



Office of the Independent Inspector General

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

**Quarterly Report
4th Quarter 2025**

January 15, 2026

INSPECTOR GENERAL'S INTRODUCTION

Dear Stakeholders,

As we close the fourth quarter of 2025, I want to share key updates and priorities for the Office of the Independent Inspector General (OIIG) as we move into fiscal year 2026.

Our approved FY2026 budget is \$3,537,706, representing an increase of \$725,533 (25.8%), most of which is allocated to salaries and benefits for our dedicated staff. This increase will allow us to strengthen our oversight capacity by adding two investigators to the Shakman Compliance Division and three audit and performance analyst professionals to the Compliance and Review Division. These additions will enhance our ability to monitor compliance, conduct program reviews, and address waste and mismanagement in procurement and operations.

We concluded 57 investigations this year, and plan to complete even more for FY2026. However, our hiring schedule will be phased in due to budgetary constraints embedded in the FY2026 plan. Despite these limitations, we remain committed to expanding Shakman monitoring to detect, prevent, and deter violations during the interviewing process and to conducting more compliance and program reviews that safeguard integrity and efficiency.

Recent media coverage underscores the importance of our mission. An Op-Ed in the Chicago Sun-Times highlighted the OIIG Budgetary Floor, and the Chicago Tribune Editorial Board addressed issues surrounding the Tyler Technologies contract, calling on the Inspector General to resolve these concerns. In response, we emphasized that if the OIIG had a Budgetary Floor, we could address large-scale, complex reviews and investigations more efficiently and effectively.

As we look ahead, our focus remains on transparency, accountability, and continuous improvement. Thank you for your ongoing support and partnership in advancing these goals.

Sincerely,

Tirrell Paxton

Inspector General

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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

Tirrell J. Paxton, Inspector General

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January 15, 2026

Transmittal via email only

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

Re: Independent Inspector General Quarterly Report (4th Qtr. 2025)

Dear President Preckwinkle and Members of the Board of Commissioners:

This report is written in accordance with Section 2-287 of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-52 (2007), to apprise you of the activities of this office during the time period beginning October 1, 2025, through December 31, 2025.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 208 complaints during this reporting period.¹ The OIIG initiated 20 new OIIG investigations during this period and still has a total of six matters under investigation. Additionally, 45 OIIG inquiries have been initiated during this reporting period while a cumulative total of 136 OIIG inquiries remain pending at the present time. We referred 47 complaints to management or outside agencies for further consideration. The number of open investigations beyond 180 days of the issuance of this report is four due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

New Summary Reports

During the 4th Quarter of 2025, the OIIG issued 20 summary reports. The following provides a general description of each matter and states whether OIIG recommendations for remediation or discipline have been adopted. Specific identifying information is being withheld in accordance with the OIIG Ordinance where appropriate.

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

IIG25-0346 – Clerk’s Office. The OIIG initiated a review after receiving numerous complaints about customer service issues at the Clerk’s Office Vital Records Division. Specifically, complaints include allegations such as failure to provide requested documents, inability to contact anyone to request documents, and early office closures.

During the course of the review, the OIIG discovered that the Vital Records department was at least a month in arrears with vital record mail orders at the Chicago location and there was no tracking system in place to expedite and monitor processing. Furthermore, online order delivery times advertised by VitalChek, a third-party vendor, were misleading, allowing customers to believe an order would be delivered 5-10 days after being placed, rather than 5-10 days after the Clerk’s Office approves the order, which includes additional processing time. Finally, site visits revealed that long lines at Clerk’s Office locations have improved because management has implemented an appointment system and because delays attributable to the Real I.D. deadline have abated, alleviating the need to pull staff from vital records to assist.

Based on our findings, the OIIG recommended the following:

1. The Vital Records department should work with VitalChek to provide more accurate delivery windows for vital record orders. Additionally, the Vital Records department should provide information on its website, work with Vital Chek to do the same, informing customers there may be a signature requirement upon delivery.
2. The Vital Records department should develop an electronic system for collecting, tracking and responding to mail orders to ensure they are better able to locate and more efficiently process mail orders.
3. The Vital Records department should develop written Standard Operating Procedures to ensure there is consistency across the department for customer relations, processing of mail, processing of VitalChek orders, and elevation of complaints.

This was a public statement and the entire OIIG report, including the Clerk’s response, can be found on the OIIG’s [website](#).

IIG25-0347 – Cook County Health. The OIIG received a complaint that a CCH employee has been on a long-term disability and is currently residing out of state. The complainant further alleged that the employee is still receiving her healthcare benefits from the County despite living out of state.

The allegation against the employee for receiving healthcare benefits while residing out of state was not sustained. However, the preponderance of the evidence supported the conclusion that the employee violated CCH Personnel Rule 8.03(c)(32) - Job Abandonment, as she did not take any action to return to work or extend her leave of absence after it was exhausted. The OIIG would

have recommended the employee be terminated, but she resigned prior to the conclusion of the investigation.

The preponderance of the evidence developed during this investigation also supports the conclusion that the employee's supervisor violated CCH Personnel Rule 8.03(d)(2) – Failure to Work in Accordance with County Policies by violating CCH Personnel Rule 8.05 and its Disciplinary Action policy when she failed to discipline the employee for job abandonment. We recommended the supervisor be disciplined in consideration of the factors set forth in CCH Personnel Rule 8.04(c), including the department practices in recent similar cases.

Finally, the OIIG noted we investigated a similar issue involving employee healthcare benefits under IIG24-0105. CCH adopted our recommendations and has established new procedures to identify employees who may not be entitled to benefits. We recommended CCH incorporate the Cook County Pension Fund's (CCPF) monthly reports into those new procedures to identify employees who are on an unapproved leave of absence. CCH accepted the OIIG recommendations.

Dual Employment/PPP Loan Investigations

The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Personnel Rules. The OIIG conducted investigations to determine if the employees informed the County that they were engaging in secondary employment and otherwise complied with County Personnel Rules. All PPP loan cases with sustained findings have been or will be referred to law enforcement for prosecution pursuant to the OIIG Ordinance. The following are PPP loan investigations closed this quarter:

IIG25-0527 – Clerk's Office. The OIIG discovered that a Clerk's Office employee sought a federal PPP loan totaling approximately \$14,000. On his loan application, the employee stated he was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate Cook County Clerk's Office Policy Manual 4.13 – Dual Employment, as he was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence supports the conclusion that the employee violated Cook County Clerk's Office Policy Manual 2.2(a)(12) - making of a false statement or representation, either verbally or in writing and Section 2.2(a)(13) - other act that brings disrepute to CCCO or its Employees, or otherwise cause public distrust. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated. This report was issued December 20, 2025, and a response is not yet due.

IIG25-0530 – Medical Examiner’s Office. The OIIG discovered that a Medical Examiner’s Office employee sought a federal PPP loan totaling approximately \$21,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate Cook County Personnel Rule 13.4 – Dual Employment, as she was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence supports the conclusion that the employee violated Cook County Personnel Rule 8.2(b)(36) – Conduct unbecoming an employee or conduct which brings discredit to the County. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG would have recommended the employee be terminated; however, she resigned. The OIIG recommended the employee be placed on the *Ineligible for Hire List*. This report was issued December 26, 2025, and a response is not yet due.

IIG25-0551 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$21,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as she was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued December 26, 2025, and a response is not yet due.

IIG25-0552 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$19,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as she was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0553 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$19,000. On his loan application, the employee stated he was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as he was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee retired, and CCH accepted the OIIG recommendation to add the employee to the *Ineligible for Hire List*.

IIG25-0554 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$20,000. On his loan application, the employee stated he was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as he was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee resigned, and CCH accepted the OIIG recommendation to place the employee on the *Ineligible for Hire List*.

IIG25-0555 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$21,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment, as she engaged in secondary employment that she did not disclose to CCH. The preponderance of the evidence also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Additionally, the preponderance of the evidence supports the conclusion that the employee failed to cooperate with the OIIG investigation even after she was compelled to do so, in violation of CCH Rule 8.03(c)(13). While the employee did answer preliminary questions voluntarily, she

refused to answer questions pertaining to her purported business and her PPP loan. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee resigned, and CCH accepted the OIIG recommendation to place the employee on the *Ineligible for Hire List*.

IIG25-0556 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$9,500. On his loan application, the employee stated he was an independent contractor for a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as he was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0557 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$21,000. On his loan application, the employee stated he was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as he was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0558 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$20,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of the evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. The employee resigned on the day her OIIG interview was scheduled. Based on the serious nature of

the misconduct, the OIIG recommended the employee be placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendation.

IIG25-0559 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$19,500. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of the evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. The employee resigned prior to the conclusion of the OIIG’s investigation. Based on the serious nature of the misconduct, the OIIG recommended the employee be placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendation.

IIG25-0572 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$13,000. On his loan application, the employee stated he was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment. Although he was not the sole proprietor of a business, the employee otherwise appropriately disclosed secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0573 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$20,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as she was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0574 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$18,500. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of the evidence supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. The preponderance of evidence developed in this investigation also supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment, as she started her business in 2021 and did not report her secondary employment to CCH until 2024. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0575 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$21,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of the evidence supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. The preponderance of evidence developed in this investigation also supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment, as she did not inform CCH of her business. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0576 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$10,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee did not violate CCH Personnel Rule 12 - Dual Employment, as she was not the sole proprietor of a business and did not otherwise have secondary employment. The preponderance of the evidence does support the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee resigned, and CCH accepted the OIIG recommendation to add the employee to the *Ineligible for Hire List*.

IIG25-0577 – Cook County Health. The OIIG discovered that a CCH employee sought one federal PPP loan and one loan through the Disaster Assistance Loan Program totaling approximately \$21,000. On her loan application, the employee stated she operated a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment. Although she was not the sole proprietor of a business, she worked secondary employment without the approval of her department head. The preponderance of the evidence also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

IIG25-0578 – Cook County Health. The OIIG discovered that a CCH employee sought a federal PPP loan totaling approximately \$21,000. On her loan application, the employee stated she was the sole proprietor of a business.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment. Although she was not the sole proprietor of a business, she worked a second full-time job without the approval of her department head. The preponderance of the evidence also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH accepted the OIIG recommendations.

Responses to Recommendations from Prior Quarters

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

IIG22-0050 – Cook County Health. The OIIG received an allegation that a Cook County Health (CCH) employee was abusing Family and Medical Leave (FMLA) sick leave and violating CCH's dual employment policy.

The preponderance of the evidence demonstrated that the employee was appropriately using approved intermittent FMLA sick leave to care for a family member with a serious medical

condition. Therefore, the allegation related to abuse of FMLA leave was not sustained. The preponderance of the evidence also demonstrated that the employee engaged in several types of dual employment outside of his work for CCH. While he disclosed several to CCH, the employee failed to disclose a type of self-employment and a consulting role in 2023 and 2024. The allegation that the employee violated CCH's dual employment policy was sustained. The OIIG recommended that CCH impose discipline on the employee consistent with factors set forth in CCH's Personnel manual, including the system's practice in recent similar cases. CCH adopted the OIIG recommendation for discipline.

IIG24-0037 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought two SBA loans: one PPP loan for approximately \$9,000 and one under the Economic Injury Disaster Loan Grant (EIDL) program for approximately \$10,000. On her loan applications, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rule 12 - Dual Employment. The employee did not disclose to CCH she was engaging in secondary employment working more than 20 hours per week while employed full-time with CCH. The employee also admitted that she had worked for another company and did not inform CCH of this employment. The preponderance of the evidence also supports the conclusion that the employee violated CCH Personnel Rule 8.03(c)(25) – Engaging in conduct that reflects adversely or brings discredit to the System. The employee was not the sole proprietor of a business and submitted false information to the federal government to obtain a financial benefit. Finally, during the course of the investigation, the OIIG discovered a misdemeanor criminal conviction that the employee failed to disclose to CCH as required, in violation of CCH Personnel Rule 8.03(b)(12) – Conviction of a criminal offense.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH adopted the OIIG recommendations. The employee resigned during the pre-discipline process and will be added to the *Ineligible for Hire List*.

IIG24-0501 – Cook County Health. The OIIG conducted an investigation into allegations that a CCH employee was involved in a pass-through scheme with a CCH vendor in order to circumvent the County's Ethics rule prohibiting County employees from having a financial interest in County contracts, work, or business.

The preponderance of the evidence demonstrates that the employee enlisted the assistance of an individual (Individual A) to provide services to CCH. The employee prepared Individual A's invoices with the name of a company owned by the employee's mother. Individual A received payments from CCH and transferred the bulk of the funds to the employee the same day or a few days later. Individual A had no direct communication with CCH personnel; rather, it was the employee who engaged in multiple email exchanges with those County employees, where she discussed services, provided quotes and documentation, inquired about payments, and thanked them for the business.

The OIIG found the employee violated CCH Personnel Rule 8.03(c)(13) which references the County Ethics Ordinance Sec. 2-581(a)(1) – No elected official or employee shall have a financial interest in their own name or in the name of any other person in any contract, work or business of the County. Also, by placing her personal gain ahead of her fiduciary duty to CCH, the employee was found to be in breach CCH Personnel Rule 8.03(c)(25) – Engaging in Conduct that Reflects Adversely or Brings Discredit to CCH.

Based on the serious nature of the misconduct involved, the OIIG recommends that the employee be terminated and that CCH place her on its *Ineligible for Hire List*. The OIIG further recommends that CCH should improve internal controls for the informal procurement process:

1. Ensure no single employee has end-to-end control over vendor selection, approval, and payment processing.
2. Run automated or manual checks to flag potential employee-vendor connections before contracts are awarded.
3. Implement a process requiring employees involved in the engagement to certify, before procurement or payment, that they have no personal interest in the transaction.

CCH adopted the OIIG recommendation for termination and placement on the *Ineligible for Hire List*. Additionally, CCH accepted recommendation 1. While not specifically adopted, recommendations 2 and 3 are being completed for contract purchases over \$25,000.

IIG25-0059 – Clerk's Office. The OIIG received an allegation that a Clerk's Office seasonal employee has been engaged in benefits fraud because she has been receiving Supplemental Nutrition Assistance Program (SNAP) and childcare benefits from the Illinois Department of Human Services (IDHS) for several years. Additionally, the employee allegedly concealed earned income received from the Board of Elections to the IDHS, enabling the employee to receive financial benefits that she would not otherwise be qualified to receive. The OIIG conducted an investigation to determine if the employee was employed by the Clerk's Office during the time she denied receiving earned income.

The preponderance of the evidence gathered during this investigation shows that the employee has been a seasonal employee with the Clerk's Office since 2017, earning \$1,400 in August 2024 and \$4,875 in November 2024. However, on September 10, 2024, the employee

applied for SNAP benefits and declared she had earned no income in the last 30 days. The employee also failed to update IDHS about her income for November 2024, as required. The employee's intentional omission in her September 2024 application and failure to report her change of income in November 2024 affected the IDHS's determination of her eligibility for SNAP benefits and resulted in an overpayment of SNAP benefits to the employee in the amount of \$965.

Considering these findings, the employee is found to be in breach of the Clerk Code of Conduct Section V-D(q)(2)(t) – "Conduct unbecoming of a Clerk Employee: which means violation of law or policy that bring into question the integrity of the Employee and reflects negatively on the Clerk or engaging in criminal conduct that otherwise publicly and negatively reflects poorly on the Clerk." Based on the serious nature of the misconduct involved, the OIIG recommended that her employment with the Clerk's Office not be renewed and that she be placed on the Clerk's *Ineligible for Hire List*. The Clerk's Office accepted our recommendation not to renew the employee's employment with the Clerk's Office. However, the Clerk's Office stated that it does not maintain an *Ineligible for Hire List*.

IIIG25-0098 – Assessor's Office. This investigation was initiated by the OIIG based on a complaint alleging that, despite receiving several notifications that a property located in Cook County was erroneously classified 2-05 (two-or-more story residence, over 62 years of age up to 2,200 square feet), the Assessor's Office continued to erroneously classify the property. It was further alleged that the property was built in 1990 and should have been classified 2-78 (two-or-more story residence, up to 62 years of age, 2,001 to 3,800 square feet).

The preponderance of the evidence in this investigation supports the conclusion that the Assessor's Office did not comply with the requirements of section 9-85 of the Property Tax Code when it failed to act on the authority granted by the code and revise the tax assessment pertaining to the property when a concerned taxpayer provided notice that the property was erroneously classified 2-05 since 1990. Additionally, the OIIG determined the Assessor's Office lacks a centralized complaint tracking system that effectively ensures complaints received are adequately stored, tracked, categorized, and acted upon in a timely manner.

The OIIG acknowledges that the Assessor's Office has corrected the problem related to this property. Nonetheless, based on our findings above, this office respectfully recommended that the Assessor's Office review the erroneous assessment history of the subject property. In doing so, the Assessor's Office should consider the feasibility of pursuing legal remedies to recoup monies that were forgone due to the misclassification error. We further recommended the Assessor's Office conduct an evaluation of its complaint intake process. As part of the evaluation, the Assessor's Office should consider assigning complaints an appeal number, which would allow the Assessor's Office to adequately track the progress and timeliness of complaints and ensure staff can document the status and disposition of the complaint. The Assessor's Office declined recommendation one stating that it lacks authority to issue revised assessments for prior years

based on the incorrect subcategory classification. The Assessor's Office accepted recommendation two.

IIG25-0137 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program (PPP loan) loans to determine whether information submitted by County employees for the PPP Loans was consistent with Cook County records and/or in violation of any County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought one federal PPP loan totaling approximately \$20,000. On her loan application, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Facilities Management that she was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of the evidence developed in the investigation supports the conclusion that the employee violated Cook County Personnel Rule 13 – Dual Employment. The employee did not report that she was the sole proprietor of a business and a worker paid by another governmental entity. The preponderance of the evidence also supports the conclusion that the employee violated Cook County Bureau of Human Resources Personnel Rule 8.2(b)(36), Conduct unbecoming an employee or conduct which brings discredit to the County. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee resigned, and Facilities Management accepted the OIIG recommendation for placement on the *Ineligible for Hire List*.

IIG25-0138 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought two federal PPP loans totaling approximately \$42,000. On his loan application, the employee stated he was a business consultant. The OIIG conducted an investigation to determine if the employee informed Cook County that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Cook County Personnel Rule 13 - Dual Employment. The evidence shows the employee did not report that he was working for two outside employers while engaged in full-time Cook County employment. The preponderance of evidence developed in the investigation also supports the conclusion that the employee violated Cook County Rule 8.2(b)(36) - Conduct

unbecoming an employee or conduct which brings discredit to the County, because he applied for and received approximately \$42,000 in federal PPP loans for an admittedly fictitious business.

Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. The employee resigned, and Facilities Management accepted the OIIG recommendation for placement on the *Ineligible for Hire List*.

IIIG25-0140 – Facilities Management. The OIIG conducted a review for dual employment compliance in connection with Cook County employees. The OIIG initiated this investigation to determine if a Facilities Management employee informed the County that he was engaging in secondary employment.

The preponderance of the evidence demonstrated that the employee held dual employment during the time he was employed by Cook County for which he did not have approval by management nor which he reported to the County, in violation of Cook County Personnel Rule 13. The OIIG recommended the employee receive discipline consistent with the factors set forth in Cook County Personnel Rules 8.3, including the department's practice in recent similar cases. Facilities Management accepted the OIIG recommendation and issued a 3-day suspension to the employee.

IIIG25-0147 – Facilities Management. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether the information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Cook County Personnel Rules. Based on this review, we discovered that a Facilities Management employee sought one federal PPP loan totaling approximately \$19,000. On his loan application, the employee stated he was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed Cook County that he was engaging in secondary employment and otherwise complied with Cook County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Cook County Personnel Rule 8.02(b)(36) - Engaging in Conduct that Reflects Adversely or Brings Discredit to Cook County. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of his purported business and its income when he submitted the application for a federal PPP loan. The investigation determined the employee was not the sole proprietor of a business and the information about the business' income was false. The employee acknowledged that he knowingly submitted information to the SBA and other financial institutions that he did not understand or properly read and accept. These statements were made to secure approximately \$19,000 in a federal loan.

The preponderance of the evidence developed in this investigation also supports the conclusion that the employee violated Cook County's Personnel Rule 13 - Report of Dual

Employment. When interviewed by the OIIG, the employee acknowledged he failed to disclose his secondary employment by owning and operating a business that generated self-employment income. Based on the serious nature of the misconduct, as well as other aggravating factors present, we recommended that the employee be terminated and placed on the *Ineligible for Hire List*. The employee retired, and Facilities Management accepted our recommendation to add the employee to the *Ineligible for Hire List*.

IIG25-0200 – Clerk’s Office. The OIIG initiated this investigation based on a complaint that a Clerk’s Office employee frequently leaves her assigned area of work after she signs in at the start of her shift. It was further alleged that the employee fails to clock in or out of work, resulting in her submitting multiple Automated Time Clock Correction Forms (ATC) to her supervisor.

The preponderance of the evidence does not support the allegation that the employee clocks in and leaves her assigned area of work. Both video footage and witness statements refute the allegation. Therefore, the violation of Clerk’s Office Policy Manual Section IX(B) – Time and Attendance is not sustained. However, the preponderance of the evidence does support the conclusion that the employee violated Clerk’s Office Policy Manual Section V(D)(1)(b) by failing to swipe 42 times in a five month period, and Section IX(C) for using the web-based dashboard to clock in via Cook County Time (CCT) rather than a stationary clock when she was not at an alternative work site.

The preponderance of the evidence also supported the conclusion that the supervisor violated Clerk’s Office Policy Manual Section V(F)(1) – Issuing Discipline, when he failed to enforce the office’s timekeeping policies. The employee submitted 25 ATC forms for 42 missed swipes during her first five months at this assignment. Clerk’s Office policy calls for discipline when an employee fails to swipe three or more times within a pay period.

Based on the foregoing, the OIIG recommended the Clerk’s Office impose discipline on the employee and the supervisor. When assessing the appropriate level of discipline, we recommended that consideration be given to the factors set forth in the Cook County Clerk’s Office Policy Manual, Section V(D)(1), including department practices in recent similar cases. The OIIG also recommended management ensure the employee has a working key fob to enter her place of work and confirm that the previous supervisor’s key fob has been collected. The Clerk’s Office accepted the OIIG recommendations.

IIG25-0256 – Human Resources. The OIIG initiated this investigation after an OIIG official saw a Human Resources employee taking pictures of Cook County employees attending New Employee Orientation (NEO) training with his personal cell phone.

After investigation, the OIIG found that, while not strictly illegal or violative of County policy, the practice of photographing attendees or presenters at NEO sessions presents the risk that attendees, especially those on their first day of employment with the County, might feel intimidated or uncomfortable having their images captured without prior notice to them or without

their consent. While Human Resources management was generally aware of the employee's practice of photographing employees at Human Resources events, the employee took the NEO photographs without the express request or authorization of BHR management, using his own cell phone. The employee maintained sole control over the images. It is inappropriate for a County employee to capture images of other County employees in the workplace without the express authorization of management and notice to the employees to be photographed.

Additionally, during the course of the investigation, the OIIG requested an interview of a Human Resources employee and asked that the request remain confidential. The OIIG received a response from a Human Resources official. The Human Resources official asked whether the OIIG's request was connected to an official investigation. When the OIIG could not comment on whether there was an active investigation, the Human Resources official asked the OIIG to provide justification to interview the Human Resources employee and to request confidentiality. OIIG reminded Human Resources that the OIIG has explicit authority to interview County employees pursuant to the OIIG ordinance and has an obligation to maintain confidentiality. Lack of confidentiality can jeopardize the efficacy of an investigation, unnecessarily hinder the full cooperation of witnesses, and damage the reputation of the accused. If the person to whom the OIIG makes a request has a question about the purpose of the request, they should address it with the OIIG directly.

The OIIG recommended Human Resources establish a policy that requires management approval before employees are allowed to take photos of any future Human Resources programs, trainings, events, or regular business operations. We also recommended photos be taken with County equipment and employees be notified when possible.

Further, we recommended that Human Resources management should refrain from potential interference with OIIG investigations. In regard to witnesses and interviews, any Human Resources employees who seek assistance from Human Resources management in response to an OIIG request should be directed to address those questions to the OIIG. Alternatively, Human Resources employees could seek advice from a union representative, if applicable, or private legal counsel. For document requests, we recommended that Human Resources explore the option of designating a Human Resources employee who will be responsible for OIIG document productions which was the established practice before 2016. Human Resources management and other Human Resources employees should not, as a group, be informed about OIIG investigations. OIIG investigations must be kept confidential, meaning that information should only be revealed on a need-to-know basis. BHR declined the OIIG's recommendations as to the creation of a photography policy. BHR denied interfering in an OIIG investigation but agreed with the remaining recommendations.

IIIG25-0593 – Cook County Health. The OIIG conducted a review for dual employment compliance of CCH employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with CCH records and/or in violation of any

CCH Personnel Rules. Based on this review, we discovered that a CCH employee sought a federal PPP loan for approximately \$21,000. On her loan applications, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed CCH that she was engaging in secondary employment and otherwise complied with CCH Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated CCH Personnel Rules. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. The employee gave conflicting stories about whether she applied for the loan with another person or provided her personally identifying information to another individual who assisted with the application. She admitted that the personal identifying information, including digital photographs of herself (selfies), included in the loan application are all hers. She admitted that she does not own the business and did not generate the income listed on the loan application. The OIIG determined that, due to an account error when the loan servicer attempted to distribute the PPP loan funds to the employee, the loan was ultimately cancelled after two attempts to disburse the funds were made. Although the employee did not receive the PPP funds, she did attempt to defraud the federal government by submitting a false PPP loan application.

The preponderance of the evidence also supports the conclusion that the employee violated CCH policy governing dual employment for failing to disclose ownership of a business, unrelated to the purported business for which she applied for the PPP loan. Based on the serious nature of the misconduct, the OIIG recommended the employee be terminated and placed on the *Ineligible for Hire List*. CCH adopted the OIIG recommendations.

Failure to Respond to OIIG Recommendations from Prior Quarters

Below are recommendations from prior quarters for which the OIIG has not received a response from the government agency or department to which they were made.

IIG22-0125 – Assessor’s Office. The OIIG conducted a review for dual employment compliance of Cook County employees who applied for federal Small Business Administration (SBA) Paycheck Protection Program loans (PPP loan) to determine whether information submitted by such employees for the PPP loans was consistent with Cook County records and/or in violation of any Personnel Rules. Based on this review, we discovered that an Assessor’s Office employee sought and was approved for two federal PPP loans totaling approximately \$11,000. On her loan application, the employee stated she was the sole proprietor of a business. The OIIG conducted an investigation to determine if the employee informed the Assessor’s Office that she was engaging in secondary employment and otherwise complied with County Personnel Rules.

The preponderance of evidence developed in this investigation supports the conclusion that the employee violated Assessor’s Office Employee Handbook Section 19(o) – Conduct

unbecoming an employee of the Assessor's Office. Although the employee owned and operated a business, the employee provided false and misleading information to the SBA about the nature of her purported business and its income when she submitted the application for a federal PPP loan. During her OIIG interview, the employee admitted that revenue she claimed from her businesses was not in line with the amounts indicated on her tax returns and the documents she provided during the loan process.

The preponderance of the evidence developed in this investigation also supports the conclusion that the employee violated Assessor's Office Employee Handbook Section 14 – Outside/Dual Employment. When interviewed by the OIIG, the employee acknowledged she failed to disclose her secondary employment owning and operating a business. Based on the serious nature of the misconduct, as well as other aggravating factors present, we recommended that the employee be terminated and placed on the *Ineligible for Hire List*. This report was issued September 17, 2025, and to date we have not received a response to our recommendations. The Assessor's Office has notified us that a response is forthcoming; however, pursuant to our enabling ordinance, this matter will be referred to the Litigation Subcommittee as the response is overdue.

Activities Relating to Unlawful Political Discrimination

In April of 2011, the County implemented the requirement to file Political Contact Logs with the Office of the Independent Inspector General. The Logs must be filed by any County employee who receives contact from a political person or organization or any person representing any political person or organization where the contact relates to an employment action regarding any non-Exempt position. The OIIG acts within its authority with respect to each Political Contact Log filed. From October 1, 2025, to December 31, 2025, the Office of the Independent Inspector General has received one new Political Contact Log.

New UPD Investigations not the result of PCLs

The OIIG received no new UPD complaints during the last reporting period. The OIIG also continues to assist and work closely with compliance personnel in the OUP, FP, CCH, and Assessor by supporting the compliance personnel whenever they need assistance to fulfill their duties under their respective Employment Plans.

Employment Plan – Ineligible for Hire Lists

The OIIG continues to collaborate with the various County entities and their Employment Plan Compliance Officers to ensure the lists are being applied in a manner consistent with the respective Employment Plans. The agencies that have Ineligible for Hire Lists include OUP, CCH, Clerk of Circuit Court, FP and the Cook County Assessor's Office. The agencies that do not currently have an Ineligible for Hire List include the Office of the Chief Judge, Cook County States's Attorney, Cook County Sheriff's Office, Cook County Treasurer, Cook County Clerk, and the Board of Review.

OIIG Employment Plan Oversight

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

1. Five proposed changes to the Cook County Actively Recruited List;
2. Three proposed changes to the Shakman Exempt List;
3. One proposed change to the Cook County Public Defender Actively Recruited List;
4. Cook County Public Defender's proposed changes to Section XVII of the Cook County's Employment Plan;
5. The hire of two CCH Direct Appointments;
6. One proposed change to the CCH Direct Appointment List;

Monitoring

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

Other Important Matters

OIIG Midyear Budgetary Hearing

In November 2025, the OIIG appeared before the Cook County Board of Commissioners for the 2026 fiscal year Budgetary Hearings. During the OIIG hearing, the OIIG reiterated the need to implement a budgetary floor set at .14% of the County's overall budget to ensure adequate funding for the OIIG. Further, a budgetary floor ensures the OIIG would be free from political control, interference or retaliation. There were Commissioners who expressed support for the OIIG and asked additional questions about the OIIG Budgetary Floor. However, there has not yet been any Commissioner to support presenting the OIIG proposal to the Board of Commissioners for a vote.

Conclusion

Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Honorable Toni Preckwinkle
and Honorable Members of the Cook County
Board of Commissioners
January 15, 2026
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Very truly yours,

A handwritten signature in cursive script, reading "Tirrell J. Paxton". The ink is dark and the signature is fluid.

Tirrell J. Paxton
Independent Inspector General

cc: Attached Electronic Mail Distribution List

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