

Illinois Ethics Matters

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Honesty, Integrity, Service

A newsletter from the Office of Executive Inspector General for the Agencies of the Illinois Governor

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Announcements

• The OEIG is pleased to announce three new Springfield staff members: Grace Lorengo, Investigative Assistant, and Anthony Mikels and Joy Willis, Investigators.

Cooperation in the Revolving Door Process

Under the "revolving door" process, the OEIG is required to determine whether certain State employees may accept non-State employment. These employees (commonly referred to as "c-listers," after Section 5-45(c) of the Ethics Act) are individuals who may have the ability to participate personally and substantially in contracting or regulatory decisions. Upon receiving a request for a determination from a State employee, the OEIG determines whether the employee participated in decisions involving the prospective employer during the past year. By law, the OEIG must make these determinations within 10 calendar days.

In FY2025, the OEIG made 207 such revolving door determinations for employees. The OEIG "restricted" 2 of these employees (meaning they could not accept the specified non-State employment for a period of a year), or less than 1% of the applicants. No employee facing the restriction appealed the OEIG's determination.

Although the OEIG typically restricts only 1-2% of revolving door applicants per year, it is imperative that employees cooperate fully during the determination process. A recent case illustrates the consequences of failing to provide the OEIG with accurate and complete information during the revolving door investigative process.

Ethics Act Violation

The OEIG, through the Attorney General, filed an Ethics Act violation with the Executive Ethics Commission (EEC) against a former Illinois Department of Agriculture (DoA) inspector. The DoA inspector twice requested revolving door determinations from the OEIG regarding work at a meat processing plant. As a DoA inspector, the employee supervised, reviewed, and approved regulatory actions regarding the plant, including the issuance of a report which resulted in a 90-day abeyance of plant operations. Accordingly, the OEIG twice restricted the inspector from accepting future employment at the plant. When the inspector requested a third revolving door determination, he represented that he would be working for a restaurant, rather than the plant; the OEIG issued a "not restricted" determination. However, the OEIG discovered in an investigation, and the EEC ultimately concluded, that the inspector was actually working for the plant rather than the restaurant.

The EEC described the DoA employee's violation as "clear and egregious in nature[,]" and explained that "[b]y submitting a deceptive revolving door determination request which falsely identified [the restaurant] as his prospective employer, [the inspector] intentionally obfuscated the nature of his prospective employment in a misguided effort to avoid the restrictions set forth in the Ethics Act." The EEC imposed a fine based on the compensation received from the plant and an additional \$2,500, for a total fine of \$16,255. *Haling v. Spalding*, (25-EEC-003), is available on the OEIG website.