



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 2024**

October 15, 2024

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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

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October 15, 2024

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. 2024)

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, 2024, through September 30, 2024.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 165 complaints during this reporting period.¹ Twelve 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, 33 OIIG inquiries have been initiated during this reporting period while a total of 153 OIIG inquiries remain pending at the present time. We referred 55 complaints to management or outside agencies for further consideration. The OIIG currently has a total of 31 matters under investigation. The number of open investigations beyond 180 days of the issuance of this report is 9 due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

New Summary Reports

During the 3rd Quarter of 2024, the OIIG issued nine summary reports. The following provides a general description of each matter and states whether OIIG recommendations for

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

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

IIG22-0856 – Cook County Health. The OIIG conducted a review for dual employment compliance of Cook County Health (“CCH”) employees who applied for federal Small Business Administration (“SBA”) Paycheck Protection Program loans (“PPP loan”)³ 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 over \$40,000. On her loan applications, the subject employee stated she was the sole proprietor of a 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 SBA PPP loan records, Illinois Secretary of State Corporation/LLC records, and other public records. The OIIG also interviewed the subject employee.

While the evidence showed the subject employee is the proprietor and operator of the listed business enterprise, it also showed that the subject employee’s business did not generate the revenues listed in her application materials. Despite the subject employee’s denial of claiming this amount in earnings and providing supporting financial documentation, she attested to the accuracy of the information provided in the application. The evidence also showed that the employee misrepresented how she spent the loan proceeds.

The preponderance of the evidence in the 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. In addition, the preponderance of the evidence supports the conclusion that the subject employee has operated the business at issue but failed to disclose secondary employment on her dual employment disclosures in violation of the CCH dual employment rules.

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 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 recommended that the subject employee's employment be terminated and that CCH place her on its *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG22-0872 – Cook County Health. The OIIG conducted a review for dual employment compliance of Cook County Health (CCH) employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two federal PPP loans totaling over \$31,000. On her loan application, the subject employee stated she was the sole proprietor of a 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 SBA PPP loan records, Illinois Secretary of State Corporation/LLC records, and other public records. The OIIG also interviewed the subject employee.

The evidence showed that although the subject employee is the proprietor and operator of a business, the business did not generate the amount of revenue declared on the Schedule C submitted with the PPP loan applications. The evidence also showed that the subject employee made deceptive claims in both the PPP loan applications and the forgiveness applications by misrepresenting how the loan funds were spent. In addition, the subject employee worked part-time at two other jobs during the relative period but failed to disclose secondary employment on her dual employment disclosures from 2020 to 2022.

The preponderance of the evidence in the 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. In addition, the preponderance of the evidence supports the conclusion that the subject employee failed to disclose secondary employment on her dual employment disclosures in violation of the CCH dual employment rules.

Based on the nature of the misconduct involved, the OIIG would have recommended that the subject employee's employment with CCH be terminated. Prior to the issuance of this report, however, the OIIG learned that the subject employee resigned from her position. Therefore, the OIIG recommended that CCH place the subject employee on its *Ineligible for Hire List*. CCH accepted the OIIG recommendation.

IIG22-0875 – Public Defender's Office. The OIIG conducted a review for dual employment compliance of Cook County Public Defender ("CCPD") employees who applied for federal Small Business Administration ("SBA") Paycheck Protection Program loans ("PPP loans") to determine whether information submitted by such employees for the PPP loans was

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consistent with CCPD records and/or in violation of any CCPD Personnel Rules. Based on this review, we discovered that a CCPD employee sought a federal PPP loan totaling over \$20,000. On her loan application, the subject employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the subject employee informed CCPD that she was engaging in secondary employment and otherwise complied with CCPD Personnel Rules.

During this investigation, the OIIG reviewed the subject employee's CCPD dual employment records, public and subpoenaed federal SBA PPP loan records, Illinois Secretary of State Corporation/LLC records, and other public records. The OIIG also interviewed the subject employee.

The evidence revealed that the subject employee's business did not generate the amount of revenues listed in her PPP loan application materials. Furthermore, the subject employee disclosed that a portion of the PPP funds she received was spent on other businesses.

The preponderance of the evidence in this investigation supports the conclusion that the subject employee violated Cook County Personnel Rule 8.2(b)(36) – Conduct unbecoming an employee or conduct which brings discredit to the County and Cook County Personnel Rule 13.4 – Dual Employment - Falsification or omission of information.

Based on the serious nature of the misconduct involved, the OIIG recommended that the subject employee's employment be terminated and that CCPD place her on its *Ineligible for Hire List*. The CCPD adopted the OIIG recommendations, and the subject employee resigned during the initiation of disciplinary proceedings.

IIIG22-0892 – Cook County Health. The OIIG conducted a review for dual employment compliance of Cook County Health (CCH) employees who applied for federal Small Business Administration (“SBA”) Paycheck Protection Program loans (“PPP loan”) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought a federal PPP loan totaling over \$4,000. On her loan application, the subject employee stated she was the sole proprietor of a 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 SBA PPP loan records, Illinois Secretary of State Corporation/LLC records, and other public records. The OIIG also interviewed the subject employee.

Although the evidence shows that the subject employee is the proprietor and operator of the listed business (which she did not disclose on her dual employment forms), it also revealed that the subject employee overstated the business's revenues when seeking the PPP loan.

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Additionally, the subject employee made false claims in the forgiveness applications regarding how much of the loan proceeds were actually spent on payroll.

The preponderance of the evidence in the 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. In addition, the preponderance of the evidence supports the conclusion that the subject employee failed to disclose secondary employment on her dual employment disclosures in violation of the CCH dual employment rules.

Based on the serious nature of the misconduct involved, the OIIG recommended that the subject employee’s employment be terminated and that CCH place her on its *Ineligible for Hire List*. CCH’s response to the recommendations is not yet due.

IIG23-0837 – Justice Advisory Council. The Cook County Judicial Advisory Council (JAC) notified the OIIG of allegations that a non-profit organization (Organization A) with whom the JAC had entered into an agreement to administer and manage funds from the American Rescue Plan Act (ARPA) Violence Prevention and Reduction Grant Portfolio, engaged in the misuse and misappropriation of grant funds and submitted fraudulent data reporting in violation of 31 U.S.C. Chapter 38. Per the JAC’s agreement with Organization A, ARPA funds would be dispersed to Organization A from March 27, 2023, through June 30, 2024, for violence reduction-related programs. The JAC conducted a site visit which revealed “very limited programming” with only 10 to 15 participants, not hundreds as Organization A claimed in its data submissions.

The OIIG investigation consisted of interviews of current and former Organization A employees, and a certain local government official along with a high-ranking staff person in his office. The OIIG also reviewed JAC’s agreement with Organization A, documents related to the grant, and the applicable statutes governing the grant.

The preponderance of the evidence gathered during this investigation does not support the conclusion that Organization A engaged in the misuse or misappropriation of grant funds. A review of the expenditure documents and receipts Organization A provided to the JAC supports the conclusion Organization A was hosting community outreach events for violence reduction programming. However, the preponderance of the evidence does support the conclusion Organization A submitted fraudulent data reporting.

One Organization A former employee stated there was “no legit” programming occurring while he was with Organization A. Another former Organization A employee involved in the program stated she had “no knowledge” of a workforce intake event purportedly held on a certain date, nor the basketball tournament registrations which purportedly also occurred around the same time. A local government employee who was present at the location at issue and kept a detailed spreadsheet of its residents, stated the workforce event at issue did not occur and found numerous errors in the names and ages of the purported basketball tournament registrants. Additionally, Organization A did not submit expense documentation or receipts of purchases related to those

alleged events, nor were any gift cards documented as being distributed to any of the listed participants. During our investigation, the OIIG also obtained statements from a former Organization A employee that another former employee was reporting false participant data to the JAC. Furthermore, a local government employee reviewed certain participant data that the Organization A employee submitted to the JAC and stated that the participant data contained errors and false information. The former Organization A employee who allegedly submitted the false data to JAC refused to cooperate with the OIIG investigation.

Since the agreement with Organization A ended on June 30, 2024, we made the following recommendations:

1. We recommended the JAC make the appropriate notifications as required under the governing federal law cited in its agreement with Organization A regarding Organization A's fraudulent data reporting.
2. We further recommended the JAC instruct its grant management personnel to make additional site visits, especially for new less established grantees. Furthermore, the JAC should have grant management personnel attend the organizations' programming to verify the legitimacy and quality of programming. Additionally, we recommended the JAC leverage technology to verify programming is occurring (*e.g.*, requiring organizations to submit photographs and video evidence of the programming), especially for events scheduled after business hours.
3. Finally, we recommended the JAC implement additional internal controls to verify submitted data from grantees. This can be accomplished by contacting a sample of participants listed on the data spreadsheets to gain reasonable assurance to the legitimacy and quality of the organizations' programming.

The JAC's response to these recommendations is not yet due.

IIIG24-0120 – Forest Preserves. The OIIG conducted a review for dual employment compliance of Forest Preserves of Cook County (FP) employees who applied for federal Small Business Administration ("SBA") Paycheck Protection Program loans ("PPP loan") to determine whether information submitted by such employees for the PPP loans was consistent with FP records and/or in violation of any FP Personnel Rules. Based on this review, we discovered that an FP employee sought two federal PPP loans totaling over \$41,000. On his loan application, the subject employee stated he was a self-employed individual of a business. The OIIG conducted an investigation to determine whether the subject employee informed the FP that he was engaging in secondary employment and otherwise complied with FP Personnel Rules.

During this investigation, the OIIG reviewed the subject employee's FP dual employment records, public and subpoenaed federal SBA PPP loan records, Illinois Secretary of State

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Corporation/LLC records, and other public records. The OIIG also interviewed the subject employee.

Evidence showed that the subject employee does not own and operate a business. During the investigation, the subject employee admitted that the business does not and has never existed.

In addition to falsifying his loan application, the subject employee made deceptive claims in the forgiveness applications. While he asserted on the forgiveness application that the entire loan received was allocated to payroll, he admitted to disbursing \$30,000 to his friend, whom he believed would be purchasing vehicles for a purported future business venture. The subject employee also presented conflicting accounts regarding the allocation of the remaining \$10,000 of the PPP funds. Initially, he asserted that the funds were disbursed to family members, but later indicated that he utilized the \$10,000 for the acquisition of a truck.

The preponderance of the evidence in this investigation supports the conclusion that the subject employee violated Cook County Personnel Rule 8.2(b)(36) – Conduct unbecoming an employee or conduct which brings discredit to the County and Cook County Personnel Rule 13.4 – Dual Employment - Falsification or omission of information.

Based on the serious nature of the misconduct involved, the OIIG recommended that the subject employee’s employment be terminated, and that the FP place him on its *Ineligible for Hire List*. The FP adopted the recommendations, but the subject employee resigned prior to termination proceedings.

IIIG24-0144 – Board of Review. This office received information that a high-ranking Board of Review Official (BOR Official A) disclosed to the media confidential information relating to two pending Board of Review (BOR) appeals relating to the valuation of a high-profile commercial property in 2023 and 2024. During our investigation we also developed information that BOR Official A made public statements indicating bias toward an appellant, which violated the duty of impartiality under the Illinois Property Tax Code.

OIIG Investigation

The OIIG interviewed BOR Official A, Manager A, and Employee B. We reviewed the BOR’s Ethics Policy, the BOR’s Personnel Rules, the BOR’s Employment Plan, internal BOR email records and Teams chats, and media reports.

Relevant Policy and Law

The BOR’s Ethics Policy

The BOR approved a new Ethics Policy by the Commissioners on November 4, 2022. The policy, consisting of five separate Articles, reads that it is meant to “establish a Code of Conduct

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for the Commissioners and Board of Review employees.” Article II, 2.16(a), “Use or Disclosure of Confidential Information,” provides:

No official or employee shall use or disclose confidential information, other than: (1) in the performance of his or her official duties; (2) as may be required by law; or (3) as permitted in Section 2.13⁴ confidential information gained in the course of or by reason of his position or employment. For purposes of this subsection, the term ‘confidential information’ means any information that may not be obtained pursuant to the Illinois Freedom of Information Act, as amended.

The BOR’s Ethics Policy defines “confidential information” in Article II, 2.16(c), as follows: “Confidential information includes, but is not limited to, information on pending cases that are not already a matter of public record and information concerning the decision-making process of particular Commissioners or Board employees.” The BOR’s Ethics Policy permits the disclosure of confidential information as a whistleblower in section 2.13(a)(3) and defines disclosure of confidential information by a whistleblower as “any information that may not be obtained pursuant to the Illinois Freedom of Information Act, as amended.”

The Illinois Property Tax Code’s Impartiality Requirement

The Illinois Property Tax Code, 35 ILCS 200/5-10, provides in pertinent part as follows:

Oath of office. Each member of the board of review or commissioner of the board of appeals created by this Code shall, before entering upon the duties of his or her office, take and subscribe to the following oath:

I do solemnly swear (or affirm) that I will as (a member of the board of review) (a commissioner of the board of appeals) faithfully perform all the duties of that office as required by law; that I will fairly and impartially review the assessments of all property to the extent authorized by this Code; that I will correct all assessments which should be corrected; that I will raise or lower (or in the case of commissioners of the board of appeals, will direct the county assessor to change, correct, alter or modify) assessments as justice may require; and that I will do all acts necessary and within my authority to procure a full, fair and impartial assessment of all property.

The BOR’s General Counsel and Chief Ethics Officer’s Caution Regarding Disclosure of Confidential Information

⁴ Section 2.13 of the BOR’s Ethics Policy is titled, “Whistleblower protection.”

On February 5, 2024, the BOR's General Counsel and Chief Ethics Officer sent an email to the three BOR Commissioners and their staff. The email carried the subject line, "No Commenting Pending Matters," and read in pertinent part:

As a general reminder, the CCBOR is a quasi-judicial body which presides over property tax appeals. Following a hearing, appeals are taken under advisement by the hearing officers. The CCBOR cannot comment on pending matters. Providing one's unofficial account of the proceedings taints the perception of impartiality of the CCBOR. The Property Tax Code requires that as triers of fact, the CCBOR must remain fair and impartial and free from bias or influence. 35 ILCS 200/5-10. Similar to the judicial code, the CCBOR requires that its analysts decide cases according to the law and facts, without regard to whether particular laws or litigants are popular or unpopular with the public, the media, government officials, or their friends and family. *See* Ill. Sup Ct. R. 71 §2.4. Confidence in the tribunal is eroded if the CCBOR's decision making is perceived to be subject to inappropriate outside influences. *Id.* Commenting on pending matters puts the CCBOR in a difficult position, undermines its authority and subjects its decisions to additional scrutiny....

OIIG Findings and Conclusions

BOR Ethics Policy, Article II, Code of Conduct 2.16,⁵ Use or Disclosure of Confidential Information

This office finds by a preponderance standard that BOR Official A violated the BOR's Ethics Policy when they disclosed confidential information on the following three occasions:

1. On one occasion, BOR Official A disclosed to two media outlets information on a pending case which was not available to the public; specifically, an intervenor's appraisal amount. During their OIIG interview, BOR Official A said the information disclosed to the media on this occasion was already public. Our investigation found this not to be the case. There was no hearing on the appeal at that point and the appeal file was not available to the public. We found no source regarding the intervenors' appraisal other than BOR Official A, and the information contained in the appeal file would not have been subject to production under FOIA.

2. On another occasion, BOR Official A disclosed to a media source a preliminary agreement concerning valuation deliberations among the BOR's three Districts. The agreement reached tentatively between the three senior BOR analysts was not only not public information, but it was also related to the BOR's decision-making process. The dollar figure which was reached

⁵ The BOR amended its Ethics Policy on July 8, 2024. The language of the sections cited in this report were unchanged.

by the three analysts was not done during public hearing; it was reached privately during a remote meeting attended only by the three analysts.

3. On the third occasion, BOR Official A disclosed to another media source information relating to the decision-making process in one of the BOR's districts. This disclosure falls under the definition of "confidential information" contained in BOR Ethics Policy 2.16(a)(c), which defines confidential information as "information concerning the decision-making process of particular Commissioners or Board employees" and is a patent violation of the BOR's Ethics Policy.

ILCS 200/5-10 Board of Review Duty of Impartiality

This office also finds by a preponderance standard that BOR Official A violated their obligation to remain impartial, an obligation contained in the Illinois Property Tax Code, when they made statements on the following two occasions:

1. On one occasion, BOR Official A made a comment to a media source indicating that they believed the valuation of a high-profile commercial site correlated to the purchase price paid, which they said speaks for itself. We find that BOR Official A's comment to the media about the significance they attached to the price paid for the site at issue reflects an inclination to hold a party to an artificially high value determined by sale chasing and is indicative of bias against a taxpayer whom BOR Official A correctly predicted would have an appeal before them.

2. On the other occasion, BOR Official A told a media source that a particular party would have to justify their intent to appeal and then later made a comment to another media source regarding the same party's matter and how it would affect funding of local school districts. It is well established by the BOR's official appeal rules (Rule 14 *et seq*) that appeals must be supported with evidence. Singling one potential appellant out for a public reminder that they need to prove their case without mentioning other parties reflects potential increased scrutiny of that appellant by a finder of fact and shows bias. Likewise, BOR Official A's comments reflected an interest not in a fair and impartial assessment, but in the funding of intervening school districts.

OIIG Recommendation

Based on our findings above, we recommended that BOR Official A participate in BOR Ethics Training. This training should encompass obligations under the Illinois Property Tax Code and the BOR's Ethics Code. BOR Official A has not responded to this recommendation.

IIG24-0233 – Board of Review. This investigation was initiated by the OIIG based on a complaint alleging that a Board of Review (BOR) employee used sick leave for the purpose of extending his vacation in violation of applicable personnel rules.

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This investigation consisted of reviewing time and attendance records and interviewing the subject employee and his supervisor.

The preponderance of the evidence in this investigation supports the conclusion that the subject employee used sick leave for the purpose of extending his vacation leave and thereby violated Cook County Board of Review Personnel Rule 4.2(b)(2) which provides: “Sick leave is granted by the Cook County Board of Review because an employee is unable to perform assigned duties, or because the employee’s presence at work would jeopardize the health of co-workers. Accordingly, sick leave shall not be used for any purpose other than to cover an absence related illness and shall not be used as additional vacation leave.”

Moreover, the BOR supervisor wrongfully applied BOR Personnel Rule 4.2(b)(2) concerning the operations of the BOR. Consequently, he did not enforce the sick leave policy and properly deny the request to use sick leave as additional vacation leave.

Based on our findings, the OIIG recommended that the subject employee receive discipline consistent with the factors set forth in Cook County Board of Review Rule 5.3(e), including the BOR’s practice in recent similar cases. Additionally, the BOR supervisor should review the BOR’s rules and procedures regarding time and attendance. The OIIG further recommended that the BOR supervisor discuss the BOR’s Paid Time Off policies with BOR’s legal counsel, so that the BOR consistently applies Paid Time Off to all BOR employees.

BOR’s response to these recommendations is not yet due.

IIG24-0366 – Transportation and Highways. This investigation was initiated by the OIIG based on a complaint from a Cook County resident who observed his neighbor, a Department of Transportation and Highway (DOTH) employee (Employee A), gather tree branches from his backyard, load them onto a DOTH Cook County vehicle, and haul them away.

During this investigation, the OIIG interviewed several DOTH employees including Employee A. The OIIG also reviewed photographs of the DOTH truck used by Employee A, along with the Automatic Vehicle Locator and the GPS report for the truck. Additionally, the OIIG examined the Daily Assignment Sheet, Radio Log records for the subject truck, and a DOTH Communication Memorandum.

The preponderance of the evidence developed in this investigation supports the allegation that Employee A traveled to his residence in a County owned vehicle and loaded tree branches from his yard into a County vehicle. Further, Employee A discarded the tree branches at the District Five Maintenance Facility while on County time. Additionally, Employee A admitted that although he loaded the tree branches onto the truck on his own, his co-workers traveled to his residence with him.

Although a strict application of the rules demonstrates that Employee A is found to be in violation of the Code of Ethical Conduct, Sec. 2-576 – the unauthorized use of County-owned property; Cook County Personnel Rule 8.2(b)(24) – leaving his assigned area or place of work during work hours without prior authorization from his supervisor; and Personnel Rule 8.2(b)(36) – Conduct unbecoming of an employee which brings discredit to the county, the OIIG believes the totality of the circumstances amounts to a de minimis infraction. The DOTH employees provided statements that were not disproved - that they had performed County work near Employee A's home. Further, it is normal for DOTH employees to need a bathroom break during working hours. Again, Employee A violated these rules when he discarded a small amount of yard waste from his home into the County owned vehicle, but this was minor and does not appear to be the primary intent for the visit.

Regarding Employee B, the preponderance of the evidence developed in this investigation supports the allegation that he violated the DOTH Memorandum - Radio Operations, when he failed to make radio calls to the Central Dispatch Operator and did not make his truck's whereabouts known to the District when they traveled to Employee A's residence. Employee B's failure to follow protocol is a violation of Cook County Personnel Rule 8.2(b)(24) – when he knowingly left his assigned area or place of work during work hours without prior authorization from his supervisor. Additionally, Employee B violated Personnel Rule 8.2(b)(36) – Conduct unbecoming of an employee which brings discredit to the County when a Cook County resident saw a County vehicle parked at a private residence, which was being used to haul away yard debris. Nonetheless, the OIIG believes the totality of the circumstances amounts to a de minimis infraction.

During our investigation, we obtained evidence, including statements from co-workers, that Employee C was not responsible for contacting the dispatcher to report and obtain permission to travel off-site to Employee A's house. Additionally, Employee C did not drive the County vehicle nor was there evidence that he placed any yard debris inside the County vehicle. The allegations against Employee C are not sustained.

The OIIG's investigation revealed that District Five's internal controls should be modified to prevent time periods where there is no DOTH employee serving as a dispatcher.

Based on our findings, the OIIG recommended the following:

1. Employee A and Employee B should be admonished and instructed to adhere to DOTH policies and procedures in connection with the Memorandum for Radio Operations. Further, the DOTH should document this admonishment and advise other DOTH personnel to avoid such conduct in the future.
2. Employee A and Employee B should receive an oral reprimand in connection with the Code of Ethical Conduct, Sec. 2-576 – the unauthorized use of County-owned property; Cook County Personnel Rule 8.2(b)(24) – leaving his assigned area or place of work during

work hours without prior authorization from his supervisor; and Personnel Rule 8.2(b)(36) – Conduct unbecoming of an employee which brings discredit to the county.

3. District Five should amend their Memorandum Radio Operations in connection with the “radio desk coverage” schedule. This schedule should assign someone to relieve the dispatcher for one hour during lunch breaks, ensuring continuous radio communication and proper documentation daily.

DOTH’s response to these recommendations is not yet due.

Responses to Recommendations from Prior Quarters

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

IG24-0158 – Board of Review. The OIIG received an allegation that a BOR official falsified a Statement of Economic Interest (SEI) by failing to disclose the existence of secondary employment that met the mandatory reporting threshold. During this investigation, the OIIG reviewed the BOR official’s dual employment records, Illinois State Board of Elections database, and the Cook County Clerk’s Office SEI public records. The OIIG also interviewed the BOR official.

The preponderance of the evidence in this investigation supports the conclusion that the BOR official failed to disclose income from a consulting business as required on SEI forms over multiple years. Such conduct constitutes a violation of Section 2-290 of the Cook County Ethics Ordinance and the corresponding Cook County Personnel Rule 8.2(b)(33) (Violation of the County’s Ethics Ordinance).

Based on our findings, the OIIG recommended that the BOR official receive discipline consistent with factors set forth in Cook County Personnel Rule 8.4, including the department practice in recent similar cases. The Board of Review accepted the OIIG’s recommendation and issued an oral reprimand to the subject employee.

IG24-0257 – Medical Examiner’s Office. This investigation was initiated based on a complaint alleging a Medical Examiner’s Office (MEO) employee placed a digital video camera on the desktop computer monitor located on his workstation inside the MEO Investigations Office. It was further alleged that the MEO employee was recording and transmitting video and audio which he could access and view remotely. This investigation consisted of reviewing the

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photographs of the MEO office space on the day the digital camera was discovered, conducting interviews with witnesses, and interviewing the subject MEO employee.

The preponderance of the evidence in this investigation supports the conclusion that the MEO employee installed a digital camera on the desktop computer monitor at his workstation in the MEO Investigations Office. He was recording, transmitting, and remotely viewing video footage of the Investigations Office without authorization. Additionally, the MEO employee connected to and utilized the MEO Wi-Fi network to transmit the video. There is no evidence indicating that the MEO employee used the camera to listen to or record audio.

Considering these findings, the MEO employee was found to be in breach of Cook County Personnel Rules by using any information technology or County instrumentality, including, without limitation, e-mail, Internet services or telephone, for an unauthorized purpose and violating departmental regulations, work rules or procedures.

Based on our findings, the OIIG recommended that the MEO employee receive discipline consistent with factors set forth in Cook County Personnel Rules, including the department practice in recent similar cases. The MEO's office issued a one-day suspension to the subject employee.

Activities Relating to Unlawful Political Discrimination

In April of 2011, the County implemented the requirement to file Political Contact Logs with the Office of the Independent Inspector General. The Logs must be filed by any County employee who receives contact from a political person or organization or any person representing any political person or organization where the contact relates to an employment action regarding any non-Exempt position. The OIIG acts within its authority with respect to each Political Contact Log filed. From July 1, 2024, to September 30, 2024, the Office of the Independent Inspector General has not received any 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, FP, 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

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

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

Monitoring

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

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,



Tirrell J. Paxton
Independent Inspector General

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and Honorable Members of the Cook County
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