



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Quarterly Report: Fourth Quarter 2025

January 15, 2026

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO

To the Mayor, City Council, City Clerk, City Treasurer, and Community Members of the City of Chicago:

Enclosed for your review is the public report on the operations of the City of Chicago Office of Inspector General (OIG) during the fourth quarter of 2025, filed with City Council pursuant to Section 2-56-120 of the Municipal Code of Chicago (MCC).

The work of the Office of Inspector General (OIG) in the fourth quarter of 2025 reflected our ongoing commitment to the aggressive pursuit of accountability for those who abuse the public trust. This quarter, we report on investigations which led to our recommending the termination of five City employees—including one who spent hours of City time at a social club and another who fabricated an on-duty injury to get workers' compensation—and three cases in which the Board of Ethics found probable cause to believe that the subject of an OIG investigation broke the City's ethics rules.

Among the sustained administrative misconduct cases we report this quarter are two in which we found that members of the Chicago Police Department (CPD) fraudulently obtained Paycheck Protection Program (PPP) loans; we recommended that both be separated from CPD and CPD agreed. Those cases are the most recent installment in our long-term and on-going efforts around PPP loan fraud. In addition to the sustained PPP fraud cases we have reported in this and previous quarters:

- three sustained PPP fraud investigations are with City departments from which we are awaiting responses;
- OIG is preparing four completed, sustained PPP fraud investigations for transmittal to City departments in the coming days; and
- OIG is on track to close at least 12 additional PPP fraud investigations in the next 60 days.

These cases continue to represent an enormous investment of investigative resources, and we will continue to report out on their outcomes; I am pleased to report that it continues to be true that City departments have agreed to fire every City employee against whom we have sustained PPP fraud allegations; I continue to believe that people cannot both work for the government and defraud the government.

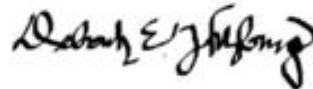
Meanwhile, we have continued to prioritize investigations into alleged violations of the City's ethics rules. Two OIG investigations are pending with BOE for consideration of probable cause and were on BOE's agenda for its January meeting. These are important cases which go to the very sorts of misconduct which contribute to distrust in City government; in one, as BOE writes in its public summary, OIG found that a now-former City employee "used their City title and authority to solicit a job opportunity for their child, with a City contractor, and allowed the contractor to perform unauthorized work for the City while their child worked for the contractor, and that the contractor violated the [Governmental Ethics] Ordinance [(GEO)] by hiring the employee's child." The other involves improper contributions to the campaign of "an unsuccessful candidate for elected City office in the 2023 campaign." BOE was unable to consider these cases because, for the second time in three months, its monthly meeting was cancelled for a lack of quorum. BOE's adjudicatory work—and that they have appropriate resources to do it—are critically important to the work of building a government which more closely resembles the one Chicagoans deserve. I

enthusiastically join BOE's Executive Director in urging Mayor Brandon Johnson to fill the vacancies on BOE which make it more vulnerable to cancellations and delays.

I want to highlight one other category of work reported this quarter. We have spent the last several years building our processes and capacities for enforcement of the City's campaign finance rules; this is how we have worked to combat the impression—and perhaps the reality—that there's a "For Sale" sign on the door to City Hall. In this quarter, OIG's work resulted in the return of more than \$180,000 in illegal campaign contributions to candidates for City office, more than we've reported in any other quarter.

I am, as always, deeply grateful to my colleagues at OIG and intensely proud of the fine work they are doing.

Respectfully,

A handwritten signature in black ink, appearing to read "Deborah E. Witzburg".

Deborah Witzburg
Inspector General
City of Chicago

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This quarterly report provides an overview of the operations of OIG from October 1, 2025, through December 31, 2025, and includes information required by the MCC.

I | Mission of the Office of Inspector General

OIG's mission is to promote economy, effectiveness, efficiency, and integrity by identifying corruption, waste, and mismanagement in City government.¹ OIG accomplishes its mission through administrative and criminal investigations; program and policy work on effectiveness, efficiency, and equity; and transparency initiatives.

When OIG investigates and sustains allegations of misconduct, it issues summary reports of investigations to the appropriate authority, City management officials, and/or the Office of the Mayor, with investigative findings and recommendations for corrective action and discipline. Narrative summaries of sustained administrative investigations, i.e., those typically involving violations of the City's Personnel Rules, Debarment Rules, and Ethics Ordinance—and the resulting department or agency actions—are released in quarterly reports. OIG's investigations resulting in criminal sanctions or civil recovery actions are summarized in quarterly reports following public action (e.g., indictment) and updated in ensuing quarterly reports as court developments warrant.

OIG's performance audits, programmatic inquiries, advisories, and other reports are directed to the appropriate agency for comment and response, and are then [published on the OIG website](#). From time to time, OIG also issues notifications to a City department for attention and comment; those notifications are summarized, along with any response, in the ensuing quarterly report.

OIG's data analysis and visualization work is available on its [Information Portal](#).

Finally, OIG issues reports as required by the City's hiring and employment plans and policies and as otherwise necessary to carry out its functions in overseeing hiring and promotion processes across the City.

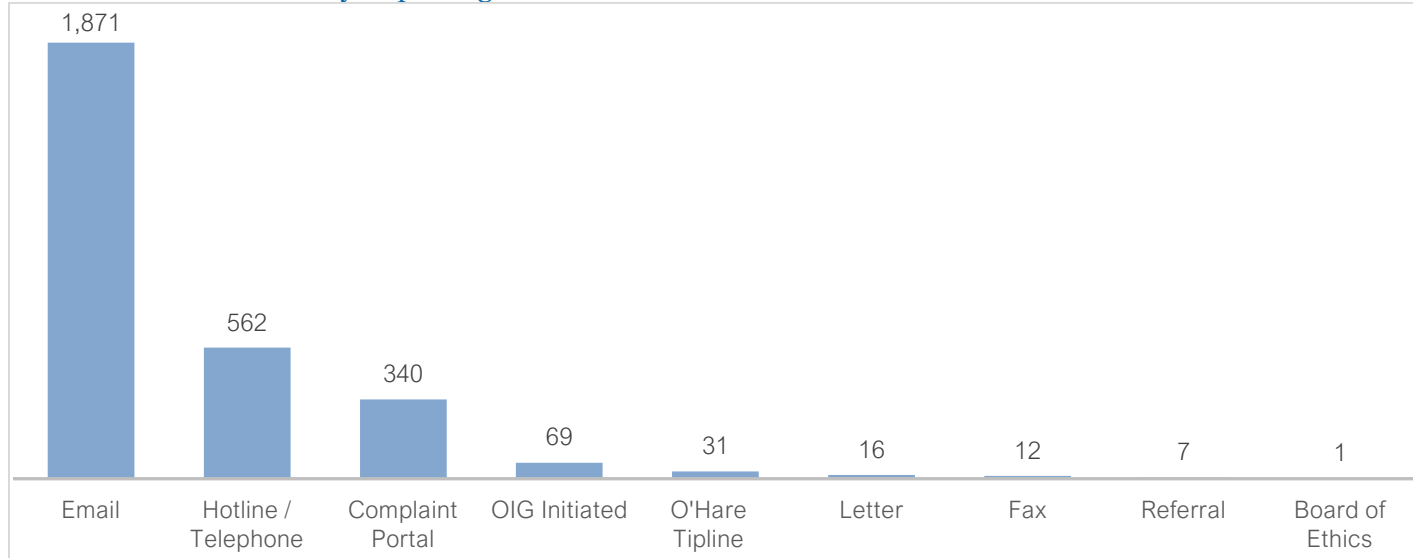
¹ "City government" includes the City of Chicago and any sister agency which enters into an Intergovernmental Agreement with the City for the provision of oversight services by OIG.

II | Intakes

1 | Intakes Received This Quarter

OIG received 2,909 intakes this quarter. The following chart shows the various reporting methods by which those intakes were received.

Intakes Chart 1: Intakes by Reporting Method



In determining whether to open an inquiry into issues raised during intake, among other factors, OIG evaluates the nature of the issue raised; which of OIG's sections might be best equipped to address the issue; and, if an intake alleges misconduct, the potential magnitude or significance of the allegations.² Following this review, OIG may open an investigative or non-investigative inquiry, decline an intake, or refer it to another agency or City department. The following information outlines the actions OIG has taken in response to intakes received this quarter.

In Q4 2025, OIG made 306³ intake referrals to City departments⁴ or other agencies.⁵ The total number of referrals (see chart below) may be greater than the number of OIG referred intakes, as a single OIG intake may be referred to more than one agency.

² As further described below, some intakes are discontinued when, after review in OIG's intake process, they are determined to be not amenable to further consideration.

³ OIG referred 306 intakes to the agencies listed in Table 1. Some intakes were referred to more than one agency, resulting in a total of 311 referrals.

⁴ OIG refers intakes to other City departments under limited circumstances. These circumstances include, but are not necessarily limited to, intakes involving CPD members which are referred pursuant to the consent decree entered in *Illinois v. Chicago*, intakes involving allegations of violations of the City's Diversity and Equal Employment Opportunity Policy, and intakes which provide notification of publicly available information on an arrest of a City employee.

⁵ Pursuant to MCC § 2-56-120, OIG does not report here referred intakes in which "(i) the complaint addresses potential criminal conduct and has been referred to a state or federal law enforcement agency, and (ii) the investigation of the conduct at issue is ongoing, and (iii) in the judgment of the inspector general, public disclosure of the referral would compromise the effectiveness of the investigation."

Table 1: Referred Intakes

Referred Agency	Number of Referrals
Chicago Police Department	128
Civilian Office of Police Accountability	83
Chicago Department of Human Resources	19
Chicago Fire Department	17
Chicago Department of Streets and Sanitation	12
Chicago Department of Transportation	7
Chicago Department of Water Management	6
Illinois Office of Executive Inspector General	6
Chicago Public Schools Office of Inspector General	5
Chicago Department of Aviation	4
Chicago Housing Authority Office of Inspector General	3
Illinois Department of Human Services Office of Inspector General	3
Chicago Department of Public Health	2
Chicago Park District Office of Inspector General	2
Chicago Public Library	2
City Colleges of Chicago Office of Inspector General	2
Federal Bureau of Investigation	2
Chicago Department of Buildings	1
Chicago Department of Fleet and Facility Management	1
Chicago Office of Public Safety Administration	1
Colorado Department of Corrections Office of Inspector General	1
Hialeah Police Department	1
Illinois Secretary of State Office of Inspector General	1
Office of the Illinois Attorney General	1
United States Marshals Service	1
Total	311

OIG may discontinue intakes that are, for a variety of reasons, not amenable to further consideration. Specifically, if after review, an intake is determined to lack sufficient information or clarity in describing the alleged misconduct, waste, or inefficiency to provide a basis for investigative follow-up, or is incoherent, incomprehensible, or factually impossible, it is designated as “Do Not Process” and is discontinued. If a communication received and cataloged as an intake is determined to be an automated, accidental, irrelevant, or inappropriate electronic message, it is designated as “Spam” and discontinued.

Finally, if a communication received and cataloged as an intake is determined to be a question or request for information that can be directly answered by OIG, it is designated as an “Inquiry,” responded to, and discontinued.

In Q4 2025, OIG discontinued 2,024 intakes.

Table 2: Discontinued Intakes

Category of Discontinued Intakes	Number of Discontinued Intakes
Do not process	977
Inquiries	598
Spam	449
Total	2,024

Pursuant to MCC § 2-56-050(b), if OIG receives an intake that constitutes a complaint alleging a violation of the Governmental Ethics Ordinance (GEO), MCC § 2-156, by any elected or appointed City officer, City employee, or any other person subject to the GEO, OIG may only: (i) decline to open an investigation if OIG determines that the complaint lacks foundation or does not relate to a violation of MCC § 2-156; (ii) refer the matter to the appropriate authority if OIG determines that the potential violation is minor and can be resolved internally as a personnel matter; or (iii) open an investigation.

In Q4 2025, OIG declined 11 complaints alleging violations of the GEO.

Table 3: Ethics Complaints Declined

Category of Declined Ethics Complaints	Number of Declined Ethics Complaints
Failure to allege a violation of MCC § 2-156	2
Complaint lacks foundation	6
Complaint of the same alleged conduct already received	3
Total	11

III | Investigations

OIG's Investigations section conducts both criminal and administrative investigations into the conduct of City officers, employees, and other entities, including contractors, subcontractors, and lobbyists. OIG may initiate an investigation either in response to a complaint or on its own initiative.

The information to follow provides an overview of OIG's investigative work this quarter and fulfills the reporting requirements set out in §§ 2-56-080 and -120 of the MCC, as well as the Intergovernmental Agreement between the Public Building Commission (PBC)⁶ of Chicago and OIG.

A | Misconduct Investigations

1 | Investigative Activity This Quarter

As of the close of this quarter, OIG has 290 active investigations. During Q4 2025, OIG initiated 13 investigations, of which 3 were self-initiated, and concluded 29 investigations.

2 | Open Matters

OIG's 290 currently active misconduct investigations involve a range of subjects and types of alleged misconduct.

Table 4: Subject of Investigations

Subject of Investigations	Number of Investigations ⁷
City employees	246
Elected officials	20
Contractors, subcontractors, and persons seeking contracts	19
Licensees	3
Appointed officials	0
Other	2
Total	290

Table 5: Nature of Allegations Under Investigation

Nature of Allegations	Number of Cases
Misconduct	289
Ineffectiveness	1
Waste/inefficiency	0
Total	290

⁶ Created by state legislation in 1956, PBC is responsible for planning, designing, and constructing municipal buildings, including schools, libraries, fieldhouses, and fire stations. See: <https://pbcchicago.com/>.

⁷ Counted here are the number of open investigations, not the number of unique subjects; that is, the same individual or entity may be the subject of more than one separate investigation.

a | *Illinois v. Chicago*, Consent Decree Paragraph 481 Investigations

Under collective bargaining agreements between the City of Chicago and certain members of the Chicago Police Department (CPD), OIG may only investigate allegations of misconduct concerning an incident or event which occurred more than five years prior to the date of the complaint or allegation, with written authorization from CPD's superintendent. Pursuant to Paragraph 481 of the consent decree entered in *Illinois v. Chicago*, if OIG requests the superintendent's authorization to open such an investigation, the superintendent must respond within 30 days.

During this quarter, OIG requested the Superintendent's authorization to open one investigation relevant to or reportable pursuant to Paragraph 481.

b | Investigations Open Over Twelve Months

As required by MCC § 2-56-080, OIG reports each quarter on active investigations which have been open for more than 12 months. Of OIG's 290 pending investigations, 179 have been open for more than 12 months. Most cases remain pending because (1) they are complex or resource-intensive investigations that may require resolution of legal issues or involve multiple subjects; (2) they involve allegations that may be the subject of criminal investigation being conducted jointly with law enforcement investigative or prosecutorial partners at the federal, state, or local level; or (3) they were extended to allocate resources to higher risk, more time-sensitive investigations. Where other explanations are relevant for cases remaining open beyond 12 months, they are noted in the table below.

Table 6: Investigations Open Over Twelve Months, Q4 2025

Case ID ⁸	Legacy ID	General Nature of Allegations
C2022-000041038	20-1375	Criminal violation
C2022-000041039	20-1376	False statements/violation of department rules
C2022-000041245	20-1589	Criminal violation
C2022-000041580	21-0219	Failure to follow department rules regarding COVID-19 quarantine
C2022-000041581	21-0220	Criminal violation
C2022-000042145	21-0820	False records submitted to City
C2022-000043912	N/A	Ethics violation
C2022-000043865	N/A	Fraud
C2022-000043921	N/A	Secondary employment violation
C2022-000043925	N/A	Procurement fraud
C2022-000043961	N/A	Ethics violation
C2022-000044042	N/A	Paycheck Protection Program (PPP) fraud
C2022-000044065	N/A	False statements
C2022-000044091	N/A	Residency violation
C2022-000044122	N/A	Criminal violation

⁸In early 2022, OIG launched a new case management system, which accounts for the new case number format.

Case ID ⁸	Legacy ID	General Nature of Allegations
C2023-000000026	N/A	Criminal violation
C2023-000000027	N/A	Criminal violation
C2023-000000032	N/A	Official misconduct
C2023-000000038	N/A	Ethics violation
C2023-000000054	N/A	Official misconduct
C2023-000000061	N/A	Fraud
C2023-000000109	N/A	Conduct unbecoming
C2023-000000118	N/A	EEO violation
C2023-000000128	N/A	Criminal violation
C2023-000000152	N/A	Criminal violation
C2023-000000164	N/A	Conduct unbecoming
C2023-000000166	N/A	Criminal violation
C2023-000000178	N/A	Criminal violation
C2023-000000179	N/A	Retaliation
C2023-000000180	N/A	Ethics violation
C2023-000000183	N/A	Fraud
C2023-000000189	N/A	Theft
C2023-000000215	N/A	PPP fraud
C2023-000000224	N/A	Residency violation
C2023-000000260	N/A	Ethics violation
C2023-000000268	N/A	PPP fraud
C2023-000000270	N/A	PPP fraud
C2023-000000271	N/A	PPP fraud
C2023-000000272	N/A	PPP fraud
C2023-000000276	N/A	PPP fraud
C2023-000000277	N/A	PPP fraud
C2023-000000278	N/A	PPP fraud
C2023-000000279	N/A	PPP fraud
C2023-000000281	N/A	Criminal violation
C2023-000000282	N/A	Criminal violation
C2023-000000332	N/A	PPP fraud
C2023-000000344	N/A	Firearms in workplace violation
C2023-000000360	N/A	Residency violation
C2024-000000006	N/A	Unlawful eavesdropping

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000007	N/A	Ethics violation
C2024-000000013	N/A	Residency violation
C2024-000000014	N/A	Ethics violation
C2024-000000017	N/A	Personnel violation
C2024-000000024	N/A	PPP fraud
C2024-000000025	N/A	Duty disability fraud
C2024-000000047	N/A	Obstruction
C2024-000000053	N/A	PPP fraud
C2024-000000057	N/A	Bribery
C2024-000000059	N/A	Theft
C2024-000000072	N/A	EEO violation
C2024-000000081	N/A	Personnel rule violation
C2024-000000082	N/A	Personnel rule violation
C2024-000000083	N/A	Criminal violation
C2024-000000099	N/A	Retaliation
C2024-000000102	N/A	Theft
C2024-000000116	N/A	Obstruction
C2024-000000120	N/A	Personnel rule violation
C2024-000000121	N/A	Personnel rule violation
C2024-000000134	N/A	Ethics violation
C2024-000000143	N/A	Ethics violation
C2024-000000160	N/A	Criminal violation
C2024-000000170	N/A	Criminal violation
C2024-000000171	N/A	Criminal violation
C2024-000000173	N/A	Retaliation
C2024-000000182	N/A	Criminal violation
C2024-000000183	N/A	Criminal violation
C2024-000000188	N/A	Ethics violation
C2024-000000190	N/A	Criminal violation
C2024-000000193	N/A	Personnel rule violation
C2024-000000201	N/A	Retaliation
C2024-000000206	N/A	Campaign finance violation(s)
C2024-000000214	N/A	False statement(s)
C2024-000000215	N/A	Ethics violation

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000217	N/A	PPP fraud
C2024-000000218	N/A	Personnel rule violation
C2024-000000220	N/A	Residency violation
C2024-000000227	N/A	Procurement fraud
C2024-000000267	N/A	Ethics violation
C2024-000000268	N/A	PPP fraud
C2024-000000270	N/A	PPP fraud
C2024-000000271	N/A	PPP fraud
C2024-000000272	N/A	PPP fraud
C2024-000000273	N/A	PPP fraud
C2024-000000274	N/A	PPP fraud
C2024-000000275	N/A	PPP fraud
C2024-000000277	N/A	PPP fraud
C2024-000000278	N/A	PPP fraud
C2024-000000279	N/A	PPP fraud
C2024-000000280	N/A	PPP fraud
C2024-000000281	N/A	PPP fraud
C2024-000000282	N/A	PPP fraud
C2024-000000283	N/A	PPP fraud
C2024-000000284	N/A	PPP fraud
C2024-000000285	N/A	PPP fraud
C2024-000000291	N/A	PPP fraud
C2024-000000292	N/A	PPP fraud
C2024-000000293	N/A	PPP fraud
C2024-000000294	N/A	PPP fraud
C2024-000000295	N/A	Bribery
C2024-000000296	N/A	PPP fraud
C2024-000000297	N/A	Personnel rule violation
C2024-000000298	N/A	Criminal violation
C2024-000000299	N/A	PPP fraud
C2024-000000300	N/A	PPP fraud
C2024-000000301	N/A	PPP fraud
C2024-000000303	N/A	PPP fraud
C2024-000000304	N/A	PPP fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000305	N/A	PPP fraud
C2024-000000306	N/A	PPP fraud
C2024-000000311	N/A	Bribery
C2024-000000312	N/A	PPP fraud
C2024-000000313	N/A	PPP fraud
C2024-000000314	N/A	PPP fraud
C2024-000000315	N/A	Personnel rule violation
C2024-000000328	N/A	PPP fraud
C2024-000000329	N/A	PPP fraud
C2024-000000330	N/A	PPP fraud
C2024-000000331	N/A	PPP fraud
C2024-000000332	N/A	PPP fraud
C2024-000000333	N/A	PPP fraud
C2024-000000334	N/A	PPP fraud
C2024-000000335	N/A	PPP fraud
C2024-000000342	N/A	PPP fraud
C2024-000000343	N/A	PPP fraud
C2024-000000345	N/A	PPP fraud
C2024-000000346	N/A	PPP fraud
C2024-000000350	N/A	PPP fraud
C2024-000000351	N/A	PPP fraud
C2024-000000352	N/A	PPP fraud
C2024-000000353	N/A	Ethics violation
C2024-000000354	N/A	Personnel rule violation
C2024-000000355	N/A	Personnel rule violation
C2024-000000369	N/A	Theft
C2024-000000372	N/A	Fraud
C2024-000000378	N/A	Residency violation
C2024-000000379	N/A	WBE fraud
C2024-000000393	N/A	Ethics violation
C2024-000000407	N/A	MWBE fraud
C2024-000000408	N/A	Theft
C2024-000000409	N/A	Residency violation
C2024-000000430	N/A	PPP fraud

Case ID ⁸	Legacy ID	General Nature of Allegations
C2024-000000431	N/A	Theft
C2024-000000432	N/A	PPP fraud
C2024-000000438	N/A	Personnel rule violation
C2024-000000439	N/A	Ethics violation
C2024-000000441	N/A	Personnel rule violation
C2024-000000445	N/A	Personnel rule violation
C2024-000000447	N/A	Personnel rule violation
C2024-000000448	N/A	PPP fraud
C2024-000000449	N/A	PPP fraud
C2024-000000450	N/A	PPP fraud
C2024-000000451	N/A	PPP fraud
C2024-000000452	N/A	PPP fraud
C2024-000000460	N/A	PPP fraud
C2024-000000469	N/A	Personnel rule violation
C2024-000000471	N/A	Theft
C2024-000000473	N/A	Criminal violation
C2024-000000481	N/A	PPP fraud
C2024-000000482	N/A	PPP fraud
C2024-000000484	N/A	PPP fraud
C2024-000000489	N/A	PPP fraud
C2024-000000490	N/A	PPP fraud
C2024-000000491	N/A	PPP fraud
C2024-000000492	N/A	PPP fraud
C2024-000000497	N/A	Unapproved secondary employment
C2024-000000498	N/A	PPP fraud
C2024-000000499	N/A	PPP fraud
C2024-000000503	N/A	Bribery
C2024-000000504	N/A	Personnel rule violation

3 | Public Building Commission Complaints and Investigations

MCC § 2-56-030 empowers OIG to exercise its powers and duties with respect to any sister agency pursuant to an intergovernmental agreement with that agency, and it does so with respect to PBC.

In Q4 2025, OIG received one new complaint related to PBC.

B | Sustained Administrative Investigations

OIG investigations may result in administrative sanctions, criminal charges, or both. Investigations leading to administrative sanctions involve violations of City rules, policies or procedures, and/or waste or inefficiency. For sustained administrative cases, OIG produces summary reports of investigation—a summary and analysis of the evidence and recommendations for disciplinary or other corrective action. OIG sends these reports to the appropriate authority as prescribed in the MCC, including the Mayor’s Office and affected City departments.

Below (Table 7) is an overview of sustained investigative matters and, pursuant to MCC § 2-56-110, deidentified synopses of administrative investigations completed and eligible to be reported as sustained investigative matters. A matter is not eligible for reporting until, pursuant to the MCC, the relevant City department has had 30 days (with the potential for an extension of an additional 30 days) to respond to OIG’s findings and recommendations,⁹ and to inform OIG of what action(s) the department intends to take. Departments must follow strict protocols set forth in the City’s Personnel Rules, Procurement Rules, and/or applicable collective bargaining agreements, prior to imposing discipline or other corrective action.¹⁰

In addition to OIG’s findings, each synopsis includes the action taken by the department in response to OIG’s recommendations. These synopses are intended to illustrate the general nature and outcome of the cases for public reporting purposes and thus may not contain all allegations and/or findings for each case.

Table 7: Overview of Cases Completed and Reported as Sustained Matters

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2022-000043944	Department of Transportation	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by the Department of Human Resources (DHR).	The Department of Transportation (CDOT) preliminarily agreed with OIG’s recommendation and requested the Department of Law (DOL) prepare discharge charges for the subject.
C2023-000000155	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	The Board of Ethics (BOE) found probable cause to believe that the subject violated the GEO.

⁹ PBC has 60 days to respond to a summary report of investigation by stating a description of any disciplinary or administrative action taken by the Commission. If PBC chooses not to take action or takes an action different from that recommended by OIG, PBC must describe that action and explain the reasons for that action.

¹⁰ In some instances, OIG may defer the reporting of a matter against an individual until the conclusion of an investigation of other individuals connected to the same misconduct, so as to preserve investigative equities and to assure that the administrative due process rights of those subject to the continuing investigation are protected.

OIG Case Number	Department or Agency	OIG Recommendation	Department or Agency Action
C2023-000000199	Department of Procurement Services	Initiate debarment proceedings for the purpose of determining appropriate remedial action against the subject.	The Department of Procurement Services (DPS) neither responded to OIG's recommendation nor requested an extension.
C2023-000000223	Department of Public Health; Board of Ethics	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR; Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	The Department of Public Health (CDPH) preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject. BOE found probable cause to believe that the subject violated the GEO and assessed a total of \$6,000 in fines.
C2023-000000335	Department of Transportation	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	CDOT preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.
C2023-000000339, C2023-000000346, C2023-000000347, C2023-000000348, C2024-000000067, C2024-000000068, C2024-000000412	Board of Ethics	Find probable cause to believe that the subjects violated the GEO and impose appropriate sanctions.	BOE found probable cause to believe that the subjects violated the GEO.

C2024-000000015	Department of Streets and Sanitation	Discharge the subjects and refer them for placement on the ineligible for rehire list maintained by DHR.	The Department of Streets and Sanitation (DSS) disagreed with OIG's disciplinary recommendations, issuing a 29-day suspension for one subject and a one-day suspension for the second subject.
C2024-000000110	Chicago Police Department	Discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR.	CPD preliminarily agreed with OIG's recommendation and requested DOL prepare separation charges for the subject.
C2024-000000169	Board of Ethics	Find probable cause to believe that the subject violated the GEO and impose appropriate sanctions.	BOE found there was insufficient evidence to warrant a finding of probable cause to believe that the subject violated the GEO.
C2024-000000483	Chicago Police Department	Issue a formal determination on the violation, designate the subject as having resigned under inquiry, and refer the subject for placement on the ineligible for rehire list maintained by DHR.	CPD agreed with OIG's recommendation and referred the subject for placement on the ineligible for rehire list maintained by DHR.

1 | Workers' Compensation Fraud; False Records; False Statements (C2022-000043944)

An OIG investigation established that a CDOT foreman fabricated an on-duty injury to receive benefits to which they were not entitled in violation of Illinois law prohibiting workers' compensation fraud, falsified time records, made false statements to the City, and failed to cooperate with OIG.

Specifically, the subject sustained a knee injury while off-duty but falsely stated in CDOT records that they injured their knee at work in order to fraudulently secure workers' compensation. The subject misappropriated City funds by accepting duty-disability payments and workers' compensation monetary benefits. When OIG interviewed the subject, the subject provided false and evasive answers such that they failed to meet their duty to cooperate with OIG.

OIG found that the subject's conduct violated 820 ILCS 305/25.5 (workers' compensation fraud), MCC § 1-21-010 (knowingly making a false statement of material fact to the City), and MCC § 2-56-090 (duty to cooperate with OIG). OIG also found that the subject's conduct violated City of

Chicago Personnel Rule XVIII, Section 1, Subsection 6 (failing to disclose any information requested or providing a false or misleading answer to any question in any application, questionnaire, information form, or other document provided by the City), Subsection 10 (requesting or accepting a leave of absence on fraudulent grounds), Subsection 11 (falsification of any attendance or other employment records), Subsection 15 (engaging in any act or conduct prohibited by the MCC or the Illinois Compiled Statutes), and Subsection 17 (misappropriating any funds of the City).

OIG recommended that CDOT discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CDOT preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

2 | Failure to Provide Information on Statements of Financial Interest (C2023-000000155)

An OIG investigation established that a Department of Finance (DOF) deputy director provided false responses on their 2015, 2016, 2017, 2018, 2020, 2021, and 2022 statements of financial interest (SOFI) to BOE. The subject claimed that they did not derive income of more than \$1,000 from any business or other organization other than their City employment despite earning more than \$1,000 of income each listed year by conducting real estate business.

OIG found that the subject's conduct violated the GEO, MCC § 2-156-160 (establishing SOFI filing requirements).

OIG recommended that that BOE find probable cause to believe that the subject violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO. The subject is entitled to meet with BOE to contest that finding.

3 | Negligent Billing in City Contract; Failure to Perform (C2023-000000199)

An OIG investigation established that a city contractor and its managers failed to maintain appropriate certifications pursuant to the terms of their contract with the Chicago Department of Aviation (CDA) and that they committed improper conduct in the form of negligent billing irregularities. The contractor holds a City contract to maintain and inspect all of the Automated External Defibrillators (AED), Stop the Bleed kits, and Narcan kits at O'Hare and Midway airports, and provides all relevant training to City employees on that equipment, in addition to training on CPR and first aid for CDA personnel. In some cases, the contractor's personnel did not hold sufficient certifications, as required in their contract, to respond to emergency AED events at the City's airports. The subject's invoices to the City further did not align with its employees' schedules, leading to numerous billing inconsistencies over a period of 30 months, which led to the City's being overbilled.

OIG found that the subject's conduct violated the City of Chicago Debarment Rules, Section V(b)(2) (failure to perform), V(b)(3) (unsatisfactory performance), and V(g)(1) (improper conduct/negligent billing irregularities).

OIG recommended that DPS initiate debarment proceedings for the purpose of determining appropriate remedial action against the subject. DPS neither responded to OIG's recommendation within the statutorily allotted 30 days nor requested an extension pursuant to MCC § 2-56-056.

After the close of the quarter but prior to the publication of this report, DPS confirmed that it would respond to OIG's recommendation in January 2026.

4 | Unauthorized Secondary Employment; Failure to Provide Information on Statements of Financial Interest; Failure to Cooperate (C2023-000000223)

An OIG investigation has established that a finance officer with CDPH maintained secondary employment, in the form of a financial consulting business which provides tax preparation assistance as well as assistance with other legal documents such as child support modifications, divorces, bankruptcies, credit report disputes, and credit repair, throughout their employment with the City and failed to obtain authorization for employment secondary to their City position. The subject also filed false information in their statements of financial interest (SOFI); specifically, they failed to report income they received from the business they owned on their 2022, 2023, and 2024 SOFIs, and failed to report certain reportable gifts which the subject admitted having received during their OIG interview. Additionally, the subject failed to cooperate with OIG's investigation into their misconduct by failing to provide requested documents.

OIG found that the subject's conduct violated City of Chicago Personnel Rules XVIII, Section 1, Subsection 43 (failure to comply with the requirements of secondary employment) and Subsection 15 (engaging in any act or conduct prohibited by the MCC), as well as City Personnel Rule XX, Section 3 Subsection (b) (outlining the procedure for securing outside employment). The subject's conduct also violated MCC § 2-56-090 (duty to cooperate) and MCC § 2-156-160 (establishing SOFI filing requirements).

OIG recommended that CDPH discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. In response, CDPH preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject. OIG also recommended that BOE find probable cause to believe that the subject violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subject violated the GEO and assessed a total of \$6,000 in fines.

5 | Absent Without Leave; Time Falsification (C2023-000000335)

An OIG investigation established that a hoisting engineer with CDOT left the worksite without authorization to go to a social club on multiple occasions, left the worksite without authorization to run personal errands while on the clock, and falsified timekeeping records. After receiving a complaint regarding the subject, OIG surveilled them entering the social club while clocked in on several location and staying for at least hour. OIG used body worn camera (BWC) footage from past CPD responses to the social club to observe the inside of the club. OIG observed what appeared to be video gaming machines and tables used for card games.

OIG found that the subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 1 (absence without leave), Subsection 2 (leaving the work site without proper authorization), Subsection 5 (failure to return to work on time after breaks, lunch or rest periods without prior authorization to extend the time of such breaks, lunch, or rest period), Subsection 11 (falsification of any attendance or other employment records) and Subsection 48 (violating any departmental regulations, rules or procedures, specifically the City's Swipe Policy and CDOT Work

Rules). Additionally, the subject provided a falsified edit sheet and thereby violated Subsection 6 (providing false or misleading answer on a document provided by the City).

OIG recommended that CDOT discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. CDOT preliminarily agreed with OIG's recommendation and requested DOL prepare discharge charges for the subject.

6 | Improper Campaign Contributions (C2023-000000339, C2023-000000346, C2023-000000347, C2023-000000348, C2024-000000067, C2024-000000068, C2024-000000412)

An OIG investigation established that a political action committee for a former elected City official improperly accepted seven monetary contributions. OIG notified the political action committee—which was closed at the time of OIG's notification—and each contributor about the campaign finance violations. OIG provided an opportunity for the parties to “cure” the violations in accordance with MCC § 2-156-445(d). That provision allows candidates to cure campaign finance violations by refunding the contribution within 10 days of becoming aware of the violation and allows contributors to cure the campaign finance violation by requesting a refund within the same time frame. Five contributors cured the violations by timely requesting refunds. However, two contributors and the political action committee failed to cure the violations in accordance with MCC § 2-156-445(d).

OIG found that the subjects' conduct violated MCC § 2-156-445 (limitation of contributing to candidates and elected officials).

OIG recommended that BOE find probable cause to believe the subjects violated the GEO and impose appropriate sanctions. In response, BOE found probable cause to believe that the subjects violated the GEO. The subjects are entitled to meet with BOE to contest that finding.

7 | Conduct Unbecoming; False Statements (C2024-000000015)

An OIG investigation established that a DSS motor truck driver engaged in an argument with a security guard at a medical facility. After leaving the location of the argument, the subject later returned to reengage the security guard and incite them into continuing the argument. A DSS sanitation laborer was present for part of the altercation, including when the first subject returned to the facility to reengage in the argument. When asked by their supervisors about the incident, both subjects provided false, inaccurate, or deliberately incomplete information to their supervisors. Furthermore, both provided false, inaccurate, or deliberately incomplete statements to OIG investigators about what occurred when the first subject returned a second time after the initial argument.

OIG found that the first subject's conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 23 (discourteous treatment, including verbal abuse, of any other City employee or member of the public) and Subsection 50 (conduct unbecoming an officer or public employee). Additionally, both subjects' conduct violated City of Chicago Personnel Rule XVIII, Section 1, Subsection 8 (making false, inaccurate or deliberately incomplete statements in an official inquiry, investigation or other official proceeding).

OIG recommended that DSS discharge both subjects and refer them for placement on the ineligible for rehire list maintained by DHR. DSS issued discipline less than was recommended, a 29-day suspension for the first subject and a one-day suspension for the second subject.

8 | PPP Loan Fraud; EIDL Fraud; Bringing Discredit to CPD; Making a False Report (C2024-000000110)

An OIG investigation established that a CPD Sergeant provided materially false statements to obtain funds from the federal Paycheck Protection Program (PPP) and an Economic Injury Disaster Loan (EIDL), subsequently received two PPP loans worth \$39,458 and an EIDL worth \$6,000, totaling \$45,458, and made materially false statements in their application for forgiveness of the loans. The subject applied for a second EIDL, which was denied.

OIG found that a form submitted as part of the subject's PPP applications contained identical information to that of the subject's former partner at CPD. OIG previously sustained violations related to PPP loan fraud against the partner and CPD is moving to separate them.¹¹ Furthermore, the evidence indicated that the subject signed three of the four loan applications via DocuSign from a City IP address on days that the subject was working.

OIG found that the subject's conduct violated 18 U.S.C. § 1001 (false statements) and City of Chicago Police Department Rules & Regulations Rule 1 (violation of any law or ordinance), Rule 2 (any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department), and Rule 14 (making a false report, written or oral).

OIG recommended that CPD discharge the subject and refer them for placement on the ineligible for rehire list maintained by DHR. CPD preliminarily agreed with OIG's recommendation, relieved the subject of their police powers, and requested DOL prepare separation charges for the subject.

9 | Advocating for the Hiring of a Relative (C2024-000000169)

An OIG investigation established that a DOL attorney recommended a family member for an open position at DOL by forwarding the family member's resume to a DOL employee that would participate in the hiring process for an open position.

OIG found that the subject's conduct violated the GEO, MCC § 2-156-130(a) (prohibiting a City employee from advocating for the hiring of a relative for employment at their own City department).

OIG recommended that BOE find probable cause to believe the subject violated the GEO and impose appropriate sanctions. BOE found there was insufficient evidence to warrant a finding of probable cause to believe that the subject violated the GEO.

10 | PPP Loan Fraud; Bringing Discredit to CPD; Making a False Report (C2024-000000483)

An OIG investigation established that a CPD civilian employee provided materially false statements to obtain a PPP loan, subsequently received PPP funds from, and made materially false statements

¹¹ [Quarterly Report: Second Quarter 2025](#), Case No. C2023-000000212

to the federal government in their application for forgiveness of the loan. OIG offered the employee the opportunity to provide records supporting the existence of a business eligible for a PPP loan, which the subject did not provide. After OIG notified the subject of its intent to the interview them regarding the misconduct, the subject resigned their City employment without providing a statement.

OIG found that the subject's conduct violated 18 U.S.C. § 1001 (false statements), and in violation of the Rules and Regulations of the Chicago Police Department, Article V, Rules of Conduct (CPD Rules), specifically CPD Rule 1 (violation of any law or ordinance), CPD Rule 2 (any action of conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department), CPD Rule 3 (any failure to promote the Department's efforts to implement its policy or accomplish its goals), and CPD Rule 14 (making a false report, written or oral).

OIG recommended that CPD issue a formal determination on the violation, designate the employee as having resigned under inquiry, and refer the employee for placement on the ineligible for rehire list maintained by DHR. CPD agreed with OIG's recommendation and referred the subject for placement on the ineligible for rehire list maintained by DHR.

C | Synopses of and Developments in Charged Criminal Cases

OIG's criminal investigations may uncover violations of local, state, or federal criminal laws, which may be prosecuted by the U.S. Attorney's Office, Illinois Attorney General's Office, or Cook County State's Attorney's Office, as appropriate. For the purposes of OIG quarterly summaries, criminal cases are considered concluded when the subject(s) of the case is publicly charged by complaint, information, or indictment.

This quarter, OIG has two updates regarding criminal cases related to an OIG investigation.

1 | United States of America v. Kenneth Ford, 22 CR 454 (Northern District of Illinois)

OIG previously reported in its [Fourth Quarter 2022](#) report on the indictment of Kenneth Ford. Ford, the Executive Director of Public Image Partnership (PIP), a former grant recipient of the City, was indicted for making a false statement to the FBI regarding payments that PIP made to an individual who did not perform any work for PIP. OIG assisted in this investigation.

On May 2, 2025, Ford pleaded guilty to one count of making a false statement to the FBI in violation of 18 U.S.C. § 1001(a)(2). On December 19, 2025, Ford was sentenced to three years of probation. He was ordered to pay restitution in the amount of \$37,000, including \$7,520 of restitution to the City of Chicago. During the term of his probation, Ford was required to resign from PIP and not accept employment at any other organization that receives federal or state grant funding. He is also prohibited from having access to or authority over federal or state grant funding.

D | Synopses and Results of Administrative Appeals, Grievances, or Other Actions

In administrative cases, a City employee may be entitled to appeal or grieve a departmental disciplinary action, depending on the type of corrective action taken, and the employee's classification under City Personnel Rules and/or applicable collective bargaining agreements. OIG

monitors the results of administrative appeals before the Human Resources Board and grievance arbitrations concerning OIG's disciplinary recommendations. Other updates, status changes, or derivative actions resulting from OIG's investigations may also be reported here.

E | Special Investigations

In addition to its reactive investigative work in response to complaints, OIG engages in certain proactive investigative projects.

1 | Campaign Finance Investigations

The MCC bans City vendors, lobbyists, and those seeking to do business with the City from contributing more than \$1,500 each year to any elected City official or candidate's political campaign. Moreover, lobbyists and entities in which a lobbyist has an ownership interest in excess of 7.5% are restricted from contributing any amount to the Mayor. Other rules and regulations, such as Executive Order 2011-4, place further restrictions on donations.¹²

Campaign contributions that potentially violate the MCC are sometimes identified through complaints; OIG also, however, engages in proactive monitoring and analysis of campaign contribution data to identify and examine potential violations. In particular, OIG's Center for Information Technology and Analytics has developed an automated data process to identify potentially improper contributions made to elected City officials or candidates by restricted contributors. In this effort, OIG has integrated and matched data from a variety of sources, including City contracts and records of payments made by the City to individuals and entities.

Pursuant to MCC § 2-156-445, "[a]ny person who solicits, accepts, offers or makes a financial contribution that violates the limits set forth in this section...shall not be deemed in violation of this section if such person returns or requests in writing the return of such financial contribution within ten calendar days of the recipient's or contributor's knowledge of the violation." Accordingly, once a potential violation is identified, OIG notifies the donor and the donation recipient of the violation and provides the individual or entity ten days to challenge the determination or cure the violation by returning the excess donation.¹³ If the excess donation is returned in a timely manner, or it is determined that a violation did not occur, OIG closes the matter as not sustained. In the event the matter is not cured or successfully challenged, OIG will sustain an investigation and deliver the case to BOE for adjudication. This quarter, OIG resolved 13 campaign finance matters, resulting in the return of \$181,525 in improper contributions. Details are provided in the table below.

¹² Executive Order 2011-4 places a restriction on the mayor and City contractors by prohibiting City contractors, owners of City contractors, spouses or domestic partners of owners of City contractors, subcontractors to a City contractor on a City contract, owners of subcontractors to a City contractor on a City contract, and spouses or domestic partners of owners of subcontractors to a City contractor on a City contract from making contributions of any amount to the mayor. Any contract negotiated, entered into, or performed in violation of any of the provisions of this Order shall be terminable by the City.

¹³ If the donor and/or recipient was already aware that the excess donation was a violation at the time the donation was made, then they may not be entitled to notice and opportunity to cure the violation and avoid a fine.

Table 8: Campaign Finance Activity

Case #	Aggregate Donation Amount (Year)	Donation Source	Donation Recipient	Amount of Returned Funds
C2024-000000206	\$49,000 (2023); \$25,000 (2024)	PAC affiliated with person doing business with Chicago Board of Education	Elected official of the City	\$71,000
C2024-000000254	\$50,000 (2023)	PAC affiliated with person doing business with the City	Elected official of the City	\$48,500
C2024-000000054	\$5,000 (2021); \$6,500 (2022); \$2,500 (2023)	Person doing business with the Chicago Housing Authority	Elected official of the City	\$9,500
C2024-000000054	\$9,000 (2021); \$5,000 (2022); \$4,000 (2023); \$10,000 (2024); \$5,000 (2025)	Person doing business with the Chicago Housing Authority	Elected official of the City	\$25,500
C2024-000000029	\$2,500 (2023)	Company affiliated with person seeking to do business with the City	Elected official of the City	\$1,000
C2025-000000029	\$8,000 (2023)	Company affiliated with person seeking to do business with the City	Elected official of the City	\$6,500
C2025-000000029	\$7,500 (2023)	Company affiliated with person seeking to do business with the City	Elected official of the City	\$6,000
C2025-000000055	\$2,500 (2022)	Company affiliated with person doing business with the City	Elected official of the City	\$1,000
C2025-000000055	\$5,000 (2022)	Company affiliated with person doing business with the City	Elected official of the City	\$3,500

C2025-000000055	\$5,000 (2023)	Company affiliated with person doing business with the City	Elected official of the City	\$3,500
C2025-000000055	\$5,000 (2022)	Company affiliated with person doing business with the City	Elected official of the City	\$3,500
C2025-000000127	\$2,500 (2023)	Person doing business with City Colleges of Chicago	Elected official of the City	\$1,000
C2024-000000267	\$2,545.45 (2022)	Person doing business with the City	Elected official of the City	\$1,025.45

2 | O'Hare 21

OIG provides oversight for major construction initiatives across the City. Specifically, OIG has worked with CDA to oversee the multi-billion-dollar expansion project at O'Hare International Airport, commonly known as O'Hare 21.

OIG manages the work of Integrity Monitors (IMs), professional services contractors charged with investigating, auditing, and testing various processes and contracts associated with O'Hare 21. The IMs are given full access to contractor records and personnel. They monitor contractors' compliance with laws, policies and procedures, and various contractual requirements, and report to an Integrity Monitoring Committee; that committee is constituted of representatives of the DPS, CDA, and OIG.

Working with the IMs, OIG receives information, leads, and complaints regarding potential misconduct on the project. Participating with CDA and DPS on the monitoring committee, OIG works in concert with partner departments to develop strategies and approaches to problems considering shared interests of promoting transparency and accountability in City business. OIG has developed an [O'Hare 21-specific tipline](#) and [email address](#) to enable members of the public, employees, and contractors to more easily raise concerns about O'Hare 21 to OIG.

F | Fines and Recoveries

In this quarter, BOE reached one new settlement on fines with the subjects of certain OIG investigations in which BOE found probable cause to believe that the subjects had violated the GEO. [All BOE settlement agreements are available to the public on the City's website.](#) The settlement reached this quarter are listed below. Because settlements with BOE, including the names of subjects, are public pursuant to MCC § 2-156-385(4), OIG lists the names of the subject of its investigations below.

Table 9: Settlements and Fines

BOE Case Number	Subject Name	Date of Settlement	Fine Amount
23045.IG/23055.IG	Melissa Conyears-Ervin	Oct. 1, 2025	\$30,000

IV | Public Safety

Pursuant to the separate powers and duties enumerated in MCC § 2-56-230, the Public Safety section supports OIG's mission of promoting economy, effectiveness, efficiency, and integrity by conducting independent, objective evaluations and reviews of CPD, the Civilian Office of Police Accountability (COPA), and the Police Board, as well as inspections of closed disciplinary investigations conducted by COPA and the Bureau of Internal Affairs (BIA).

A | Evaluations and Reviews

The Public Safety section conducts program and systems-focused evaluations and reviews of CPD, COPA, and the Police Board. Based on the findings of these inquiries, OIG makes recommendations to improve the policies, procedures, and practices of those entities. The following summarizes the Public Safety section reports released this quarter.

1 | Chicago Police Department's Discipline Implementation, Options, and Recordkeeping¹⁴

OIG conducted an inquiry into procedural consistency and fairness in the CPD disciplinary process; specifically, this report assessed whether finalized disciplinary actions imposed on CPD members are fully and consistently implemented (i.e., the necessary steps for the relevant disciplinary action have been completed) and recorded, and whether the exercise of "options to suspension" impacts the implementation, consistency, and fairness of final discipline. Options in lieu of suspension, or "options," allow a suspended member to use accrued paid time off in lieu of serving an unpaid suspension. In its assessment, OIG analyzed a CPD-provided list of all Sustained disciplinary actions against CPD members, finalized between April 13, 2016, and April 13, 2021.

OIG found that CPD's recording of its implementation of final discipline in Citywide personnel and payroll databases was inconsistent (e.g., if a suspension has been implemented—in other words, a member has served a suspension—there ought to be data regarding the suspension in the member's personnel file along with an associated deduction of pay in the relevant Citywide databases, but OIG found that the necessary information in **both** databases was not reliably recorded), and was most incomplete for reprimands and suspensions. Although all of the Department's reported finalized separations were appropriately recorded, CPD could not provide documentation for over half of the finalized reprimands and over a third of finalized suspensions that were reported to OIG. Inconsistent implementation and documentation of suspensions may be attributable to gaps in the coordination among City departments which is necessary to implement different types of final discipline. Whereas the implementation of reprimands is relatively straightforward and confined within CPD, the implementation of both suspensions and separations is more complicated and requires several layers and stages of administrative action. Current processes for implementing suspensions and separations involve multiple forms passing among CPD's BIA, the CPD Superintendent's office, the Office of Public Safety Administration (OPSA), DHR, the disciplined member, and the member's unit timekeeper. Further complicating the multi-department coordination is the fact that many of CPD's directives and forms related to the implementation of discipline do not reflect the creation of OPSA in 2019 nor do they enumerate OPSA's various responsibilities throughout the disciplinary process.

¹⁴ Published December 16, 2025. See <https://igchicago.org/publications/cpd-discipline-implementation/>.

In addition, OIG found that CPD, OPSA, and DHR do not share a common understanding of discipline reporting and recording obligations, jeopardizing the completeness and reliability of discipline records. Documentation for suspensions varied depending on suspension length. OIG found documentation for 42.9% of members who CPD specifically identified as “Suspended Over 30 Days” between April 13, 2015, and April 13, 2022. Comparatively, OIG found documentation for only 3.2% of CPD members with a discipline type of “Days Suspended”—which included suspensions of any length, both under and over 30 days—reported in CPD data. The inconsistency of documentation for suspensions not specifically labeled as over 30 days could be attributed to CPD, OPSA, and DHR’s divergent understanding of reporting obligations and differing practices for recording such suspensions. OPSA reported to OIG that suspensions of less than 30 days are not entered into personnel records, whereas DHR stated that all suspensions of any length must be recorded. Further complicating the complete and accurate documentation of suspension is the granting and exercising of options. OIG could not confirm whether the use of options impacted the completeness of CPD’s suspension documentation because CPD provided five completed options forms from the period of analysis; notably, neither CPD nor OPSA could provide any options forms completed before 2019.

OIG did not find any written guidance from CPD on coding resignations or retirements in lieu of discipline or while a member is under investigation. According to the City’s “Policy Regarding Ineligibility for Rehire,” members who retire or resign in lieu of discharge are deemed “Ineligible for Rehire,” while members who retire or resign while they are the subject of an ongoing misconduct investigation are to be designated as “Resigned or Retired Under Inquiry.” In addition, the policy states that if a former member with the “Resigned or Retired Under Inquiry” designation returns to City employment, then DHR—the agency tasked with maintaining the Ineligible for Rehire list—is prompted to notify the appropriate investigating agency that it may resume and complete its misconduct investigation, if it chooses. OIG found that for CPD members listed as having a discipline type of “Resigned,” over two thirds of such records lacked details on the nature or disposition of members’ end of employment. Because there are no restrictions on when members may resign or retire, the accurate coding of the disposition of a member’s resignation or retirement is significant.

Finally, OIG found that neither CPD nor OPSA have clear criteria for the granting of options or the documentation of their use, and neither maintains a complete record of the exercise of options by CPD members. The lack of criteria guiding the granting of options risks members viewing the granting of options and the disciplinary process as a whole as unfair or inconsistent. Other than reviewing individual personnel files for every member who has been issued a suspension, CPD has no comprehensive method for tracking the granting or use of options. Failure to document the use of options may impact the complete or accurate recording of suspensions. The use of options to fulfill part or all of an issued suspension may result in a lesser suspension or no suspension at all being recorded in a member’s disciplinary history. Without documentation of the use of options in this case, there may not be a record of the actual length of the issued suspension, thereby obscuring a member’s accurate disciplinary history.

Incomplete and inaccurate disciplinary records impact the application of progressive discipline and preclude CPD from analyzing trends in members’ disciplinary histories that could help identify early intervention and training opportunities for members who consistently engage in patterns of misconduct—including as required by the consent decree entered in *Illinois v. Chicago*. Such gaps in disciplinary records increase the risk that CPD members who should face more severe penalties

for subsequent misconduct do not, or more seriously, that those who should not continue to serve remain on duty.

Any risk that CPD members found to have committed misconduct might escape finalized discipline or might avoid such discipline from appearing in their personnel records threatens the credibility of and public trust in Chicago's police discipline and accountability system. To better ensure the complete and accurate implementation and documentation of final discipline, OIG made recommendations to CPD, OPSA, and DHR.

2 | Chicago Police Department's Response to Hate Crimes and Hate Incidents¹⁵

Pursuant to MCC §§ 2-56-030 and -230, the Public Safety section of OIG conducted an inquiry into CPD's response to hate crimes and hate incidents. CPD defines "hate crime" as a crime "targeting individuals or groups based on actual or perceived race, color, creed, religion, ancestry, gender, sexual orientation, physical or mental disability, citizenship, immigration status, or national origin," and lists assault, battery, and property damage as examples of hate crimes. CPD's definition of hate crimes is informed by the Illinois Compiled Statutes (ILCS) (720 ILCS 5/12-7.1) and the MCC. As outlined in the ILCS, a hate crime is a felony charge, and certain misdemeanors—for example, misdemeanor theft or misdemeanor criminal damage to property—can be elevated to a felony if the investigating law enforcement agency determines that the crime was motivated by hate. In this report, OIG examined CPD's and relevant City agencies' response model for reported hate crimes and hate incidents.

OIG found that CPD has made recent efforts to improve public information on hate crime reporting, but should examine areas where it could provide more current or accurate information, such as regarding resources for victims of hate crimes or specialized information tailored to Chicago's distinct communities. Additionally, OIG noted that the staff allocated to hate crime response across City agencies, notably within CPD and the Chicago Commission on Human Relations (CCHR), should be evaluated in any forthcoming CPD staffing analysis and in consideration of CCHR's budget. The City's ability to adequately address hate crimes and hate incidents is critical not only to preserve the safety of Chicago's communities, but to bolster community trust in CPD and City institutions broadly.

B | Review of Closed Disciplinary Investigations

Pursuant to its obligations under the MCC, the Public Safety section reviews individual closed disciplinary investigations conducted by COPA and BIA. OIG may make recommendations to inform and improve future investigations and, if it finds that a specific investigation was deficient such that its outcome was materially affected, may recommend that it be reopened. Closed investigations are selected for in-depth review based on several criteria, including, but not limited to, the nature and circumstances of the alleged misconduct and its impact on the quality of police-community relationships; the apparent integrity of the investigation; and the frequency of an occurrence or allegation. The closed investigations are then reviewed in a process guided by the standards for peer review of closed cases developed by the Council of Inspectors General on Integrity and Efficiency. OIG assesses sufficiency across several categories, including timeliness, professional standard of care, interviews, evidence collection and analysis, internal oversight, and case disposition.

¹⁵ Published December 19, 2025. See <https://igchicago.org/publications/cpd-response-to-hate-crimes/>.

This quarter, the Public Safety section's Investigative Analysis unit examined 266 closed disciplinary cases and opened 24 for in-depth review. OIG found four COPA investigations that contained deficiencies materially affecting their outcomes.

Table 10: Disciplinary Cases Reviewed

Agency	Cases Screened	Cases Opened
BIA	174	7
COPA	92	17
Total	266	24

1 | Recommendations to Reopen Closed Disciplinary Investigations

This quarter, OIG sent COPA four letters of recommendation to reopen an investigation. COPA accepted one and declined one of OIG's recommendations; two responses are pending.

Additionally, by the end of this quarter, BIA responded to three recommendations to reopen sent in the second quarter of 2025. BIA declined to reopen the three investigations. OIG received responses from COPA on one investigation made in the third quarter of 2025; COPA declined OIG's recommendation. COPA responded to two recommendations made in the fourth quarter of 2025; COPA declined one recommendation and accepted one recommendation.

Below are summaries of investigations that have reached a final disciplinary decision during the fourth quarter. Once BIA or COPA has responded to an OIG recommendation to reopen an investigation, and the underlying investigation has reached a final disciplinary decision, OIG's recommendation letters and the agencies' responses will be published on OIG's website. In these procedural postures, OIG's recommendations to reopen and the agencies' responses have been available and, from time to time, released pursuant to MCC § 2-56-250 and the Illinois Freedom of Information Act. Accordingly, the summaries contained in this section of the quarterly report will include the names of involved CPD members. These recommendations to reopen, issued pursuant to MCC § 2-56-230(c), are separate from OIG's own confidential investigative work, which is governed by the confidentiality provisions set out in MCC § 2-56-110.

a | Recommendation to Reopen to Investigate Potential Rule 14 Violation (C2024-000000138/CPD Log #2022-0005027)

COPA investigated allegations that Officers Reynol Cuellar De La Cruz, Star #7661, and Denny Sanchez, Star #7759 detained the complainant and their passenger without justification, searched the complainant's vehicle without justification, failed to complete an Investigatory Stop Report (ISR) for a traffic stop that included a search, and failed to provide the complainant with an Investigatory Stop Receipt. COPA exonerated Officers Cuellar De La Cruz and Sanchez on the allegation of unjustified detainment and sustained the allegations that they failed to complete an ISR, failed to provide an ISR receipt, and searched the vehicle without justification. COPA recommended a three-day suspension for Officers Cuellar De La Cruz and Sanchez.

Officers Cuellar De La Cruz and Sanchez conducted a traffic stop of the complainant. During the traffic stop, the complainant requested a supervisor and Sergeant John Hanlon, Employee #115870, responded to the scene. Officer Cuellar De La Cruz informed Sergeant Hanlon that the

complainant did not want to exit the vehicle and seemed nervous. Officer Cuellar De La Cruz told Sergeant Hanlon that they asked the complainant to exit their vehicle because the complainant provided inconsistent identities for the owner of the vehicle.

During its review of the BWC footage, OIG found that Officer Cuellar De La Cruz never asked the complainant about the owner of the vehicle, nor did the complainant ever identify any owner of the vehicle prior to Officer Cuellar De La Cruz asking them to step out of the vehicle and searching the vehicle.

OIG recommended that COPA reopen the investigation to address Officer Cuellar De La Cruz's false statements made to Sergeant Hanlon and whether those statements constituted a violation of CPD's Rule 14, which prohibits false reports.

In response to OIG's recommendations, COPA agreed to reopen the investigation. COPA served two Rule 14 allegations related to Officer Cuellar De La Cruz's statements to Sergeant Hanlon and conducted a second interview. Officer Cuellar De La Cruz admitted that they never asked the complainant about the vehicle's ownership before searching the vehicle and stated that their statements to Sergeant Hanlon were the result of poor phrasing and choice of words. Officer Cuellar De La Cruz stated that they made assumptions from the evidence and relayed those assumptions to Sergeant Hanlon. COPA sustained the Rule 14 allegations against Officer Cuellar De La Cruz, finding that their statements to Sergeant Hanlon were false, willful, and material. COPA recommended that Officer Cuellar De La Cruz be separated from the Department.

b | Recommendation to Reopen to Address All Allegations (C2024-000000232/CPD Log #2019-0000262)

BIA received allegations made by a reporting CPD member that Sergeant Peter Edwards, Star #1145, violated CPD's Directive on Prohibitions on Gifts and Gratuities and that Sergeant Oommen Sleetba, Star #1625, owns a security firm and recruits CPD members while on duty. During the investigation, BIA served the reporting CPD member with an allegation for failing to notify a supervisor within one hour of their scheduled start time that the reporting CPD member would be using medical time. BIA exonerated the allegation against the reporting CPD member after learning that incident had already been addressed through a Summary Punishment Action Request (SPAR) by Sergeant Richard Steinbrenner, Star #1864.

During its review, OIG identified that BIA named the reporting CPD member as an accused—despite their status as a complainant—and failed to address the initial allegations against Sergeants Edwards and Sleetba.

OIG recommended BIA reopen the investigation to address the initial allegations made against Sergeants Edwards and Sleetba and to investigate the additional allegation of retaliation made by the reporting CPD member.

BIA accepted OIG's recommendation and reopened the investigation. BIA determined that the allegations made by the reporting CPD member against Sergeants Sleetba and Edwards did not violate any CPD Directives and unfounded the allegations. BIA also investigated the allegation that Sergeant Steinbrenner allegedly retaliated against the reporting CPD member when issuing a SPAR. BIA unfounded the allegation against Sergeant Steinbrenner.

c | Recommendation to Reopen to Consider All Available Evidence (C2024-000000476/CPD Log # 2023-0004717)

BIA investigated allegations that CPD Officer Korey Giles, Star #9350, committed a home invasion on September 25, 2023. Officer Korey Giles was arrested on October 12, 2023, and subsequently charged with Home Invasion and Non-consensual Dissemination of Private Sexual Images. During BIA's preliminary investigation, Officer Korey Giles resigned from the Department, and BIA administratively closed its investigation.

During its review, OIG learned that Officer Korey Giles sent a nude photo of the victims to his sister, Officer Kayla Giles, Star #9680. Officer Kayla Giles provided a statement to the CPD Detective and confirmed that Officer Korey Giles sent them a nude photo of the victims lying in bed via text message. BIA did not document any potential rule violations against Officer Kayla Giles for failure to report to the Department potential criminal activity or rule violations by Officer Korey Giles, as required by Rules 21 and 22 of CPD's Rules of Conduct.

OIG recommended BIA reopen the investigation to consider all available evidence and investigate all applicable rule violations associated with Officer Kayla Giles.

In response to OIG's recommendations, BIA accepted OIG's recommendation and reopened the investigation. BIA sustained the allegation that Officer Kayla Giles "received a photo from [their] brother, Korey Giles, (who at the time was a Chicago Police Officer ...) on [their] cell phone on 25 Sep 2023 at approximately 0914 hours, of Korey Gile's [sic] girlfriend and a male both of whom were partially nude, and asleep, and that [Officer Kayla Giles] failed to notify the Chicago Police Department [they] had received the photo from [their] brother Korey Giles." Per a Mediation Agreement, Officer Kayla Giles agreed to serve a three-day suspension.

d | Recommendation to Reopen to Serve All Appropriate Allegations (C2024-000000506/CPD Log # 2021-0003104)

COPA investigated allegations against CPD Officer Jeffrey Zlotkowski, Star #18596, related to an off-duty confrontation with the complainant. COPA recommended separation for Officer Zlotkowski on sustained findings that Officer Zlotkowski engaged in an unjustified verbal altercation, followed the complainant to their residence without justification, used excessive force without justification, and drove without due regard for the safety of all persons. Additionally, COPA served allegations against Officer Marcus Turner, Star #14203, for failing to conduct a thorough and proper preliminary investigation. COPA reached a finding of Sustained and recommended a 10-day suspension for Officer Turner.

In the Original Case Incident Report, both Officer Turner and Officer Alvarez are listed as Reporting Officers. Yet, COPA did not serve Officer Alvarez with any allegations despite sustaining the charges against Officer Turner for failing to conduct a thorough and proper preliminary investigation.

On April 11, 2024, CPD Superintendent Larry Snelling requested that COPA conduct further review of Log #2021-0003104 to address the lack of information from witnesses, and to serve Officer Alvarez with Notification of Charges/Allegations for failing to conduct a thorough and proper preliminary investigation. Superintendent Snelling noted that the complainant, and the

complainant's neighbor, informed Officer Alvarez that Officer Zlotkowski was intoxicated; however, Officer Alvarez failed to include this information on the Original Case Incident Report.

On October 15, 2024, COPA notified BIA that it declined to reopen Log #2021-0003104 and listed its efforts to contact witnesses. However, COPA failed to address Superintendent Snelling's request to serve Officer Alvarez with allegations that Officer Alvarez failed to conduct a thorough and proper preliminary investigation just as COPA had sustained for Officer Turner.

On December 27, 2024, OIG recommended that COPA serve Officer Alvarez with all appropriate allegations either in Log #2021-0003104 or under a separate log number.

OIG learned that Superintendent Snelling submitted to COPA a Partial Non-Concurrence letter concurring with COPA's findings against Officer Zlotkowski but not concurring with COPA's findings against Officer Turner recommending that, "There should not be a penalty" against Officer Turner. COPA accepted Superintendent Snelling's recommendations and stated there would be a supplemental report distributed.

On February 26, 2025, COPA declined OIG's recommendation to reopen the investigation to serve Officer Alvarez with all appropriate allegations noting that "arbitrators routinely rescind or significantly reduce discipline against officers in cases over three years old. Reopening this case now to serve allegations against Officer Alvarez is unlikely to result in sustained discipline."

On November 18, 2025, OIG furthered reviewed Log #2021-0003104 and observed that COPA had not uploaded its supplemental report, nor had it changed its finding against Officer Turner. OIG then sent COPA a Notice of Error related to these facts.

On December 2, 2025, COPA notified OIG that the supplemental report was uploaded to the case file and the finding for Officer Turner was corrected in CPD's Case Management System (CMS).

[e | Recommendation to Reopen to Gather All Available Evidence \(C2025-000000119/CPD Log# 2023-0000420\)](#)

BIA investigated allegations that Officer Larrick West, Star #17947, was involved in an off-duty physical altercation. BIA administratively closed the investigation without speaking to the CPD Detective that initiated the investigation or the CPD officers that initially responded to the scene.

During its review, OIG identified that the electronic case file was incomplete, in that it did not contain additional Detective Supplemental Reports or recordings of the 911 calls made during the incident.

OIG recommended BIA reopen the investigation to gather all possible evidence, fully investigate the allegation of engaging in a physical altercation while off-duty and conduct an analysis of whether Officer West's actions during the incident required completion of a Tactical Response Report (TRR).

In response to OIG's recommendations, BIA declined OIG's recommendation to reopen the investigation. BIA stated that it administratively closed the investigation, in part, because Officer West was identified as a victim on the case report.

f | Recommendation to Reopen to Consider All Available Evidence (C2025-000000192/CPD Log # 2024-0003922)

BIA investigated allegations that CPD Officers Juan Peralta, Star #3277, and Enrique Sepulveda Jr., Star #17266, while on-duty, traveled to the residence of a witness to investigate an off-duty incident. The incident involved the witness, who was the driver of a blue Chevrolet sedan, and Officer Peralta.

CPD brought allegations that Officers Peralta and Sepulveda failed to notify the Office of Emergency Management and Communications (OEMC) of their location and the circumstances of the investigation, and failed to activate their BWC. It was also alleged that Officer Peralta called Officer Ryan Luzin's, Star #17586, mother a "slob," improperly investigated an off-duty incident involving themselves, and while off-duty ran a license plate for unofficial purposes. Officer Peralta alleged that Officer Luzin called Officer Peralta's cellphone and threatened to batter them. Lastly, it was alleged that Sergeants Ryne Tobin, Star #2194, and Javier Alonso, Star #1717, failed to initiate a Log number on behalf of Officer Luzin's mother. BIA sustained the allegations against Officers Peralta, Luzin, Sepulveda, and Sergeant Alonso; the allegation against Sergeant Tobin was not sustained.

During its review, OIG identified that despite Officer Sepulveda's admission that they were present and observed Officer Peralta's improper conduct, BIA did not conduct an analysis of whether Officer Sepulveda violated CPD's Rule 22, which requires CPD members to report any rule violation or improper conduct by another member. Further, BIA's investigative file did not contain a response from OPSA related to its request for information that may show Officer Luzin used CPD databases to obtain Officer Peralta's phone number.

OIG recommended that BIA reopen the investigation to consider all available evidence and conduct an analysis of whether the conduct at issue violated Rule 22 of CPD's Rules of Conduct and any other CPD directives.

In response to OIG's recommendations, BIA reopened its investigation. BIA determined that Officer Sepulveda violated Rule 22 by failing to report Officer Peralta's misconduct and recommended a 5-day suspension. BIA also included in its investigative file OPSA's response related to Officer Luzin's use of CPD databases to obtain Officer Peralta's phone number. The results did not demonstrate that Officer Luzin ran a name inquiry on Officer Peralta during the timeframe of the incident.

g | Recommendation to Reopen to Conduct Additional Analysis (C2025-000000207/CPD Log#2023-0004677)

BIA investigated allegations that Officer Saul Diaz, Star #17501, attempted to run the complainant off the road while the complainant was riding their bicycle. BIA reached a Not Sustained finding for the allegation.

While travelling to a call for shots fired, Officers Diaz and Daniel Gonzalez, Star #10364 encountered the complainant while the complainant was riding their bicycle near the driver's side of the CPD squad car. As shown on BWC footage reviewed by OIG, Officer Diaz told the complainant, "You're on the wrong side of the street" and ordered the complainant off their bike. The complainant and the officers exchanged words, and eventually the complainant provided their

identifying information to the officers. Officer Gonzalez conducted a name check and issued the complainant an Administrative Notice of Violation for obstruction or interference with traffic. During its review, OIG identified that BIA did not include an ISR in its electronic case file. OIG also identified that BIA did not address that observed fact that Officer Diaz reached into the complainant's pants pockets and retrieved their cell phone, potentially conducting an improper search.

OIG recommended BIA reopen the investigation to conduct an analysis of whether Officer Diaz conducted an unlawful search and whether the involved CPD members failed to complete an ISR.

In response to OIG's recommendations, BIA declined to reopen the investigation, stating "this case will not be re-opened to address completing an Investigatory Stop Report and removing the Reporting Party's cell phone from [their] pocket during a protective pat down search. This case is in Command Channel Review and near Closed Final."

h | Recommendation to Reopen to Investigate All Allegations (C2025-000000229 and C2025-000000230/CPD Logs 2023-0002418 and 2023-0002419)

In Log #2023-0002383, BIA investigated allegations that CPD Officer Juan Cauinian, Star #7275, threatened to pull out their firearm and used profanity towards Officer Amir Dana, Star #18794. BIA sustained both allegations against Officer Cauinian and recommended a 10-day suspension and placement in the Behavioral Intervention System.

During Officer Cauinian's interview with BIA regarding the allegations made against them in Log #2023-0002383, Officer Cauinian alleged a pattern of discrimination regarding their nationality. Officer Cauinian stated that they were "being bullied," called "stupid," and that Officer Dana told Officer Cauinian on a prior occasion, "your accent, you're not even an American, you're not supposed to be an officer, because of your color..."

During its review of Log #2023-0002383, OIG identified Log #s 2023-0002418 and 2023-0002419 that contained allegations of conduct unbecoming and harassment made by Officer Cauinian against Officers Dana, Cedric Campbell, Star #3407, Sergeant Leonard Ficht, Star #940, and Lieutenant Kevin Kendzior, Star #299, respectively. OIG reviewed Log #s 2023-0002418 and 2023002419 and learned that BIA administratively closed both cases indicating that the allegations were to be investigated under Log #2023-0002383. However, there is no indication in Log #2023-0002383 or CPD's CMS that BIA investigated Officer Cauinian's allegations of a hostile and discriminatory work environment.

OIG recommended that BIA reopen Log #s 2023-0002418 and 2023-002419 to investigate the allegations brought by Officer Cauinian against Officers Dana and Campbell. Lieutenant Kendzior and Sergeant Ficht have since left the Department.

In response to OIG's recommendations, BIA declined to reopen Logs #2023-0002418 and #2023-0002419, stating that the allegations were addressed in Log #2023-0002383.

i | Recommendation to Reopen to Consider All Available Evidence (C2025-000000231/CPD Log#2025-0001793)

COPA investigated allegations that CPD Field Training Officer (FTO) Gloria Tirado, Star #3355, entered and searched the complainant's residence without a warrant, and "aggressively pushed" the complainant without justification. COPA interviewed the complainant, gathered evidence, and administratively closed the investigation without findings.

The incident occurred while FTO Tirado assisted a 911 caller in retrieving their property from their former residence. FTO Tirado escorted the 911 caller through two separate residential units in a two-flat apartment building. The 911 caller retrieved one item from a bedroom in the first-floor apartment, then accessed the complainant's separate second-floor apartment via the back porch stairway.

After FTO Tirado and the 911 caller entered the second-floor apartment, the complainant told them both to get out of their house. The 911 caller asked FTO Tirado to open a bedroom door in the second-floor apartment, and the complainant stood in front of the door. FTO Tirado told the complainant that the 911 caller was there to retrieve property, and the complainant responded, "I don't care, [they] don't live here." FTO Tirado shoved the complainant away from the bedroom door and opened the door, enabling the 911 caller to enter and search the bedroom.

In its Non-Final Summary Report (NFSR), COPA reported it found "no reasonable, objective, verifiable evidence to proceed with an investigation." COPA concluded that the 911 caller "had access to the building and the right to retrieve [their] property, and only [the 911 caller] searched the residence." Regarding the allegation that FTO Tirado pushed the complainant without justification, COPA stated it "does not believe this amounts to misconduct." COPA stated that the complainant grabbed FTO Tirado's hand and used their elbow to block FTO Tirado from opening the bedroom door, which COPA determined "amounts to force that could have caused injury and therefore elevated [the complainant] to an assailant."¹⁶

OIG recommended that COPA reopen the investigation to consider all available evidence, including the case report that shows the 911 caller self-reported their residence, which supported the complainant's claim that the 911 caller's former residence was strictly the first-floor apartment. OIG also recommended that COPA evaluate whether CPD policies required FTO Tirado to complete a TRR for pushing the complainant before opening the closed bedroom door.

In response to OIG's recommendations, COPA declined to reopen the investigation. In its response, COPA stated that "no new evidence emerged" that could "materially affect" the results of the investigation. COPA stated that it did not find that the "manner in which the investigation was concluded resulted in a gross miscarriage of justice." COPA asserted that it is "unlikely that significant discipline" would be imposed on FTO Tirado, and therefore COPA does not believe that reopening the investigation would be "an efficient use of resources."

¹⁶ CPD General Order G03-02-01 defines an assailant as "a person who is using or threatening the use of force against another person or himself/herself which is likely to cause physical injury. Assailants are further subdivided into two categories: (1) a person whose actions are aggressively offensive with or without weapons and (2) a person whose actions constitute an imminent threat of death or great bodily harm to a Department member or to another person." CPD General Order G03-02-01, "Response to Resistance and Force Options," effective June 28, 2023, accessed October 20, 2025, <https://directives.chicagopolice.org/#directive/public/6605>.

j | Recommendation to Reopen to Reconsider Its Analysis (C2025-000000237/CPD Log #2023-0005718)

COPA investigated allegations that CPD Officers Bret Hon, Star #6214, Steven Sreniawski, Star #2878, and Michael Tanon, Star #6300, stopped, arrested, and conducted a strip search of the complainant without justification, related to the alleged sale of narcotics. COPA reached a finding of Not Sustained on the improper stop and arrest of the complainant, and unfounded the allegation that the accused CPD members conducted a strip search.

OIG's review of police reports and video evidence revealed that in concluding that the arrest of the complainant was justified, COPA relied on facts which the officers did not possess at the time of arrest nor would have possessed if it were not for the improper search. Further, COPA did not consider the facts stated in its credibility assessment that the amount of cannabis and currency found on the complainant did not suggest the complainant was selling narcotics at the time of arrest.

OIG recommended that COPA reopen the investigation to ensure its analysis of the probable cause for the arrest of the complainant aligned with the circumstances known to the involved officers at the time of the complainant's arrest and did not rely on evidence obtained as a result of that arrest.

In response to OIG's recommendations, COPA reopened its investigation, determined that the CPD members had probable cause to arrest the complainant, despite its assertion that "video footage does not clearly depict the underlying conduct that provided probable cause for the arrest," found "insufficient information to either refute or substantiate the allegation," reclosed the investigation, and maintained the finding of Not Sustained on the allegation that the complainant's arrest was improper.

2 | Notifications

a | Notification to COPA of Missing Final Supplemental Summary Report and Incorrect Finding (C2024-000000506/CPD Log #2021-0003104)

COPA investigated allegations against Officer Jeffrey Zlotkowski, Star #18596, related to an off-duty confrontation with the complainant. COPA recommended separation for Officer Zlotkowski on sustained findings that Officer Zlotkowski engaged in an unjustified verbal altercation, followed the complainant to their residence without justification, used excessive force without justification, and drove without due regard for the safety of all persons.

Additionally, COPA served allegations against Officer Marcus Turner, Star #14203, for failing to conduct a thorough and proper preliminary investigation. COPA reached a finding of sustained and recommended a 10-day suspension for Officer Turner.

On January 9, 2025, Superintendent Larry Snelling submitted to COPA a Partial Non-Concurrence letter concurring with COPA's findings against Officer Zlotkowski but not concurring with COPA's findings against Officer Turner recommending that, "There should not be a penalty." COPA accepted Superintendent Snelling's recommendations and stated there would be a supplemental report distributed.

OIG sent COPA a Notice of Error noting CPD's CMS did not contain a copy of COPA's Supplemental Final Summary Report (FSR). Additionally, CMS still reflected that Officer Turner's allegation of failing to conduct a thorough and complete preliminary investigation as sustained.

COPA notified OIG that the supplemental report was uploaded to the case file and the finding for Officer Turner was corrected in CMS.

b | Notification to BIA to Correct the Record (C2025-000000084/CPD Log #2023-0001464)

BIA investigated allegations that CPD Officers Lori Davis, Star #17412, Lauren Lewis, Star #18962, and Brian Batey, Star #11591, left their assigned district without authorization, failed to report a pursuit, failed to notify OEMC of a traffic crash, and failed to conduct a preliminary investigation after a traffic crash. BIA sustained all the allegations against the three officers and recommended a 4-day suspension for each officer.

During its review, OIG identified that CPD's CMS lists one of Officer Batey's allegations as "Police Officer Brian Beaty [sic] #11591 Employee # 123137 failed to stop after being involved in a traffic crash." BIA's investigation does not reflect that Officer Batey was involved in a traffic crash, but rather that they were a rear seat passenger in the squad car driven by Officer Davis during this incident. BIA did not establish any unique actions taken by Officer Batey that would warrant serving them with a different allegation than those served to Officers Davis and Lewis.

OIG recommended that BIA correct the listed allegation for Officer Batey in CMS to accurately reflect Officer Batey's involvement in the incident.

In response to OIG's recommendation, BIA declined to "reopen" the investigation stating that Officer Davis accepted their penalty, while Officers Lewis and Batey are grieving their penalties.

c | Notification to CPD Related to Misconduct Investigations involving the SIG Sauer P320 Weapon (C2025-000000295)

OIG alerted CPD of sustained misconduct cases where allegations involving the mishandling of CPD members' SIG Sauer P320 resulted in discipline. In recent years, several documented unintentional discharges of the SIG Sauer P320 have resulted in law enforcement agencies across the United States discontinuing the use of the SIG Sauer P320. The risk of the SIG Sauer P320's discharging without a trigger pull raises concerns where misconduct allegations have been sustained against CPD members related to unintentional discharges of weapon and whether those accused members' culpability was partly or entirely mitigated.

On April 30, 2025, CPD notified its members that the SIG Sauer P320 would no longer be a Department approved firearm and required that its members transition to a new approved firearm. OIG notified CPD of the relevant sustained misconduct findings against its members for consideration as it deems appropriate.

In response to OIG's notification, CPD responded that it determined that "a sufficient basis exists to support the investigative outcome and penalty" where relevant. CPD also noted that COPA

“retained jurisdiction over the remaining log numbers identified [by OIG].” COPA did not respond to OIG’s notification, despite its statutory obligation to do so.

d | Notification to COPA of Potential Oversight (C2025-000000395/CPD Log #2024-0003552)

COPA sustained an allegation that CPD members Kerry Ferrantella, Star #964, and Colleen Gardner, Star #6115, failed to complete an ISR documenting the interaction with an arrestee.

In COPA’s FSR, it referenced Special Order S04-13-09, Investigatory Stop System, that states, “ISRs will be submitted for all Investigatory Stops and Protective Pat Downs that lead to an arrest, Personal Service Citations, Administrative Notices of Violation (ANOV), Curfew Violation Report, School Absentee Reports, or other enforcement action.” In its FSR, COPA writes, “Sergeant Ferrantella stated that, to the best of [their] knowledge, an ISR was not completed for [the arrestee] because [they were] placed under arrest, and the report would have been redundant and unnecessary. While Officer Gardner believed that an ISR was not necessary [sic] due to [the arrestee] being placed in custody, this is incorrect according to the Department policy.”

OIG notified COPA of a potential oversight in its review of the language in Special Order S04-13-09, Investigatory Stop System. COPA responded to OIG stating it reviewed its original analysis and believes it to be correct. COPA noted in its letter that the directive does not provide for exceptions to completing an ISR as it does for providing the subject of a stop an Investigatory Stop Receipt.

3 | Recommendation to Inform and Improve

During the closed case review of individual closed disciplinary investigations, OIG’s Investigative Analysis Unit may identify deficiencies in one or more investigations or an investigative practice that may or may not materially affect the outcome of an investigation but may affect the thoroughness and objectivity of the investigation. In these instances, OIG will make recommendations to inform and improve future investigations to the respective agencies. Below is a summary of the Recommendation to Inform and Improve letter published this quarter.

a | Recommendation to Inform and Improve CPD’s Rule 47

CPD’s Rules and Regulations includes its Rules of Conduct, which serve to inform its members of conduct prohibited by the Department. Rule 47 prohibits members from “[a]ssociating or fraternizing with any person known to have been convicted of any felony or misdemeanor, either State or Federal, excluding traffic and municipal ordinance violations.” During its regular review of closed disciplinary investigations conducted by BIA, OIG identified inconsistencies across investigations in BIA’s analyses of the relationship between the accused CPD member and the individual convicted of a felony.

While Rule 47 does not identify exclusions to the rule, BIA’s investigatory outcomes have informally defined exceptions to its rule. For example, in one investigation BIA determined that a CPD member knowingly associated with a convicted felon, who was their sibling, and briefly allowed that sibling to reside with them. In this investigation, BIA exonerated the allegation of violating Rule 47, concluding that the CPD member’s explanation to house their family member was “compelling enough to be exculpatory.” Unlike similar policies in other law enforcement jurisdictions, CPD’s Rule 47 does not

address any familial exceptions to associating or fraternizing with individuals known to have been convicted of any felony or misdemeanor.

Outcomes in investigations where a CPD member has a non-familial relationship with a convicted felon vary significantly. In one case, BIA found that a CPD member who was romantically involved with a convicted felon but ended the relationship after learning of the person's history, was still in violation of Rule 47. In another investigation, a CPD member who was friends with a convicted felon stated that they knew the individual was previously incarcerated, but did not know that the individual was a convicted felon. Despite this denial, BIA found the CPD member violated Rule 47. However, in other investigations, the CPD member denying knowledge of an individual's status as a convicted felon was enough to not sustain the Rule 47 violation against the CPD member.

Currently, CPD's Rule 47 does not contain explicit exceptions, yet certain exceptions are sometimes—but not always—applied in practice, which risks arbitrary enforcement and unfair outcomes for members accused of violating Rule 47. Accordingly, CPD members and BIA may benefit from an updated Rule 47 that clearly defines expectations and prohibitions to facilitate its fair and consistent application.

In order to inform and improve future investigations, OIG recommended that CPD: (1) reevaluate the purpose and/or goal of Rule 47 to include defining any circumstances that may be exempt from Rule 47 violations and make revisions to the policy accordingly; and (2) outline any reporting procedures that Department members may utilize when associating with a convicted felon. OIG also presented this letter with its recommendations to the Chicago Police Board.

In response to OIG's recommendations, the Chicago Police Board noted that it has "the power to adopt Rules and Regulations for the Chicago Police Department (CPD)" and plans to continue to review and draft revisions to CPD's Rules of Conduct that "will more clearly and effectively communicate to Chicago police officers and the public how CPD members are required to conduct themselves." The Chicago Police Board stated that it will consider OIG's recommendations related to Rule 47.

In response to OIG's recommendations, CPD stated, "...the Police Board has the authority to adopt the Rules and Regulations of the Chicago Police Department pursuant to section 2-84-030 of the Municipal Code of Chicago. CPD recognizes the importance of clear and consistent direction to all members, as well as the consistent and fair application of discipline."

V | Reports and Monitoring Activity

A | Audits and Follow-Ups

Separate from its confidential investigative work, OIG's Audit and Program Review (APR) section produces a variety of public reports, including independent and objective analyses and evaluations of City programs and operations with recommendations to strengthen and improve the delivery of City services. These engagements focus on the integrity, accountability, economy, efficiency, and effectiveness of each subject. The following summarizes one audit and two follow-up reports published this quarter.

1 | Audit of the Chicago Fire Department's Annual Fire Prevention Inspections and Tests (C2022-000043822)¹⁷

OIG conducted an audit of the annual inspection and testing processes of the Chicago Fire Department's (CFD) Fire Prevention Bureau (FPB). The objectives of the audit were to determine whether FPB,

1. conducted annual inspections that are required to ensure compliance with the Fire Code and protect against the loss of life and property;
2. maintained a proper record of fire safety inspections as required by MCC § 2-36-280(a);
3. notified property owners of noncompliance and conducted re-check inspections of known issues; and
4. ensured that independent contractors complete required annual tests of fire sprinklers, fire pumps, and standpipes.

OIG concluded that FPB did not fulfill its annual inspection and testing mandates. This increases the risk that it will not discover hazardous conditions that could increase the risk of harm to building occupants and first responders. Fundamental issues with organizational strategy and procedures—as well as the quality of FPB's data—limit FPB's ability to ensure that buildings from hospitals to hotels to high-rises are safe places to work, visit, and live.

OIG found that FPB did not complete annual inspections of buildings required by the Fire Code. Additionally, due to missing and inaccurate data, FPB did not have or maintain a complete and accurate inventory of buildings that require inspections. Of the buildings and tenant spaces in FPB's database, 16.8% received an annual inspection within a 12-month period.¹⁸ Additionally, FPB had not inspected nearly half of buildings in five years or more. OIG found that FPB's records of annual inspections did not contain the date of any Fire Code violation notices or a final disposition status, which are elements required by the Fire Code.

¹⁷ City of Chicago Office of Inspector General, "Audit of the Chicago Fire Department's Annual Fire Prevention Inspections and Tests," October 23, 2025, <https://igchicago.org/wp-content/uploads/2025/10/Audit-of-CFDs-Annual-Fire-Prevention-Inspections-and-Tests.pdf>.

¹⁸ FPB conducts separate inspections of the common elements of a structure ("building inspections") and of any commercial tenant spaces within ("tenant inspections"). For example, in a large office building, a building inspection would include common stairwells, lobbies, and other common spaces. The tenant inspection would include office suites leased by different tenants.

Of annual building inspections that failed, FPB conducted at least one re-check inspection for 87.8% of those failed building inspections. The median time between the initial finding of violations and subsequent re-check was 5.2 months. The City collected only 13.2% of the fees owed for re-checks of violations, leaving \$1.1 million unrecovered over a ten-year period.

In addition, OIG found that independent contractors did not annually test all water-based fire suppression systems as required by the Fire Code and that FPB's data on systems that require annual tests is inaccurate and incomplete. In a 12-month period, independent contractors submitted annual test reports to FPB for 73.7% of premises with sprinkler systems, 79.6% of fire pumps, and 77.8% of premises with standpipes.

OIG also found that CFD was not in compliance with MCC § 2-36-220, which requires it to create and submit an annual report to the Mayor and City Council about the causes and extent of fire loss throughout the city. Lastly, FPB destroyed paper inspection reports without prior approval by the Cook County Local Records Commission.

OIG recommended that CFD,

- work with relevant City departments to identify a complete and accurate inventory of existing buildings subject to Fire Code inspections;
- develop procedures to ensure it conducts the required inspections and monitors progress toward the completion of inspections;
- ensure it maintains proper records as required by the Fire Code by documenting the notice of violation date and memorandum of final disposition related to inspections;
- develop and document procedures to ensure it conducts re-check inspections and assesses re-check fees;
- develop procedures to monitor and ensure property owners obtain tests of all water-based fire suppression systems on an annual basis, as required by the Fire Code;
- work with City departments to identify and maintain a complete and accurate inventory of fire suppression systems subject to the tests;
- create and submit the annual report of fires mandated by MCC § 2-36-220; and
- consult with DOL or the Cook County Local Records Commission regarding any remediation actions necessary based on the fact that it destroyed inspection forms, develop procedures for retaining inspection records, and provide guidance to CFD members regarding legal requirements related to document retention and destruction.

In response to OIG's audit findings and recommendations, CFD largely disagreed with OIG's recommendations. Regarding the lack of a complete and accurate building inventory, CFD stated that while it works with other City departments to ensure accuracy of building information, it "is not responsible for identifying, creating, or maintaining an inventory of buildings [. . .]". CFD explained that it had suspended some inspections during the COVID-19 pandemic, but did not address the need for documented procedures to address monitoring its progress, the prioritization of inspections, or the standardization of the process and related recordkeeping. CFD stated it was developing training regarding in-service inspection requirements.

Regarding the maintenance of annual inspection data points within Infor Public Sector 11 (IPS 11) inspection records, CFD referred to systems outside of IPS 11 and did not address why the inspection records in IPS 11 do not include all the required data.

On the subject of re-check inspections, CFD committed to develop procedures to document and track the inspections. CFD also stated it would issue guidance to FPB staff regarding the assessment of re-check fees.

Regarding the development of procedures to ensure property owners obtain tests of water-based suppression systems, CFD noted that automated notifications are sent to property owners. CFD did not acknowledge the need for FPB procedures to address property owners who do not obtain the required tests, stating, “[. . .] there is no corrective action that could be taken.” CFD provided the same response regarding the need for a complete and accurate inventory of fire suppression systems.

CFD confirmed that it has prepared and submitted the annual report of fires since 2023.

Finally, regarding compliance with the Illinois Local Records Act, CFD committed to consulting with DOL about any required remediation, and drafting guidance for all FPB members to ensure compliance.

2 | Second Follow-up to OIG’s Second Audit of the Chicago Fire Department’s Fire and Emergency Medical Response Times (C2025-000000296)¹⁹

OIG completed a second follow-up to its October 2021 audit of CFD’s fire and emergency medical response times. Based on CFD’s responses, OIG concluded that CFD has not implemented corrective actions related to the audit findings.

The purpose of the 2021 audit, OIG’s second on the topic following a first audit in 2013, was to determine whether CFD had goals for fire and emergency medical services (EMS) response times consistent with state and national standards and whether CFD response times in fact met those standards. OIG found that CFD had not implemented performance management strategies that would allow it to evaluate fire and EMS response times in alignment with best practices, nor had the Department remedied data issues first identified by OIG in 2013.

Based on the results of the 2021 audit, OIG recommended that CFD,

- acknowledge the importance of department-wide quantitative performance measures and begin public annual reporting on its response time performance;
- establish and document department-wide turnout, travel, and total response time goals at the 90th percentile for both fire and EMS; or, if they believed National Fire Prevention Association (NFPA) recommended turnout and travel times were unachievable in Chicago, conduct a systematic evaluation of local factors affecting response times and set reasonable goals for turnout, travel, and total response times accordingly;
- identify, monitor, and remedy the cause of gaps in its data;
- consider hiring an internal data specialist to improve data quality; and
- ensure that any external partners it engages to analyze departmental data conduct a full assessment of that data’s completeness and reliability.

¹⁹ City of Chicago Office of Inspector General, “Second Follow-up to OIG’s Second Audit of the Chicago Fire Department’s Fire and Emergency Medical Response Times,” October 29, 2025, <https://igchicago.org/wp-content/uploads/2025/10/OIG-Second-Follow-up-to-Second-Audit-of-CFD-and-EMS-Response-Times.pdf>.

In its response to the audit, CFD “acknowledge[d] the importance of department-wide quantitative performance measures” and described corrective actions it would take.

In August 2025, OIG inquired about corrective actions taken by CFD in response to the 2021 audit and a 2023 initial follow-up report. Based on CFD’s response to the second follow-up inquiry, OIG concludes that CFD has not implemented corrective actions. Notably, CFD has neither hired staff to assist with data analytics nor found another method to analyze data gaps. Nor has CFD established and documented response time goals. Further, CFD has not worked with OEMC to assess the root causes of data gaps. Finally, CFD has not employed any after-action reporting and improvement planning mechanism to improve data quality. CFD attributed its lack of progress to the Office of Budget and Management’s (OBM) denying budget requests for personnel and resources to conduct data analysis.

3 | Follow-up to OIG’s Audit of Chicago Department of Public Health’s Construction and Demolition Debris Recycling Enforcement (C2025-000000303)²⁰

OIG completed a follow-up to its June 2023 audit of CDPH’s Construction and Demolition (C&D) Debris Recycling Enforcement. Based on CDPH’s responses, OIG concluded that CDPH fully implemented one corrective action and did not implement seven corrective actions related to the audit findings.

CDPH is responsible for ensuring that contractors who work on construction and demolition projects comply with the provision in MCC requiring them to recycle at least 50% of C&D debris generated. Contractors must demonstrate compliance with the ordinance within 30 days of project completion. If they do not meet the 50% requirement or fail to demonstrate compliance within the 30-day window, they may be subject to fines. Furthermore, CDPH may coordinate with the Department of Buildings (DOB) to withhold permits or certificates of occupancy from non-compliant contractors. In addition, the MCC requires the City to maintain a construction/demolition debris management fund and to use it “for the regulation of construction or demolition debris.” Such use includes “enforcement against illegal dumping of construction and demolition debris and oversight of recycling of concrete debris.”²¹

The purpose of OIG’s 2023 audit was to determine, first, whether CDPH engaged in oversight activities—such as reviewing recycler’s affidavits obtained from contractors and sending enforcement letters—to ensure compliance with the City’s C&D debris recycling requirements, and, second, whether the City used the construction/demolition debris management fund in the manner required by the MCC.

OIG found that CDPH did not ensure that contractors comply with C&D debris recycling requirements. CDPH could not determine the extent of contractors’ compliance or identify contractors who did not meet the requirements. Nor could CDPH calculate the C&D debris recycling rate for inclusion in the Citywide diversion rate.²² Additionally, the City did not meet the

²⁰ City of Chicago Office of Inspector General, “Follow-up to OIG’s Audit of Chicago Department of Public Health’s Construction and Demolition Debris Recycling Enforcement,” December 9, 2025, <https://igchicago.org/wp-content/uploads/2025/12/CDPH-Construction-Demolition-Debris-Recycling-Follow-up.pdf>.

²¹ MCC § 11-4-1962.

²² A diversion rate is the percentage of waste generated that is diverted from landfills by recycling, reuse, composting, and other means.

MCC requirements related to expenditures from the construction/demolition debris management fund. The City, therefore, could not determine whether it used the \$1.2 million collected between January 1, 2017, and July 1, 2021, in a manner that complied with the MCC. Contrary to applicable law, the City deposited fees collected during this period into the corporate fund—its general operating fund—rather than a dedicated construction/demolition debris management fund.

Based on the results of the 2023 audit, OIG recommended that CDPH,

- work with DOB to develop a process to identify the population of projects subject to the MCC’s C&D debris recycling requirements;
- document and implement procedures to ensure that contractors submit the required compliance documentation within 30 days of project completion;
- document and implement standardized procedures to review the documentation and ensure that each contractor recycles at least 50% of C&D debris, as required;
- develop and implement both enforcement procedures and a method to incorporate the C&D debris diversion rates into the Citywide diversion rate;
- implement a process to periodically train contractors on the MCC requirements and collaborate with the chief sustainability officer to develop procedures that incentivize or further require material reuse; and
- work with the relevant departments to create the required dedicated construction/demolition debris management fund and ensure both that C&D debris fees are deposited there and that, as required by applicable law, the fund is used to regulate C&D debris. Such regulation, according to the MCC, would include “monitoring, planning, inspecting, providing technical assistance, and enforcing rules, regulations and ordinances with respect to [. . .] construction/demolition debris.” It would also include the oversight of concrete debris recycling and enforcement against illegal dumping of debris.

In August 2025, OIG inquired about corrective actions taken by CDPH in response to the 2023 audit. Based on CDPH’s follow-up response, OIG concluded that CDPH fully implemented one corrective action and did not implement seven corrective actions. Specifically, CDPH worked with relevant City departments and established the C&D debris management fund. The City transferred into the fund unallocated fees and fines collected prior to its creation. As of October 16, 2025, the C&D debris management fund contained \$2.8 million.

Regarding the remaining corrective actions, ultimately, CDPH intends to use a web-based waste management software, but this depends on an upgrade of DOB’s software which is not expected until sometime in 2026. While waiting for the new software, CDPH developed a manual process to identify some projects subject to MCC C&D debris recycling requirements. However, this manual process does not allow CDPH to identify the full population of projects subject to these requirements. Because CDPH has not procured the anticipated web-based waste management software, it has not implemented the seven corrective actions dependent on that resource.

OIG acknowledged that the C&D debris management program is expected to transition from CDPH to the Department of Environment (DOE) in 2026. OIG urged CDPH and/or DOE to fully implement corrective actions, such as procuring a web-based waste management software, identifying the population of projects subject to the MCC’s C&D debris recycling requirements, developing written procedures to ensure that contractors submit all recycling compliance documentation, developing

enforcement procedures, calculating the recycling diversion rate, creating periodic training sessions for contractors, and developing procedures to incentivize contractors to reuse materials.

B | Advisories and Department Notification Letters

Advisories and department notification letters describe management problems observed by OIG sections in the course of its various oversight activities, which OIG determines to merit official notice to City or department leadership. OIG completed five notifications this quarter.

1 | Advisory on Chicago Moves and Reducing Fraud Risk in Emergency Preparations (C2023-000000053)

On September 5, 2025, OIG notified the Mayor's Office regarding certain risks associated with expediting programs outside of the City's regular procurement process in times of emergency. The notice was specifically in relation to a program launched during the Covid-19 pandemic; OIG sent the notification, however, to aid the City in proactively preparing for future emergency conditions while minimizing the risk of fraud, mismanagement, or misuse of government funds.

In April 2022, the City launched the Chicago Moves Program (the Program). The Program's stated goal was to alleviate the financial burden on Chicagoans due to the increased cost of goods and services, including fuel costs. The former mayoral administration developed a proposal to quickly provide \$12.5 million in direct assistance for fuel and public transportation costs by distributing prepaid debit cards. The Mayor's Office chose a vendor, Onbe/North Lane, with the assistance of Fifth Third Bank, to administer the Program. The vendor and the Mayor's Office worked on an agreement, which described the prepaid cards as "spend-restricted," meaning that the cards could only be used with merchants defined by the City: gas stations within Chicago city limits and regional transit services, which included CTA, Metra, and Pace. An ordinance, which included the agreement, was presented to City Council. The restricted spend feature of the prepaid debit cards was a critical part of the Program. The ordinance passed. However, within five months of launching the program, a recipient of a card used it outside of the spend restrictions. OIG opened an investigation to determine if misconduct occurred. Although OIG did not make a finding of misconduct, OIG identified waste and inefficiency in the Program.

In summary, the restricted spending feature of the prepaid debit card lacked controls to detect and prevent misuse, which would have been necessary and appropriate for a publicly funded program. OIG found: (1) there was a total of \$202,674 in excess spending over the value loaded on the cards, though the City was not legally responsible for these overage costs and did not pay them; (2) approximately \$94,580 in funds were misspent at retail establishments outside of those designated for the Program; and (3) the agreement incentivized the vendor to retain Program funds from expired cards as a form of payment. Overall, the City did not have proper controls in place to independently detect fraud and mismanagement. The shortcomings limited the City's ability to carry out its policy objectives and efficiently deliver aid. As a result of these findings, OIG recommended the current Administration evaluate past programs to prepare for future emergency conditions.

In a written response, the Mayor's Office agreed with OIG, stating "it is of the utmost importance that programs designed to meet the needs of Chicagoans are developed and implemented transparently, efficiently, and effectively." The Mayor's Office cited the 2025 Road to Recovery Plan

and Performance Report as an example of its commitment to these values. The Mayor's Office asserted that report outlines the current administration's work to ensure the State and Local Recovery Fund (SLFRF) dollars are used appropriately. In evaluating SLFRF-funded programs, the administration stated that it "conducted a comprehensive evaluation of all SLFRF-funded programs to identify areas of risk, measure progress, and inform decisions about future programming." The Mayor's Office also stated that it will "continue to strive to ensure that resources are used to the maximum benefit of those in need through proactive guardrails, strong accountability, and true transparency."

2 | Notification Concerning Driver's License Monitoring (C2024-000000391)

OIG notified DSS about a concern regarding DSS's practice of monitoring the status of employees' driver's licenses if the employee is required to drive as part of their job duties. OIG opened an investigation into an allegation that a DSS employee was driving a City vehicle on a suspended license. OIG learned that the employee had received a statutory summary suspension following a DUI arrest that was rescinded shortly following the required 46-day notice period; however, DSS only became aware of the suspension well after the fact. While conducting its investigation, OIG discovered some potential issues impacting DSS' ability to ensure that DSS employees have active and valid driver's licenses as required by City policy.

During its investigation, OIG learned that DSS employees are informally directed to inform their management chain if they have been arrested or if their driver's license has been suspended. However, DSS does not currently have a written policy or directive to this effect requiring employees to inform their supervisor to any changes affecting their license status.

OIG additionally learned DSS supervisors currently conduct monthly audits of driver's licenses; however, the current auditing procedure would not necessarily capture certain license suspensions, including suspensions following a DUI arrest, where police may not physically confiscate an arrestee's driver's license (for example, if the arrestee does not physically have their driver's license in their possession during the offense), or if an employee is able to obtain additional copies of their driver's license. As such, DSS employees may be arrested or have their license suspended, not inform their management chain, and continue driving City vehicles as part of their duties—potentially putting the City at risk.

Finally, OIG learned that DHR has a current system in place to receive notifications of invalid licenses from the Illinois Secretary of State. While this system serves to protect the City by checking for invalid licenses, the City remains at risk in the interim period between an arrest occurring and DSS receiving the resulting notification. Although the City's current system would eventually catch an unreported, invalid license, a City employee may still continue to drive a City vehicle for months following a DUI arrest, during which time the City may be at risk.

OIG recommended that DSS formalize their informal policy requiring DSS drivers to report any arrest or license suspension into a written procedure reflecting those requirements. Such a formalized policy would allow DSS to more effectively hold drivers accountable for failing to comply with the policy. Given the serious risks posed by a City employee driving a City vehicle on a suspended license or following an arrest, a written procedure would serve to (1) protect the City from potential misconduct and (2) convey required procedures and the resulting consequences of their violation to City employees.

In response, DSS informed OIG that, as the issue was not specific to DSS alone but rather was a matter that calls for a citywide policy to ensure uniform application across all departments, DSS was working with DOL and DHR to consult in the development and review of such a policy.

3 | Advisory Concerning Unannounced Inspections of City Premises (C2025-000000339)

OIG notified the Mayor's Office about concerns regarding OIG's access to City premises for purposes of conducting unannounced inspections. The MCC provides that "[e]ach department's premises, equipment, personnel, books, records, and papers shall be made available as soon as practicable to the inspector general." MCC §2-56-090. Unannounced inspections are an important tool in oversight work, allowing for unmanipulated assessment of practices, behaviors, and conditions; moreover, it is in the regular practice of inspectors general to conduct unannounced inspections.

On two occasions over the past year, however, Office of Inspector General (OIG) investigators have been denied access to City premises for the purpose of conducting an unannounced inspection. The first was an unannounced inspection of the Mayor's so-called "Gift Room," as described in OIG's January 2025 Advisory on Gifts Accepted on Behalf of the City.²³ Following the publication of that Advisory, the Mayor's Office published a 21-second video of the Gift Room to the Mayor's YouTube page. The Mayor's Office announced new rules concerning gifts accepted by the Mayor "on behalf of the City" and that the Gift Room would be opened to members of the press and the public. City records reveal, however, that the Gift Room depicted in the Mayor's Office's video, and which is open for public inspection was in fact not constructed until February 2025—after OIG attempted to conduct an unannounced inspection of gifts received by the Mayor's Office. Because OIG was denied access to a City premise during its original inspection attempt, OIG was unable to independently confirm whether and where City property—including cufflinks, designer handbags, and men's shoes—was being stored prior to the construction of the new Gift Room.

The second thwarted unannounced inspection attempt occurred in July 2025. OIG attempted to inspect a City office to search for items which OIG believed were being stored there in violation of City policy. An attorney with the City's DOL instructed a City employee using that office to not admit OIG during OIG's initial visit. Several weeks later, OIG inspected the office with DOL present and confirmed the presence of those items in the office, underscoring the necessity and appropriateness of the inspection. However, obstruction of OIG's attempt to conduct an unannounced inspection precluded the immediate gathering of complete and reliable evidence of then current conditions bearing directly upon the alleged violation of City policy.

OIG advised the Mayor in this Advisory that the MCC provides that "[e]ach department's premises" must be "made available" to OIG "as soon as practicable." OIG's legal authority to access City premises is therefore not unqualified, but it does not permit outright denial of access without any showing of impracticability. In both of the instances discussed here, however, City premises being made available to OIG "as soon as practicable" should have resulted in physical access to those premises on the occasion of OIG's initial visit, without obstruction, interruption, or delay. In both cases, OIG sought to conduct the search during business hours and while persons who would normally have access to the area to be inspected were present.

²³ <https://igchicago.org/wp-content/uploads/2025/01/OIG-Advisory-Concerning-Gifts-Accepted-on-Behalf-of-the-City.pdf>

On its face, “as soon as practicable” does not mean with advance notice to a City department occupying City premises, with advance notice to DOL, or only with a DOL attorney present; OIG’s authority to access City premises is plainly not made contingent on any of those conditions—or, in fact, to any conditions other than practicability.

In its Advisory, OIG recommended that the Mayor take appropriate steps to ensure that City premises are made available to OIG as required by law and to ensure the transparency and accountability of City government, including without limitation issuing guidance to City departments to clarify OIG’s legal authority to access City premises. OIG invited the Mayor’s Office to respond in writing.

On October 31, 2025, the Mayor’s Office responded, apparently declining to implement OIG’s recommendation. Regarding OIG’s July 2025 attempt to inspect a City office for the presence of prohibited items, the Mayor’s Office responded that “OIG cannot reasonably deny that it was granted access” to the office “as soon as practicable.” The Mayor’s Office suggested that certain exercises of OIG’s authority to access City premises might be ones in which “DOL’s involvement is warranted under other provisions of the MCC or the OIG Rules.” The only provision cited in apparent support of that position, though, is one in OIG’s Rules which allows witnesses and subjects in OIG investigations to bring counsel to interviews. See OIG Rules and Regulations § 11.7(E). That provision does not entitle a City employee to the presence of DOL while OIG conducts non-testimonial investigative steps; there is no more an entitlement to have DOL present during a premise inspection than during a covert surveillance.

With respect to the Gift Room, the Mayor’s Office response describes what it calls “evolving interpretations of the City’s Governmental Ethics Ordinance,” and states that “[t]he relocating of the Gift Room was not a covert undertaking but rather was done in full transparency.”

4 | Notification of Federal Settlement (C2025-000000355)

OIG notified DPS of a recent settlement involving a subcontractor with the City and the federal government. The settlement resolved the federal government’s claim that the subcontractor submitted false claims for payment for work not actually performed, despite being contractually obligated to perform that work. OIG notified DPS so it could take any action it deemed necessary regarding the subcontractor.

In response, DPS notified OIG that because there was no admission of liability in the settlement, it would not take any action against the subcontractor at this time. However, DPS stated that it would “keep the Settlement Agreement in mind” and monitor future contracts with the subcontractor to assess whether action should be taken against the subcontractor in the future.

5 | Letter of Notification to the Chief Information Officer Regarding OIG’s Audit of CFD’s Annual Fire Prevention Inspections and Tests²⁴

OIG conducted an audit of annual fire prevention inspections and tests led by CFD’s FPB. The objectives of the audit were to determine whether FPB 1) conducts required annual inspections to ensure compliance with the Fire Code and protect against the loss of life and property 2) maintains a proper record of fire safety inspections as required by subsection 2-36-280(a) of MCC 3) notifies

²⁴ This audit is discussed on page 40 of this quarterly report.

property owners of noncompliance and conducts follow-up inspections of known issues and 4) ensures that independent contractors complete required annual tests of fire sprinklers, fire pumps, and standpipes. With this audit, OIG issued a notification to the City's chief information officer noting the following data quality issues encountered during the audit.

1. FPB did not have or maintain a complete and accurate inventory of buildings subject to annual fire preventions inspections. The unreliability of data in Infor Public Sector 11 (IPS 11) hampers FPB's ability to plan and communicate its work.
2. In part due to the configuration of IPS 11, FPB does not keep a proper record of inspection results as defined by MCC 2-36-280(a). According to FPB staff, IPS 11 cannot capture the date of notice of Fire Code violations or the final disposition of violations, both elements required by the MCC.

As established in OIG's Advisory Concerning the City of Chicago's Data Quality, OIG provided notification of these data quality issues to support the Chief Information Officer's role in improving data integrity to enable a more robust, transparent, and accessible use of data.

C | Other Reports and Activities

In the service of its mission to promote economy, effectiveness, efficiency, and integrity, OIG may periodically participate in additional activities and inquiries, outside of the other categories identified here, to improve transparency and accountability in City government, and may from time to time issue additional reports. OIG issued no additional reports this quarter.

D | Monitoring Employment Actions

OIG's Compliance unit, situated within its Legal section, has broad oversight responsibilities under the Employment and Hiring Plans which govern the employment practices of the City, CPD, and CFD. The Compliance unit came into formal existence as a product of an evolving partnership between OIG and the court-appointed monitor overseeing the City's hiring and promotion practices under the decree entered in *Shakman, et al. v. City of Chicago, et al.*, No. 69-cv-2145 (N.D. Ill.). From spring 2010 through spring 2014, the OIG-*Shakman* Monitor partnership gradually transitioned from the court-appointed Monitor to OIG for both disciplinary investigations and program compliance and monitoring activities. That transition was completed in June 2014 with the court's finding the City in substantial compliance with the *Shakman* decree.

The Compliance unit's responsibilities are specific to overseeing the City's employment actions, issuing guidance, training, and program recommendations to City departments on a broad and complex array of employment-related actions; monitoring human resources activities including hiring and promotion; performing legally mandated and discretionary audits and reviews; and reviewing the City's hiring and employment practices to ensure compliance with applicable rules.

The Compliance unit performs quarterly reviews and audits of data regarding the hiring processes to identify Employment Plan violations or errors. As defined in the Employment Plan, a review involves a check of all relevant documentation and data concerning a matter, while an audit is a check of a random sample or risk-based sample of the documentation and data concerning a hiring element. Employment Plan violations are actions and/or behaviors that are not in compliance with the City's Employment and Hiring Plans. Errors are deviations in processes that are not Employment Plan violations, but actions and/or behaviors that differ from established departmental

processes.

The following section includes information on these activities and others on which OIG is required to report pursuant to the Employment and Hiring Plans and MCC § 2-56-035.

1 | Review of Contracting Activity

Under the Contractor Policy, departments are required to annually report to OIG the names of all contractors performing services on City premises. This quarter, OIG did not receive any annual reports from departments of contractors performing services on City premises.

OIG may also choose to review any solicitation documents, draft agreements, final contracts, or agreement terms to assess whether they follow the Contractor Policy. This review includes analyzing contracts for common-law employee risks and ensuring the inclusion of the 2014 Hiring Plan Prohibitions and a Contractor Selection Certification.²⁵ OIG shall report on all service contracts or agreements received and reviewed by OIG Compliance. This quarter, OIG did not receive or review any contracts.

2 | Hiring Related Reviews Performed by OIG

a | Contacts by Hiring Departments

OIG tracks all reported or discovered instances in which hiring departments contacted DHR to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are not exempt from the requirements of the *Shakman* decree (“covered positions”) or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of such direct contact occurrences.

b | Contacts by the Fire Department

OIG tracks all reported or discovered instances in which CFD contacted DHR or OPISA’s human resources function (OPISA-HR) to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are not exempt from the requirements of the *Shakman* decree (covered positions) or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of such direct contact occurrences.

c | Chicago Police Department Intervention

OIG tracks all reported or discovered instances in which CPD hiring units contacted DHR or OPISA-HR to lobby for or advocate on behalf of actual or potential applicants for covered positions or to request that specific individuals be added to any referral or eligibility list. This quarter, OIG received no notifications of CPD intervention.

²⁵ The 2014 Hiring Plan Prohibitions state that the City is prohibited from hiring persons as governmental employees in non-exempt positions on the basis of political reasons or factors. Contractor Selection Certifications are certifications signed by the contractor and user department affirming that no political reasons, factors, or other improper considerations influenced the selection.

d | Contacts by Elected and Appointed Officials

OIG tracks all reported or discovered instances in which elected or appointed officials of any political party or any agent acting on behalf of an elected or appointed official, political party, or political organization contacted the City attempting to affect any hiring for any covered position or other employment actions.

Additionally, City employees often report contacts by elected or appointed officials that may be categorized as inquiries on behalf of their constituents, but not as an attempt to affect any hiring decisions for any covered position or other employment actions. This quarter, OIG received one notification of a political contact.

e | Exemptions

OIG reviews for adherence to *Shakman*-exempt hiring process requirements, all reported or discovered *Shakman*-exempt appointments, and modifications to Exempt Lists.²⁶ This quarter, OIG received notification of 25 exempt appointments.

Compliance Case No. C2024-000000063

On December 5, 2025, OIG informed DHR that it had not provided proper notice to OIG of all hires to *Shakman* Exempt (“Exempt”) positions as required by the City of Chicago Employment Plan (Employment Plan). Chapter IX of the Employment Plan governs the City’s “Exempt Position Hiring Process” and states that “DHR shall forward notice of hires under this section to OIG at least seven (7) days prior to the candidate(s)’s start in the position.”

DHR also did not comply with Employment Plan provisions regarding modifications to and publication of the “Exempt List.” The Employment Plan also requires DHR to post, on a quarterly basis, “[a] list of all Classes that may be filled using the Exempt Position Hiring Process” on the City’s publicly available website. However, OIG found that DHR had not updated the Exempt List on its website since June 2023, making it unclear which titles may follow the Exempt Position Hiring Process, and which may not.

In response, DHR agreed that it must update the Exempt List and publish the same quarterly. DHR stated it would publish a list of titles on the DHR website during the first quarter of 2026. For the lack of *Shakman* Exempt notifications to OIG, DHR stated that notifications were not provided for *Shakman* Exempt titles for City Council. However, DHR would provide those notices to OIG in the interim while it reviewed its processes. For departmental hires, several notices were in fact provided to OIG but not identified because a preferred name, as opposed to legal name was used. However, OIG did not receive notice of four other *Shakman* Exempt hires and DHR stated it would review the reason for the failures and correct the same.

f | Senior Manager Hires

OIG may review in-process senior manager hires pursuant to Chapter VI of the City’s Employment Plan, Chapter VII of the CPD Hiring Plan for Sworn Titles, and Chapter VI of the CFD Hiring Plan for Uniformed Positions, each covering the Senior Manager Hiring Process. This quarter, OIG reviewed one senior manager hiring sequence and found no violations.

²⁶ An exempt position is a City position to which the requirements governing Covered Positions do not apply. These positions are cataloged on the Exempt List which is publicly available on the DHR website.

g | Selected Department of Law Hiring Sequences

Pursuant to Section B.7 of the DOL Hiring Process, OIG has the authority to review in-process DOL hiring packets. Hiring packets include assessment forms, notes, documents, written justifications, and hire certification forms. This quarter, OIG conducted no reviews of DOL hiring sequences.

h | Discipline, Arbitrations, and Resolution of Grievances by Settlement

OIG receives notifications of disciplinary decisions, arbitration decisions, and potential grievance settlement agreements that may impact the procedures outlined in the City's Employment Plans. This quarter, OIG did not receive or review any notifications of arbitration decisions, disciplinary decisions or resolutions of grievances by settlement.

i | Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG may review modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG reviewed 174 modifications to class specifications. Of these, OIG reviewed 70 specifications which modified minimum qualifications to include language specifying that work experience can meet minimum qualifications in lieu of a college degree.

j | Referral Lists

A referral list includes applicants/bidders who meet the predetermined minimum qualifications generated by DHR for City positions. OIG may review this list by examining a sample of referral lists and notifying DHR when potential issues are identified. This quarter, OIG did not review any referral lists.

k | Chicago Police Department Written Rationale

OIG reviews any written rationale when no consensus selection was reached during a Consensus Meeting for Covered Positions within CPD. This quarter, OIG did not receive any such written rationale related to a no consensus selection.

l | Chicago Fire Department Written Rationale

OIG reviews any written rationale when no consensus selection was reached during a Consensus Meeting for Covered Positions. This quarter, OIG did not receive any such written rationale related to a no consensus selection.

m | Chicago Police Department Emergency Appointments

OIG reviews circumstances and written justifications for any emergency appointments made pursuant to the City of Chicago Personnel Rules and Section 2-74-050(8) of the MCC. This quarter, OIG did not receive notification of any CPD emergency appointments.

n | Chicago Fire Department Emergency Appointments

OIG reviews circumstances and written justifications for any emergency appointments made pursuant to the City of Chicago Personnel Rules and Section 2-74-050(8) of the MCC. This quarter, OIG did not receive notification of any CFD emergency appointments.

3 | Hiring Related Audits Performed by OIG

a | Selected Hiring Sequences covered by the City of Chicago Employment Plan

Each quarter, OIG may audit in-process and completed hiring sequences conducted by the following departments or their successors: the Department of Fleet and Facility Management (2FM), CDA, DOB, DSS, CDOT, the Department of Water Management (DWM), and six other City departments selected at the discretion of OIG. For 2025, OIG selected the following six additional departments: COPA, CDPH, the Chicago Public Library (CPL), Business Affairs and Consumer Protection (BACP), CPD, and DHR. Additionally, OIG has the authority, pursuant to 2-56-035 of the MCC, to audit employment actions under the hiring plan and related policies and procedures.

This quarter, OIG did not complete any audits of any hiring sequences.

b | Examinations Covered by the City of Chicago Employment Plan

OIG may conduct an audit of DHR test development, administration, and scoring each quarter. This quarter, OIG did not conduct any audits of examinations covered by the City of Chicago Employment Plan.

Compliance Case No. C2024-000000158

On December 5, 2025, OIG notified DHR about an intake it received regarding the test administration for a CDA aviation security officer position. OIG learned that a testing administrator mistakenly set 65 minutes on a timer, when the exam should have had 90 minutes, then stopped the test when the 65-minute timer went off. None of the parties present noticed the discrepancy, and all candidates left the facility. One candidate had not completed the test when the testing administrator announced that time was up. After realizing the error, the testing administrator called this candidate and offered a re-take of the exam the following day. The candidate accepted and returned to complete the test.

Upon scoring the results, the testing team found that all candidates who had completed the exam in the originally offered 65 minutes passed. The single candidate who did not complete the test initially but then retook the exam with the properly allowed time, failed both test opportunities.

One of the stated Goals and Principles of the City's Employment Plan is to "[p]rovide equal employment opportunity to all qualified Applicants." Applicants for the aviation security officer position are normally given 90 minutes to complete the test, and these applicants were given less time. Therefore, equal opportunities to these specific candidates were not offered. One candidate, particularly, did not complete the test. However, the testing administrator acted immediately and attempted to remedy the error by re-offering the candidate who failed another testing opportunity. While this appears to have been a good-faith effort to correct a mistake, it could have also further exacerbated an already unequal opportunity. OIG recommended that testing administrators initiate an escalation with OIG instead of independently determining a corrective response.

In response, DHR agreed with OIG as to the facts and agreed that it may have been appropriate to initiate an escalation with OIG. DHR also noted that its Testing Division implemented a Universal Manual for its staff in 2025, which includes information about potential incidents such as mistiming.

c | Chicago Police Department Testing

OIG is required to conduct audits of CPD testing including test administration and scoring. This quarter, OIG did not conduct any audits of test administrations for covered positions within CPD.

d | Chicago Fire Department Testing

OIG is required to conduct audits of CFD testing including test administration and scoring. This quarter, OIG did not conduct any audits of test administrations for covered positions within CFD.

e | Acting Up

OIG audits compliance with Chapter XIII of the City's Employment Plan and the Acting Up Policy. This quarter, OIG received no DHR-approved waiver requests to the City's 90-Day Acting Up limit.

f | Selected Chicago Police Department Hiring Sequences

Pursuant to Chapter XI of the CPD Hiring Plan for Sworn Titles, OIG completes mandatory audits of in-process and completed CPD hiring sequences as well as employees hired through the Merit Promotion Process to ensure compliance with the hiring process. This quarter, OIG did not conduct any audits of CPD hiring sequences.

g | Selected Chicago Fire Department Hiring Sequences

Pursuant to Chapter IX of the CFD Hiring Plan for Uniformed Positions, OIG completes mandatory audits of in-process and completed CFD hiring sequences as well as employees hired through the Performance Selection Process. This quarter, OIG did not conduct any audits of CFD hiring sequences.

h | Chicago Police Department Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG is required to conduct audits of CPD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CPD.

i | Chicago Fire Department Modifications to Class Specifications, Minimum Qualifications, and Screening and Hiring Criteria

OIG is required to conduct audits of CFD modifications to class specifications, minimum qualifications, and screening and hiring criteria. This quarter, OIG did not receive any requests for such modifications from CFD.

j | Chicago Police Department Candidate Lists

OIG is required to conduct audits of CPD candidate lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CPD candidate lists.

k | Chicago Fire Department Referral Lists

OIG is required to conduct audits of CFD referral lists who meet the predetermined minimum qualifications for the positions that are created by DHR. This quarter, OIG did not conduct any audits of CFD referral lists.

l | Chicago Police Department Acting Up

OIG is required to audit compliance with Chapter X of CPD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CPD.

m | Chicago Fire Department Acting Up

OIG is required to audit compliance with Chapter XI of CFD's Hiring Plan and the Acting Up Policy. This quarter, OIG did not receive any Acting Up reporting from CFD.

n | Chicago Police Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CPD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CPD's Hiring Plan.

o | Chicago Fire Department Arbitrations and Resolution of Grievances by Settlement

OIG is required to audit all arbitration decisions and grievance settlement agreements that may impact the procedures under CFD's Hiring Plan. This quarter, OIG did not receive any arbitration decisions or grievance settlement agreements that may impact the procedures under CFD's Hiring Plan.

4 | Other Compliance Activity

a | Monitoring

In addition to auditing hire packets, OIG monitors hiring sequences as they progress by attending and observing intake meetings, interviews, tests, and consensus meetings. The primary goal of monitoring hiring sequences is to identify any gaps in internal controls and non-compliance with the City of Chicago's Employment and Hiring Plans. However, real-time monitoring also allows OIG to detect and address compliance issues as they occur.

OIG identifies the hiring sequences to be monitored based on risk factors such as past errors, complaints, and historical issues with particular positions. This quarter, OIG monitored six hiring

sequences across three City departments. The table below shows the breakdown of monitoring activity by department.²⁷

Table 11: Hiring Sequences Monitored in Q4 2025

Department	Intake Meetings Monitored	Tests Monitored ²⁸	Interview Sets Monitored ²⁹	Consensus Meetings Monitored	Violations	Errors
Department of Fleet and Facility Management	0	0	0	1	0	0
Chicago Police Department	0	1	0	0	0	0
Chicago Department of Transportation	0	0	1	0	0	0
Chicago Department of Aviation	0	0	2	4	0	0
Chicago Department of Water Management	0	1	0	0	0	0
Chicago Public Library	0	0	1	0	0	0

b | Escalations

Recruiters, classification analysts, and testing administrators in DHR must escalate concerns regarding improper hiring by notifying OIG. In response to these notifications, OIG may take one or more of the following actions: conduct a review of the hiring sequence, refer the matter to the DHR commissioner or appropriate department head for resolution, or refer the matter to the OIG Investigations section.

This quarter, OIG did not receive any new escalations.

Table 12: Escalations Received in Q4 2025

Escalation Status	Number of Escalations
Newly initiated	0
Pending	1
Referred to DHR commissioner	0
Closed with investigation	0
Closed without investigation ³⁰	0

²⁷ If a department is not included in this table, OIG did not monitor any elements of that department's hiring sequence(s).

²⁸ Tests monitored are totaled by exam type, i.e. Police Officer, Detective, etc.; not total number of tests monitored for exam type.

²⁹ Interview Sets Monitored are totaled by positions monitored; not total number of interviews monitored.

³⁰ Escalations categorized as Closed without Investigation are received by OIG with either (1) a self-initiated remedy from the DHR commissioner and the escalation is considered closed after OIG reviews the escalation and concurs with the remedy issued by DHR with no further recommendations made by OIG; or (2) after review or inquiry, any findings and recommendations of OIG are reported to the DHR commissioner and, when appropriate, the department head and the DHR commissioner reports to OIG what action they took on OIG's recommendation.

c | Processing of Complaints

OIG receives complaints regarding the City's hiring and employment processes, including allegations of unlawful political discrimination and retaliation and other improper considerations in connection with City employment. These complaints may be resolved in several ways, depending on the nature of the complaint. If there is an allegation of an Employment Plan violation or breach of a policy or procedure related to hiring, OIG may open an inquiry into the matter to determine whether such a violation or breach occurred. If a violation or breach is sustained, OIG may make corrective recommendations to the appropriate department or may undertake further investigation. If, after sufficient inquiry, no violation or breach is found, OIG will close the case as Not Sustained. If, during an inquiry, OIG identifies a process or program that could benefit from a more comprehensive audit, OIG may consider a formal audit or program review.

The table below summarizes the disposition of complaints related to the City's hiring and employment processes received this quarter.

Table 13: Hiring and Employment-Related Complaints Received in Q4 2025

Complaint Status	Number of Complaints
Newly initiated	27
Pending	17
Closed	0
Declined	10

Compliance Case No. C2024-000000133

On December 1, 2025, OIG informed DHR that it violated the City's Policy on Background Checks when it failed to make an individualized assessment of a candidate's submitted criminal background. The candidate applied for a position as custodial worker with CDA and was given a conditional offer by CDA, but CDA withdrew the offer from the candidate after DHR did not provide an individualized assessment of the candidate's criminal background as required by the Policy on Background Checks. OIG learned that a former DHR recruiting coordinator was assigned to the candidate's hiring requisition, but the recruiting coordinator was later terminated for insubordination and multiple incidents of poor work performance, which had resulted in employment offers being rescinded for multiple candidates. OIG recommended that DHR should notify OIG of all known or suspected irregularities of the Employment Plan once they are known in the form of an escalation.

In response, DHR stated that it was still processing the candidate's background check with outside partners when CDA rescinded the candidate's offer. DHR maintained communication with CDA about the requisition, but the recruiting coordinator failed to identify what the delays in the background check were. OIG stated in its December 1, 2025, communication that the recruiting coordinator's duties should have been reassigned when insubordination issues were recognized, but DHR responded that the recruiting coordinator was still an active employee and expected to continue to perform their job duties. Accordingly, DHR disagreed that it violated the City's Policy on Background Checks or that there should have been an escalation to OIG.



The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency.

The authority to perform this inquiry is established in the City of Chicago Municipal Code §§ 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct; to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations; and, specifically, to review the operations of CPD and Chicago's police accountability agencies. Further, Paragraph 561 of the consent decree entered in *Illinois v. Chicago* requires OIG's Public Safety section to "review CPD actions for potential bias, including racial bias." The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, Chicago, IL 60604, or visit our website at igchicago.org.

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