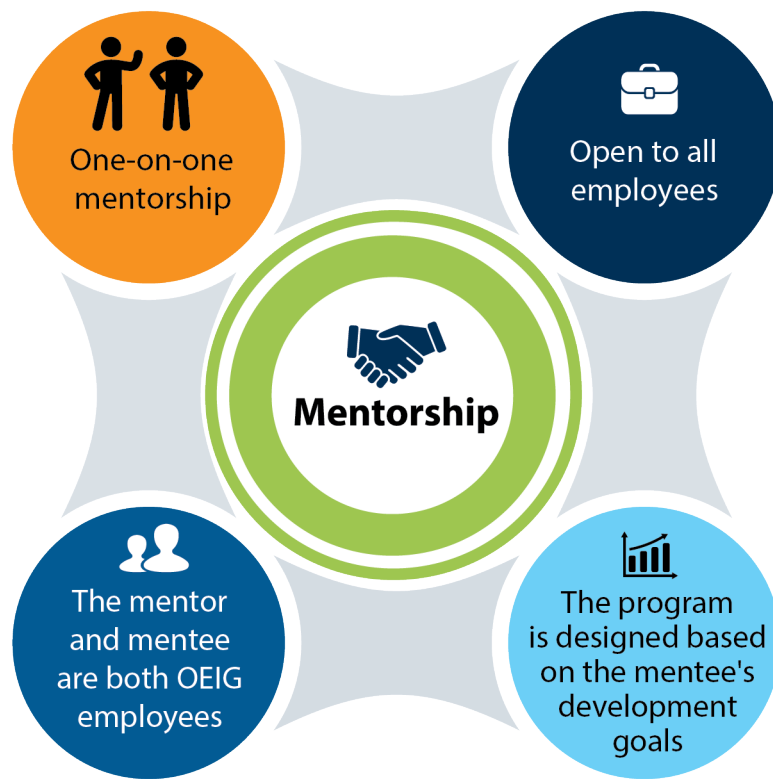
We also planned events aimed at retaining newly hired employees. On November 7, 2024, the Working Group hosted newer employees for its second New Employee Day. The focus of New Employee Day was to provide connection and integration in the Office. Nine employees who started within the past year attended. The event included small group conversations with managers, a scavenger hunt with tasks aimed at learning about the office and interacting with coworkers, and a presentation regarding OEIG history.

DEIA Training

During FY2025, the Working Group researched and facilitated training opportunities available through the Illinois Department of Human Rights. In 2024, the Illinois Department of Human Rights conducted the following five trainings for the OEIG:

- September 16, 2024. Two-hour training course for managers titled “Adapting Your Leadership Style.” During this course, managers learned qualities of effective leadership and how to communicate constructively with employees.
- October 22 and 24, 2024. Two-hour, in-person training for all OEIG Staff regarding social and emotional intelligence. During this course, staff discussed qualities and tools for building social and emotional intelligence.
- November 18, 2024. Two-hour training course for managers titled “Servant Leadership.” This course discussed focusing on the success of employees to build better professional relationships.
- January 20, 2025. Two-hour training course for managers titled “Motivating Your Employees.” This course discussed strategies for motivating employees and understanding their strengths and weaknesses.
- March 17, 2025. Two-hour training course for managers titled “Delivering Constructive Criticism.” This course provided tools for providing constructive feedback in a way that demonstrates a commitment to the development of staff and their careers.

These trainings each focused on aspects designed to foster employee success and tailor leadership to individual employee strengths.

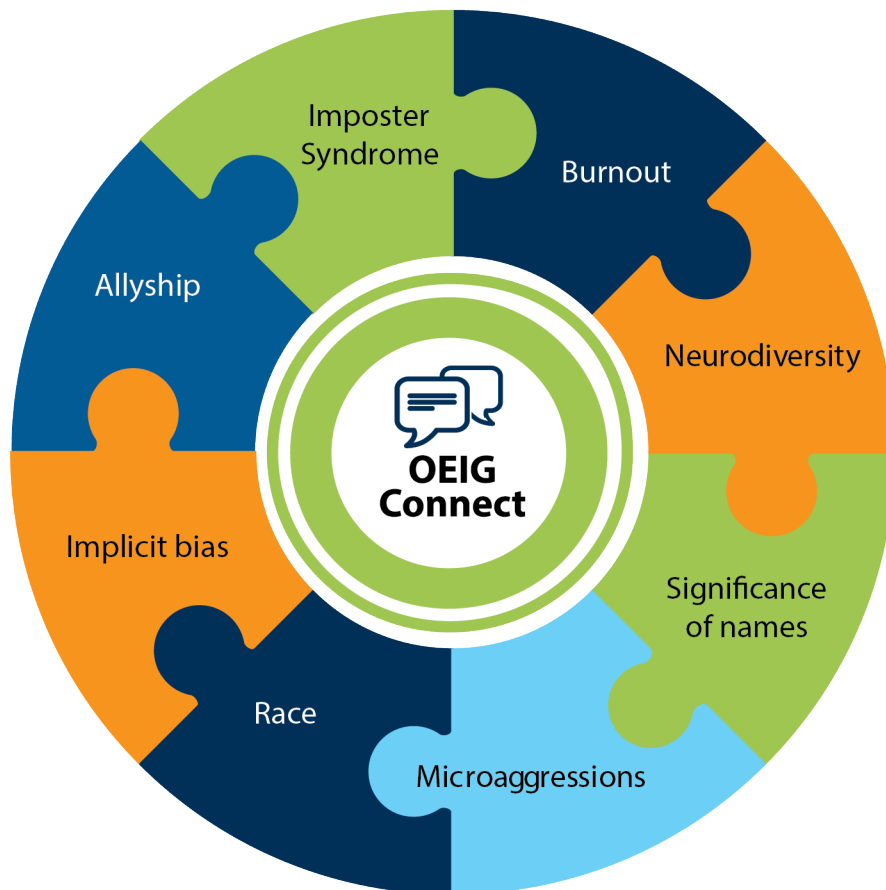


Mentorship & Development

The DEIA Working Group continued to maintain an internal mentorship program available to all OEIG employees. This internal, voluntary program works to provide support, guidance, development, leadership, and community for both mentees and mentors through one-on-one and group mentorship activities. The mentorship program is mentee driven and designed to allow mentees to establish their own uniquely tailored developmental goals that can be achieved through one-on-one mentorship. The mentee and mentor are paired for a period lasting between six and nine months, depending on the goals and plan they develop. The feedback from end-of-program surveys is overwhelmingly positive. Each year, new staff have participated and reported that it was a very beneficial and productive use of their time.

Employee Connection

The DEIA Working Group also continued to facilitate OEIG Connect—consisting of internal, voluntary meetings designed to discuss issues regarding marginalized groups and identities, such as race, gender, and ability. Before these discussions, the Working Group members leading the Connect meeting circulate questions and topics, articles, and/or podcasts for review. OEIG Connect was developed to create an open forum for employees to share their identities, hear from others, and be seen as their whole selves. OEIG Connect is part of the DEIA Working Group's mission to build a community that talks openly and listens to other voices discussing topics related to diversity, equity, inclusion, and accessibility. All OEIG employees are invited to participate by listening or sharing and come together with the goal of connecting on a personal level with colleagues.



This year we held two OEIG Connects: “Neurodiversity” and “The Name Story.” In January 2025, the DEIA Working Group held a Connect session about neurodiversity. The goals of that session were to: define neurodiversity and explain how it impacts the workplace; demonstrate how to support neurodiversity in the workplace; and encourage further discussion and generate awareness of neurodiversity.

In May 2025, the DEIA Working Group held a Connect session titled “The Name Story.” The goals of this discussion were to: understand how names shape personal and professional identities; explore the connection names have to DEIA; and discuss practical steps for respectful name use in the workplace.

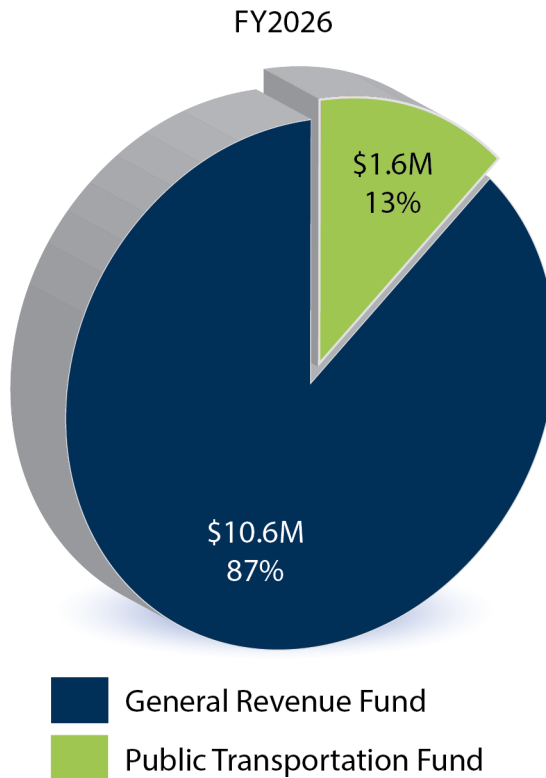
Another way the Working Group fosters connection is through a monthly email. Each month, the DEIA Working Group circulates information regarding holidays, cultural events, and important dates of recognition. The goal of this distribution is to ensure our employees are seen and heard by recognizing and celebrating the diversity that makes our office great.

On June 24, 2025, the DEIA Working Group hosted a Celebration of Holidays Potluck Luncheon. We invited staff to bring in a food or non-alcoholic beverage that is enjoyed on a cultural holiday or event that their family celebrates. At the event we welcomed participants to share stories about the holiday and foods that matter to them and their family. Some of the holidays represented were Día de los Muertos, Juneteenth, Diwali, Hmong Summer Festival, and birthday traditions.

FINANCES

In June 2025, [Public Act 104-0003](#) was signed into law. This law appropriated \$10,646,100 from the General Revenue Fund (GRF) and \$1,610,800 from the Public Transportation Fund (PTF) for the OEIG's FY2026 ordinary and contingent expenses.

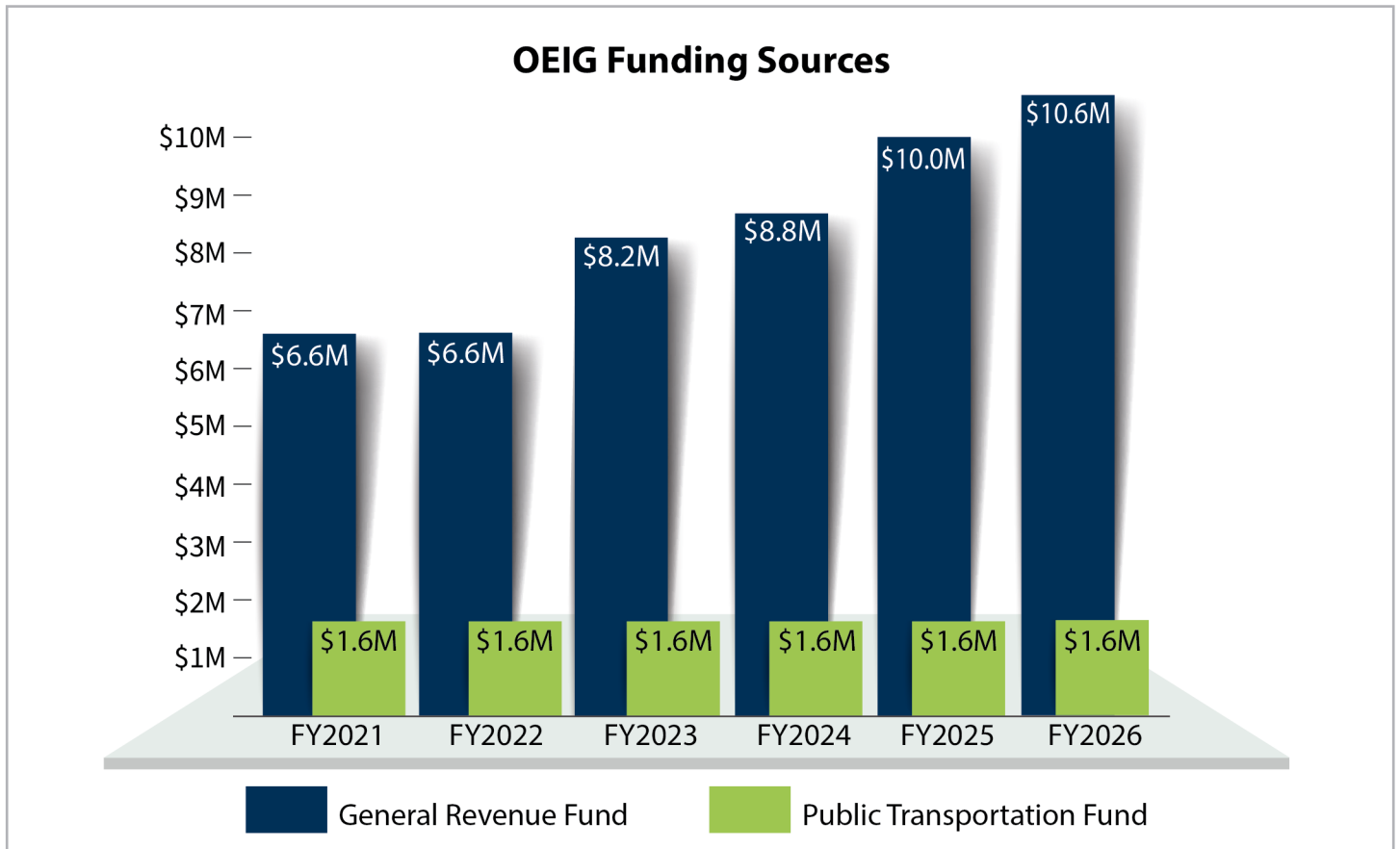
OEIG Appropriations by Funds



The 6% increase in the GRF appropriation from \$10M in FY2025 to \$10.6M in FY2026 will strengthen the OEIG's ability to execute on its mission of ensuring accountability in State government.

The PTF appropriation supports the OEIG's jurisdiction on matters involving the Regional Transportation Authority, Chicago Transit Authority, Metra, and Pace. The FY2026 \$1.6 million appropriation from the PTF has remained flat since FY2014.

Historical GRF and PTF Appropriations



The above graph shows six years of historical GRF and PTF appropriations. Prior to FY2023, the OEIG GRF budget was historically flat, and did not reflect the increase in OEIG statutory responsibilities and the need for additional staff to perform the growing workload of the office.

The 22% increase in GRF appropriation from \$8.2M in FY2023 to \$10.0M in FY2025 enabled the OEIG to achieve several key objectives:

- Hired additional staff members.
- Provided competitive salary adjustments to retain our highly skilled team.
- Maintained a high staff retention.
- Invested in staff training and development.
- Upgraded critical IT infrastructure.

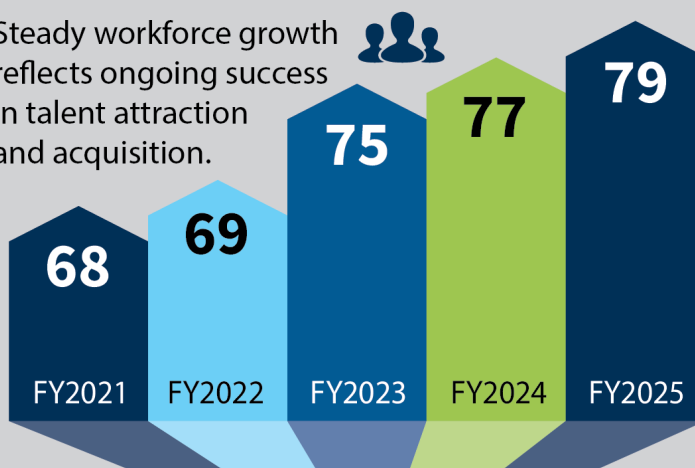
These enhancements have strengthened our capacity to fulfill our mission effectively.

Agency Headcount

Over the past five fiscal years (FY2021 – FY2025), the OEIG has demonstrated consistent and strategic growth in staffing, increasing headcount from 68 to 79. This upward trend reflects intentional actions to strengthen operational capacity and ensure a stable and motivated workforce dedicated to upholding the integrity and mission of the office. Staff retention has also remained strong reflecting continued success in fostering a positive work environment.

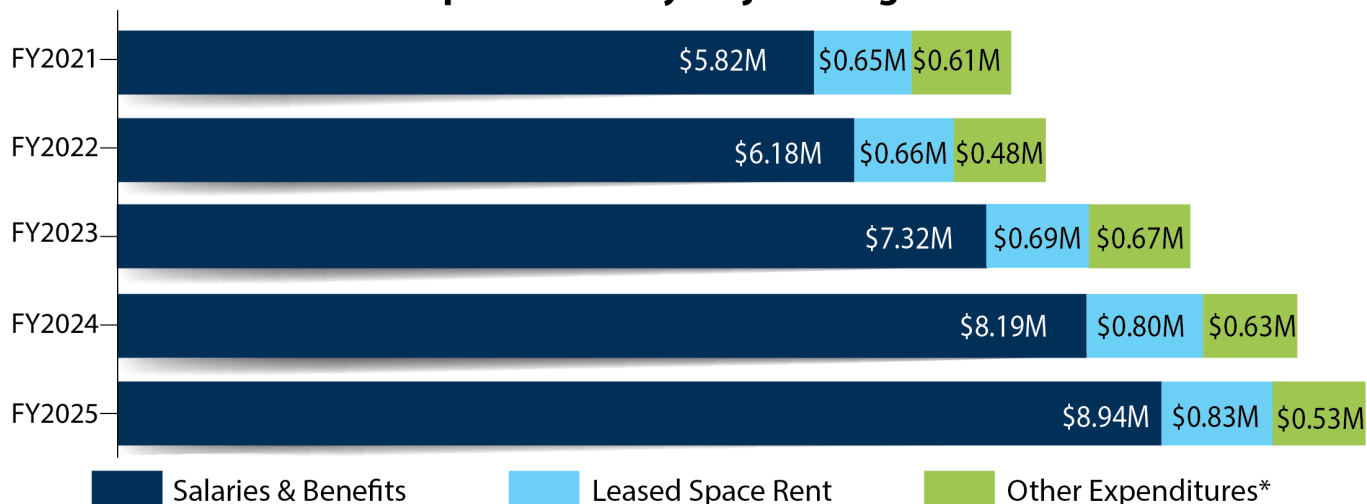
OEIG Headcount (End of FY)

Steady workforce growth reflects ongoing success in talent attraction and acquisition.



Operating Expenditures

Expenditures by Major Categories



*DoIT support services, CMS chargebacks, computer software, office furniture and equipment, contractual services, telecommunications, travel, and other ancillary charges

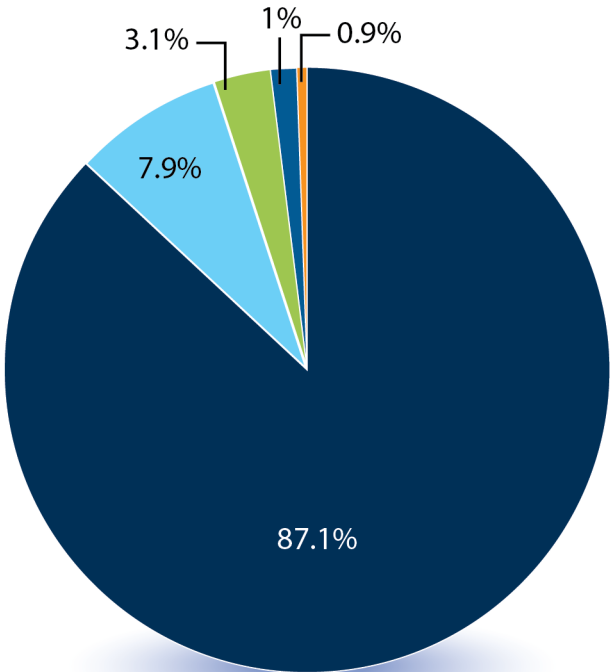
The OEIG aims to use the State's financial resources effectively and efficiently and conforms to the State uniform accounting system by ensuring it obligates and expends public funds in accordance with applicable laws and rules.

Personnel-related expenditures accounted for about 87% of the FY2025 operating expenditure. Non-salary-related operating expenditure includes leased space rent which accounts for about 8% of total spend. Other operating expenditure accounts for the remaining 5% and includes DoIT support services, CMS chargebacks, computer software, office furniture and equipment, contractual services, telecommunications, travel, and other ancillary charges.

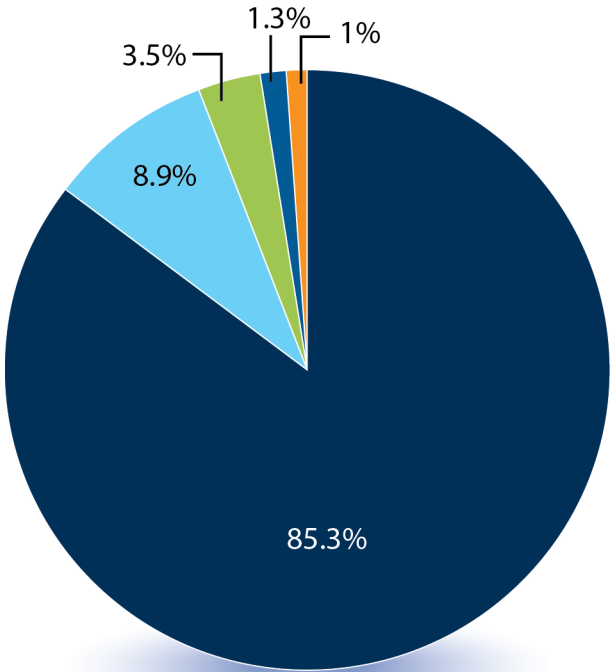
Expenditures by Fund

OEIG Expenditures by Fund

General Revenue Fund (GRF) FY2025



Public Transportation Fund (PTF) FY2025



| | GRF | | PTF | |
|------------------------------------|-------------|-------------|-------------|-------------|
| | FY2024 | FY2025 | FY2024 | FY2025 |
| Personnel Costs | \$7,235,693 | \$7,782,839 | \$956,450 | \$1,159,381 |
| Leased Space Rent | \$684,655 | \$708,775 | \$116,566 | \$121,106 |
| Interagency & Contractual Services | \$402,549 | \$272,862 | \$95,157 | \$47,864 |
| Telecommunications | \$86,511 | \$92,955 | \$16,478 | \$17,706 |
| Other Expenditures | \$25,597 | \$79,124 | \$3,897 | \$13,805 |
| Total | \$8,435,006 | \$8,936,556 | \$1,188,549 | \$1,359,861 |

LEGISLATIVE ENGAGEMENT



The OEIG is committed to better State government, and therefore, regularly works with legislators and stakeholders on matters related to ethics legislation. Throughout the year, the OEIG works with other executive inspectors general, the EEC, the Attorney General's Office, the Governor's Office, legislators, and other stakeholders to discuss potential amendments to the Ethics Act as well as to the Illinois Administrative Code.

House Bill 1703

The OEIG worked with Representative Fred Crespo on House Bill 1703 that was introduced on January 24, 2025.

House Bill 1703 amends the Ethics Act to allow Executive Inspectors General (EIGs) to make a public statement in limited circumstances after the EIG concludes their investigation and 1) recommends systemic or procedural action based on the investigation; or 2) finds reasonable cause to believe that a violation has occurred, and the EIG does not believe a complaint should be filed by the Attorney General. The public statement will not disclose the name of any subject, but instead provide the nature of the allegations, the violations or basis for the findings, the EIG's recommendations, and any response by the ultimate jurisdictional authority.

The OEIG introduced this bill to allow for the public to receive timely information about wrongdoing. If this information is timely, it will allow for better education, deterrence, proactive change, and transparency. Under the current process, after an EIG concludes its investigation and makes a finding, the full founded report is considered for publication by the Executive Ethics Commission. This is typically not done until all disciplinary proceedings are complete, which often can take up to a year or more. Thus, agencies and the public often do not receive timely information about wrongdoing.

House Bill 1703 was assigned to the Ethics & Elections Committee, but did not move out of Committee this session.

OEIG's Appropriations Request

As reflected in the Finances section of this report, the OEIG also proposes its own budget and drafts documents and information to explain the Office's work and financial needs. During FY2025, the OEIG sought a modest budget increase to provide a cost-of-living increase for staff and to cover DoIT charges for the services it provides our independent agency. As outlined in this Annual Report, the OEIG has a high output in relation to its small staff, and unlike most State agencies, as an independent agency, OEIG staff do not receive automatic cost-of-living increases. In FY2025, the OEIG testified before the House and Senate appropriations committees to explain its request and answer any questions.

In the May 2025 appropriations bill, the General Assembly granted our request for an increase in funds. For FY2026, the OEIG will have a budget of \$10,646,100 in General Revenue Funds and \$1,610,800 in Public Transportation Funds.

APPENDICES

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Executive Management Team

Susan M. Haling, Executive Inspector General

EIG Haling was first nominated as Executive Inspector General in March 2018, and was most recently reconfirmed by the Illinois Senate on April 11, 2024. She first joined the OEIG in December 2011 as Special Counsel, and served as the First Assistant Inspector General beginning in 2015. EIG Haling has more than nine years of experience as an Assistant U.S. Attorney in Chicago, where she tried over 20 criminal trials. She also previously worked for the U.S. Justice Department, Criminal Division, in Washington, D.C. and was a law clerk for the Honorable James F. Holderman, a former U.S. District Judge for the Northern District of Illinois. EIG Haling received her BA from the University of Notre Dame and obtained her law degree from the DePaul University College of Law, where she graduated Order of the Coif, served as editor for the Law Review, and was a member of the Moot Court Trial Team.

Neil P. Olson, General Counsel

Mr. Olson returned to the OEIG in May 2018 and serves as General Counsel. Mr. Olson previously worked at the OEIG as Deputy Inspector General and Chief of Springfield Division before leaving the OEIG in 2013 to serve as General Counsel in the Office of the Illinois State Treasurer. Prior to his return to the OEIG, Mr. Olson also served as an Assistant Attorney General and then the Deputy Public Access Counselor in the Office of the Illinois Attorney General. He also previously worked for the Massachusetts Attorney General's Office, the Massachusetts Commission on Judicial Conduct, as a litigator in private practice, and as the law clerk to the Honorable Kenneth Laurence of the Massachusetts Appeals Court. Mr. Olson is a graduate of Grinnell College and Northeastern University School of Law, and is licensed to practice law in Massachusetts and Illinois.

Fallon Opperman, Deputy Inspector General and Chief of Chicago Investigative Division

Ms. Opperman joined the OEIG as an Assistant Inspector General in June 2008 and then served as Chief of the Regional Transit Board Division. As Deputy Inspector General and Chief of Chicago Division since February 2015, Ms. Opperman manages the investigative activities of the OEIG's Chicago office, including oversight of the Regional Transit Board Division. Ms. Opperman received a BA from North Central College and obtained her law degree from the DePaul University College of Law.

Erin K. Bonales, Director of Hiring & Employment Monitoring

Ms. Bonales is responsible for directing the OEIG's Hiring & Employment Monitoring Division, which engages in compliance reviews and monitoring activities related to hiring and employment decisions, policies, and practices. Ms. Bonales previously worked for the OEIG for nearly eight years, including serving as Deputy Inspector General and Chief of the Chicago Investigative Division. Prior to joining the OEIG in May 2006, Ms. Bonales was an Assistant General Counsel for the Illinois Department of Human Services for approximately five years. Ms. Bonales received a JD from the University of Illinois College of Law, and a BA in Political Science from Southern Illinois University.

Christine P. Benavente, Deputy Inspector General - Executive Projects

Ms. Benavente joined the OEIG as an Assistant Inspector General in August 2011 and later served as a Legislative Assistant Inspector General. As Deputy Inspector General-Executive Projects, Ms. Benavente leads numerous executive projects, including overseeing the Division of External Compliance & Outreach, serving as the legislative attorney for all legislative matters pertaining to the OEIG, and serving as the Diversity, Equity, and Inclusion Coordinator. Prior to working at the OEIG, she was an Associate at Jenner & Block, LLP. Ms. Benavente obtained her law degree from DePaul University College of Law, where she graduated Order of the Coif and magna cum laude. During law school, she served as Editor-in-Chief of the Women's Law Caucus Digest and Moot Court Representative for the Hispanic National Bar Association. She obtained BAs from the University of Iowa.

Angela Luning, Deputy Inspector General and Chief of Springfield Investigative Division

Ms. Luning joined the OEIG as an Assistant Inspector General in 2012, became a Deputy Inspector General for Investigations in 2015, and currently also serves as Acting Chief of the Springfield Division. Ms. Luning previously served as an Assistant State's Attorney in the Will County State's Attorney's Office, an Assistant Attorney General, and an Assistant Corporation Counsel for the City of Chicago; she also was a law clerk to the Hon. George W. Lindberg in the U.S. District Court for the Northern District of Illinois. Ms. Luning has a BA from Yale University, and received her law degree from Loyola University Chicago, where she served as the Executive Editor for Lead Articles on the Loyola University Chicago Law Journal.

Ogo Akpan, Chief Fiscal Officer and Operations Manager

Ms. Akpan joined the OEIG as Chief Fiscal Officer/Chicago Operations Manager in December 2021. She provides leadership and management of all financial operations of the agency and is also responsible for administrative operations of the Chicago office. Prior to the OEIG, she worked as a Certified Public Accountant for the Illinois Office of the Comptroller. She previously held finance leadership roles in the private sector responsible for accounting, finance, and data analytics functions. Ms. Akpan received her Bachelor of Science in Accounting from the University of Nigeria, obtained her MBA from Schulich School of Business, York University Toronto Canada, and is a Certified Public Accountant in the State of Illinois.

Number of Complaints Received by Agency in FY2025

| Agency | Complaints Received |
|--|---------------------|
| Abraham Lincoln Presidential Library and Museum | 23 |
| Aging, Department on | 20 |
| Agriculture, Department of | 13 |
| Attorney Registration and Disciplinary Commission | 5 |
| Capital Development Board | 5 |
| Central Management Services, Department of | 33 |
| Chicago Public Schools | 5 |
| Chicago State University | 34 |
| Chicago Transit Authority | 113 |
| Children and Family Services, Department of | 178 |
| City Colleges of Chicago | 1 |
| City of Chicago | 16 |
| Civilian Office of Police Accountability | 1 |
| Civil Service Commission | 1 |
| Clerk of the Fourth District Appellate Court | 1 |
| Commerce and Economic Opportunity, Department of | 25 |
| Commerce Commission | 6 |
| Commission on Equity and Inclusion | 5 |
| Cook County Clerk of Circuit Court | 2 |
| Cook County | 7 |
| Corrections, Department of | 530 |
| Court Officials | 12 |
| Court of Claims | 1 |
| Criminal Justice Information Authority | 9 |
| Eastern Illinois University | 2 |
| Emergency Management Agency | 13 |
| Employment Security | 86 |
| Environmental Protection Agency | 37 |
| Equal Employment Opportunity Commission | 1 |
| Executive Ethics Commission | 2 |
| Executive Inspector General, Office of | 8 |
| FBI | 2 |
| Financial and Professional Regulation, Department of | 40 |
| Governor's Office | 18 |
| Governors State University | 3 |
| Healthcare and Family Services, Department of | 47 |
| Human Rights, Department of | 38 |
| Human Services, Department of | 784 |
| Illinois Attorney General | 21 |

Number of Complaints Received by Agency in FY2025

| Agency | Complaints Received |
|---|---------------------|
| Illinois Gaming Board | 4 |
| Illinois General Assembly | 3 |
| Illinois Guardianship and Advocacy Commission | 11 |
| Illinois Housing Development Authority | 13 |
| Illinois Human Rights Commission | 1 |
| Illinois Law Enforcement Training and Standards Board | 5 |
| Illinois Racing Board | 1 |
| Illinois State Board of Elections | 3 |
| Illinois State Comptroller | 2 |
| Illinois State Fire Marshal, Office of | 10 |
| Illinois State Museum | 1 |
| Illinois State Police | 31 |
| Illinois State Police Merit Board | 1 |
| Illinois State Treasurer | 2 |
| Illinois State University | 12 |
| Illinois State's Attorneys | 13 |
| Illinois Student Assistance Commission | 2 |
| Innovation & Technology, Department of | 30 |
| Insurance, Department of | 24 |
| Judicial Inquiry Board | 4 |
| Juvenile Justice, Department of | 34 |
| Labor, Department of | 14 |
| Liquor Control Commission | 1 |
| Local Police Departments / Sheriff's Offices | 23 |
| Lottery, Department of | 5 |
| Mathematics and Science Academy | 2 |
| Metra | 62 |
| Metropolitan Pier and Exposition Authority | 1 |
| Military Affairs, Department of | 11 |
| Natural Resources, Department of | 24 |
| None Given | 36 |
| Non-State Agency | 224 |
| Northeastern Illinois University | 7 |
| Northern Illinois University | 6 |
| Oakton Community College | 2 |
| Other | 438 |
| Other Inspector General | 1 |
| Pace | 35 |
| Pollution Control Board | 1 |

Number of Complaints Received by Agency in FY2025

| Agency | Complaints Received |
|---|---------------------|
| Prisoner Review Board | 6 |
| Public Health, Department of | 49 |
| Regional Transportation Authority | 4 |
| Revenue, Department of | 38 |
| Secretary of State | 62 |
| Social Security Administration | 7 |
| South Suburban College | 1 |
| Southern Illinois University | 3 |
| Southern Illinois University - Carbondale | 19 |
| Southern Illinois University - Edwardsville | 10 |
| Southern Illinois University - School of Medicine | 1 |
| State Board of Education | 5 |
| State Employees Retirement System of Illinois | 5 |
| State Universities Retirement System | 1 |
| Toll Highway Authority | 17 |
| Transportation, Department of | 208 |
| United States Postal Service | 7 |
| University of Illinois | 39 |
| Unknown | 17 |
| Vendor | 102 |
| Veterans Affairs, Department of | 49 |
| Waubonsee Community College | 1 |
| Western Illinois University | 7 |
| Workers Compensation Commission | 1 |
| Total | 3907 |

Allegations Received by Type of Misconduct in FY2025

| General Type of Alleged Misconduct | Allegations Received |
|-------------------------------------|----------------------|
| Abuse | 64 |
| Breach of Confidentiality | 18 |
| Bribery | 7 |
| Child Support | 5 |
| Conflict of Interest | 49 |
| Customer Service | 112 |
| Discrimination | 326 |
| Document Falsification | 26 |
| Ex Parte Communication | 1 |
| Extortion | 3 |
| Failure to Cooperate | 9 |
| Failure to File SEI | 2 |
| Failure to Follow Department Policy | 53 |
| False Employment Application | 2 |
| Fraud | 364 |
| Gift Ban Violation | 5 |
| Grant Fraud | 6 |
| Harassment | 281 |
| Hiring/Promotional Improprieties | 154 |
| Misappropriation / Misuse of Funds | 42 |
| Misconduct | 1158 |
| Mismanagement | 415 |
| Misuse of Property | 29 |
| None | 23 |
| Other | 94 |
| Other Ethics Act | 5 |
| Prisoner Complaint | 107 |
| Procurement Improprieties | 10 |
| Prohibited Political Activity | 21 |
| Retaliation | 277 |
| Revolving Door Violation | 4 |
| Sexual Harassment | 318 |
| Theft | 31 |
| Time Abuse | 124 |
| Unethical Behavior / Practices | 172 |
| Violence in the Workplace | 28 |
| Waste | 4 |
| Wrongful Termination | 31 |
| Total | 4380 |

Founded Reports Issued in FY2025

| Agency | Founded Reports Issued |
|--|------------------------|
| Agriculture, Department of | 1 |
| Central Management Services, Department of | 1 |
| Chicago Transit Authority | 7 |
| Children and Family Services, Department of | 2 |
| Commerce and Economic Opportunity, Department of | 1 |
| Corrections, Department of | 1 |
| Criminal Justice Information Authority | 1 |
| Financial and Professional Regulation, Department of | 2 |
| Healthcare and Family Services, Department of | 1 |
| Human Services, Department of | 25 |
| Illinois Guardianship and Advocacy Commission | 1 |
| Illinois Housing Development Authority | 1 |
| Illinois State Board of Elections | 1 |
| Illinois State Fire Marshal, Office of | 1 |
| Illinois State Police | 1 |
| Metra | 22 |
| Military Affairs, Department of | 1 |
| Natural Resources, Department of | 1 |
| Pace | 21 |
| State Employees Retirement System of Illinois | 1 |
| Transportation, Department of | 1 |
| Veterans Affairs, Department of | 2 |
| Total | 96 |

Types of Misconduct in Founded Reports Issued in FY2025

| Type of Misconduct | Approximate Number of Findings |
|---|--------------------------------|
| Paycheck Protection Program Fraud | 72 |
| Failure to Report Secondary Employment | 37 |
| Failure to Cooperate in an OEIG Investigation | 9 |
| Document Falsification | 5 |
| Conduct Unbecoming | 4 |
| Mismanagement | 4 |
| Misuse of State Resources | 4 |
| Sexual Harassment | 3 |
| Conflict of Interest | 2 |
| Inappropriate Conduct | 2 |
| Failure to Disclose Economic Interests | 1 |
| Failure to Perform Duties | 1 |
| Gift Ban | 1 |
| Time Abuse | 1 |
| Violation of Policy, Law, or Rule | 1 |
| Total | 147 |

Online References

State Officials and Employees Ethics Act (5 ILCS 430)

ilga.gov/legislation/ilcs/ilcs3.asp?ChapterID=2&ActID=2529

Founded OEIG Investigative Reports

oeig.illinois.gov/investigations/published-oeig-cases

OEIG File a Complaint

oeig.illinois.gov/complaints/file-a-complaint

OEIG Hiring and Employment Monitoring Quarterly/Annual Reports

oeig.illinois.gov/hem/hem-reports

OEIG FOIA Officer:

Neil P. Olson, General Counsel
Office of Executive Inspector General
for the Agencies of the Illinois Governor
607 E. Adams, 14th Floor
Springfield, IL 62701-1634

OEIG.FOIA@illinois.gov

Photocopy costs for FOIA requests: First 50 black-and-white copies are at no charge; \$.15 per page for each additional page.

Printed by authority of the State of Illinois 12/2025

In an effort to conserve resources and be green, the FY2025 Annual Report will be distributed electronically. An online copy of this report in PDF format may be found at:

oeig.illinois.gov/publications/annual-reports



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

Enhancing Integrity in State Government



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