Illinois Chapter
Association of Inspectors General
Advancing Professionalism, Accountability & Integrity
Newsletter

Message from Illinois AIG Chapter Communications Committee

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Chapter Members,

We are pleased to bring you this quarter's newsletter with updates and information useful to the Illinois IG community.

All chapter members are welcome to attend the chapter's board meetings, which will take place on August 6, 2025; October 1, 2025; and December 4, 2025. Simply email Board President Kathryn Richards at krichards@thecha.org to be added to the Outlook calendar invite list.

We hope to see you at the next chapter board meeting!

CHA Office of Inspector General 2025 Q2 Report: Full Speed Ahead for the OIG

The OIG stayed on the move this quarter by breaking intake complaint records, opening and closing cases, securing the criminal conviction of a former CHA Habitat property management employee, and indicting a past HCV participant for fraud.

During this quarter, the OIG received 335 complaints, the most in seven years. 135 were referred to CHA departments and outside agencies, 7 received investigative support from our team, and 146 were declined. The OIG opened 5 new investigations, with 42 complaints still under review or processing.

Read more here

Former Habitat Employee Sentenced in Rent Theft Case

On June 30, 2025, Delvya Harris, a former Assistant Community Manager for the Habitat Company, pleaded guilty to one count of Theft of Governmental Property and was sentenced to two years in prison.

Harris worked at Trumbull Park Homes on Chicago's far South Side. An internal complaint led to an OIG investigation, which found she had stolen at least 50 tenant rent money orders totaling approximately $18,215. Harris deposited some of the stolen funds into her personal bank account and instructed her partner to cash the others at various check-cashing locations.

In September 2024, Harris was indicted on six counts, including theft, forgery, and wire fraud. A Grand Jury later returned 13 additional charges for loan fraud, forgery, and tax fraud, linked to $51,000 in fraudulent PPP loans.

She was fired by Habitat in early 2023. The OIG worked with Habitat to correct tenant rent records. The case was prosecuted by the Illinois Attorney General's Office, and the OIG has now closed its investigation.

Read more here

City of Chicago OIG Releases Second Quarter 2025 Report

This quarterly report provides an overview of the operations of the City of Chicago Office of Inspector General (OIG) from April 1, 2025 through June 30, 2025.

OIG continues to promote economy, effectiveness, efficiency, and integrity in the operation of City government. OIG generally does work in three channels: conduct administrative and criminal investigations into allegations of misconduct; program and policy work, looking at whether the City is operating in a way which is efficient and effective; and transparency work, animated by the principle that information about the government belongs to the governed.

The work completed in the second quarter of 2025, demonstrates OIG's efforts across all three of those channels. Among the sustained misconduct investigations reported, OIG found:

- A Department of Water Management (DWM) hoisting engineer was clocking into work and then returning home on City time;
- A business compliance investigator with the Department of Business Affairs and Consumer Protection was arrested for driving while their driver's license was suspended as the result of a Driving Under the Influence arrest, and tried to use their City position to avoid arrest and charging;

- A former assistant commissioner with the Department of Housing and a Chicago Police Department member fraudulently obtained pandemic-era Payroll Protection Program loans;
- An airport operations supervisor with the Chicago Department of Aviation fraudulently obtained 14 identification cards from several states outside of Illinois;
- A Department of Finance auditor sold cocaine and misused City sick time to testify in federal court; and
- A DWM plumber illegally possessed a loaded firearm while on the clock and travelling between City worksites.

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Chicago City Council Votes by Overwhelming Majority to Protect Oversight

On July 16, 2025, Chicago's City Council voted overwhelmingly in support of Ordinance SO2025-0015583, which protects against threats posed by City Hall practices to the independence and effectiveness of the investigative work done by the City of Chicago Office of Inspector General (OIG).

Specifically, the new law allows OIG to protect the integrity and confidentiality of its investigative interviews by limiting the circumstances under which City lawyers may be present, and permits OIG's review of certain records which the City claims are subject to attorney-client privilege. The version of the ordinance which passed into law was a compromise reached among the Office of Inspector General, the City's Department of Law, and the Chair of the City Council Committee on Ethics and Government Oversight.

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National Association of Inspectors General Peer Review Finds OIG in Compliance with All Applicable Professional Standards

The City of Chicago Office of Inspector General (OIG) is pleased to announce that it has recently been peer reviewed by the Association of Inspectors General (AIG) and found in compliance with all relevant professional quality standards.

OIG is a member of AIG, a national organization that encourages professional development; standardizes practices, policies, and ethics; and establishes professional qualifications and certifications for Offices of Inspectors General. As a member of AIG, OIG participates in a rigorous peer review process to assess compliance with professional standards. Every three years, OIG invites a team of inspectors from other oversight agencies across the country to review policies and practices, interview staff, etc., in order to determine whether OIG and its work meet the standards of the field and to provide any recommendations to improve operations.

Read more here

Public Safety Section Annual Report 2024

Pursuant to Municipal Code of Chicago (MCC) § 2-56-240(b), the Annual Report of the City of Chicago Office of Inspector General's (OIG) Public Safety section provides a detailed accounting of work published by the Public Safety section in 2024 and an analysis of 2024 data.

The Public Safety section aims to enhance the effectiveness of the Chicago Police Department (CPD), the Civilian Office of Police Accountability (COPA), and the Police Board with the mission of increasing public safety, protecting civil liberties and civil rights, and ensuring the accountability of the police department, thus building stronger police-community relations.

Providing dedicated oversight, transparency, and accountability into and across Chicago's complex public safety system is at the heart of the Public Safety section's work, as well as contributing to the City's ongoing reform effort. By doing so, we strive to create a safer, fairer, and more transparent public safety system for residents and officers committed to serving and protecting.

Read more here

Recommendation to Reopen Chicago Police Department Misconduct Investigation - Log #2023-0005877

Pursuant to the Municipal Code of Chicago (MCC) § 2-56-230(c)(ii), the Public Safety section of the City of Chicago Office of Inspector General (OIG) conducts reviews of individual closed disciplinary investigations conducted by the Civilian Office of Police Accountability (COPA) and the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA). Based on those reviews, OIG may make a recommendation to reopen the investigation to address a deficiency materially affecting its outcome.

COPA investigated allegations that a CPD officer used excessive force and engaged in maltreatment of an arrestee, and that a CPD Lieutenant failed to review the use of force used by the CPD officer and failed to properly complete the Tactical Response Report (TRR). COPA sustained the allegations against the CPD officer and recommended a reprimand and retraining on CPD's use of force policy. COPA reached a finding of unfounded against the CPD Lieutenant.

Read more here

The City of Chicago's Implementation and Enforcement of the Gun Offender Registration Ordinance

The Public Safety section of the Office of Inspector General (OIG) conducted an inquiry into the City of Chicago's implementation and enforcement of the Gun Offender Registration Ordinance (the Ordinance). Initially passed in 2010 and amended in 2013, the Ordinance requires all Chicago residents who have been convicted of specific gun-related offenses to register with the Chicago Police Department (CPD or the Department). Per the Ordinance, CPD is responsible for notifying qualifying offenders of their duty to register, maintaining

the public Gun Offender Registry, and enforcing registration requirements. The objectives of this inquiry were to describe the demographic profile and qualifying criminal offenses of the registrants on the Gun Offender Registry and to assess how effectively CPD and other involved agencies are fulfilling the mandates outlined in the Ordinance and provisions outlined in CPD policies, including providing notice to offenders and enforcing registration obligations.

As a result of this inquiry, OIG identified areas of concern regarding the current implementation and enforcement of the Gun Offender Registration Ordinance.

Read more here

Recommendation to Reopen Chicago Police Department Misconduct Investigation - Log #2022-0005043

Pursuant to § 2-56-230(c)(ii) of the Municipal Code of Chicago (MCC), the Office of Inspector General's (OIG) Public Safety section conducted a preliminary review of the investigation conducted by the Civilian Office of Police Accountability (COPA) in Log #2022-0005043. OIG recommends that the investigation be reopened to conduct a Rule 14 analysis. Log #2022-0005043 is currently in a Command Channel Review status.

Log #2022-0005043 concerns allegations against a Chicago Police Department (CPD) Officer, related to allegations of making unwanted sexual advances, inappropriate physical contact, and unwanted physical contact with the complainant while off-duty. COPA reached findings of Not Sustained.

Read more here

Recommendation to Reopen Chicago Police Department Misconduct Investigation - Log #2022-0003399

Pursuant to § 2-56-230(c)(ii) of the Municipal Code of Chicago (MCC)), the Office of Inspector General's (OIG) Public Safety section conducts reviews of individual closed disciplinary investigations conducted by the Civilian Office of Police Accountability (COPA) and the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA). Based on those reviews, OIG may make a recommendation to reopen an investigation to address a deficiency materially affecting its outcome.

BIA investigated allegations that two CPD members failed to conduct a thorough investigation and failed to arrest a subject for violating an order of protection. In its initial Investigative Closing Report (ICR), BIA sustained both allegations against the accused members and recommended reprimands.

During its review, OIG identified a discrepancy between BIA's findings and their written analysis. OIG found that BIA sustained the allegation that the accused members failed to arrest a subject for violating an order of protection but wrote in its ICR that it agreed with the members' conclusion that no violation occurred, and therefore an arrest was unwarranted.

OIG recommended that BIA reopen the investigation to either align its finding with its written analysis or clarify its existing analysis to support its Sustained finding for failure to make an arrest.

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Recommendation to Reopen Chicago Police Department Misconduct Investigation - Log #2022-0004433

Pursuant to the Municipal Code of Chicago (MCC) § 2-56-230(c)(ii), the Public Safety section of the City of Chicago Office of Inspector General (OIG) conducts reviews of individual closed disciplinary investigations conducted by the Civilian Office of Police Accountability (COPA) and the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA). Based on those reviews, OIG may make a recommendation to reopen an investigation to address a deficiency materially affecting its outcome.

OIG reviewed a COPA investigation concerning allegations that a CPD member was arrested for strangling their pregnant intimate partner. The CPD member pled guilty to misdemeanor battery in criminal court and was sentenced to one year of court supervision.

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Recommendation to Reopen Chicago Police Department Misconduct Investigation - Log #2020-0001911

Pursuant to the Municipal Code of Chicago (MCC) § 2-56-230(c)(ii), the Public Safety section of the City of Chicago Office of Inspector General (OIG) conducts reviews of individual closed disciplinary investigations conducted by the Civilian Office of Police Accountability (COPA) and the Chicago Police Department's (CPD) Bureau of Internal Affairs (BIA). Based on those reviews, OIG may make a recommendation to reopen an investigation to address a deficiency materially affecting its outcome.

OIG reviewed a COPA investigation concerning allegations that two CPD members used excessive force against a juvenile arrestee by kicking and punching them, one CPD member inappropriately searched the arrestee's genital area during their arrest, and another CPD member failed to activate their body worn camera (BWC). COPA administratively closed this investigation under its Timeliness Initiative and placed the investigation in a Non-Disciplinary Closure (NDC) status.

Read more here

Did You Know that the City of Chicago Budgeted $22 Million for Street Lighting in 2025?

The City of Chicago Office of Inspector General (OIG)'s City of Chicago Annual Appropriation details dashboard lists the budget

appropriations that each department will receive from the City for the fiscal year.

The annual appropriation ordinance is the final City budget as approved by the City Council. It lists the budget appropriations that each department will receive from the City for the fiscal year. A budget appropriation is the legal authority to spend a specific amount of money for a stated purpose.

Did you know Roughly 40 Percent of Budgeted City Positions in 2025 are in the Chicago Police Department

There are 34,568 budgeted positions in 2025 for the City as a whole, and 13,742 are in the Chicago Police Department.

For more information view the City Annual Appropriations dashboard.

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Join the Waitlist - Inspector General Institute® - Columbus, Ohio - August 4-8, 2025

Participants will receive instruction from highly qualified instructors in core competency areas identified by the Association. The Association awards the designation of Certified Inspector General®, Certified Inspector General Investigator®, Certified Inspector General Auditor®, Certified Inspector General Inspector/Evaluator, and Certified Inspector General Counsel® to individuals who meet the eligibility requirements regarding education and experience and successfully complete the certification programs.

Click here for more information

2025 Association of Inspectors General Annual Training Conference - Oversight Under Pressure - San Diego, CA

AIG is excited to announce the 2025 Annual Training Conference, which will take place in San Diego from November 11th to 13th, 2025. The conference will be hosted at The Westin San Diego Gaslamp Quarter, located at 910 Broadway Circle, San Diego. Early check-in will be available on Monday, November 10th from 3 pm to 6 pm (Pacific). The Conference concludes on Thursday, November 13th, at 12:30 PM Pacific.

The 2025 AIG Annual Training Conference will focus on "Oversight Under Pressure," and will delve into the challenges that face inspectors general in the evolving landscape of government oversight.

The Conference will feature dynamic plenary programming and engaging breakout sessions. Attendees will learn from distinguished speakers representing federal, state, city, county, and nonprofit organizations.

Click here for more information and to register

City of Chicago Office of Inspector General

Assistant Inspector General
Investigator II

Chicago Housing Authority Office of the Inspector General

Senior Auditor

Legal Briefs

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AIG Illinois Chapter's Spring Training this year included the session *Pitching Criminal Cases*, which featured a panel of prosecutors from the Office of the Illinois Attorney General and Cook County State's Attorney's Office sharing their perspectives on how to effectively pitch a case. Among a variety of practical discussion points, the panelists emphasized the importance of not compelling a statement from the subject of the investigation if the case might result in a criminal pitch. In light of that discussion, this quarter's Legal Briefs column highlights some of the less commonly discussed aspects of *Garrity v. New Jersey*, 385 U.S. 493 (1967), and related decisions.

The Supreme Court held in *Garrity* that the government cannot compel a public employee to provide a statement under threat of discharge and then use that statement against the individual in a subsequent criminal proceeding. For offices of inspector general, *Garrity* presents essential considerations in investigations of potentially criminal conduct. This is because a public sector employee's *voluntary* statement can be used against them in a subsequent criminal proceeding, but if a public employee is compelled to provide statements, those compelled statements—and any evidence arising from them—cannot be used against them in a subsequent criminal proceeding.

Although public employees are often the focus when *Garrity* considerations arise, it is important to be mindful that the analysis in *Garrity* also applies to public sector contractors. In *Lefkowitz v. Turley*, 414 U.S. 70 (1973), the Supreme Court held that when the government compels statements from a contractor under a threat of loss of contracts, those statements and the fruits thereof cannot be used against the contractor in a subsequent criminal proceeding. Therefore, when an office of inspector general is investigating procurement fraud or other potentially criminal conduct by a contractor that might result in a criminal pitch, it is essential to have a clear record regarding whether any statements have been compelled from the contractor.

A clear record of whether an interview is compelled or voluntary is important because *Garrity* may apply even when an individual is not expressly told that they must cooperate in an interview. If an individual is not informed that an interview is voluntary or compelled but (1) believes they will lose their job if they fail to cooperate and (2) their belief is reasonable, then any statement they give may be considered coerced and could not be used against them in a subsequent criminal case. *See U.S. v. Wells*, 55 F.4th 784 (9th Cir. 2022) (summarizing cases).

Lastly, though *Garrity* is often discussed in the context of compelled interview statements, its application is not limited to just oral statements. The analysis in *Garrity* is rooted in the Fifth Amendment's protection against an individual being compelled to provide incriminating testimony. Testimonial evidence includes both oral and written statements. Additionally, even the production of documents—if in response to a sufficiently broad subpoena or other compelled request—could be considered testimonial and therefore fall within Fifth Amendment protections. *See United States v. Hubbell*, 530 U.S. 27, 41–42 (2000). Therefore, any time information is requested in a potential criminal case from an individual who has a duty to cooperate, caution should be exercised as to whether the information is compelled and whether it might constitute testimony.

The panelists from the Office of the Illinois Attorney General and Cook County State's Attorney's Office generally encouraged outreach to their offices early in an investigation if a case could be criminal in nature. Early communication and coordination with a

prosecutor's office helps further mitigate the risk of a compelled statement tainting a potential criminal case.

Information in this column is for general information purposes only and does not constitute legal advice.

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