OFFICE OF THE INDEPENDENT INSPECTOR GENERAL
Tirrell J. Paxton, Inspector General
69 West Washington Street | Suite 1160 | Chicago, IL 60602 | (312) 603- 0350

September 30, 2026

Re: Public Release of OIIG Report No. IIG26-0074 (OIIG Referrals to OPR)

Pursuant to Sections 2-289(c)(2) and 2-289(d) of the Independent Inspector General Ordinance, Cook County, Illinois, Ordinance No. 07-O-52 (2007), attached hereto are the following:

- OIIG Report No. IIG26-0074 (OIIG Referrals to OPR) dated September 15, 2026
- Cook County Sheriff's Response to OIIG Report IIG26-0074 dated September 29, 2026
- OIIG Reply to Response dated September 30, 2026

cc: Honorable Toni Preckwinkle
Cook County Board of Commissioners
Lanetta Haynes Turner, Chief of Staff, Office of the President
Laura Lechowicz Felicione, General Counsel - Deputy Chief of Staff Legal, Government, and Legislative Affairs

OFFICE OF THE INDEPENDENT INSPECTOR GENERAL
Tirrell J. Paxton, Inspector General
69 West Washington Street | Suite 1160 | Chicago, IL 60602 | (312) 603- 0350

September 15, 2026

Honorable Thomas J. Dart
Sheriff of Cook County
50 W. Washington Street
Chicago, Illinois, 60602

Re: OIIG Public Statement No. IIG26-0074 (OIIG Referrals to OPR)

Dear Sheriff Dart:

This letter is written in accordance with 2-289(c)(2) and 2-289(d) of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-05 (2007) (the OIIG Ordinance), relative to a review to assess how the Office of Professional Review (OPR) resolved complaints referred to it by the Office of the Independent Inspector General Office (OIIG).

Background

The OIIG receives numerous complaints each year, prompting us to leverage strong working relationships with other oversight agencies to maximize our effectiveness. Further, the OIIG frequently receives complaints against Sheriff Office employees alleging misconduct, waste and mismanagement. Over time, the majority of these complaints have been referred to OPR for investigation. To ensure that these referrals were received, processed, and resolved in an appropriate manner, the OIIG initiated a review of OPR's handling of the matters forwarded by our office.

OIIG Review

The OIIG requested that OPR provide a report listing the OIIG referred complaints and describing how the complaints were resolved. OPR did not have a mechanism in place to efficiently identify and track OIIG's complaint referrals. Therefore, the OIIG provided OPR with the original referrals sent to them for resolution for three years from 2023 through 2025.

OPR subsequently provided the OIIG with a spreadsheet that identified OPR case numbers associated with an OIIG complaint referral. The spreadsheet listed 164 OIIG referrals to OPR. Of those 164 complaints, OPR did not investigate three complaints nor did OPR explain whether these complaints were resolved.

Scope and Methodology

The OIIG established five categories for classifying complaints:

1. Deputy Misconduct & Abuse of Authority ("Abuse of Authority");

2. Corrections Misconduct & Inmate Welfare ("Inmate Welfare");

3. Facility Operations, Property & Administrative Complaints ("Facilities);

4. Civil Rights, Unlawful Enforcement & Legal Process Complaints ("Civil Rights"); and

5. Excessive Force & Assault Allegations ("Excessive Force").

The OIIG selected three categories for further examinations. We selected these categories due to the severity of the allegations. Specifically, we identified the following allegations for further review:

1. Abuse of Authority,
2. Inmate Welfare, and
3. Excessive Force.

The OIIG identified 15 cases from these three categories to determine whether the investigations were thorough, fair, and complete. Then, the OIIG obtained the supporting documentation for the cases from OPR for these 15 cases. Below are the results of our review.

OIIG Analysis

OPR2025-0061/IIG25-0075

This complaint involved a Cook County Department of Corrections (CCDOC) correctional officer being served with an Order of Protection. In response to the referral, the correctional officer was de-deputized, his Firearm Owner's Identification (FOID) card and department issued firearm were confiscated. As the officer was on leave, OPR closed the matter pending his return to duty. Based on its review, the OIIG determined that OPR took appropriate action in response to the complaint.

OPR2024-0299/IIG24-0538

This complaint involved allegations that a CCDOC correctional officer was in possession of a stolen firearm and reporting to work under the influence of alcohol or drugs. OPR administratively closed the case because they could not contact the complainant. OPR did not interview the correctional officer, his supervisors, or coworkers. Based on its review, the OIIG has concerns that interviews were not conducted, locker search requests were not made, or a just-cause breath analysis or drug tests were not performed on the officer.

OPR2023-0452/IIG23-0587

This complaint involved an allegation that a CCDOC correctional officer published body camera video on social media. OPR reviewed the video and concluded that no County employees were involved in the release of the video. Based on its review, the OIIG concluded that OPR took appropriate action in response to the complaint.

OPR2023-0633/IIG23-0736

This complaint involved an allegation that a CCDOC correctional officer threatened a resident and that the officer smokes cannabis. OPR's investigation revealed that the subject was not an employee of the County and therefore administratively closed the case. Based on its review, the OIIG concluded that OPR took appropriate action in response to the complaint.

OPR2024-0061/IIG24-0078

This complaint involved allegations that Cook County Sheriff's Office (CCSO) police officers aggressively grabbed the complainant's boyfriend outside a liquor store and that the purported use of force caused partial paralysis to the boyfriend's arm. OPR reviewed body worn camera (BWC) video which provided evidence that Sheriff's personnel did not grab or handcuff the individual. Based on its review, the OIIG concluded that OPR took appropriate action in response to the complaint. However, the OIIG found OPR's Investigation Initiation Form lacks pertinent information in order to track OIIG referrals. There are no dates indicating when the complaint was received by OPR and no date listed as to when OPR initiated their investigation into the matter.

MI2025-0116/IIG25-0477

This complaint involved allegations that conditions at Cook County Jail (CCJ) related to staff shortages and failing facility infrastructure have created emotional, health, safety, sanitation, dietary, and medical care concerns. OPR referred this complaint to the CCDOC. Based on its review, the OIIG concluded that OPR's Investigation Initiation Form lacks pertinent information in order to track OIIG referrals. There are no dates when the complaint was received by OPR, no date listed as to when OPR initiated their own investigation into the matter, and no follow-up with CCDOC to ascertain what CCDOC did with the referral.

OPR2023-0572/IIG23-0630

This complaint involved allegations that a complainant did not receive the same amount of United States Currency when he was released from CCJ as he possessed when he was arrested by the Illinois State Police (ISP). OPR referred the case to the ISP and kept its own case open. After all evidence was reviewed, to include BWC, it was determined that the subject was processed with less than he claimed he had, that he utilized some of the money to pay three bonds and that the remaining sum was returned to him via check. Based on its review, the OIIG determined that although the allegations were addressed, there does not seem to be any consistency with how OPR

opens a referral from the OIIG. Forms that were utilized in previous referrals were not utilized in this referral. In certain cases, it is difficult to follow timelines and ensure the referrals are being handled appropriately.

INF2025-2464/IIG25-0396

This complaint involved allegations that on several occasions when the complainant contacted the CCDOC to inquire about her relative's (Cook County Jail inmate) extradition status, the CCDOC personnel on the call were rude, disrespectful, and unhelpful. OPR closed the case due to the inmate having been extradited to Wisconsin. There was no attempt to identify the CCDOC personnel who interacted with the complainant. Further, OPR did not conduct interviews for this matter. Based on its review, the OIIG determined OPR should have done more to address the complaint such as address the alleged lack of professionalism by CCDOC staff.

MI2025-0112/IIG25-0463

This complaint involved allegations that a CCDOC inmate being transported to court was not afforded the opportunity to use the restroom and subsequently soiled himself as a result of the denial. OPR referred the complaint to management, and the investigation revealed that no corrections officer with the listed name of the accused was assigned to that division. Furthermore, there was insufficient evidence to substantiate or repudiate the allegation. Based on its review, the OIIG determined that the complaint was handled appropriately and timely based on the information provided by the complainant. The OIIG identified the appropriate documentation regarding the referral to management included in the file, along with management's findings and a closure letter to the complainant.

NF2025-3087/IIG25-0638

This complaint involved allegations that a CCDOC employee was alleged to have acted unprofessionally during a phone conversation with an individual who called multiple times to request an update on when a CCDOC inmate was going to be released. OPR initiated an investigation and called the complainant, but the complainant could not provide the name of the employee with whom she spoke, which made it difficult to identify the employee. OPR sent the complaint to management in the CCDOC for informational purposes. Management responded by redistributing the Sheriff's policy on telephone courtesy to all employees. All appropriate documentation, including management's response, was in the OPR file. Based on its review, the OIIG concluded that OPR took appropriate action in response to the complaint.

INF2026-0323/ IIG25-0680

This complaint involved allegations that a CCDOC correctional officer was allegedly taking commissary food from inmates. The complainant provided the OIIG with the officer's last name. OPR initiated an investigation but could not find an employee by that name (or similar name) and logged the complaint as informational. While the matter appears to be properly closed,

there are no closing documents in the file, only a handwritten note on the initiating form regarding the results of the name search for the employee.

Based on its review, the OIIG concludes that OPR did not take the proper actions with this complaint. OPR should have included documentation that a name search was conducted. Additionally, OPR could have sent the complaint to management in the CCDOC for informational purposes so management could have redistributed applicable policies with an appropriate warning to employees. A complaint logged for informational purposes can provide an opportunity for management to notify employees that a complaint was received and serve as a reminder that misconduct will not be tolerated and could lead to discipline.

OPR2023-0336/IIG23-0340

This complaint involves allegations that during a domestic dispute, responding CCSO police officers were unprofessional and failed to follow state law. OPR initiated this investigation and reviewed the BWC video and the incident report. OPR determined that BWC video showed that the officers were professional throughout their interactions with both parties involved in the domestic dispute and discussed options with both parties, who ultimately signed refusals to prosecute.

The complainant further alleged that after she signed the refusal to prosecute and returned home, her husband returned home shortly thereafter. The complainant alleged that one of the officers came to the home and broke up another disturbance. The complainant alleged that the officer stated that he "was going to turn his camera off" for her husband's "protection." She alleged that her husband ultimately left and she was given a police report. The officer's report ends with a note that the complainant will return to the residence while her husband will go to his father's house for the night.

Based on our review, OPR's report properly addresses the portion of the complaint that alleges that the officers were unprofessional and failed to provide proper police service. However, it appears that OPR did not contemplate the portion of the complaint that alleged that the officer turned off his camera. OPR should have documented its attempt, if any, to investigate that portion of the complaint, including interviewing the officers in the absence of BWC.

OPR2023-0550/IIG23-0705

This complaint involves allegations that the Chicago Police Department (CPD) arrested a CCSO employee for battery. OPR initiated this investigation after CPD notified it that a CCSO employee had been arrested for battery. CPD notified both the OIIG and OPR on the day of the arrest. The OIIG made a referral to OPR, but OPR had already initiated its investigation in addition to de-deputizing the officer. The following day, OPR requested all reports and BWC video. Further, there were Sheriff's officers who confiscated the officer's service weapon. The officer resigned from CCSO nine days later, and OPR closed the case administratively. Based on its review, the OIIG concluded that all appropriate documentation appears to be in the file, and the referral was addressed appropriately in all respects.

OPR2024-0114/IIG24-0249

This complaint alleges that a CCSO officer was unprofessional in a public recording and violated departmental policy. OPR received the complaint prior to the OIIG referral and viewed the video of the incident. Based on the video, OPR determined that there was no misconduct and "administratively closed" the complaint. Based on its review, the OIIG concluded that the Sheriff's officer was not in the proper CCSO uniform and did not have identification or a badge clearly visible to the public. The officer was wearing a zippered sweater with no CCSO emblem. Additionally, the officer's sweater covered her uniform shirt and badge. OPR failed to address the uniform infraction and there is no indication that the officer was interviewed. Although the complaint focused on the officer's purported unprofessional conduct, the video clearly illustrates the officer being out of uniform, yet OPR did not address the issue. Based on its review, the OIIG concluded that OPR did not conduct a thorough and complete investigation in connection with this complaint.

DR2023-0451/OIIG23-0525/0527

This complaint involves multiple allegations against a CCSO officer. The complainant alleged that the CCSO officer forced his way into the complainant's home and pushed him against the washing machine. Further, the complainant alleges they sustained an injury. Additionally, the CCSO officer allegedly remained aggressive and shouted orders and unlawful commands. OPR referred the case to the CCSO Police Department (Squad 2). Squad 2 determined there was no misconduct after it reviewed the BWC video and evidence. Based on its review, the OIIG concluded that although OPR appropriately referred the case to an internal CCSO investigatory body, there does not seem to be any consistency with how OPR opens a referral from the OIIG. Forms that were utilized in previous referrals were not utilized in this referral. It is difficult to follow timelines and ensure the referrals are being handled appropriately.

OIIG Findings and Conclusions

The OIIG's review concludes that OPR generally takes appropriate action in response to complaints and referrals; however, several investigations revealed recurring deficiencies in investigative consistency, documentation, and case management. With the exception of one OIIG referral,[1] these deficiencies do not necessarily indicate that OPR's ultimate dispositions were incorrect; rather, they demonstrate a need for greater uniformity and accountability in the investigative process.

1. During 2023 through 2025, the OIIG referred 164 complaints related to the Sheriff's Office to OPR for resolution. During our review, the OIIG found that OPR could not locate 3 (1.8%) of the 164 OIIG referred complaints during the period in review. Additionally, the OIIG found that OPR appropriately handled 9 (60%) of the 15 complaints. However, the OIIG found that OPR did not appropriately investigate 5 (33.3%) of the 15 complaints.

[1] *OPR2024-0299/IIG24-0538:* This complaint involved allegations that a CCDOC correctional officer was in possession of a stolen firearm and also reporting to work under the influence of alcohol or drugs.

Furthermore, the OIIG found that OPR did not sufficiently provide an adequate audit trail for 5 (33.3%) of the 15 complaints.

2. Complaint OPR2024-0299 involved allegations that a CCDOC correctional officer was in possession of a stolen firearm and also reported to work under the influence of alcohol or drugs. OPR administratively closed the case because they could not contact the complainant. Based on its review, the OIIG has concerns that interviews were not conducted, locker search requests were not made, or a just-cause breath analysis or drug tests were not performed on the officer.

3. Complaint INF2025-2464 involved allegations that on several occasions when the complainant contacted the CCDOC to inquire about her relative's (Cook County Jail inmate) extradition status, the CCDOC personnel on the call were rude, disrespectful, and unhelpful. Based on its review, the OIIG determined OPR should have done more to address the complaint such as address the personnel's alleged lack of professionalism.

4. Complaint INF2026-0323 involved allegations that a CCDOC correctional officer was allegedly taking commissary food from inmates. The OIIG determined OPR should have done more to address the complaint.

5. Complaint OPR2023-0336 involved allegations that during a domestic dispute, responding CCSO police officers were unprofessional and failed to follow state law. Based on its review, the OIIG concluded that OPR's report does not address the portion of the complaint that alleges that the officer turned off his camera.

6. Complaint OPR2024-0114 alleged that a CCSO officer was unprofessional in a public recording and violated departmental policy. OPR failed to address the uniform infraction and there is no indication that the officer was interviewed. Based on its review, the OIIG concluded that OPR did not conduct a thorough and complete investigation in connection with this complaint.

7. OPR did not consistently document when complaints were received, investigation start dates, investigative steps, follow-up for referrals, or the basis for administrative closures. Several matters also reflected insufficient investigative follow-up, including failures to interview relevant witnesses, identify potential subjects, address allegations apparent from available evidence, or document attempts to investigate allegations for which evidence was unavailable.

8. Inconsistent use of case-opening and referral documentation made it difficult to establish timelines, determine whether appropriate investigative steps were taken, and independently verify the basis for a case disposition.

OIIG Recommendations

Based on the foregoing, the OIIG recommends that OPR:

1. Implement a standardized case-opening and referral process requiring documentation of the date a complaint is received, the date an investigation is initiated, the referral date, and the investigative entity responsible for the matter. (Reference: OPR2024-0061, MI2025-0116, OPR2023-0572, DR2023-0451)

2. Implement a formal closing audit checklist requiring investigators to document all allegations, investigative steps taken, evidence reviewed, outstanding investigative leads, and the basis for the final disposition. (Reference: All listed cases)

3. Ensure all allegations are specifically addressed, including allegations identified through video, reports, or other evidence even when they are outside the primary allegations presented by the complainant. (Reference: OPR2024-0299, OPR2023-0336)

4. Establish consistent procedures for informational complaints and external referrals, including notification to the appropriate department management and documentation of any management response before closure. (Reference: INF2025-2464, INF2025-3087, INF2026-0323)

5. Consistently conduct thorough investigations for each complaint, including interviews, searches, review of available evidence, and documented efforts to identify potential subjects. (Reference: OPR2024-0299, OPR2024-0061, MI2025-0116, OPR2023-0572, INF2025-2464, INF2026-0323, OPR2023-0336, OPR2024-0114, DR2023-0451)

6. Send all complaints logged as "informational" to the appropriate department's management and that management's response should be documented in the OPR file prior to closure. (Reference: INF2026-0323)

Finally, in accordance with Section 2-289(d)(2) of the OIIG Ordinance, we respectfully request that any response to this OIIG report be submitted to this office within 10 business days. Thank you for your consideration of this issue. Of course, please do not hesitate to contact me if you have questions regarding this or any other matter.

Very truly yours,

Tirrell J. Paxton
Independent Inspector General

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SHERIFF'S OFFICE OF COOK COUNTY, ILLINOIS
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VIA ELECTRONIC MAIL ONLY

September 29, 2026

Tirrell J. Paxton, Inspector General
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RE: CCSO Response to OIIG Public Statement No. IIG26-0074 (OIIG Referrals to OPR)

Mr. Paxton,

The Cook County Sheriff's Office (CCSO) submits this letter and attached exhibits in response to a letter from the Office of the Independent Inspector General (OIIG) dated September 15, 2026, regarding the "OIIG Public Statement No. IIG26-0074 (OIIG Referrals to OPR)" [the "Public Statement"]. The OIIG indicates he will release the Public Statement on September 29, 2026. Since the OIIG's inception, the CCSO has worked in cooperation with the OIIG on a variety of investigations and issues including, most recently, dozens of investigations into potential fraud from the PPP loan programs. For years, the CCSO has accepted hundreds of complaints referrals from the OIIG and handled them with the seriousness and thoroughness those complaints require and deserve. Given this cooperative work relationship, the CCSO was surprised to receive the Public Statement and confused by the substance of the OIIG's findings.

The CCSO is puzzled by these findings and criticisms after decades of meaningful cooperation, coordination, and collective effort to make our workplaces and County function efficiently and safely. In that spirit, the CCSO complied completely with the OIIG's review process and requests for information. While confused by the OIIG's findings, the CCSO takes this opportunity to provide substantive information to the OIIG and the public about the purpose and results of its own internal affairs operations and the shortcomings of the OIIG's review.

The Office of Professional Review

The CCSO receives thousands of complaints of potential employee misconduct annually. Through established procedures and policy, the CCSO processes, reviews, and investigates all complaints

received regardless of the source of those complaints. This mandate to properly manage and complete internal affairs investigations flows from our duty to ensure the public trust of our operations; to operate our numerous departments and units with an efficiency, productivity, and care required of a publicly funded office; to comply with all state and federal law; and to meet the obligations as an employer and the requirements inherent in managing sworn correctional, peace and law enforcement officers.

The CCSO takes this job seriously to maintain safe, secure, and effective operations. To ensure this mandate is fulfilled, the CCSO maintains a large internal affairs unit, the Office of Professional Review or "OPR," to timely investigate claims of employee misconduct independently and to ensure misconduct and mismanagement are addressed accordingly. OPR staffs 26 sworn investigators and five administrative and support personnel. OPR fielded 3,661 complaints of misconduct against staff last year and 1,992 complaints this year to date. Complaints are submitted by civilians, detained individuals, attorneys, staff, external agencies such as the OIIG, internal departments such as HR and the Use of Force Review Unit, and CCSO management. Since January 1, 2026, OPR has taken an average of 67 days to receive, process, and investigate through closure the complaints it receives. Currently, OPR is directed and overseen by a former Illinois State Police colonel who managed ISP's internal affairs division for 19 years.

OPR operates under its Standard Operating Procedures ("SOPs") which address all aspects of OPR's operations from inputting complaints into a case management system to investigative tactics and processes to ensuring employees' legal and CBA-related due process requirements are met. These SOPs, while amended over time, were established and reviewed by federal court-appointed monitors and the Department of Justice and *Shakman* administrators. In addition, the CCSO purchased and maintains a case management system, *IAPro*, to manage the thousands of complaints, investigations, and outcomes handled by OPR annually.

OPR will always process and investigate complaints referred by the OIIG as appropriate and expects the OIIG to provide ***all*** CCSO-related complaints received in a timely manner for OPR to meet its legal mandates and ensure workplace safety and security.

OIIG Complaint Referrals, Oversight Functions, Investigations and the OPR Review

For some time, the OIIG has referred hundreds of complaints that its office receives to the CCSO. That referral process, managed solely by the OIIG, is, by any definition, informal. As illustrated in the email dated February 13, 2026, attached as Exhibit A, the OIIG sends an email to the Executive Director of OPR with more than a dozen or so collected "complaints" of alleged misconduct. The OIIG, generally, as shown in the example, indicates the complaints are being referred to the CCSO to be handled as it "deems necessary" and that the OIIG considers them closed.

At no time in the past three years or earlier has the OIIG categorized these complaints by type or "seriousness," indicated an expectation that our intake process track referring agency information or that the OIIG would question "whatever action [OPR] deem[ed] necessary." The OIIG simply "consider[ed] these matters closed."

Yet, on February 19, 2026, the OIIG wrote the CCSO a letter (the Request Letter) requesting, pursuant to Section 2-285(d) of the OIIG Ordinance, a list of all referrals sent to OPR over the past three years, the final disposition of those referrals, and "accompanying documentation [undefined] that reflects or explains the final disposition." *See* Exhibit B. Section 2-285(d) of the OIIG's enabling ordinance which requires "every employee, department and elected official to cooperate with the Independent Inspector General ***in any investigation*** or hearing. Each department's premises, equipment, personnel, books, records and papers shall be made readily available to the Independent Inspector General." (emphasis added). Further, the Request Letter states: "The OIIG Ordinance grants our office both the responsibility and the authority ***to review and investigate*** matters pertaining to the operations of the Cook County Sheriff's Office."

This Request Letter, however, was not predicated on any investigation. Instead, according to the OIIG in February, the "request should not be interpreted as a lack of confidence in the manner in which the Office of Professional Review handles referrals or conducts its internal processes. Rather, as part of ***our mandated oversight function***, we are obligated to obtain reasonable assurance that the OIIG is fulfilling its responsibilities and that all referred matters are being addressed appropriately. This cooperative exchange of information is essential to maintaining transparency, accountability, and the integrity of ***the County's oversight framework***." (emphasis added). The CCSO has always supported this cooperative working relationship. Nevertheless, there is no reference in the OIIG's enabling ordinance that creates an oversight framework or oversight function and such oversight suggested by the Public Statement would exceed the OIIG's authority.

Upon receipt of the Request Letter, the CCSO questioned the OIIG's reference to oversight functions and requested clarity and a citation in the enabling ordinance that authorized it. The OIIG did not provide any clarity or a citation. Instead, the OIIG now maintains that this process is a "review." At a meeting on September 8, 2026, between the OIIG and the CCSO, which the OIIG called an "Exit Conference," the OIIG, when questioned, said the CCSO was not under investigation and the forthcoming Public Statement concerns "a review of a program."

The OIIG's forthcoming Public Statement notably abandons any reference to an "oversight" role. The Public Statement itself says it was written "relative to a review to assess" OPR's handling of complaints.

While confused by this shifting explanation, the CCSO fully complied with the Request Letter and provided all requested materials that were identified in the letter. OPR's case management system does not track, as a separate data point, a referring agency of a received complaint because all complaints are treated as the same whether they are submitted anonymously or by another agency. As such, the CCSO requested the OIIG to provide a list of the referrals that they had a record of, for the time period at issue, to ensure a complete list of referrals was accounted for and responded to. For reasons we are unclear of, the OIIG would not give us this basic information so as to ensure completeness.

OIIG's Review Does Not Reference Foundation and Standards

The OIIG's actual review of OPR's handling of the referred complaints is puzzling. As explained below, the OIIG makes findings without basic understandings of OPR's systems and processes and without a clear investigative method of their own. The OIIG initiated a "review of OPR's handling" of referred complaints "(t)o ensure that these referrals were received, processed, and resolved in an ***appropriate manner***." (emphasis added). "Appropriate manner" is undefined and unqualified. Later in the Public Statement, the OIIG concludes "OPR generally takes appropriate action in response to complaints and referrals; however, several investigations revealed recurring deficiencies in investigative consistency, documentation, and case management." Ultimately, the OIIG found that OPR did not "appropriately investigate" five complaints [out of 15 cases reviewed] and did not "sufficiently provide an adequate audit trail" for five complaints. None of this is accurate or based on fact.

The CCSO will address the individual investigations at issue below. As an initial matter, however, the following points, each related to the next, regarding the "methodology" and shortcomings of the OIIG's review and findings, are identified and addressed:

- For years, the OIIG used the informal referral process <u>they chose</u> via email and OPR thoroughly processed and reviewed every complaint received. Importantly, the OIIG never suggested there was an expectation that *their* referrals, though closed, need to have an "adequate audit trail," including that OPR sufficiently track where a complaint originated or that certain documentation be provided upon request. At no time since we have been working with the OIIG has the OIIG requested or expected OPR to keep a list of the referrals they sent to us for handling.
- The <u>OIIG did not explain what questions they were asking</u> but OPR provided what was responsive to that request. The Request Letter only asked for "accompanying documentation that reflects or explains the final disposition" of cases it referred to OPR. So, while requesting only information of the final disposition, the OIIG made findings about unrelated things like "establishing timelines," "inconsistent use of case-opening and referral documentation," "when complaints were received, investigation start dates, investigative steps, follow-up for referrals, or the basis for administrative closures." The CCSO had no notice or understanding that any of these aspects were of concern given the years of working together without the OIIG expressing any hint of concern.
- Confusingly, <u>the OIIG did not interview a single OPR or CCSO employee</u> regarding this review prior to drafting the Public Statement and making his findings. In fact, not a single request for follow-up or clarification from the OIIG was made to this office about this review.
- <u>OPR tried to provide follow-up but did not receive a response from the OIIG</u>. The OIIG stated at the Exit Conference that *four* referred complaints were ignored or lost by OPR, which was a big concern of theirs, and that concern materialized on page one of the Public Statement: "OPR did not investigate three complaints nor did OPR explain whether these complaints were resolved." On September 15, 2026, two days *before* receiving the Public Statement from the OIIG, OPR emailed the OIIG explaining that three of these complaints were never sent to OPR and one was not accounted for due to a typo in the OIIG's list but had been reviewed by OPR. *See* Exhibit C attached. This clarifying information was not included in the Public Statement.

- What is even more puzzling is that the OIIG reviewed OPR's handling of their complaints without the application of any investigative standard. The CCSO is evaluated by numerous agencies on local, state, and federal levels [i.e. OSHA, EEOC, IDHR, Cook County Department of Human Rights and Ethics, the U.S. District Court, IDOC, Illinois Labor Board, many more] and these evaluations are based on accepted investigative standards. Any review of this office's management of misconduct complaints must be made against a standard, policy, agreement, or law to compare and analyze. Yet, the OIIG cites no reference point to gauge or evaluate OPR's protocols, operations, or decisions. The CCSO is confused by this as such a review should be evaluated by some understood standards and not personal opinion.
- That leads to another important point. The CCSO is an employer, a custodian of detained persons, a police force, and the chief law enforcement officer of our county. The CCSO has obligations to ensure misconduct complaints are processed and investigated with timeliness and reasonable care pursuant to Illinois law [i.e. the Human Rights Act, OSHA, ILRA, the Safety Act], federal law [claims under §1983, Title VII and *Monell*], collective bargaining agreements [just cause standards for discipline], Administrative Codes, and other sources. The OIIG approaches complaints only from the purpose conferred to it by the County Board. To judge this office by what the OIIG thinks is appropriate, without reference to an established standard.
- If the OIIG is in fact using a standard or other reference for this review, it is not identified in the Public Statement which makes it impossible to properly respond to it as required in Section 2-289(d)(2).
- At the Exit Conference, the OIIG was apparently unaware that OPR utilized a case management system, called *IAPro*, to process and track its complaints and investigations. As explained above, this system has been in place for years, contains pertinent information and progress on each case, and is essential to the operations and decision-making of OPR. Though the CCSO explained this at the conference, the OIIG made no effort to review it or understand what information it held prior to issuing the Public Statement which, ironically, critiques OPR's case management processes.
- The CCSO also told the OIIG that OPR has SOPs at the Exit Conference. As far as the CCSO knows, the OIIG neither requested nor reviewed OPR's SOPs prior to drafting their Public Statement. Either way, the Public Statement does not reference or acknowledge them in any manner. The SOPs specifically address all aspects of OPR's operations including case initiation, investigative protocol, documentation, and case management. These are all aspects of OPR's operations that the OIIG now criticizes. For example, the OIIG recommends "implement[ing] a standardized case-opening and referral process," yet the OIIG didn't review, acknowledge, or reference Chapter 4 of OPR's SOPs, entitled "Handling Complaints," or Chapter 5, "Management of Complaints," before coming to this conclusion. The CCSO doesn't understand why the OIIG didn't review the SOPs and understand them before issuing this Public Statement and his findings.
- The OIIG did not review or cite to a single policy, such as the Code of Conduct or Drug and Alcohol-Free Workplace Policy, or CBA, all of which provide procedural and substantive language related to "for cause" discipline and are relevant here. The OIIG does not cite any CCSO policy or CBA.

With this background on the CCSO's concerns and the OIIG's methodology, a review of the individual case assessments, where the OIIG found fault in OPR's investigative thoroughness, steps, or actions, can be made in the proper context. The CCSO responds to each such case assessment as follows.

Complaint OPR2024-0299

- OIIG received complaint on September 7, 2024.
- OPR received notice of complaint on September 17, 2024 (10 days lapsed).
- Complaint: a correctional employee was coming to work drunk, is an alcoholic and was in possession of a stolen firearm.
- OIIG found:
    - "Based on its review, the OIIG has concerns that interviews were not conducted, locker search requests were not made, or a just-cause breath analysis or drug tests were not performed on the officer."[1]
- CCSO Response:
    - OPR opened an investigation into this complaint, assigned an investigator and supervisor, and worked on the investigation through closure. The claims against all officers were not sustained.
    - Complaint was made by a person who identified themselves as the daughter-in-law of the CCSO employee's deceased son. This was determined to be false.
    - Complainant provided a disconnected phone number and could not be reached by phone.
    - Complainant did not provide a date of occurrence, timeframe, or other specific information related to the alleged misconduct.
    - OPR Investigator attempted to contact the complainant by phone and email with negative results. There was no evidence corroborating the complaint.
    - Without a timeframe, OPR determined further interviews were not merited and could not lead to additional evidence. The Jail is a 24/7/365 operation. Officers and supervisors rotate daily and, without a specific date, it is not possible to know who would have relevant information.
    - OIIG does not explain why the lack of locker searches was inappropriate. Officers are searched upon entrance to the jail compound and firearms are prohibited past the external posts. A firearm or alcohol would not be in a locker nor was there any reason to believe they would.
    - OIIG does not explain how OPR would have justification to force an officer to take a breathalyzer test pursuant to Section 110.7.2 of the CCSO Policy 110: Drug and Alcohol-Free Workplace policy. That policy requires the CCSO to have *reasonable suspicion*, based on articulable and objective facts, that the employee's "ability to perform the functions of the job is

[1] At the Exit Conference, the OIIG asked if the CCSO has a policy on "just-cause" breathalyzer tests on employees. Upon learning that the CCSO does, the OIIG did not request this policy or cite to it in their report. Had they reviewed it, they would have determined we could not force this officer to take such a test in these circumstances. Yet, the review criticizes OPR's failure to force the test.

impaired, or that the member's ability to perform their job safely is reduced." Considering the OIIG did not send the complaint to OPR for ten days, a complainant who could not be contacted, and a lack of a specific timeframe, OPR had no known objective facts that the officer was impaired to support the test.
    - This policy is actively enforced throughout the CCSO and if an employee is believed to be actively impaired by drugs or alcohol, such testing is utilized and administrative steps are immediately taken to ensure a safe workplace.

Complaint INF2025-2464

- OIIG did not provide the date they received this complaint.
- OPR received notice of complaint on September 8, 2025.
- Complaint: complainant said on several occasions they contacted the CCDOC regarding a relative's extradition status, the Jail employees were rude, disrespectful and unhelpful.
- OIIG found:
    - "OPR should have done more to address the complaint such as address the personnel's alleged lack of professionalism."
    - "There was no attempt to identify the CCDOC personnel who interacted with the complainant. Further, OPR did not conduct interviews."
    - "OPR closed the case due to the inmate having been extradited to Wisconsin."
- CCSO Response:
    - The complainant did not provide any contact information for themselves or any dates, times, or CCDOC telephone numbers where this alleged rude and disrespectful behavior took place.
    - Without a date, phone number, employee identifier, or the ability to contact the complainant, OPR could not proceed in investigating the allegation.
    - OPR closed this matter because there was not enough information to proceed, not because the detained person was extradited to Wisconsin.
    - OPR is not aware of any investigative standard or guideline that would require further investigation in these circumstances. OIIG provided none.

Complaint INF2026-0323

- OIIG received complaint on October 23, 2025.
- OPR received notice of complaint on February 13, 2026 (a lapse of 111 days).
- Complaint: a CCDOC correctional officer was allegedly taking commissary food from inmates.
- OIIG found:
    - "OPR should have done more to address the complaint."

  - "While the matter appears to be properly closed, there are no closing documents in the file, only a handwritten note on the initiating form regarding the results of the name search for the employee."
  - "Based on its review, the OIIG concludes that OPR did not take the proper actions with this complaint. OPR should have included documentation that a name search was conducted. Additionally, OPR could have sent the complaint to management in the CCDOC for informational purposes so management could have redistributed applicable policies with an appropriate warning to employees."
- CCSO Response:
  - The complaint was made anonymously with no contact information, specific dates, locations, or any other information regarding the allegations besides an employee's last name.
  - OPR reviewed and evaluated the information provided and this case was closed because no one with the identified last name was employed by the CCSO.
  - The OIIG does not cite any procedural standard or guidelines to suggest "OPR should have done more" or what was done was "inappropriate."
  - The OPR SOPs do not require "closing reports or documents" when a complaint is as threadbare as this and the complainant is not reachable.
  - The OIIG's suggestion that OPR "could have" sent the complaint to DOC management for them to redistribute applicable policies to staff is confusing. First, the warning is "don't steal" which is self-explanatory, obvious and generally covered in trainings (follow the law). Second, the OIIG does not explain, again, how *not* doing this is inappropriate. Third, OPR uses discretion when referring such matters to Departments and this complaint did not warrant it. This critique is odd, unfounded and unnecessary.

Complaint OPR2023-0336

- OIIG received complaint on April 19, 2023.
- OPR received notice of complaint on May 3, 2023 (a lapse of 14 days).
- Complaint: complaint that police officers responding to a domestic dispute were unprofessional and failed to follow state law, specifically alleging one officer stated that he "was going to turn his camera off for her husband's 'protection.'"
- OIIG found:
  - "OPR's report properly addresses the portion of the complaint that alleges that the officers were unprofessional and failed to provide proper police service."
  - But "OPR should have documented its attempt, if any, to investigate whether [the officer turned off his camera], including interviewing the officers in the absence of BWC."
  - OPR failed to "ensure all allegations are specifically addressed" and "consistently conduct thorough investigations for each complaint."

- CCSO Response:
  - OPR opened an investigation into this complaint, assigned an investigator and supervisor, and worked on the investigation through closure. The claims against all officers were not sustained.
  - Each claim submitted by the complainant was determined to be false as was explained in the closing investigative report.
  - All BWC video of the officers on scene was reviewed, and each was wearing and utilizing BWCs. None of the BWCs were found to have captured an officer saying they were turning off their BWC for any reason nor were any BWCs abruptly turned off during the incident.
  - The OIIG did not find that the OPR's investigation was inaccurate or failed to properly address actual misconduct.
  - The OIIG did not find that the failure to address this single allegation specifically violated an investigative standard or guideline and certainly did not and cannot say this investigation represents "inefficient or wasteful" management.

Complaint OPR2024-0114

- OIIG received complaint on April 10, 2024.
- OPR received an anonymous complaint on April 11, 2024.
- OPR received notice of the OIIG complaint on May 29, 2024 (a lapse of 49 days).
- Complaint: a CCSO officer was unprofessional in a public recording and violated departmental policy.
- OIIG found:
  - "The Sheriff's officer was not in the proper CCSO uniform and did not have identification or a badge clearly visible to the public."
  - "OPR failed to address the uniform infraction and there is no indication that the officer was interviewed. Based on its review, the OIIG concluded that OPR did not conduct a thorough and complete investigation in connection with this complaint."
  - The OIIG does not opine on how OPR handled the significant allegations of unprofessional behavior and "race baiting" choosing instead to focus on their uncited position that a uniform violation was not investigated.
- CCSO Response:
  - OPR investigates complaints regarding major cause or significant misconduct. Complaints of minor infractions such as uniform issues are not investigated by OPR.
  - OPR reviewed the video and a detailed timeline was completed. During the video the deputy showed her badge and duty weapon to identify herself as a sworn employee. There was no misconduct identified.
  - OPR had opened an investigation, collected pertinent evidence, completed its investigation, and closed the case **before OIIG even referred its complaint to OPR.**

- The OIIG did not find that the failure to address this single allegation specifically violated an investigative standard or guideline and certainly did not and cannot say this investigation represents "inefficient or wasteful" management.
- OPR referred the matter to the Department for further review on the uniform issue.
- OPR opened an investigation into this complaint, assigned an investigator and supervisor, and worked on the investigation through closure. The claims against all officers were not sustained.

The Cook County Sheriff's Office has always respected the authority of the OIIG and has worked cooperatively with the office for many years. Never has the OIIG maintained they have the authority to conduct a review of OPR or issue a Public Statement against the CCSO. The OIIG is not authorized to conduct "reviews" by its enabling ordinance nor is it authorized to issue Public Statements concerning "reviews." As indicated above and in Section 2-283, the OIIG's purpose is "to detect, deter and prevent corruption, fraud, waste, mismanagement, unlawful political discrimination or misconduct in the operation of County government." In Section 2-284, the County Board conferred certain powers, authority, and functions upon the OIIG to accomplish its purpose. The CCSO is confused why the OIIG has conducted this review at all given how long this referral process has been in place and the lack of any actual complaints related to it.

To be clear, the OIIG's authority, like that of any administrative body, is defined by the text of the ordinance that creates it. *Schalz v. McHenry County Sheriff's Department Merit Comm'n,* 113 Ill.2d 198, 202 (1986) (Administrative agency is "a creature of statute and has no general or common law powers"). Powers not expressly granted, or necessarily implied, may not be assumed and any actions it takes must be authorized by statute. *See Vuagniaux v. Department of Professional Regulation,* 208 Ill.2d 173, 186 – 187 (2003) ("Any power or authority claimed by an administrative agency must find its source within the provisions of the statute by which the agency was created").

It is clear the authority conferred by the County Board is to conduct investigations and *only* investigations. Sections 2-284(1)(a) and (c), 2-284(2), 2-284(3), 2-284(4), 2-284(5), 2-284(6), 2-285(a), 2-285(d) all reference or are predicated on the OIIG's authority "to investigate." Quarterly reports, described in Section 2-287, only reference an accounting of investigations. More importantly, Section 2-288 details the procedure and requirements for Summary Reports which are to be created at the "conclusion of any investigation" and shall be submitted to the elected official impacted. None of these Sections reference "reviews" or "oversight functions."[2]

[2] It is helpful to compare the County ordinance language, granting the OIIG with *only* investigative authority and *not* review authority, against the City of Chicago's enabling IG Ordinance. The City ordinance specifically provides:

> … the Inspector General shall have the following powers and duties: … (c) To promote economy, efficiency, effectiveness and integrity in the administration of the programs and operations of the city government **by reviewing programs,** identifying any inefficiencies, waste and potential for misconduct therein, [and] … (e) To request information related **to an investigation, audit or**

The OIIG cites Sections 2-289(c)(2) and 2-289(d) as the source of its authority to issue the Public Statement of the review. The relevant language of Section 2-289 is as follows, with emphasis added:

> ***Investigatory files and summary reports*** concerning alleged corruption, fraud, waste, mismanagement, unlawful political discrimination or misconduct by any person ***shall be confidential except as provided below*** …
>
> (c) The Independent Inspector General ***is authorized to issue public statements concerning***: …
>
> (2) ***An investigation that concerns inefficient or wasteful management***, as opposed to individual misconduct or illegality.
>
> (d) ***Before issuing a written public statement pursuant Section 2-289(c)(2)*** of this Ordinance, involving an OIIG review, inspection, or audit that results in a finding of inefficient or wasteful management the Independent Inspector General must first:
>
> (1) ***Share the summary report and written public statement*** with the head of the department or bureau and elected official to whose office the investigation pertains; …

As the Ordinance explains, issuing a public statement is the exception to the OIIG's confidentiality mandate and requires 1) an investigation that 2) finds inefficient and wasteful management and 3) the summary report of that investigation that is shared with the elected official. None of those requirements are met here. There is no investigation; the OIIG does not find inefficient or wasteful management; and the OIIG has not generated a summary report to share with the CCSO. The OIIG's actions are unauthorized by the Ordinance.

While not ignoring the significance of this unauthorized action by the OIIG, the CCSO still cooperated with the OIIG, as it always has, with regards to this review. The record is clear that the CCSO took every complaint received and handled it appropriately and fully complied with this review.

Response to OIIG Recommendations

As expressed above, the OIIG's review was originally predicated on a "oversight function" that does not exist and is not based on investigative standards, guidelines, or other benchmarks. The OIIG criticized OPR's case management processes and investigative procedures without

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> **program review** from any employee, … *See 2-56-030 Inspector General – Powers and duties [emphasis added].*

The County's Ordinance only authorizes investigations: to investigate in 2-284(2); to promulgate rules for the conduct of investigations in 2-284(3); to request information for the purpose of investigation in 2-284(4); to require employee cooperation in the conduct of investigations in 2-285(a) and (d); to issue subpoenas related to an investigation in 2-286. The absence of a review power is obvious yet ignored by the OIIG.

reference to or evaluation of OPR's existing case management system or standard operating procedures. Finally, the actual review of our handling of the complaints was inaccurate, incomplete, and included no follow-up or conversation with this office prior to the issuance of the Public Statement.

As such, the CCSO rejects every Recommendation asserted by the OIIG. The OIIG did not possess the requisite information, data, understanding, wherewithal, and authority to make these recommendations. Nevertheless, the CCSO will always, as it always has, cooperate with the OIIG and, in the spirit of cooperation, suggests the following administrative measures to avoid any misunderstandings or miscommunication in the future.

1. Establish a formal process for complaint referrals to OPR whether that be an MOU, which the CCSO suggested in February and was rejected by the OIIG, or expressed procedure.
2. Refer complaints on a timely basis to ensure the CCSO, an employer and custodian, may take appropriate actions to ensure a safe and secure working environment. Referrals from the OIIG are routinely made several months after their original receipt, with some referrals to OPR delayed over half a year. This is outrageous.
3. Seek and utilize clarifying information provided by your county partners to ensure reports and recommendations are accurate and substantiated by evidence and knowledge.
4. Use standards of review that are understood by all involved parties to evaluate procedures of other agencies.

We look forward to maintaining a professional working relationship with the OIIG and, as we always have, want to rid the County of fraud, waste, mismanagement, unlawful political discrimination, misconduct in the operation of County government, or to deter and prevent corruption. The CCSO has worked hard to eliminate these very things from the Sheriff's Office and will always support investigations into any complaint that taxpayer dollars are not being spent appropriately or erodes their trust in government.

Sincerely,

Nicholas S. Scouffas
General Counsel

Exhibit A

Referrals from Cook County OIIG

From:	Jennifer Foether (Inspector General) <Jennifer.Foether@cookcountyil.gov>
To:	Jennifer Black (Sheriff) <Jennifer.Black@ccsheriff.org>
Cc:	Cindy Kirk (Sheriff) <Cindy.Kirk@ccsheriff.org>, Jason Bray (Sheriff) <Jason.Bray@ccsheriff.org>, Deborah Simental (Sheriff) <Deborah.Simental2@ccsheriff.org>
Sent:	February 13, 2026 2:56:17 PM CST
Received:	February 13, 2026 2:58:16 PM CST
Attachments:	IIG25-0677.pdf, IIG25-0690.pdf, IIG25-0680.pdf, IIG25-0712.pdf, IIG25-0717.pdf, IIG25-0735.pdf, IIG25-0757.pdf, IIG25-0751.pdf, Inmates cook county jail, IIG25-0798.pdf, IIG25-0811.pdf, IIG25-0812.pdf, IIG25-0817.pdf, IIG25-0819.pdf, IIG25-0820.pdf, IIG25-0828.pdf, IIG25-0823.pdf, IIG25-0835.pdf

Ms. Black –

We are referring the attached complaints to your office for whatever action you deem necessary. We are considering these matters closed. Thank you.

Jennifer L. Foether
Office Manager
Office of the Independent Inspector General
69 W. Washington St., Ste. 1160
Chicago, IL 60602
(312) 603-0350
jennifer.foether@cookcountyil.gov

Exhibit A

Exhibit B

OFFICE OF THE INDEPENDENT INSPECTOR GENERAL
Tirrell J. Paxton, Inspector General
69 West Washington Street | Suite 1160 | Chicago, IL 60602 | (312) 603- 0350

February 19, 2026

Deborah Simental
Executive Director
Cook County Sheriff's Office
Office of Professional Review

Re: Request for Records Pertaining to OIIG Referrals

Dear Deborah:

Pursuant to Section 2-285(d) of the Cook County Office of the Independent Inspector General Ordinance, the Office of the Independent Inspector General (OIIG) respectfully requests documents and information related to matters referred by the OIIG to the Cook County Sheriff's Office, Office of Professional Review (OPR).

Specifically, we request:

1. A list of all matters referred by the OIIG to the Sheriff's Office/OPR, including the OIIG case number or other identifying reference from 2023-2025.
2. The final disposition for each matter, including whether the allegation was:
    - Sustained
    - Not Sustained
    - Closed
    - No Action Taken
    - Or any other disposition category used by OPR
3. Any accompanying documentation that reflects or explains the final disposition, to the extent permitted by law and OPR policy.

Exhibit B

The OIIG Ordinance grants our office both the responsibility and the authority to review and investigate matters pertaining to the operations of the Cook County Sheriff's Office. Our request should not be interpreted as a lack of confidence in the manner in which the Office of Professional Review handles referrals or conducts its internal processes. Rather, as part of our mandated oversight function, we are obligated to obtain reasonable assurance that the OIIG is fulfilling its responsibilities and that all referred matters are being addressed appropriately. This cooperative exchange of information is essential to maintaining transparency, accountability, and the integrity of the County's oversight framework.

We request that this information be provided within three weeks of receipt of this letter, consistent with the requirements of Section 2-285(d). If you have questions or require clarification, please contact me for additional information.

Thank you for your cooperation and continued partnership in supporting transparency, accountability, and the integrity of Cook County operations.

Sincerely,

Majed Assaf

Majed Assaf,
Supervising Investigator
Office of the Independent Inspector General

cc: Tirrell J. Paxton, Inspector General
Nicholas Scouffas, General Counsel, Sherriff's Office
Steve E. Cyranoski, General Counsel

Exhibit B

Exhibit C

From:	Deborah Simental (Sheriff)
To:	Majed Assaf (Inspector General); jeffrey.ryan@cookcountyil.gov; Katherine McKay (Inspector General)
Cc:	Nicholas Scouffas (Sheriff)
Subject:	Update from the meeting
Date:	Tuesday, September 15, 2026 9:48:51 AM

Good morning all,

I'd like to give some additional insight/timeline regarding the OIIG's initial request for all matters they referred to OPR for 2023 – 2025, more specifically the "4 missing cases" (IIG23-0641, IIG23-0784, IIG24-0736 & IIG25-0325):

09.09.26: Director Bray and I again reviewed the list OIIG sent along with all the emails to locate the "4 missing referrals." We determined IG24-0736, which is the number OIIG provided is actually IG24-0376. We were able to locate DR2024-0082 (DR=Detainee Report/IIC Grievance) that corresponded to the IIC grievance included in one of the emails the IG forwarded. OPR opened the DR on February 9, 2024. The IG sent an email with IG24-0376 on July 5, 2024. It is just a guess on my part that the IG number was not linked in IaPRO because a Detainee Report was already opened in our database. It should also be noted that the remaining three cases were **NOT** included in any of the email referrals to us. At this time, OPR does not show any evidence we received those remaining 3 OIIG cases.

Executive Director Deborah Simental
Cook County Sheriff's Office
Office of Professional Review
Deborah.simental2@ccsheriff.org
Cell 773.485.5433
Office 773.674.2370

Exhibit C

OFFICE OF THE INDEPENDENT INSPECTOR GENERAL
Tirrell J. Paxton, Inspector General
69 West Washington Street | Suite 1160 | Chicago, IL 60602 | (312) 603- 0350

September 30, 2026

Honorable Thomas J. Dart
Sheriff of Cook County
50 W. Washington Street
Chicago, Illinois, 60602

Re: OIIG Public Statement No. IIG26-0074 (OIIG Referrals to OPR) – OIIG Reply

Dear Sheriff Dart:

This letter is written pursuant to Section 2-289(d)(3) of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-05 (2007), as a reply to issues raised by your office in its response to the above-referenced public statement. In its response, your office questioned the OIIG's authority to conduct the review of OIIG referrals to OPR that led to the public statement at issue. The sole argument by your office on this issue is that our office only has the authority to conduct investigations and does not have the authority to conduct reviews. That argument is simply a matter of semantics. A review in the sense that our office uses the term is merely a type of investigation. We use the term review to distinguish an investigation into waste and mismanagement (which can be the subject of a public statement) from an investigation into individual misconduct (which cannot be the subject of a public statement). *See* Cook County Code, Sec. 2-289(c). Both types of investigations use the same basic methods of research, document requests, and interviews. We have been conducting both types of investigations and using the same terms since the inception of our office as you can see by the public statements posted on our office's website. In short, this review was nothing other than an investigation into the inefficient management by OPR of complaints referred to it by the OIIG.

In its response, your office also questioned the standards and methodology the OIIG used in analyzing the efficiency of OPR's handling of the subject complaints and the thoroughness of OPR's investigations. Our staff consists of highly trained investigators, many of them with federal and local law enforcement experience. In fact, one of the investigators assigned to this matter has a background in police internal affairs investigations. As such, they are more than capable of making findings and conclusions regarding the adequacy of investigations into alleged police misconduct such as whether relevant witnesses were interviewed and whether relevant documents were obtained.

Although your office also suggested that this review was unnecessary given the years that our offices have worked together, we believe that the public has a right to know that the matters of alleged police misconduct that we refer to OPR are being adequately addressed. Otherwise, we could not justify referring them in the first place.

As a public agency, the Sheriff's Office should embrace rather than reject scrutiny and recommendations for improvement. After all, its salaries are paid by Cook County taxpayers. But you may ask who does the same for the OIIG. Holding itself to the same standards, the OIIG recently requested an amendment to its enabling ordinance to allow its work to be reviewed by an Association of Inspectors General peer review team to determine if it was adhering to best practices in the conduct of its operations. Currently we do not have the authority to do that given provisions in our enabling ordinance, but we are seeking that change to subject our office to the same scrutiny that the Sheriff's Office is resisting. The taxpayers of Cook County deserve no less in holding their public officials, including the OIIG, accountable.

Because your office has rejected all of our recommendations to improve the process of investigating complaints received by the OIIG and then referred to OPR, the OIIG will no longer refer complaints received regarding the Sheriff's Office to OPR unless absolutely necessary. Instead, the OIIG will resolve these complaints.

As to these and other issues raised in our public statement and your office's response, we suggest that a public hearing before the County Board would be the most appropriate and transparent way to address them and give the public an opportunity to participate in discussing these very important issues.

Very truly yours,

Tirrell J. Paxton
Independent Inspector General

cc: Nicholas S. Scouffas, General Counsel, Sheriff's Office