



Office of the Independent Inspector General

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

**Quarterly Report
3rd Quarter 2023**

October 13, 2023

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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

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October 13, 2023

Transmittal via email only

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

Re: Independent Inspector General Quarterly Report (3rd Qtr. 2023)

Dear President Preckwinkle and Members of the Board of Commissioners:

This report is written in accordance with Section 2-287 of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-52 (2007), to apprise you of the activities of this office during the time period beginning July 1, 2023, through September 30, 2023.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 186 complaints during this reporting period.¹ Eighteen new OIIG investigations have been initiated. This number includes those investigations resulting from the exercise of my own initiative (OIIG Ordinance, Sec. 2-284(2)). Additionally, 44 OIIG inquiries have been initiated during this reporting period while a total of 214 OIIG inquiries remain pending at the present time. We referred 54 complaints to management or outside agencies for further consideration. The OIIG currently has a total of 20 matters under investigation. The number of open investigations beyond 180 days of the issuance of this report is 11 due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

New Summary Reports

During the 3rd Quarter of 2023, the OIIG issued 13 summary reports. The following provides a general description of each matter and states whether OIIG recommendations for

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

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remediation or discipline have been adopted. Specific identifying information is being withheld in accordance with the OIIG Ordinance where appropriate.²

IIG22-0227 – Board of Review. The OIIG received information concerning a BOR practice wherein employee overtime is banked and has accumulated over the years to approximately \$1 million in a BOR liability that far exceeds the level of budgetary funding available for overtime use. The OIIG also received information suggesting that the BOR does not utilize Cook County Time (CCT) to record overtime worked. Instead, the BOR allegedly relies on a manual process of converting overtime worked into compensatory time (“comp time”). The manual process requires employees to record and maintain their respective overtime hours on paper time sheets.

OIIG Review

Interview of BOR Official A

BOR Official A was asked if BOR has written policies or procedures that she relies on to guide her with the awarding and overall administration of overtime hours worked by employees. BOR Official A said BOR follows the same time and attendance rules, including overtime rules, issued by the Cook County Bureau of Human Resources (BHR) for employees of the Offices under the President. BOR Official A stated that when employees work more than their regular scheduled hours, the employee is compensated 1.5 times their rate of pay for each additional hour worked beyond 40 hours in a work week. BOR Official A said that in adherence to BHR’s policy regarding overtime, BOR allows employees to accrue a maximum of 240 hours of overtime.³ The OIIG asked BOR Official A to explain why she did not make a distinction between overtime and comp time when she explained how BOR administers overtime. BOR Official A stated that she uses compensatory time and overtime terms interchangeably. She further stated that in administering overtime hours earned and paid she simply does not make any distinction between compensatory time and overtime pay. BOR Official A then clarified her previous statement concerning overtime accruals and acknowledged that the BOR allows certain employees to accrue overtime hours beyond the 240-maximum allowed.

The OIIG asked BOR Official A to explain how she manually calculates overtime and how she enters those calculations into CCT. BOR Official A stated that she does not actually conduct an independent calculation of overtime. She said that BOR relies on CCT to record and maintain account balances pertaining to overtime hours worked. During a previous OIIG interview, BOR

² Please note that OIIG Quarterly Reports pertaining to the Metropolitan Water Reclamation District of Greater Chicago (MWRD) are reported separately. Those reports can be found at: <https://www.cookcountyil.gov/service/metropolitan-water-reclamation-district-greater-chicago>.

³ The BHR’s overtime policy makes a distinction between compensatory time and overtime worked by employees. Per said policy, employees who work more than 40 hours in a week earn compensatory time at a rate of 1.5 for each hour worked beyond 40 hours and can accumulate up to 240 hours of compensatory time. All overtime hours worked above this limit must be compensated with overtime pay at the rate of 1 and ½ hours for every hour worked in a week over 40 hours after banking 240 hours of compensatory time.

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Official A stated that BOR entered lump sum amounts of overtime into CCT because CCT did not have the functionality to compute overtime when an employee worked beyond the parameters of their scheduled work hours. BOR Official A confirmed that CCT does not currently have the functionalities to capture and calculate overtime hours worked by BOR employees. However, she wanted to make clear that she is not responsible for performing the manual calculations to determine the amount of overtime that is awarded to employees. She said she relies on Excel spreadsheets submitted to her by BOR supervisors to assist her in ascertaining which individual employees are owed overtime. She added that in addition to the noted spreadsheets, she at times may receive emails from the respective supervisors alerting her of overtime owed to an employee. BOR Official A said she uses the balances in the spreadsheets and emails to enter lump sum totals into CCT.

Because CCT actually has built-in functionalities which allow the system to automatically calculate overtime hours worked, BOR Official A was asked if BOR had taken any actions to modify the CCT system and somehow disable said system from calculating overtime as it was initially designed. BOR Official A said, “Yes, there were discussions to modify the system.”

The OIIG asked BOR Official A to explain how she would obtain the balance of overtime liability owed as of a certain date in time. BOR Official A said, “I might have something...nothing formal.” She went on to clarify that she would have to rely on CCT to obtain the “real balance” of overtime owed instead of relying on spreadsheets she uses to record overtime hours owed. BOR Official A said that despite having an overtime budget of over \$200,000, the Budget Department “shows us in the red by \$900,000.”

Review of BOR Overtime Policies and Procedures

BOR Official A was asked to produce any written policies or procedures concerning the administration and awarding of overtime or comp time. She provided a memo dated January 13, 2020, addressed to “All Employees” from the Chief Deputy Commissioner and former Secretary of the Board. The memo stated, in part, “Due to the Board’s projected volume for Groups 6 thru 9 of over 182,000 complaints and the urgent necessity to complete this session by April 20th, beginning the week of January 13, 2020, the Board will institute mandatory ten (10) hours of overtime per week until further notice....”

In addition, the OIIG obtained a BOR letter dated July 25, 2022, addressed to the Cook County Budget Department wherein BOR Official B provided justifications to increase BOR’s overtime budget from \$350,000 to \$1,500,000. In the letter, BOR Official B stated, in part, “To answer any questions about transparency and accountability of how the funding allocation [sic], the BOR will detail and release an overtime policy. The policy will include how many hours employees can earn, how overtime is granted, and details the CCT approval process....”

Issues Regarding BOR Overtime Computation in CCT

As part of the OIIG’s request for records pertaining to CCT’s functionalities and related accounting of overtime and comp time by the BOR, BOR Official A tendered a series of emails. In those emails, a BOT Application Developer responded to a BOT Time Ticket in which BOR Official A explained that CCT was computing overtime hours inaccurately. More specifically, she stated that BOR required a correction in CCT because the system was not computing overtime at 1.5 times when employees worked more than eight hours per day.⁴ The BOT Application Developer asked BOR Official A whether she was amenable with Workforce coding “everything 8 hours a day to be at 1.5x.” She stated, “Yes, as long as I can use the comp adjustment code to enter OT that shouldn’t be computed at 1.5x.” BOR Official A sent a follow-up email to BOT Application Developer asking for an update on the CCT “issues” he had previously forwarded to Workforce. The BOT Application Developer responded that BOR’s request was considered a project change order and therefore needed to be vetted and approved by Enterprise Resource Planning. BOR Official A acknowledged the foregoing requirement and stated, “In the interim I will use the comp adjustment and enter manually.”

The BOR did not provide any documentation demonstrating that CCT comp time issues noted above have been resolved. During the course of our comprehensive review and detailed testing of employee time records in CCT, we noted that the BOR continued to use “comp time adjustments” to manually enter overtime worked and overtime paid out in monetary value. Moreover, our detailed testing revealed that during the period of our review (FY2017 to FY2021), the BOR continued to enter lump sums of comp time hours accrued and paid in money. Those lump sum totals were entered sporadically into CCT during the year. Importantly, we noted the employees did not record overtime worked in CCT. Instead, each employee we tested recorded regular 8-hour workdays. However, the employees were awarded lump sums of comp time, despite having no record in CCT that they had worked more than 40 hours during a given week. The BOR did not disclose the origin of the comp time or show how the value paid out in money was calculated when those items were entered into CCT as lump sums. The BOR continues to use a parallel manual system of spreadsheets and emails to track and record comp time, separate and apart from CCT.

Budgeted vs. Actual Annual Overtime Compensation

The OIIG accessed CCT’s reporting function and generated Comp Time Accrual Reports (“Comp Time Reports”) for fiscal years 2017 to 2021. The Comp Time Reports document individual accruals for each BOR employee, including initial balance, time accrued during the year, time used, and the corresponding ending balance. We analyzed all employees’ balances as they were recorded in CCT and traced them to Comptroller’s payroll records to generate a dollar value for each of the aforementioned balances (i.e., initial, accrued, used, and ending) based on the

⁴ BOR Official A apparently misinterpreted the BHR policy which actually states that overtime is to be calculated on a weekly basis, not a daily basis.

hourly pay rate during the year. Table A below is a summary of the comp time balances and related dollar values for the relevant period of our review.⁵

Table A				
FY2017:	Total Hours	Amount	# of Employees	% of Total Employees (126)
Initial Balance	2,972	\$ 120,601.97	76	60%
Accrued	25,640	\$ 893,633.28	100	79%
Used	25,551	\$ 902,919.12	100	79%
Ending Balance	3,061	\$ 111,316.13	97	77%
FY2018:	Total Hours	Amount	# of Employees	% of Total Employees (124)
Initial Balance	2,960	\$ 113,852.83	95	77%
Accrued	17,754	\$ 644,563.09	95	77%
Used	18,819	\$ 682,816.63	94	76%
Ending Balance	1,895	\$ 75,550.89	91	73%
FY2019:	Total Hours	Amount	# of Employees	% of Total Employees (125)
Initial Balance	1,979	\$ 84,906.61	87	70%
Accrued	27,957	\$ 1,067,690.48	104	83%
Used	28,468	\$ 1,092,299.03	105	84%
Ending Balance	1,430	\$ 59,360.21	87	70%
FY2020:	Total Hours	Amount	# of Employees	% of Total Employees (141)
Initial Balance	1,468	\$ 63,404.14	87	62%
Accrued	26,417	\$ 1,003,424.09	119	84%
Used	21,837	\$ 827,119.08	115	82%
Ending Balance	6,049	\$ 239,709.15	114	81%
FY2021:	Total Hours	Amount	# of Employees	% of Total Employees (167)

⁵ The OIIG determined that the ending balances did not agree with the subsequent fiscal year beginning balances from year-to-year due to the manner in which CCT captures the accrual of employees on a given date. For example, an employee may have started employment in FY2019 and therefore will have an accrued beginning balance in FY2019 but not an accrued ending balance in FY2018 because he was not employed during that relevant fiscal year. The OIIG reviewed and compared each of the employees' accrued balances from year-to-year and determined the differences between fiscal year ending and beginning are reasonably attributed to the manner in which CCT reports and captures accrual data. The OIIG determined that the differences from year-to-year are immaterial for testing purposes.

Initial Balance	6,088	\$ 254,539.26	116	69%
Accrued	22,949	\$ 899,088.18	120	72%
Used	22,297	\$ 867,270.93	133	80%
Ending Balance	6,741	\$ 286,356.51	120	72%

We compared CCT’s comp time “used” line items above with the budgeted amounts appropriated to the BOR for Planned Overtime Compensation per the Annual Appropriation Bill.⁶ The BOR was appropriated \$150,000 for fiscal year 2017 and \$250,000 individually for each fiscal year 2018 to 2021, respectively. Our review and analysis of the BOR’s budget revealed that the BOR exceeded its Planned Overtime Compensation budget appropriation by \$752,919, \$432,816, \$842,299, \$577,119, and \$617,270 for fiscal years 2017, 2018, 2019, 2020, and 2021, respectively.

BOR Documentation for Accrued Overtime

The OIIG also reviewed individual employee balances of accrued comp time according to reports maintained in CCT. The purpose of this review was to ascertain which employees had the largest number of comp time hours accrued. We selected, on a sample basis, 10 employees from each fiscal year from 2017 to 2021 for a total of 50 employees in the sample group.

The OIIG issued a document request to the BOR for any and all supporting documents that were utilized by the BOR to establish the value of each of the accrued comp time balances for the 50 employees in the sample group. In its response, the BOR stated that no records existed to support the amounts accrued for the 30 selected employees for fiscal years 2017, 2018, and 2019. The BOR further stated that the accrued hours were “computed based upon clock in/out recorded in CCT.”

With respect to fiscal year 2020, the BOR responded that for 6 of the 10 employees tested, no responsive records existed. For the remaining 4 employees, the BOR tendered a one-page screenshot of a report that included the following fields: name of employee, rate of pay, comp time hours as of May 29, 2020, Hours Over 240, Dollars Over 240, MMC Buyback Hours, MMC Buyback Dollars, and Remaining Hours. This data was in summary format and did not provide specific details regarding the awarding of comp time. Moreover, no responsive time records, such as daily time sheets, were tendered that specifically detailed when the comp time was earned, who approved the time and whether the employee was eligible to earn overtime based on number of hours worked during the time the overtime was earned.

For all 10 employees tested in fiscal year 2021, the BOR provided a one-page screen shot of an internal BOR spreadsheet from the employee’s respective supervisor. The spreadsheets did not include supporting documents or detailed information to trace the number of hours accrued to relevant time and attendance records, which would have included daily time sheets, emails, and

⁶ The comp time used figures include time that was taken as time off as well as time that was paid in dollars.

approval reports. In addition, the BOR provided a simple statement indicating that the “overtime hours for fiscal year 2021 were computed based upon hours recorded in CCT.”

OIIG Findings and Conclusions

Our review revealed that the BOR lacks an effective system of internal controls related to the administration and documentation of overtime that is converted to comp time such as written policies and procedures that are implemented and followed. Contrary to the statements that the BOR adheres to BHR’s overtime and comp time policies and procedures, we found that the BOR did not follow BHR policies which require that overtime be calculated on a weekly basis (rather than a daily basis) and that overtime be documented through written forms approved in advance. Instead of following BHR policies, the BOR relied on informal policies and practices and informed the Budget Office that it intended to formulate and release its own overtime policy. As of the conclusion of our review, the BOR had not implemented its overtime policy regarding the administration and documentation of overtime.

In addition, our review also revealed that BOR lacks internal controls with respect to recordkeeping for overtime. As discussed above, the BOR was unable to produce adequate documentation regarding overtime when it was requested by the OIIG during this review.

Finally, our review confirmed that the BOR regularly exceeds its annual budget for overtime expenses.

OIIG Recommendations

Based upon the foregoing, we recommended the following:

1. The BOR should formally implement written policies and procedures concerning the administration and documentation of overtime and related comp time conversions. As noted in the BOR’s letter to the Budget office, the policy and related procedures should include, among other things, the process by which overtime is granted and paid in money and details of the CCT approval process. The policy should also require that overtime be approved in writing in advance and that such approvals and related overtime documentation be maintained for audit purposes.
2. The BOR should utilize CCT functionalities as they were designed and discontinue the use of a separate manual system to record and account for overtime and comp time earned and used.
3. The BOR should conduct an evaluation of its workforce and take the necessary actions to ensure compliance with the budgeted Planned Overtime Compensation appropriations in a given fiscal year.

This report was issued August 24, 2023, and the response is not yet due.

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and Honorable Members of the Cook County
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IIG22-0836 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”)⁷ to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$41,666. On her loan applications, the subject employee stated she was the “Sole Proprietor” of a “Hair Stylist” business and a “House Keeping Service” business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment as required by CCH Personnel Rules.

This investigation consisted of a review of the subject employees CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, and Illinois Department of Financial and Professional Regulation (IDFPR) records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely certifying on federal PPP loan applications that she owned a hairstylist business and that she also separately owned and operated a housekeeping business. The OIIG found no evidence to support the subject employees claims that she owned or operated either business. Searches of state and public record databases also failed to show evidence that the subject employee incorporated either business or that she was licensed as a cosmetologist as required by the State of Illinois to operate a hairstyling business. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that she spent \$27,500 of the \$41,666 she received on payroll costs for the fictitious businesses.

When the OIIG notified the subject employee that she was the subject of an official OIIG investigation, she failed to meet with investigators to answer questions regarding her alleged outside employment. Instead, the subject employee quickly resigned from her CCH position the day after the OIIG’s request for an interview. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees.

⁷ The CARES Act is a federal law enacted on March 29, 2020, to provide emergency financial assistance in connection with economic effects of the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through the PPP. The PPP allows qualifying small businesses and other organizations to receive loans with a maturity of two years and an interest rate of 1%. PPP loan proceeds must be used by businesses on payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be forgiven if the business spends the loan proceeds on these expense items within a designated period of time after receiving the proceeds and uses at least a certain percentage of the PPP loan proceeds on payroll expenses.

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Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee's employment be terminated. However, as the subject employee resigned from her position with CCH during the OIIG's investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued August 17, 2023, and CCH adopted our recommendation.

IG22-0840 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$41,666. On her loan applications, the subject employee stated she was the "Sole Proprietor" of a "Home Contracting & Remodeling" business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employees CCH dual employment records, Cook County Time records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, City of Chicago records, a public Facebook profile, a LinkedIn profile, and other public records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence gathered in this investigation shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on two federal PPP loan applications that she owned a "Home Contracting & Remodeling" business, which she stated generated gross receipts or sales of \$115,300 in 2020. The OIIG found no evidence to support the subject employee's claims that she owned and operated a "Home Contracting & Remodeling" business as she listed on her federal PPP loan and forgiveness applications. Searches of state and public record databases also did not reveal any evidence that the subject employee had been operating the business listed on her PPP federal loan applications.

When the OIIG notified the subject employee that she was the subject of an official OIIG investigation, she failed to meet with investigators to answer questions regarding her alleged outside employment. Instead, the subject employee quickly resigned from her CCH position five days after the OIIG requested an interview. Committing financial fraud directed at the federal government tarnishes the subject employee's reputation and brings discredit to CCH as it can erode the public's trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employees conduct in fraudulently obtaining the loans occurred while she was on CCH time.

Based on the serious nature of the misconduct involved, as well as other aggravating factors present, the OIIG would have recommended that the subject employee's employment be terminated. However, as the subject employee resigned from her position with CCH during the OIIG's investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued September 29, 2023, and CCH adopted our recommendation.

IIG22-0844 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$41,666. On his loan applications, the subject employee stated he was an "Independent Contractor" of a "Business Consulting" business. The OIIG conducted an investigation to determine if the subject employee informed CCH that he was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employee's CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, North American Industry Classification System records, and other public records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on two federal PPP loan applications that he owned a "business consulting" business. The subject employee submitted two different 2019 Schedule C tax forms with his applications which contained conflicting information as to the amount of revenue generated by his alleged business. The OIIG found no evidence to support the existence of the subject employee's alleged business through searches of state and public record databases. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that he spent \$31,440 of the \$41,666 he received on payroll costs for the fictitious business.

When the OIIG notified the subject employee that he was the subject of an official OIIG investigation, he failed to meet with investigators to answer questions regarding his alleged outside employment. Instead, the subject employee quickly resigned from his CCH position the day his supervisor notified him that the OIIG was trying to contact him. Committing financial fraud directed at the federal government tarnishes the subject employee's reputation and brings discredit to CCH as it can erode the public's trust in Cook County government, CCH, and their employees.

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Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee's employment be terminated. However, as the subject employee resigned from his position with CCH during the OIIG's investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued August 28, 2023, and CCH adopted our recommendation.

IIIG22-0846 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$41,666. On her loan applications, the subject employee stated she was a "Self-employed Individual" of a "Real Estate" business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employee's CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, North American Industry Classification System code records, and other public records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on two federal PPP loan applications that she owned a real estate business which generated gross receipts or sales of \$107,932 in 2020. Through searches of State and public record databases, the OIIG found no evidence to support the subject employee's claims that she owned and operated a real estate business or that she was even licensed as a realtor as required by the State of Illinois. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that she spent \$37,000 of the \$41,666 she received on payroll costs for the fictitious business.

When the OIIG notified the subject employee that she was the subject of an official OIIG investigation, she failed to meet with investigators to answer questions regarding her alleged outside employment. Instead, the subject employee quickly resigned from her CCH position after the OIIG requested an interview. Committing financial fraud directed at the federal government tarnishes the subject employee's reputation and brings discredit to CCH as it can erode the public's trust in Cook County government, CCH, and their employees.

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Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee's employment be terminated. However, as the subject employee resigned from her position with CCH during the OIIG's investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

The report was issued August 28, 2023, and CCH adopted our recommendation.

IG22-0860 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$40,050. On her loan applications, the subject employee stated she was the "Sole Proprietor" of a "Business Consulting" business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules. During the OIIG's investigation, it was further discovered that the subject employee had also obtained \$10,000 through the SBA Covid-19 Economic Impact Disaster Loan ("EIDL") program. The EIDL was another program through the SBA intended to help struggling businesses during the Covid-19 pandemic.⁸

During this investigation, the OIIG reviewed the subject employee's CCH dual employment records, Cook County Time records (CCT), public and subpoenaed federal Small Business Administration PPP loan and EIDL records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, North American Industry Classification System records, Chase Bank records, and other public records. The OIIG also interviewed the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The records obtained in this investigation and the subject employee's statements during her OIIG interview prove that she provided false and misleading information about owning a business and the revenue the business generated to obtain two federal PPP loans. Searches of state and public record databases and the subject employee's bank records failed to show any evidence that the subject employee operated the business listed on her loan applications or any other business. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that she spent the entirety of the \$40,050 in federal PPP funds she received on payroll costs for the fictitious business.

⁸ In response to COVID-19, small business owners, including agricultural businesses, and nonprofit organizations in all U.S. states, Washington D.C., and territories were able to apply for the COVID-19 Economic Injury Disaster Loan (EIDL). Proceeds are to be used as working capital to make regular payments for operating expenses, including payroll, rent/mortgage, utilities, and other ordinary business expenses, and to pay business debt incurred at any time.

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Moreover, the OIIG found that the subject employee also provided false information about owning an agricultural business to obtain a \$10,000 SBA emergency loan through the EIDL program which was intended to help struggling businesses during the COVID-19 pandemic. After fraudulently obtaining the EIDL funds, bank records show that the subject employee then improperly spent those funds entirely on personal expenses.

Committing financial fraud directed at the federal government tarnishes the subject employee's reputation and brings discredit to CCH as it can erode the public's trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employee's conduct in fraudulently obtaining the loans occurred while she was on CCH time.

Based on the serious nature of the misconduct, as well as other aggravating factors present, we recommended that the subject employee's employment be terminated and that she be placed on the *Ineligible for Hire List*. Aggravating factors considered in making this recommendation include the fact that the subject employee committed fraud against the federal government at times while on CCH time.

This report was issued September 26, 2023, and a response is not yet due.

IIIG22-0861 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$40,000. On his loan applications, the subject employee stated he was the "Sole Proprietor" of a "Business Consulting" business. The OIIG conducted an investigation to determine if the subject employee informed CCH that he was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employee's CCH dual employment records, Cook County Time records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, North American Industry Classification System code records, and other public records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on two federal PPP loan applications that he owned a "business consulting" business that generated gross receipts or sales of \$106,600 in 2019. The OIIG found no evidence to support the subject employee's claims

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that he owned and operated a “business consulting” business or an insurance business, as he listed on his federal PPP loan and forgiveness applications. In searching State and public record databases, the OIIG also found no evidence that the subject employee incorporated a business or that he was licensed as an insurance producer as would be required by the State of Illinois. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that he spent \$25,410 of the \$40,000 he received on payroll costs for the fictitious business.

When the OIIG notified the subject employee that he was the subject of an official OIIG investigation, he failed to meet with investigators to answer questions regarding his alleged outside employment. Instead, the subject employee quickly resigned from his CCH position days after the OIIG requested an interview. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employee’s conduct in fraudulently obtaining the loans occurred while he was on CCH time.

Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee’s employment be terminated. However, as the subject employee resigned from his position with CCH during the OIIG’s investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued August 30, 2023, and CCH adopted our recommendation.

IIG22-0868 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling \$35,375. On his loan applications, the subject employee stated he was the “Sole Proprietor” of a “Business Consulting” business. The OIIG conducted an investigation to determine if the subject employee informed CCH that he was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employee’s CCH dual employment records, Cook County Time (CCT) records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, the results of a North American Industry Classification System code search, and other public records. The OIIG also attempted to interview the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that

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Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on two federal PPP loan applications that he owned a “business consulting” business in the insurance field which allegedly generated gross receipts or sales of \$106,600 in 2019 and \$92,965 in 2020. The OIIG found no evidence to support the subject employee’s claims that he owned and operated such a business. Searches of state and public record databases also failed to show evidence that the subject employee incorporated the business listed on his loan application or any other business. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of the two federal PPP loans and falsely certified that he spent \$22,671 of the \$35,375 he received on payroll costs for the fictitious business.

When the OIIG notified the subject employee that he was the subject of an official OIIG investigation, he failed to meet with investigators to answer questions regarding his alleged outside employment. Instead, the subject employee quickly resigned from his CCH position five days after the OIIG requested an interview. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employee’s conduct in fraudulently obtaining the loans occurred while he was on CCH time.

Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee’s employment be terminated. However, as the subject employee resigned from his position with CCH during the OIIG’s investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued August 24, 2023, and CCH adopted our recommendation.

IIIG22-0883 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought a federal PPP loan totaling \$20,832. On her loan application, the subject employee stated she was the “Sole Proprietor” of an “Agents and Managers for Artists” business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

During this investigation, the OIIG reviewed the subject employee’s CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records, Illinois Secretary of State Corporation/LLC records, Illinois Department of Financial and Professional Regulation (IDFPR) records, North American Industry Classification System records, two public LinkedIn profiles, and other public records. The OIIG also attempted to interview the subject employee.

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The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence shows that the subject employee engaged in fraud against the federal government by falsely claiming and certifying on a federal PPP loan application that she owned an “Agents and Managers for Artists” business. The subject employee submitted a 2020 Schedule C tax form with her application, which stated that her business had gross receipts or sales of \$100,000, but the OIIG found no evidence to support the existence of the subject employee’s alleged business through searches of state and public record databases. Moreover, a bank statement that the subject employee provided to the lender did not reflect any business activity but rather showed the subject employee’s personal day-to-day banking activities. After fraudulently obtaining the federal PPP funds, the subject employee requested forgiveness of her federal PPP loan and falsely certified that she spent \$15,832 of the \$20,832 she received on payroll costs for the fictitious business.

When the OIIG notified the subject employee that she was the subject of an official OIIG investigation, she failed to meet with investigators to answer questions regarding her alleged outside employment. Instead, the subject employee quickly submitted her resignation from her CCH position. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees.

Based on the serious nature of the misconduct involved, the OIIG would have recommended that the subject employee’s employment be terminated. However, as the subject employee resigned from her position with CCH during the OIIG’s investigation, we recommended that CCH place the subject employee on the *Ineligible for Hire List*.

This report was issued September 26, 2023, and CCH adopted our recommendation.

IIIG23-0197 – Medical Examiner’s Office. This investigation was initiated based on a complaint alleging that an MEO employee is believed to have stolen a Nikon D850 digital camera from the MEO. During our investigation, the OIIG reviewed spreadsheets listing assignments of MEO camera equipment, email records, and an invoice for the camera. This office also interviewed the various MEO employees including the subject.

The preponderance of the evidence developed during this investigation does not support the allegation that the subject employee stole the missing camera in violation of Cook County Personnel Rule 8.2(b)(10). Although the camera was assigned to the subject employee and was eventually missing, there is no evidence he took the camera off MEO premises. While it is possible that the subject employee stole the camera, the lack of enforceable inventory and control procedures coupled with the wide access to the equipment storage cabinet make it difficult to ultimately draw this conclusion.

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The preponderance of the evidence developed during this investigation does support the conclusion that the subject employee acted negligently with regard to the camera in violation of Cook County Personnel Rule 8.2(b)(13). After being assigned an expensive camera, the employee decided not to use it but failed to securely store it. Instead, he placed it in a cabinet which he knew to be accessible by a number of people including contractors and which he knew was frequently open when it should have been locked. The employee also acknowledged that he failed to inform his former supervisor or anyone else that he had placed the camera in the storage cabinet and never checked on the camera again, although the camera had been assigned to him. The employee's negligence in this regard resulted in the loss of an expensive piece of equipment.

As the subject employee resigned from his position with the MEO shortly after being interviewed by the OIIG, we did not recommend any disciplinary action against him. However, we did recommend that the MEO implement policies to enhance internal controls regarding office property which should include, among other things, policies regarding regular inventories to account for all property over a certain dollar value threshold and policies regarding the safeguarding of expensive equipment assigned to individual employees so that if any such equipment is missing someone may be held accountable.

This report was issued August 15, 2023, and in its timely response, the MEO adopted our recommendation.

IIIG23-0416 – Forest Preserves. The OIIG initiated this investigation based on a complaint that two employees of the Forest Preserves (FP) made offensive remarks regarding racial and LGBTQ groups. During its investigation, the OIIG reviewed FP policies and interviewed several FP employees including the subject employees.

The Forest Preserves Districtwide Non-Discrimination & Harassment Policy Number 06.30.00 provides, in pertinent part:

The District prohibits all forms of discrimination, including any employment-related action that adversely affects an individual based on race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, pregnancy, military discharge status, source of income, housing status, or gender identity, and other classifications protected by law.

Discriminatory harassment, including sexual harassment, is verbal or physical conduct that demeans or shows hostility or aversion toward an individual based upon that individual's protected class. It has the effect of interfering with an individual's work performance or creating a hostile or abusive work environment.

Conduct that may, under certain circumstances, constitute discriminatory harassment, can include making derogatory comments, crude and offensive statements or remarks; making slurs or off-color jokes; stereotyping; engaging in

threatening acts; making indecent gestures; pictures, cartoons, posters or material; making inappropriate physical contact; or using written material or department equipment and/or systems to transmit or receive offensive material, statements or pictures. Such conduct is contrary to this policy and to the District's commitment to a discrimination free work environment.

The preponderance of the evidence developed during this investigation supports the allegations that both subject employees violated the FP Non-Discrimination & Harassment Policy and related Personnel Rules. One subject employee violated the policy by making offensive statements regarding racial and ethnic groups and the other violated the policy by making crude and offensive remarks regarding members of the LGBTQ community, specifically transgender people.

We recommended additional training and/or discipline consistent with other cases involving similar violations of the FP Non-Discrimination & Harassment policy for both subject employees. Such corrective action is necessary to ensure that the work environment of FP employees is free from all forms of discrimination and harassment. This report was issued August 9, 2023, and in its timely response, the FP adopted the OIIG recommendations.

IIG23-0430 – Cook County Health. This investigation was initiated by the OIIG based on an anonymous complaint alleging that a CCH employee had been observed distributing homemade alcohol to her co-workers during duty hours while at work and on CCH property. During the investigation, this office reviewed a Facebook account and interviewed CCH employees including the subject employee.

When interviewed by the OIIG, the employee admitted to distributing bottles of alcohol to co-workers while on CCH property. Accordingly, the preponderance of the evidence supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(2). As a result, the OIIG recommended that the employee be admonished to refrain from distributing alcohol on CCH property. We also recommended that the other employees in her department receive counseling as to the rule against distribution of alcohol on CCH property as the evidence suggests such activity has occurred in the past.

This report was issued August 10, 2023. In its timely response, CCH adopted both OIIG recommendations.

IIG23-0451 – Medical Examiner's Office. This investigation was initiated by the OIIG based on an anonymous complaint alleging that a Medical Examiner's Office (MEO) employee has been working outside secondary employment for a local fire department. During our investigation, the OIIG reviewed the subject employee's Cook County dual employment form, the subject employee's fire department time sheets, and the subject employee's Cook County personnel file. In addition, the OIIG interviewed the subject employee.

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The preponderance of the evidence developed in this investigation supports the allegation that the subject employee has been working full-time as a fire chief at a local fire department in excess of the 20-hour weekly limit set forth in Cook County Personnel Rule 13.3. Furthermore, Cook County Personnel Rule 13.4 states: “Failure by an employee to disclose the above information to one’s Department Head or providing false information on the form shall be cause for disciplinary action up to and including discharge from County employment.” The preponderance of the evidence supports the conclusion that the subject employee falsified his Dual Employment form when he indicated that he only works 20 hours per week for the local fire department.

Based on the foregoing, we recommended that disciplinary action be imposed upon the subject employee. When assessing the appropriate level of discipline, we recommended that consideration be given to the factors set forth in Cook County Personnel Rule 8.3(b), including the department practice in recent similar cases.

This report was issued August 14, 2023, and the MEO adopted our recommendation to impose discipline on the subject employee.

Responses to Recommendations from Prior Quarters

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

From the 2nd Quarter 2023

IIG21-0336 – Public Defender’s Office. This investigation was initiated based on a complaint alleging that the Cook County Public Defender’s Office (“CCPD”) has improperly provided confidential juvenile and adult client information including names, addresses, telephone numbers, and charging information to a private legal center (the “Legal Center”).

OIIG Investigation

This investigation consisted of a review of a “Memorandum of Agreement” between CCPD and the Legal Center, communications between CCPD and the Legal Center, and information from the Office of the Chief Judge of Cook County. The OIIG also interviewed Assistant Public Defender A, Assistant Public Defender B, the current Public Defender, the Presiding Judge of the Cook County Juvenile Justice Division and the Legal Services Administrator for the Office of the Chief Judge. The OIIG also attempted to interview a former high ranking official in CCPD (“Official A”), but she declined the request.

MOA Between CCPD and the Legal Center

The Memorandum of Agreement (“MOA”) between CCPD and the Legal Center was signed by the Legal Center’s Executive Director and former Official A. It provides that CCPD will share “identifying information” of clients with the Legal Center so that the Legal Center may determine which clients it may offer to represent in pending criminal charges. “Identifying information” is defined in the MOA as “a client’s name, date of birth, type of pending criminal charge(s), case numbers, and contact information such as address and phone number, but not including work product or other attorney-client communications.” The MOA also provides that “[t]he Parties’ interest predates this Agreement and this Agreement shall apply to the Parties’ communications and any information that the Parties have shared before or will share after the date of this Agreement relating to the Evaluation Clients.”

Interview of the Current Public Defender

The current Public Defender (“PD”) stated that shortly after taking office he discovered the MOA between CCPD and the Legal Center to share client information. The PD stated he quickly ended the agreement and directed senior leadership to prepare a summary outlining the history of the MOA because he saw many issues with the MOA including obvious problems with confidentiality.

The PD stated his office conducted an internal investigation into the sharing agreement. The PD stated after reviewing internal emails, his office found no evidence that the Legal Center received payment from the juvenile clients referred by CCPD. The PD acknowledged, however, that the Legal Center used the information provided by CCPD to solicit the juveniles for legal services. The PD further acknowledged that the Legal Center’s grant funding is determined by the number of clients to whom it provides legal services.

The PD stated he contacted the Executive Director of the Legal Center and told him that CCPD was terminating the agreement with the Legal Center. The PD stated the Executive Director wanted to continue the program but did not try to “strong arm” him to keep the agreement in place. The PD stated he spoke with senior leadership within his office and made it clear that the data sharing needed to end. The PD stated “everyone was quite relieved it stopped” because “nobody [in CCPD] was comfortable” with it. The PD stated he does not believe the Legal Center requested confidential juvenile data from Assistant Public Defenders after the agreement ended.

Interview with Assistant Public Defender A

Assistant Public Defender (“APD”) A stated she was familiar with the arrangement between CCPD and the Legal Center under which CCPD agreed to refer juvenile clients to the Legal Center. APD A recalled that several APDs were not comfortable with the arrangement due to, among other things, confidentiality concerns. APD A stated that despite a lack of clear understanding of the scope or legality of the arrangement, APDs repeatedly forwarded the names

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of juveniles who fit a particular profile (geographic location, type of crime, etc.) to the Legal Center. After the current PD took office, APD A wrote a memo outlining her concerns regarding the MOA with the Legal Center which she submitted to CCPD leadership.

Interview with Assistant Public Defender B

APD B stated his managers at Juvenile Court informed him that CCPD would refer cases to the Legal Center that matched a particular profile. APD B was unaware whether the Office of the Chief Judge was aware of the arrangement. APD B further stated he sent weekly emails to the Legal Center stating whether there were new eligible cases in the system and providing the juveniles' names, addresses, and phone numbers. APD B stated CCPD never sought consent from the juveniles' parents for the Legal Center to represent the juveniles or to send the juveniles' contact information to the Legal Center. APD B was unaware if CCPD had determined whether the Juvenile Court Act allowed such an arrangement.

Communications between CCPD and the Legal Center

The OIIG obtained email communications between CCPD and the Legal Center. The emails reveal a plan between former Official A and the Legal Center to enter into an agreement where CCPD would supply the Legal Center the identifying information of juvenile and adult clients "to develop research and best practices for holistic community-based restorative justice legal services." Additionally, the emails reveal that former Official A joined the Legal Center Advisory Board while employed at CCPD and former Official A discussed working for the Legal Center upon leaving CCPD. In various emails, the Legal Center Executive Director expressed fear of losing funding if the Legal Center did not receive enough referrals from CCPD. For example, in one email, the Legal Center Executive Director wrote former Official A stating: "I'm concerned ... that funding for it will stop if we don't get our numbers up to 40 per month. We are way behind in implementing the evaluation." In another, the Legal Center Executive Director requested an in-person meeting "to bring together all of the stakeholders." This email began:

We are coming to a "do or die" point on the evaluation we have been working so hard to implement together. If we cannot consent 40 people per month into our evaluation, we will have to consider ending or altering the evaluation we've been working so hard on for so long to implement.

This email was sent to former Official A, as well as three high-ranking employees in CCPD.

In another email, the Legal Center Executive Director outlined additional steps that would be taken to ensure the Legal Center acquired the desired number of clients. The Legal Center Executive Director referenced the drafting of a "confidentiality agreement" to "share information," as well as Legal Center staff meeting with CCPD supervisors in Adult and Juvenile Court.

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*Interview of the Presiding Judge of the Cook County Juvenile Justice Division and the
Legal Services Administrator for the Office of the Chief Judge of Cook County*

The OIIG provided a copy of the MOA signed by former Official A and the Legal Center’s Executive Director to the Presiding Judge of the Cook County Juvenile Justice Division (“Presiding Judge”) and the Legal Services Administrator for the Office of the Chief Judge of Cook County (“LSA”) for their review prior to their OIIG interview. Both the Presiding Judge and the LSA stated that they were unaware of the agreement between CCPD and the Legal Center. The Presiding Judge stated, and the LSA reiterated, nobody from CCPD or the Legal Center came to the Presiding Judge’s Office requesting approval for such an agreement. The Presiding Judge added, “I would not have agreed to sign it if they had come to me.”

Both the Presiding Judge and the LSA expressed concern with the fact that the MOA lacked a provision to obtain consent from the minors and their parents or guardians for the sharing of the minors’ identifying information. The Presiding Judge and the LSA stated they believed such information, absent consent from the minor and parent or guardian, would be required to be kept confidential pursuant to The Juvenile Court Act and could not be shared with the Legal Center.

The Presiding Judge stated that he has given permission in the past for the release of aggregate data to persons engaged in bona fide research. The Presiding Judge explained that his office held a “Juvenile Justice Agency Collaborative” with a local university crime lab and agency partners, including CCPD, to analyze data on gun violence. The Presiding Judge stated that he gave permission for the release of data under those circumstances. The Presiding Judge also noted that, under The Juvenile Court Act, the Superintendent of the Chicago Police Department, as the chief executive of the agency which prepared the documents (e.g., arrest reports), also needed to give permission for the release of information to the crime lab. The Presiding Judge and the LSA emphasized that the data was redacted to eliminate any identifying information – only aggregate data, which included general demographics such as age, race, and zip code, are released. Both reiterated that this was to protect the minors’ identifying information. The LSA noted that while CCPD was present at the Collaborative, CCPD did not contribute to the data – citing attorney-client privilege.

The LSA also stated that earlier in 2022, former Official A (now employed by the Legal Center), the Legal Center Executive Director and another employee requested permission for the Legal Center to have a table in one of the Juvenile Justice courtrooms “to allow new attorneys to observe proceedings.” The LSA stated that the Legal Center employee followed up on that request and mentioned that the Legal Center “still needed to get people for its initiative” and “needed people for the million-dollar grant.” The LSA stated these comments raised concerns for her regarding the potential for the Legal Center to solicit clients. The LSA stated that the Cook County Sheriff was consulted regarding the Legal Center’s request, and ultimately, the request was denied due to security risks. The Presiding Judge stated that he was unaware of whether former Official A or the Legal Center had been in contact with the Chief Judge of the Circuit Court of Cook County (“Chief Judge”) regarding the MOA.

Correspondence with the Office of the Chief Judge

Investigators sent correspondence to the Chief Judge inquiring if the Court had authorized the sharing of client information between CCPD and the Legal Center. A representative at the Office of the Chief Judge called the OIIG and stated that the Office of the Chief Judge was not aware of data sharing between CCPD and the Legal Center. The representative further stated that Information Services has authorized data sharing in the past when bona fide research was being conducted but emphasized that data was redacted to provide anonymity – especially when it encompasses juvenile information. The representative further stated that he did not believe there was any Court authorization for the Legal Center to conduct research.

Attempted Interview of the Former Official A

The OIIG attempted to interview former Official A. However, former Official A declined to be interviewed.

The Illinois Juvenile Court Act of 1987

The Illinois Juvenile Court Act of 1987, 705 ILCS 405/1, *et seq.*, (the “Act”) governs the confidentiality and dissemination of juvenile court records and juvenile law enforcement records. Both are protected under the Act. Section 1-3(8.1) of the Act defines a “juvenile court record” as including, but not limited to:

- (a) all documents filed in or maintained by the juvenile court pertaining to a specific incident, proceeding, or individual;
- (b) all documents relating to a specific incident, proceeding, or individual made available to or maintained by probation officers;
- (c) all documents, video or audio tapes, photographs and exhibits admitted into evidence at juvenile court hearings; or
- (d) all documents, transcripts, records, reports, or other evidence prepared by, maintained by, or released by any municipal, county or State agency or department, in any format, if indicating involvement with the juvenile court relating to a specific incident, proceeding, or individual.

Section 1-3(8.2) of the Act defines a “juvenile law enforcement record” as including “records of arrest, station adjustments, fingerprints, probation adjustments, the issuance of a notice to appear, or any other records or documents maintained by any law enforcement agency relating to a minor suspected of committing an offense, and records maintained by a law enforcement agency that identifies a juvenile as a suspect in committing an offense....”

Section 1-7 of the Act applies to the confidentiality of “juvenile law enforcement records” while Section 1-8 covers the confidentiality of “juvenile court records.” Both sections provide that the records may never be disclosed to the general public. Each section provides exceptions, but those exceptions either require a court order or restrict access to the records to certain individuals such as those involved in the court proceedings, including judges, prosecutors, defense counsel (private counsel or public defender). None of the enumerated exceptions would apply to the sharing of confidential juvenile information which was occurring between CCPD and the Legal Center. A willful violation of Section 1-7 or Section 1-8 of the Act is a Class C misdemeanor, and each violation is subject to a fine of \$1,000.

Illinois Rules of Professional Conduct – Rule 1.6: Confidentiality of Information

The Illinois Rules of Professional Conduct govern attorneys licensed in this State. Rule 1.6(a) states “[a] lawyer shall not reveal information relating to the representation of a client unless the client gives informed consent, the disclosure is impliedly authorized in order to carry out the representation, or the disclosure is permitted by paragraph (b) or required by paragraph (c).” Paragraphs (b) and (c) of the Rule do not apply to the sharing of confidential juvenile information which was occurring between CCPD and the Legal Center.

OIIG Findings and Conclusions

The preponderance of the evidence gathered during this investigation supports the conclusion that CCPD, under the guidance and direction of former Official A, misused confidential information by sharing it with the Legal Center. Such conduct violated Cook County Personnel Rules as well as the fiduciary duty provisions of the Cook County Ethics Ordinance as the names, contact information, and case information of juveniles are protected under the Juvenile Court Act and Rule 1.6 of Illinois Professional Rules of Conduct. Neither contains an exception which would allow the sharing of information which occurred between CCPD and the Legal Center, and no court order was sought or entered to permit the sharing of information.

OIIG Recommendations

Based on the above findings and conclusions, we recommended that:

1. CCPD provide additional instruction and training to its staff to ensure that the sharing of confidential information described above is no longer occurring and will not occur in the future.
2. CCPD make the appropriate notification to the Attorney Registration and Disciplinary Commission regarding the breaches of confidentiality relating to the agreement to share client information with the Legal Center.

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This report was issued June 29, 2023. In its timely response, CCPD adopted both of the OIIG recommendations.

IIG22-0359 – Cook County Health. This investigation was initiated based on a complaint alleging that a CCH employee spent several hours each day while on duty completing coursework relating to her outside employment teaching online courses at universities. The OIIG's investigation consisted of interviews with current and former CCH employees and the subject employee. The OIIG also reviewed subpoenaed records from three local universities and one local college as well as the subject employee's personnel file and Cook County Time (CCT) records.

The preponderance of the evidence in this investigation supports the conclusion that the subject CCH employee violated CCH Personnel Rule 8.03(d)(4) by engaging in non-CCH business while on duty and/or on CCH premises. Three CCH current or former employees stated that they witnessed the subject employee working on her own educational courses and/or her teaching jobs during her CCH work hours while at CCH. Numerous records from the subject employee's secondary employers corroborate these witness statements as to her engaging in non-CCH business while on duty and on CCH premises hundreds of times during the period of our review.

The preponderance of the evidence also supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(24) by using CCH resources, including her paid CCH time and CCH secure networks, to engage in her secondary employment endeavors. Specifically, the IP addresses associated with her logins to her secondary employers show that her outside employment activity was conducted using CCH's network on numerous occasions. CCT records further confirm that such conduct frequently occurred during the subject employee's paid CCH time.

Finally, CCH Personnel Rule 12.04 (Parameters for Dual Employment) provides that dual employment is permissible only when the specific hours of the outside activities are not in conflict with the employee's normal duty hours and do not interfere with the employee's ability to satisfactorily perform CCH duties. Furthermore, this rule prohibits employees from engaging in outside activities that utilize CCH property or are conducted on CCH premises. Not only did the subject employee engage in outside employment during her CCH work hours and while on CCH premises as discussed above, but the preponderance of the evidence shows that her outside employment interfered with her ability to satisfactorily perform her duties. Multiple witnesses independently described how the subject employee's secondary employment caused her to be unprepared for an important meeting with regulatory bodies and/or to delegate her responsibilities to subordinates. The subject employee's conduct caused them undue burden and contributed to them leaving their employment with CCH. For all of these reasons, the subject employee's conduct violated the parameters for dual employment as provided in CCH Personnel Rule 12.04.

Based on the findings and conclusions above, including at least one sustained finding of a Major Cause infraction, we recommended that the subject employee receive significant disciplinary action in the form of a suspension. We recommended that the length of the suspension be determined by CCH based on the factors set forth in the CCH Personnel Rules.

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This report was issued May 24, 2023. CCH terminated the subject employee.

IIG22-0638 – Cook County Health. This investigation was initiated based on an anonymous complaint alleging that a nurse at Cook County Health (“CCH”) has been observed by her co-workers utilizing CCH computers to engage in outside secondary employment while on duty for the past couple of years. During this investigation, the OIIG reviewed the subject nurse’s CCH dual employment form, her CCH personnel file, and her Cook County Time (“CCT”) records. In addition, the OIIG reviewed the sign-in sheets (“Work Logs”) from the subject nurse’s former secondary employer. This office also interviewed the owner of the secondary employer and the subject nurse.

The CCH Personnel Rule 12.03 provides: “Employees must complete, sign and submit the Report of Dual Employment Form prior to engaging in outside activities.” The preponderance of the evidence revealed that the subject nurse failed to report her dual employment when she sought and obtained outside employment during the relevant time period.

CCH Personnel Rule 12.04 provides that dual employment is permissible only when the type of work to be performed in connection with the outside activities is approved in advance by the employee’s Department Head and the specific hours of the outside activities are not in conflict with the employee’s normal duty hours. The preponderance of the evidence in this investigation supports the conclusion that the subject nurse’s dual employment was not approved by her Department Head and conflicted with her CCH work hours on at least one occasion.

CCH Personnel Rule 12.05 states: “Failure by an Employee to disclose the above information to their Department Head or providing false information on the Report of Dual Employment Form shall be cause for disciplinary action up to and including discharge from employment.” The preponderance of the evidence supports the conclusion that the subject nurse failed to report her outside employment to her Department Head when she indicated on a Report of Dual Employment Form that she did not have secondary employment when she in fact had been engaging in secondary employment.

Based on the foregoing, we recommended that disciplinary action be imposed on the subject nurse. CCH issued a counseling to the subject nurse.

IIG22-0830 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought three federal PPP loans totaling \$82,608. On one loan application, the subject employee stated she was the “Sole Proprietor” of a “Spa Services” business. On two other federal PPP loan applications, the subject employee stated she was a “Self-employed Individual” of a “Personal Services” business. The

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OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment as required by CCH Personnel Rules.

This investigation consisted of a review of the subject employee's CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records and Cook County Time (CCT) records, as well as an Illinois Secretary of State Corporation/LLC search and an Illinois Department of Financial and Professional Regulation (IDFPR) search. The OIIG also interviewed the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence, including the subject employee's statements to OIIG investigators, show that the subject employee engaged in fraud against the federal government by falsely claiming on a federal PPP loan application that she owned a business that generated gross receipts of \$300,000. She further defrauded the federal government by providing false information on two additional federal PPP loan applications that contradicted the information she had provided in her first PPP loan application. While the subject employee may have been eligible for some minimal PPP support based on her verbal description of her esthetician business, the subject employee intentionally misrepresented her business activities and supplied false revenue information to extensively increase the amount of federal loans she received. After fraudulently obtaining \$82,608 in federal PPP funds, the subject employee admitted to improperly spending those funds on personal expenses, which included car payments, rent, and groceries. When requesting forgiveness of the three federal PPP loans, the subject employee falsely stated that she spent \$57,608 of the \$82,608 on payroll costs. Committing financial fraud directed at the federal government tarnishes the subject employee's reputation and brings discredit to CCH as it can erode the public's trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employee's conduct in fraudulently obtaining the loans occurred while she was on CCH time.

The preponderance of evidence developed in this investigation also supports the conclusion that the subject employee violated CCH Personnel Rule 12 – Dual Employment. This rule states employees must complete and submit the Report of Dual Employment Form prior to engaging in outside employment. Evidence obtained during this investigation and statements made by the subject employee show that she has been engaging in outside employment as an esthetician (although not to the extent she claimed on her PPP loan applications) since starting her job at CCH but failed to disclose such outside employment.

Based on the serious nature of the misconduct involved in the Rule 8.03(c)(25) violation, as well as other aggravating factors present, we recommended that the subject employee's employment be terminated and that she be placed on the *Ineligible for Rehire List*. Aggravating factors considered in making this recommendation include the fact that the subject employee committed fraud against the federal government at times while on duty at CCH.

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This report was issued on June 26, 2023, and CCH adopted the OIIG recommendations.

IIG22-0862 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by CCH employees for the PPP Loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, it was discovered that a CCH employee sought two federal PPP loans totaling \$39,848 wherein she disclosed being a “Self Employed Individual” of a “Home Care Aide” business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment as required by CCH Personnel Rules.

This investigation consisted of a review of the subject employee’s CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records, U.S. Bankruptcy Court Records, and Illinois Secretary of State Corporation/LLC records. Our office also interviewed the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence gathered during this investigation, including the subject employee’s statements to OIIG investigators, show that the subject employee engaged in fraud against the federal government by falsely claiming on two federal PPP loan applications that she owned a Home Care Aide business that generated gross receipts of \$95,636. After fraudulently obtaining \$39,848 in federal PPP funds, the subject employee admitted to improperly spending those funds entirely on personal expenses, including car payments, car insurance, loans, utilities, other bills, and day-to-day living expenses. When requesting forgiveness of the PPP loans, the subject employee falsely stated to the federal government that she spent the funds on payroll costs. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees. This is especially true in this case considering that the subject employee is the director of a department that oversees sensitive patient information.

Based on the serious nature of the misconduct and the subject employee’s sensitive placement in government, as well as other aggravating factors present, we recommended that the subject employee’s employment be terminated and that she be placed on the *Ineligible for Rehire List*.

This report was issued June 7, 2023. CCH adopted the OIIG recommendations.

IIG22-0865 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by CCH

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employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, it was discovered that a CCH employee sought two federal PPP loans totaling \$39,114 wherein she disclosed being the “Sole Proprietor” of a “Legal Services” business. The OIIG conducted an investigation to determine if the subject employee informed CCH that she was engaging in secondary employment as required by CCH Personnel Rules.

This investigation consisted of a review of the subject employee’s CCH dual employment records, public and subpoenaed federal Small Business Administration PPP loan records and Cook County Time (CCT) records, as well as an Illinois Secretary of State Corporation/LLC search. The OIIG also interviewed the subject employee.

The preponderance of evidence developed in this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH. The evidence, including the subject employee’s statements to OIIG investigators, shows that the subject employee engaged in fraud against the federal government by falsely claiming on two federal PPP loan applications that she owned a paralegal business that generated gross receipts of \$93,874. While the subject employee may have been eligible for some minimal PPP support based on her verbal description of her business, the subject employee intentionally misrepresented her business activities and supplied false revenue information to increase the amount of federal loans she received. After fraudulently obtaining \$39,114 in federal PPP funds, the subject employee admitted to improperly spending those funds on personal expenses, which included \$18,000 in home renovations and a new garage. When requesting forgiveness of the two federal PPP loans, the subject employee falsely stated that she spent the entirety of the \$39,114 on payroll costs. Committing financial fraud directed at the federal government tarnishes the subject employee’s reputation and brings discredit to CCH as it can erode the public’s trust in Cook County government, CCH, and their employees. This is especially true in this case, considering that some of the subject employee’s conduct in fraudulently obtaining the loans occurred while she was on CCH time.

The preponderance of evidence developed in this investigation also supports the conclusion that the subject employee violated CCH Personnel Rule 12 – Dual Employment. This rule states employees must complete and submit the Report of Dual Employment Form prior to engaging in outside employment. Evidence obtained during this investigation, including statements made by the subject employee, shows that she has been engaging in outside employment (although not nearly to the extent she claimed on her PPP loan applications) but failed to disclose such outside employment as required by CCH rules.

Based on the serious nature of the misconduct and the subject employee’s placement in government, as well as other aggravating factors present, we recommended that the subject employee’s employment be terminated and that she be placed on the *Ineligible for Rehire List*. Aggravating factors considered in making this recommendation include the fact that the subject employee committed fraud against the federal government at times while on CCH time.

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This report was issued June 29, 2023. CCH adopted the OIIG recommendations.

IIG23-0308 – Cook County Health. This investigation was initiated by the OIIG based on an anonymous complaint alleging that a CCH employee has been observed selling homemade T-shirts to her co-workers at work and while on duty without getting authorization from her immediate supervisor. It was also alleged that the subject employee does not have a dual employment form on file. During this investigation, our office reviewed the CCH dual employment form for the subject employee and conducted a search of the Illinois Secretary of State (“ILSOS”) Database. We also interviewed the subject employee and her supervisor.

The preponderance of the evidence developed during this investigation supports the conclusion that the subject employee violated CCH Personnel Rule 8.03(d)(4) - Engaging in non-CCH business or sales of any kind without prior authorization while on duty or on CCH premises. When interviewed by the OIIG, the employee admitted that she sold T-shirts to co-workers while on CCH property and during her CCH work hours without obtaining prior authorization from management.

The preponderance of the evidence developed during this investigation does not support the conclusion that the subject employee violated CCH Personnel Rule 12.03 - Report of Dual Employment. A CCH file review revealed that the employee did complete and submit a secondary employment form to CCH as required. The employee was not required to report her activity with the T-shirts as dual employment as the evidence suggests that she only made T-shirts as a hobby, not as a business venture, and a search of the ILSOS database did not reveal any businesses associated with her.

Based on the foregoing, the OIIG recommended that the subject employee be admonished to follow CCH Personnel Rule 8.03(d)(4) and obtain permission from her supervisor prior to selling any items at work. If she does not receive such permission, we recommended that she should be instructed to sell such items to her co-workers at times when she is not working or on CCH premises in order to comply with CCH Personnel Rules.

This report was issued June 9, 2023. In its timely response, CCH adopted the OIIG recommendations.

From the 1st Quarter 2023

IIG22-0658 – Cook County Health. The OIIG received a complaint alleging that a CCH employee left before her scheduled shift ended on numerous occasions and failed to clock out to avoid detection. During its investigation, the OIIG reviewed Cook County Time (CCT) System records, CCH Human Resource policies, and CCH personnel rules. The OIIG also interviewed CCH employees, including the subject employee and her supervisor.

The preponderance of evidence developed during the course of this investigation revealed that the subject CCH employee violated CCH timekeeping policies. A CCT Timesheet Audit Report revealed that on fifteen occasions during a period of approximately four months the subject employee failed to clock out at the end of her work shift when assigned to an alternate worksite. When interviewed by the OIIG, the subject employee acknowledged that she did not clock out on the days she worked at the alternate worksite and did not complete a Payroll Approval of Non-Punch Hours Form.

The preponderance of the evidence developed during the course of this investigation also revealed that the subject employee and her supervisor violated Rules of Conduct 8.03(c)(10)(b) – Misuse of timekeeping facilities or records by altering or falsifying timesheets, timecards, or other records. A review of the CCT Timesheets revealed that on the days the subject employee admitted to leaving work at approximately 3:00 p.m., her time was manually inserted to reflect that she ended her shift at 3:30 p.m. When interviewed by the OIIG, the subject employee’s supervisor stated she authorized the employee to leave work 30 minutes early on days that she worked at the alternate worksite because the employee encountered additional commuting time when assigned there. On those days, the supervisor admitted that she manually adjusted the employee’s time in the CCT system to reflect her end of the workday as 3:30 p.m. instead of the time she actually left work. During her OIIG interview, the subject employee admitted to leaving work between 3:00 p.m. and 3:15 p.m. on the days in question, but stated her time was manually entered by her supervisor to reflect she departed at 3:30 p.m. Other CCH employees confirmed that they observed the subject leave early on the days in question.

Based on the foregoing, we made the following recommendations:

1. That the subject employee and her supervisor receive discipline consistent with prior similar cases for violating the CCH time and attendance policy and rules of conduct.
2. That the subject supervisor receive additional training regarding the time and attendance policy, in addition to the duties and responsibilities of supervisors and managers when entering and approving entries into CCT.

This report was issued February 22, 2023. CCH adopted OIIG’s recommendation to discipline the supervisor. CCH declined to discipline the subject employee based on its position that she was following her supervisor’s directions.

Activities Relating to Unlawful Political Discrimination

Political Contact Logs

In April of 2011, the County implemented the requirement to file Political Contact Logs (PCLs) with the Office of the Independent Inspector General. The Logs must be filed by any County employee who receives contact from a political person or organization or any person

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representing any political person or organization where the contact relates to an employment action regarding any non-Exempt position. The OIIG acts within its authority with respect to each Political Contact Log filed. From July 1, 2023, to September 30, 2023, the Office of the Independent Inspector General received no new Political Contact Logs.

Post-SRO Complaint Investigations

The OIIG received no new Post-SRO Complaints during the last quarter.

New UPD Investigations not the result of PCLs or Post-SRO Complaints

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

Employment Plan – Do Not Hire Lists

The OIIG continues to collaborate with the various County entities and their Employment Plan Compliance Officers to ensure the lists are being applied in a manner consistent with the respective Employment Plans.

OIIG Employment Plan Oversight

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

1. One proposed change to the Cook County Actively Recruited List;
2. Six proposed changes to the Cook County Exempt List;
3. Eight proposed changes to the CCH Direct Appointment List;
4. The hire of seven CCH Direct Appointments; and,
5. One proposed change to the CCH Employment Plan.

Monitoring

The OIIG currently tracks disciplinary activities in the Forest Preserve District and Offices under the President. In this last quarter, the OIIG tracked ten disciplinary proceedings including Employee Appeals Board and third step hearings. Further, pursuant to an agreement with the

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Bureau of Human Resources, the OIIG tracks hiring activity in the Offices under the President, conducting selective monitoring of certain hiring sequences therein. The OIIG also is tracking and selectively monitoring CCH hiring activity pursuant to the CCH Employment Plan.

Conclusion

Thank you for your time and consideration to these issues. Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Steven E. Cyranoski".

Steven E. Cyranoski
Interim Inspector General

cc: Attached Electronic Mail Distribution List

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