



**OFFICE OF THE ILLINOIS SECRETARY OF STATE
THE INSPECTOR GENERAL'S OFFICE
324 W. Monroe
Springfield, IL 62704
217/785-2012**

December 30, 2022

To: Office of the Speaker of the House
300 Capitol Building
Springfield, Illinois 62706

Office of the House Republican Leader
316 Capitol Building
Springfield, Illinois 62706

Office of the President of the Senate
327 Capitol Building
Springfield, Illinois 62706

Office of the Senate Republican Leader
108D Capitol Building
Springfield, Illinois 62706

Honorable Leaders of the General Assembly:

Under the Secretary of State Act's provisions for submission of an annual report, please find enclosed a Summary Report of the investigations and other related activities undertaken by the Office of the Inspector General during the past calendar year.

Sincerely,

A handwritten signature in blue ink that reads "Paul D. Thompson".

Paul D. Thompson
Interim Inspector General
Illinois Secretary of State's Office



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2022 Secretary of State Inspector General's Annual Report to the General Assembly

Complaint Process

The Office of the Inspector General (OIG), under the Secretary of State Act, 15 ILCS 305, receives complaints, including anonymous complaints, through telephone, letter, fax, email, in-person, and the OIG website: www.ReportItNow.net. With eight Inspectors and two support personnel at locations in Chicago, Springfield, and Oak Brook, the OIG documents and follows-up on all complaints and assigns a complaint reporting number for logging. The IG reviews each complaint for the proper disposition; the OIG statutory jurisdiction includes investigation of allegations of ethical improprieties, fraud, corruption, mismanagement, abuse of authority, harassment, violation of policy/law/regulation, danger to public health & safety, and gross, aggravated, or criminal misconduct as well as procurement oversight and investigating wrongdoing of lobbyists and lobbying entities. Some complaints do not fall within the jurisdiction of the OIG so these complaints are forwarded to the appropriate private or public person/entity or are returned to the complainant with suggestions as to the appropriate entity for the complaint. If a complaint falls within the jurisdiction of the OIG (Secretary-of-State officers, employees & contractual-employees, vendors, contractors, and lobbyists) and contains a sufficient basis to believe that a violation of SOS policy or rules, state or federal law has occurred, the OIG titles and initiates an investigation and assigns the matter to an Inspector for further proceedings. If the complaint does not contain a sufficient basis to show that there has been such a violation, but contains allegations that might, if supplemented, be sufficient to show such a violation, the OIG will assign the case to an Inspector to conduct a preliminary inquiry to determine whether there is other supporting

evidence of a violation. Lastly, some complaints raise issues that are managerial or supervisory in nature, or raise questions regarding the proper interpretation of departmental rules, and the OIG refers these cases to the relevant departmental Director for disposition or to the General Counsel's Office, as appropriate.

Investigations generally entail extensive research, subpoenas, witness interviews and document review. On occasion, OIG investigations also have utilized surveillance or electronic information gathering. At the conclusion of any investigation, the Inspector may prepare a written Summary Report to document the matter. A supervisor reviews these Summary Reports to determine whether to investigate further. If the investigation is complete, the supervisor documents any determination for referral, if necessary, to the relevant Directors for informational purposes or for further action by the agency or law enforcement.

Primarily, OIG investigations involve allegations of violations of policies, directives or procedures, ethical standards, administrative or other non-criminal workplace misconduct. The OIG investigates and refers these types of cases, as stated above, for administrative disposition in conjunction with the Department of Personnel. However, some investigations result in allegations or findings of gross, aggravated, or criminal misconduct for which the OIG may jointly investigate with local, State, and federal law enforcement or prosecutorial agencies. The ethics enabling laws mandate that the Inspector General refer to the Attorney General and Executive Ethics Commission certain matters for enforcement as well to include, among others, sexual harassment allegations against persons required to register as lobbyists.

Special Report Process

The OIG has statutory authority under the Secretary of State Act to "review, coordinate, and recommend methods and procedures to increase the integrity of the Office of the Secretary of State." This authority includes the authority to assess programs and Departments with the goal of identifying or correcting waste, fraud, mismanagement, or other issues. In the exercise of that authority, the OIG continually evaluates the operation of the various Departments and programs of the Office of the Secretary of State. Randomly, the OIG may determine that the specified operation is appropriate to conduct

a review of a particular Department or program to ascertain whether the focus area complies with the mandated function or whether there are potential issues that require management attention. Upon completion of a review, the OIG prepares a written Special Report. The Special Report identifies any potential problem areas, as well as identifies those programs or Departments that comply with their assigned functions.

Occasionally the OIG identifies an issue or problem during the course of an investigation that requires management consideration beyond the scope of that investigation. In those instances, the OIG may choose to prepare a Special Report. If the issue appears to be programmatic, the OIG may conduct a review of the Department or the program in preparation of the Special Report. An Audit Review Committee comprised of Department Directors and senior management reviews the Special Reports and determines an appropriate response.

The OIG also has a complaint data review project for security and fraud prevention. These project efforts include, but are not limited to, the analysis of information for the detection and prevention of patterns of fraud or misconduct by employees and/or the public that may violate SOS policies, federal or state laws or regulations. The associated research and analysis include the examination of underlying identification documents presented by applicants for various services offered by the Secretary of State, including driver's licenses and vehicle titling, to include fee payments for such services. The primary mission of the pattern analysis is to ensure the integrity of information presented to the Secretary of State. The methods used by the project for gathering information relevant to the Secretary of State systems involve the collection of public and non-public information in order to determine its underlying value and to enable Inspectors to make recommendations to management based on that information through Special Reports.

Ethics

The OIG also serves as a monitor over the enforcement of specific ethics reform laws. Within this additional jurisdiction, the OIG focuses on two areas – lobbyists and procurement compliance. The provisions regarding lobbyists provide that the OIG shall receive and investigate allegations regarding entities or individuals who conduct lobbying

activities and make associated expenditures without having registered as lobbyists with the State or who in the course of their lobbying activities commit any type of harassment or discrimination. In addition, the OIG monitors registered lobbyists and lobbying entities to ensure compliance with their anti-harassment, discrimination, and ethics training, client disclosure and expenditure reporting mandates. The OIG, through the Procurement Monitor, also oversees acquisitions of goods and services by SOS to ensure compliance with the governing procurement requirements.

Please note the Executive Inspector General, added under the State Officials and Employees Ethics Act, independently monitors policy enforcement with regard to, among others, the gift ban provisions, prohibitions on ex parte communications, ethics training, prohibited political activities, sexual harassment, and employment matters including revolving-door restrictions. The revolving door rules are intended to prevent conflicts of interest in situations where employees leave their SOS employment to accept employment with entities with which they previously had executive, regulatory or contractual authority or secondary employment. The EIG instituted an acknowledgement system for both hired and terminated employees, as applicable, to ensure compliance.

Visits to Departments, Offices and Facilities

Each SOS facility or office location is assigned to an OIG Inspector. Each Inspector is responsible for conducting, documented random visits to their assigned facilities or offices. The purpose of the visits is to allow the Inspectors to meet with facility managers and personnel to discuss any problems or concerns that the facility personnel may have as well as to reinforce ethical standards.

The visits also serve to professionally network with employees, to encourage greater communication between the facility staff and the OIG. The OIG philosophy is that the proper ethics culture requires consistent training and ongoing oversight and personnel are more willing to report potential issues or problems if there is arm's-length communication, appropriate supervisory controls, and an independent, specific contact point for reporting and complaints, as opposed to personnel viewing the OIG as another executive, internal affairs, or auditing office.

CALENDAR YEAR 2022

Investigations

The OIG received 651 complaints during calendar year 2022. From these complaints, the Inspector General initiated 148 investigations or preliminary inquiries and the Executive IG independently selected 17 inquiries or investigations to initiate and review. Additionally within the OIG, thirteen complaints were referred to the Illinois Attorney General's Office, 107 complaints were referred to the Governor's EIG or another applicable IG/EIG or agency, 36 complaints were referred to the Equal Employment Opportunity Office, and 39 complaints were referred to law enforcement. The IG reviewed the remaining complaints for timely, proper referral to Departmental Directors or General Counsel as managerial, collective-bargaining, or legal matters. In 2022, the OIG completed 120 investigations, fifty-eight of which resulted in some form of disciplinary action. Twenty-Eight investigations or inquiries remained open as of the end of 2022.

Special Reports

During calendar year 2022, the OIG prepared and submitted pre-decisional, deliberative materials in the form of special or administrative reports to Department Directors and the Audit Review Committee. The submitted reports related to preliminary recommendations on the operations of departments, policies, or programs.

Lobbying Activity

The OIG received sixteen complaints in 2022 alleging improper lobbying reporting or activity. The OIG investigated the cases through preliminary inquiry, written correspondence, document collection, and personal interviews. The complaints were resolved through registration and training, fee payment, administrative notice, or with submission of an exemption from the registration requirements. Additionally, the OIG assisted the Department of Index with the administrative enforcement of the annual lobbyist ethics/harassment training, expenditure filings and reporting requirements for the reported 2215 registered lobbyists, representing 2519 registered lobbying entities with 53 lobbying consultants disclosed.