



**THE ILLINOIS SECRETARY OF STATE
INSPECTOR GENERAL'S OFFICE**
324 W. Monroe, Springfield, IL 62704
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2024 Secretary of State Inspector General Annual Report to the General Assembly

Complaint Process:

The Secretary of State appointed Inspector General (IG) under Section 14 of the *Secretary of State Act, 15 ILCS 305/14*, receives identified or anonymous complaints at Office of the Inspector General (OIG) offices through a variety of channels to include among others via referral, delivery, telephone, letter, fax, email to IG@ilsos.gov, in-person, and the OIG web portal: www.ilsos.gov. With five Inspectors and two support personnel at locations in Springfield and Chicago, the IG documents and follows-up on all complaints, assigns a complaint reporting number for logging review, and OIG answers in-person each phone call. The IG reviews each complaint for the proper disposition, as 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 Secretary of State policy or rules, state or federal law has occurred, the OIG titles and initiates an investigation and assigns the matter to an Inspector Special Agent 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 or request for more information to determine whether there is other supporting evidence of a violation. Lastly,

some complaints raise issues or infractions that are managerial/supervisory in nature or raise questions regarding the proper interpretation of departmental work 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 gathering of information including, but not limited to, research, subpoenas, interviews, and document review. On occasion, OIG investigations also have utilized surveillance or electronic information gathering. At the conclusion of any investigation, the Inspector prepares a written summary or report to document the matter. A supervisor reviews these reports to determine whether to investigate further. If the investigation is complete at that time, the supervisor documents any determination for referral, if necessary, to the relevant Directors for informational purposes or for further action by the agency, Personnel Department, or law enforcement.

Primarily, OIG investigations involve allegations of violations of policies, directives or procedures, ethical standards, administrative or other non-criminal workplace misconduct (unless law-enforcement defers criminal matter to OIG). The OIG investigates and refers these types of cases 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, especially as the Secretary of State has a dedicated, assigned, internal police force. The ethics enabling laws also mandate that this Inspector General jointly work with the Attorney General and Executive Ethics Commission on certain matters for enforcement to include, among others, sexual harassment allegations against persons required to register as lobbyists.

Special Report Process:

The OIG has statutory authority under Section 14 of the *Secretary of State Act, 15 ILCS 305/14*, 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 or compliance audit 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 to any recommendations.

The OIG also has complaint data review projects 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 this constitutional office's policies, federal or state laws or corresponding regulations. The associated research and analysis include the examination of underlying, official documents presented for various services offered by the Secretary of State, including departmental regulatory licensure, titling, and registration systems to include fee payments for such services. The primary mission of the pattern analysis is to ensure the integrity of information presented to and logged by 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 through special reports based on that information.

Ethics Standards:

The OIG also oversees the enforcement of specific ethics reform laws. Within this additional jurisdiction, the OIG focuses on, among others, 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 mandated ethics training, client disclosure and expenditure reporting mandates. The IG, as procurement monitor, also oversees acquisitions of goods and services by the Office of the Secretary of State to ensure compliance with the governing procurement requirements. Further, the OIG also reviews employees' secondary employment with other entities outside of the Secretary of State's Office to ensure there is no conflict-of-interest issues or emerging revolving-door concerns.

Please note an Executive IG Officer, subsequently added under the State Officials and Employees Ethics Act as independently appointed, monitors agency policy with regard to, among other areas, gift bans, prohibitions on ex parte communications, ethics training, prohibited political activities, sexual harassment, and employment matters including revolving-door restrictions.

Visits to Departments, Offices and Facilities:

Each Secretary of State facility or office location is assigned to an OIG Inspector. Each Inspector is responsible for conducting documented, random visits to the 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 and receive or inquire on complaints.

The visits also serve to professionally network with employees to encourage greater communication between the facility staff and the OIG. The OIG philosophy reinforces that the proper ethics culture requires consistent training and ongoing oversight. Personnel are more willing to report potential issues or problems if there is direct, yet arm's-length communication, appropriate supervisory controls, and an independent, responsive, specific contact point for reporting complaints for trusted, timely, and complete follow-through on issues and inquiries.

- **CALENDAR YEAR 2024** -

Investigations:

The OIG received 1376 complaints or requests for IG assistance during the calendar year. Each of these matters were reviewed by the IG, and the OIG initiated or continued 147 investigations or preliminary-inquiries, and also referred 21 matters to the Executive IG Officer for review. Additionally within the OIG, 59 complainants were referred to the Illinois Attorney General's Office or applicable State's Attorney, 66 complainants were referred to the Governor's EIG or another applicable IG/EIG/government agency, 42 complaints were referred to the Equal Employment Opportunity Office, and 108 complaints were referred to law enforcement. The IG further reviewed the remaining complaints for timely, proper referral to Departmental Directors or General Counsel as managerial, constituent, collective-bargaining, or legal matters. For the year, the OIG completed 124 investigations/inquiries – fifty-one of which full investigations resulted in disciplinary action. Twenty-five investigations or inquiries remained open as of the end of the year.

Special Reports:

The OIG prepared and/or submitted pre-decisional, deliberative-process materials in the form of special or administrative reports to Department Directors or an audit review. The preparatory or submitted reports related to preliminary recommendations on the operations of Departments, policies, & programs.

Lobbying Complaints:

The OIG received seven complaints during the year alleging improper lobbying registration, reporting, or activity. 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. Correspondingly, 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 2456 registered exclusive/contractual lobbyists, representing 2823 registered lobbying/client entities, which disclosed 67 lobbying consultants in their registrations.