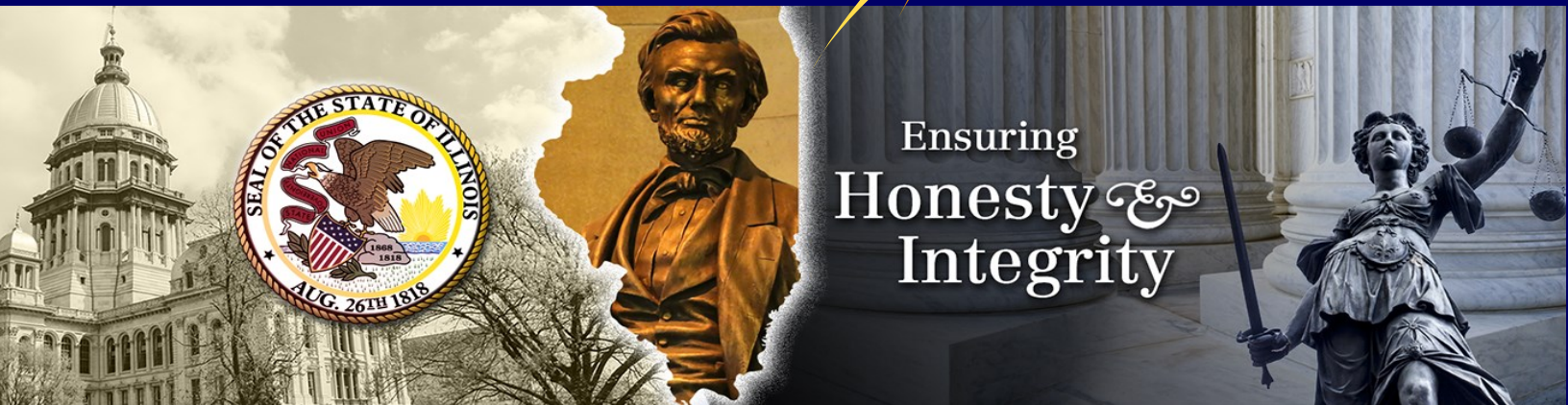


OFFICE OF EXECUTIVE INSPECTOR GENERAL FOR THE ILLINOIS STATE TREASURER



INVESTIGATIONS POLICY AND PROCEDURES MANUAL

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INTRODUCTION

In December 2003, the Illinois State Officials and Employees Ethics Act (5 ILCS 430, *et seq.*, hereinafter, the “Ethics Act”) established the Office of Executive Inspector General for the Illinois Treasurer (“OEIG”). The Executive Inspector General (“EIG”) is appointed to a 5-year term by the Treasurer without regard to political affiliation and solely on the basis of integrity and demonstrated ability. The OEIG is an objective and independent entity which is operationally autonomous from the Treasurer’s Office.

The OEIG has discretion to determine the appropriate means of investigation as permitted by law, and has four main functions:

- investigate allegations of fraud, waste, abuse, mismanagement, misconduct, nonfeasance, misfeasance, malfeasance, and violations of the Ethics Act (such as prohibited political activity, sexual harassment, the gift ban, and retaliation) and other related laws and rules;
- establish standards for and oversee Ethics Act mandated training programs;
- monitor compliance with State and federal hiring laws; and
- administer “revolving door” restrictions for post-State employment for certain individuals.

The OEIG has jurisdiction over all employees, appointees, elected officials and vendors doing business within the jurisdiction of the Office of the Illinois State Treasurer.

Pursuant to Section 20-20 of the Ethics Act, the OEIG has the jurisdiction and authority to, among other things:

- receive and investigate allegations of fraud, waste and abuse. Specifically, the OEIG investigates Ethics Act violations, policy infractions or other forms of misconduct.
- request information relating to an investigation from any person when the EIG deems that information necessary in conducting an investigation;
- issue subpoenas to compel the attendance of witnesses for the purposes of testimony and production of documents and other items for inspection and copying, and to make service of those subpoenas;
- receive and investigate allegations of unlawful discrimination and harassment, including the prohibition on sexual harassment;
- participate in or conduct, when appropriate, multi-jurisdictional investigations;
- provide each employee with knowledge and information regarding the laws, regulations and policies related to their work through education and training efforts;
- require cooperation of employees;
- promote integrity and the highest standards of ethics within the Treasurer’s Office.

CHAPTER I
CONDUCT OF INVESTIGATIONS AND
JOINT COMMITTEE ON ADMINISTRATIVE RULES
ILL. ADMIN. CODE tit. 2, § 1620.300

POLICY 1.10: Conduct of Investigations

All OEIG personnel must comply with Joint Committee on Administrative Rules, Ill. Admin. Code tit. 2, § 1620.300 (2012) [hereinafter “Admin. Code”], Conduct of Investigations, which states as follows:

Section 1620.300 Conduct of Investigations

a) Policy and Procedures Manual

- 1) All investigations by an Executive Inspector General or the Executive Inspector General employees (collectively known as EIG) shall be conducted in accordance with procedures contained within this Part and within a policy and procedures manual developed by the EIG and approved by the Executive Ethics Commission. Approval shall be based on compliance with the Act, this Part and other applicable law. A policy and procedures manual should give direction to EIG employees that supplement the requirements of the Act and this Part.
- 2) The policy and procedures manual described in subsection (c) shall be submitted for approval to the Executive Ethics Commission within 90 days after July 1, 2008. Any future amendments to the policy and procedures manual shall be subject to the Commission's approval. An updated policy and procedures manual for each EIG shall be posted on the EEC website. Portions of the policy and procedures manual that may compromise the integrity of investigations or confidential investigative techniques may be redacted by the EEC after consultation with the appropriate EIG.

b) Waiver of Policy and Procedures Manual Provisions

1) Waiver by the Commission

Upon written petition by an Executive Inspector General and a finding that the waiver is, in the particular context, necessary to avoid compromising the integrity of an investigation, the Commission may grant a waiver of the subsection [(c)(5)]¹ requirement that requests for documents or physical objects be in writing.

2) Temporary Waiver by the Chair

The Chair of the Commission, or the Chair’s designee, may likewise

¹ The original text of § 1620.300 refers to subsection (c)(6).

grant a waiver of the subsection [(c)(7)]² requirement that requests for documents or physical objects be made in writing in response to an oral or written request by an EIG if the Chair or the Chair's designee finds that the waiver is, in the particular context, necessary to avoid compromising the integrity of an investigation, and provided that, within 72 hours after the waiver, the Executive Inspector General files a written request to the Commission. A waiver granted by the Chair pursuant to this subsection (b)(2) may be withdrawn by the Chair at any time if the Chair no longer reasonably believes that the waiver is necessary to avoid compromising the integrity of an investigation.

- c) The policy and procedures manual shall include, but not be limited to, the following:
 - 1) An EIG shall accept case initiation forms from State of Illinois employees and the general public in accordance with Section 1620.320.
 - 2) An EIG shall not investigate allegations of violations of State or federal law or this Part made against an EIG (including the EIG's employees). An EIG shall not investigate allegations of violations of State or federal law or of this Part if an EIG (including the EIG's employees) could be reasonably deemed to be a wrongdoer or suspect. Instead, in such cases, the EIG shall promptly refer all such allegations to the EEC for consideration of appointment of a Special Executive Inspector General.
 - 3) Within 5 business days either after the receipt of a complaint in which a 20-63 Complainant is identified or after the subsequent identification or location of a person who was subjected to the discrimination, harassment, or sexual harassment as alleged in a pending complaint, the EIG shall notify the 20-63 Complainant *of the receipt of the complaint, the complainant's rights, and an explanation of the process, rules and procedures related to the investigation of an allegation*, and the duties of the EIG and the EEC. [5 ILCS 430/20-63] The notification shall be transmitted to the 20-63 Complainant by letter or appropriate electronic means.
 - 4) Within 30 calendar days after receipt of a case initiation form as described in Section 1620.320, the EIG shall do one of 5 things:
 - A) Determine that no investigation is appropriate; or
 - B) Open an investigation file pursuant to Section 1620.330 and commence an investigation; or
 - C) Refer the case initiation form to the appropriate EIG, the Executive Ethics Commission or other appropriate body as described in Section 1620.340 and take no further action; or

² The original text of § 1620.300 refers to subsection (c)(6).

- D) Suspend the investigation pending review of the outcome of other proceedings; or
 - E) Refer the investigation to the Executive Ethics Commission for consideration of appointment of a Special Executive Inspector General.
- 5) The EIG shall notify a 20-63 Complainant of the EIG's decision to open or close an investigation into the relevant complaint or to refer the complaint to another appropriate agency within 5 business days after the decision is made. If, however, the EIG *reasonably determines that publicly acknowledging the existence of an investigation would interfere with the conduct or completion of that investigation, the notification may be withheld until public acknowledgement of the investigation would no longer interfere with that investigation.* [5 ILCS 430/20-63]
- 6) Each EIG shall disclose the opening of all investigation files, as described in Section 1620.330, in writing to the Executive Ethics Commission. The disclosure shall identify the affected office, agency or agencies, the date the investigation was opened, and the investigation's unique tracking number. Reports on all investigations opened in a calendar month shall be submitted to the Commission on or before the 15th day of the following month.
- 7) All EIG requests for production of or viewing of documents or physical objects under office or agency control shall be made in writing; provided, however, that the Commission may exempt any EIG who functions wholly within a single office or agency from the application of this requirement upon joint petition by the EIG and the affected office or agency. A written request for documents or physical objects shall state that the recipient of the request, should the recipient believe that the release of the subject matter of the request might violate existing rights or protections under State or federal law, has the right to seek a determination from the Commission relative to such rights or protections, if desired. An EIG may take reasonable steps to seal or otherwise ensure the integrity of the requested documents or physical objects pending the Commission's determination. If security concerns demand the removal of sealed documents or physical objects, the EIG shall issue a subpoena before removal. The Commission shall consider the applicability of the right or protection asserted and issue a determination within 5 business days; provided, however that where delay for such a period could place an investigation in jeopardy, an EIG may request expedited consideration. The recipient and Commission shall maintain confidentiality about the request so as to minimize any risk of compromising the investigation. The recipient may assert any existing rights or protections under State or federal law with respect to the request, and such assertions made in good faith do not constitute failure to cooperate in an investigation.

- 8) An EIG desiring to interview any State officer or employee who is the subject of an EIG investigation and whom the EIG, based on the information available at the time of the interview, reasonably believes likely faces discipline shall notify the interviewee whether the underlying investigation is criminal or administrative in nature. If the underlying investigation is criminal in nature, the interviewee shall be presented a form that outlines the interviewee's rights during the interview, including the right to the presence of an attorney, union representative or coworker uninvolved in the investigation. If the underlying investigation is administrative in nature, the interviewee shall be presented a form that outlines the interviewee's rights during the interview, including the right to presence of a union representative or coworker uninvolved in the investigation. In both criminal and administrative investigations, the interviewee shall sign the form, attesting only to the fact that the form was presented to the interviewee and he or she was given the opportunity to read it. All forms presented to interviewees shall be pre-approved by the Commission. If, at any point, an interview subject requests the presence of a person authorized by this subsection (c)(8), or an attorney, the interview shall be suspended, and a new date and time set. Evidence obtained directly or indirectly in violation of this subsection (c) is not admissible in any proceeding before the Executive Ethics Commission.
- 9) No EIG shall infringe upon the right of employees or officers to seek advice from their agency ethics officer on the interpretation and implementation of the Act, or to seek advice from private legal counsel.
- 10) Conduct of Interview
- A) Interviews shall be conducted in a businesslike manner. The investigator shall avoid any personality clashes, acts of undue familiarity, abuse, or use of profanity. The investigator shall treat all persons interviewed with respect and not unduly embarrass, inconvenience, intimidate or degrade the interviewee.
- B) Any armed State employee present shall not use firearms in any manner that might intimidate, unless anyone in the room is physically threatened.
- C) Interviewees enjoy all rights in the course of an interview protected by the Constitution of the United States and federal and State law.
- D) The duty to cooperate in investigations as provided at 5 ILCS 430/20-70 does not include restriction on those rights.
- E) In the event that the subject of an interview believes that the investigator has operated in violation of this Part, or in violation of applicable law, the interviewee may file a written objection with the Commission, setting forth with specificity the nature of the alleged violation. Within 30 days after receiving the objection, the Commission

shall issue a written finding either sustaining or overruling the objection, shall appoint a Special Executive Inspector General to discover more facts (by interviewing witnesses, etc.), or shall refer the issue to an appropriate law enforcement authority. If the Commission sustains the objection, it shall issue a copy of its finding to the EIG to whom the investigator reports, as well as make public a copy of its finding. Subjects of the complaint process described in this subsection (c)(11)(E) are entitled to due process of law.

- 11) State employees who are subjects of EIG interviews and whom the EIG, based on the information available at the time of the interview, reasonably believes likely faces discipline, shall be presented a form that outlines their rights during the interview. The form shall also clearly indicate that the interviewee has the right to refuse to consent to have the interview recorded and the right to stop the recording of the interview at any time and that refusing to consent to have the interview recorded or to stop the recording at any time shall not constitute failure to cooperate in the investigation or otherwise subject the interviewee to any discipline. The form shall also indicate that the interviewee may request at any time that the interview be recorded. If the interviewee requests at any time that the interview be recorded, the interviewer shall honor this request, stop the interview and immediately provide the employee a request to record form. Upon execution of a request to record form, the interview and all future interviews of the subject shall be recorded by mechanical, digital or other means. All forms and recordings shall be preserved, unedited, in the investigation file. Nothing in this subsection (c)(11) shall be construed to require the recording of interviews other than pursuant to an appropriately executed request of the interviewee. The interviewee shall sign the form, attesting only to the fact that the form was presented to the interviewee and that the interviewee was given the opportunity to read it.
 - 12) Upon completion of investigations, the EIG or the EIG's designee shall write a final report summarizing the background of the investigation, the allegations, investigative steps taken and conclusions drawn. The final report shall include a recommendation regarding appropriate action. An investigation is deemed completed for purposes of this Part when all processes of internal review of the investigation and of the final report have terminated.
 - 13) The policy and procedures manual may contain additional policies or procedures not inconsistent with this Part, subject to Commission approval as outlined in subsection (a)(2).
- d) The EIG shall determine a reasonable time, place and manner for a 20-63 Complainant to exercise the Complainant's right to review, in person, any transcript or interview report created from an audio recording of the Complainant's interview and shall make reasonable accommodations as necessary.

- e) Any person may complain to the Commission, in writing, concerning an EIG's alleged violation of the Act or this Part. Upon receipt of a complaint, the Commission may notify the EIG and require the EIG to provide information related to the investigation in order to determine whether any conduct has occurred that would require the Commission to appoint a Special Executive Inspector General pursuant to 5 ILCS 430/20-21. Under those circumstances, the Commission deems the EIG's disclosure of that information to the Commission to be "necessary" as provided at 5 ILCS 430/20-95(d).

POLICY 1.20: Conduct of Investigations – OEIG Staff

All OEIG personnel must execute their investigative duties and responsibilities in an objective manner without regard to political affiliation or personal bias. If, for any reason, any OEIG personnel believe they are incapable or unwilling to investigate in a manner consistent with any policy or procedure set forth herein, they must notify the Executive Inspector General immediately so that appropriate action may be taken.

CHAPTER II

EMPLOYEE DUTIES AND RESPONSIBILITIES

POLICY 2.10: Confidentiality

All OEIG employees, including temporary and contract employees, are required as a condition of employment to sign a confidentiality agreement. A copy of the signed agreement will be placed in each employee's personnel file.

POLICY 2.20: OEIG Policy and Procedures Manual

This Policy and Procedures Manual contains the investigative policies and procedures of the OEIG, to which all OEIG staff will adhere when discharging their duties and responsibilities.

POLICY 2.30: Distribution of OEIG Policy and Procedures Manual

All OEIG personnel will be provided a copy of this Policy and Procedures Manual. OEIG personnel are responsible for reviewing this Policy and Procedures Manual and becoming familiar with all the policies and procedures contained herein.

POLICY 2.40: Violations of Policies or Procedures

Any OEIG personnel who violate the policies or procedures contained in this Policy and Procedures Manual may be subject to disciplinary action, up to and including discharge.

POLICY 2.50: Badges and Credentials

The OEIG issues badges and credentials to investigators and supervisory personnel as identification in connection with official duties and responsibilities. OEIG badges and credentials may only be used by OEIG personnel in connection with their official duties and responsibilities.

All OEIG badges and credentials are property of the OEIG and must be immediately relinquished upon request of the Executive Inspector General or at termination of employment.

CHAPTER III

GENERAL INVESTIGATION PROCEDURES

POLICY 3.10: Compliance with Administrative Rules

All OEIG investigative activity must comply with Admin. Code §§ 1620.300-350. If any policy or procedure contained in this Policy and Procedures Manual is inconsistent with the Administrative Rules, then the Administrative Rules shall control.

POLICY 3.20: Filing Complaints with the OEIG

Any person may file a complaint, *anonymously or in his or her name*, with the OEIG by:

- (1) mailing or hand-delivering a completed OEIG complaint form to one of the following addresses:

Office of Executive Inspector General
for the Illinois State Treasurer
1 East Old State Capitol Plaza
Springfield, IL 62701

Office of Executive Inspector General
for the Illinois State Treasurer
555 West Monroe, 14th Floor
Chicago, IL 60661

- (2) by submitting a completed OEIG complaint form via the OEIG website at:
https://illinoistreasurer.gov/Executive_Inspector_General/

- (3) by emailing the OEIG at oig@illinoistreasurer.gov or oeig@illinoistreasurer.gov

- (4) by calling the OEIG at (217) 557-1972 or

- (5) calling the OEIG Ethics and Compliance Line: (833) 996-1651.

POLICY 3.30: Confidentiality of the Complainant or Source

The OEIG will keep confidential the identity of all complainants or sources of allegations as provided by law. Pursuant to Section 20-90(a) of the Ethics Act, the identity of any individual providing information or reporting any possible or alleged misconduct to the OEIG will be kept confidential by the OEIG, unless the individual consents to the disclosure or disclosure is otherwise required by law. The OEIG may disclose the identity of a person in any other capacity other than as the source of the allegation.

POLICY 3.40: Contents of OEIG Complaint Forms

Pursuant to Admin. Code § 1620.310, the OEIG has prescribed and made available a case initiation form (OEIG Complaint Form 100) for investigation of a complaint against an individual or entity under OEIG jurisdiction. The contents of OEIG Complaint Form 100 are consistent with Admin. Code § 1620.320, which states as follows:

Section 1620.320 Case Initiation Form - Contents

The case initiation form shall set out:

- a) the name of the employee or officer who is alleged to have committed misconduct;
- b) the identity of the State agency by which the employee or officer is employed;
- c) the name, address and telephone number of the complainant, unless filed anonymously;
- d) the date and time of the alleged misconduct;
- e) a description of the acts and circumstances that surrounded the alleged misconduct;
- f) the names of any other person who witnessed, participated in, or was subjected to, alleged misconduct of any kind;
- g) an address to which the completed form may be mailed;
- h) a statement of the confidentiality of the identity of the complainant (see 5 ILCS 430/20-90(a));
- i) a statement that penalties may be applied for intentionally making a false report alleging an ethics violation (see 5 ILCS 430/50-5(d)); and
- j) such other information that the Executive Inspector General reasonably requires.

POLICY 3.50: Opening an Investigative File

The OEIG will open an investigation in accordance with the provisions of the Ethics Act and Admin. Code § 1620.330, which states as follows:

Section 1620.330 Opening an Investigation File

- a) Upon deciding to open an investigation file in accordance with Section 1620.300(c)(4[3])(B),³ the Executive Inspector General shall promptly create an investigation file and assign the file a unique tracking number. Multiple case initiation forms that relate to the same alleged acts of misconduct may be consolidated for purposes of investigation. In the absence of a completed case initiation form, upon information received, the Executive Inspector General may create an investigation file and assign the file a unique tracking number if the Executive Inspector General reasonably believes that misconduct may have occurred within the Executive Inspector General's jurisdiction. Investigations

³ The original text of §1620.330 refers to § 1620.300 (c)(4)(B).

that have been closed and are reopened, involving the same alleged wrongdoing by at least one of the same persons who was the subject of the original complaint, shall be identified by the same tracking number as the initial investigation. All time limits stated in this Part shall be applied from the date of the original complaint.

- b) The investigation file shall contain the case initiation form, or if none, so much of the information that would normally appear on the case initiation form as is known to the Executive Inspector General at the inception of the matter.

POLICY 3.60: Evaluation of Complaints

All new OEIG complaints will be evaluated by OEIG personnel who will take action in a manner consistent with Admin. Code § 1620.300(c)(3).

POLICY 3.70: Electronic Tracking of Investigations

The OEIG will store data regarding the status of investigations in an electronic database in order to track the progress of each investigation according to its unique tracking number.

POLICY 3.80: Completion of Investigations – Final Report

An OEIG investigation will be deemed completed by the OEIG when all processes of internal review of the investigation and of the final report have terminated. *See* Admin. Code §1620.300(c)(10), which is set forth in Chapter I, Policy 1.10 of this Policy and Procedures Manual, *supra*. Upon completion of an OEIG investigation, OEIG personnel will issue a summary report and otherwise comply with the procedures set forth in Admin. Code §§1620.1000 & .1010, which state as follows:

Section 1620.1000 Investigation Reports Finding a Violation

If an Executive Inspector General,⁴ or the Attorney General, pursuant to Section 20-50 or 20-51 of the Act, respectively, upon the conclusion of an investigation, determines that reasonable cause exists to believe that a violation has occurred, then the Executive Inspector General or Attorney General, shall issue a summary report of the investigation. The report shall be delivered to the appropriate Ultimate Jurisdictional Authority and to the head of each State agency affected by or involved in the investigation, if appropriate. [5ILCS 430/20-50]

- a) The summary report of the investigation shall include the following:
 - 1) The unique tracking number of the investigation.

⁴ The italics set forth in this section are in the original text.

- 2) *A description of any allegations or other information received by the Executive Inspector General or Attorney General pertinent to the investigation.*
 - 3) A summary of investigative steps taken. This summary need not disclose any confidential investigation techniques.
 - 4) *A description of any alleged misconduct discovered in the course of the investigation.*
 - 5) *Recommendations for any corrective or disciplinary action to be taken in response to any alleged misconduct described in the report, including but not limited to discharge.*
 - 6) *Other information the Executive Inspector General or Attorney General deems relevant to the investigation or resulting recommendation. [5 ILCS 430/20-50(b)]*
 - 7) The last known mailing addresses for all subjects or, if the subjects are represented by counsel, the mailing address for their counsel.
 - 8) The date of the last alleged violation of the Act or other State law, rule or policy giving rise to the investigation.
 - 9) Other information deemed necessary by the Commission to fulfill its duties.
- b) *The appropriate UJA or agency head shall respond to the summary report within 20 days, in writing, to the Executive Inspector General or Attorney General, as appropriate. The response shall include a description of any corrective or disciplinary action to be imposed. [5 ILCS 430/20-50] If the appropriate UJA or agency fails to respond in writing within 20 days, the Executive Inspector General or Attorney General shall inform the Commission of this failure within 5 business days.*
- c) *Within 30 days after receiving a response from the appropriate UJA or agency head, the Executive Inspector General or Attorney General, as appropriate, shall:*
- 1) *notify the Commission and the Attorney General that he or she believes that a complaint should be filed with the Commission and submit the summary report and supporting documents to the Attorney General; or*
 - 2) *deliver to the Commission a statement setting forth the basis for his or her decision not to file a complaint and a copy of the summary report and response from the UJA or agency head. [5 ILCS 430/20-50(c-5)]*

- d) A summary report submitted to the Commission shall be accompanied by a copy of any impact statement submitted by a 20-63 Complainant with respect to the report.
- e) *If, after reviewing the documents, the Commission believes that further investigation is warranted, the Commission may:*
 - 1) *request that the Executive Inspector General provide additional information or conduct further investigation; or*
 - 2) *appoint a Special Executive Inspector General; or*
 - 3) *refer the summary report and response to the Attorney General for further investigation or review.*
- f) *If, after review, the Attorney General determines that reasonable cause exists to believe that a violation has occurred, then the Attorney General may file a complaint with the Commission. If the Attorney General concludes that there is insufficient evidence that a violation has occurred, the Attorney General shall notify the Commission and the appropriate Executive Inspector General. [5ILCS 430/20-50(c-10)]*
- g) If a given investigation results in a determination by the EIG that reasonable cause exists to believe that violations of both the Ethics Act(including rules or policies adopted to implement the Ethics Act) and laws other than the Ethics Act have occurred, and if the Attorney General files a complaint with the Commission related to the Ethics Act violations, then the EIG must file its summary report as to the non-Ethics Act violations no later than 30 days after the final administrative decision is made with respect to the complaint filed by the Attorney General.

Section 1620.1010 Investigation Reports Finding No Violation

If, upon the conclusion of an investigation, an Executive Inspector General or the Attorney General determines that there is insufficient evidence that a violation has occurred, the Executive Inspector General or Attorney General shall close the investigation and provide the Commission with a written statement. [5 ILCS 430/20-51]⁵

- a) The statement shall contain:
 - 1) The unique tracking number of the investigation.
 - 2) A description of any allegations or other information received by the Executive Inspector General or Attorney General pertinent to the investigation.

⁵ The italics set forth in this section are in the original text.

- 3) A summary of investigative steps taken. This summary need not disclose any confidential investigation techniques.
- 4) The facts or conclusions of law that form the basis for the Executive Inspector General's determination that no violation of the State Officials and Employees Ethics Act has occurred.
- 5) Recommendations for any corrective action to be taken in response to any findings made in the report, if any.
- 6) Other information the Executive Inspector General deems relevant to the investigation or resulting statement.
- 7) Other information deemed necessary by the Commission to fulfill its duties.

b) *If, after reviewing the documents, the Commission believes that further investigation is warranted, the Commission may:*

- 1) *request that the Executive Inspector General provide additional information or conduct further investigation; or*
- 2) *appoint a Special Executive Inspector General; or*
- 3) *refer the allegations to the Attorney General for further investigation or review. [5 ILCS 430/20-51]*

CHAPTER IV

OEIG REQUESTS FOR INFORMATION

POLICY 4.10: OEIG Requests for Information

When requesting, for production or viewing, documents or physical objects under office or agency control relating to an OEIG investigation, all OEIG personnel must comply with Admin. Code § 1620.300, which is set forth in Chapter I, Policy 1.10 of this Policy and Procedures Manual, *supra*. OEIG personnel shall utilize OEIG FORM 400 when requesting production or viewing of documents or physical objects under office or agency control.

CHAPTER V

CONDUCT OF OEIG PERSONNEL AND RELATED ADMINISTRATIVE RIGHTS OF WITNESSES

POLICY 5.10: Conduct of Interviews

When conducting interviews, all OEIG investigators must act in a manner consistent with Admin. Code § 1620.300(c)(8).

POLICY 5.20: Administrative Rights: Audio Recording

When conducting interviews, all OEIG personnel must present the interviewee a form consistent with Admin. Code § 1620.300(c)(9)⁶ stating the interviewee's rights relating to audio recording of the interview. OEIG personnel shall utilize OEIG FORM 200 to comply with this policy.

POLICY 5.30: Administrative Rights: Representation

When conducting interviews of a State employee who is the subject of an investigation and who, based on the information available at the time of the interview, is reasonably believed likely to face discipline or adverse action, OEIG personnel must present the interviewee a form consistent with Admin. Code § 1620.300(c)(6).⁷ OEIG personnel shall utilize OEIG FORM 300 to comply with this policy.

POLICY 5.40: Application of Policy 5.30

Unless OEIG personnel, based on the information available at the time of the interview, reasonably believe there are no circumstances under which the interviewee would be a subject or likely to face discipline or adverse action, OEIG personnel must present the interviewee with an OEIG FORM 300 so that the interviewee is fully informed of his or her administrative rights.

POLICY 5.50: Request for Written Statement of Decision to Close Investigation

All OEIG personnel must comply with Section 20-51 of the Ethics Act, which states, *inter alia*, that “[a]t the request of the subject of the investigation, the Inspector General shall provide a written statement to the subject of the investigation of the Inspector General’s decision to close the investigation.” The OEIG requires subjects of investigations to make such requests in written form to the OEIG.

⁶ Set forth in Chapter I, Policy 1.10 of this Policy and Procedures Manual, *supra*.

⁷ Set forth in Chapter I, Policy 1.10 of this Policy and Procedures Manual, *supra*.

CHAPTER VI

REVOLVING DOOR PROHIBITION

POLICY 6.10: Compliance with Administrative Rules

The OEIG will comply with Admin. Code § 1620.610, which states as follows:

Section 1620.610 Revolving Door Prohibition

- a) *Within 6 months after the effective date of PA 96-555 (August 18, 2009), each executive branch constitutional officer shall adopt a policy delineating which State positions under his or her jurisdiction and control, by the nature of their duties, may have the authority to participate personally and substantially in the award or fiscal administration of State contracts or in regulatory or licensing decision.⁸ These policies shall be filed with the Commission and appropriate Executive Inspector General. [5 ILCS 430/5-45(c)]*
- b) *No later than June 1, 2010, and annually thereafter, each Executive Inspector General shall report to the Commission his or her determination of any additional State positions under his or her jurisdiction, not otherwise subject to the policies required by Section 5-45(c) of the Act, that are nonetheless subject to the notification requirement of Section 5-45(f) due to their involvement in the award or fiscal administration of State contracts or in regulatory or licensing decisions. [5 ILCS 430/5-45(d)]*
- c) *Any State employee in a position subject to the policies required by subsection 5-45(c) or a determination of Section 5-45(d) of the Act, but who does not fall within the prohibition of Section 5-45(h), who is offered non-State employment during State employment or within a period of one year immediately after termination of State employment shall, prior to accepting such non-State employment, notify the appropriate Executive Inspector General. [5 ILCS 430/5-45(f)] The employee's notification to the appropriate Executive Inspector General must include:*
 - 1) the employee's name;
 - 2) a description of the positions the employee held in State government in the last 12 months, including the title, responsibilities, and employing State agency or agencies;
 - 3) the title, description and responsibilities of the prospective employment position;
 - 4) the name, description, ownership, corporate structure including its parent and any subsidiaries, and contact information of the prospective employer;
 - 5) in the case of self-employment, that is, when the employee will be an independent contractor who receives compensation or fees for services

⁸ The italics set forth in this section are in the original text.

provided, regardless of whether those fees are paid directly or through a third party, the employee's initial submission shall include a list of known clients with which the employee or the employee's business intends to contract. The employee must update this list for a period of one year after termination of State employment when the employee or the employee's company intends to contract with a new client and submit the names of each additional client to both the former employee's Ethics Officer and the appropriate Inspector General.

- 6) a statement from the Ethics Officer or Officers of the State agency or agencies employing the employee in the last 12 months that identifies any contracts the prospective employer, or its parent or subsidiaries have had with the State agency or agencies in the last 12 months, the amounts of those contracts, any regulatory or licensing decisions made by the State agency or agencies in the last 12 months that applied to the prospective employer or its parent or subsidiary, whether the employee was involved in any regulatory, licensing or contracting decisions or activities regarding the prospective employer or its parent or subsidiary within the last 12 months, and if the employee was involved, a description of that involvement. If the Ethics Officer is the employee seeking the determination or is unable for any reason to provide this statement, the Executive Inspector General may consider a statement provided by another appropriate employee or officer. The statement from the ethics officer must be submitted to the appropriate Executive Inspector General within 5 calendar days after receiving notification from the employee.
- d) *Within 10 calendar days after receiving notification from an employee or officer in a position subject to policies required by subsection (a) the Executive Inspector General shall make a determination as to whether the State employee is restricted from accepting such employment by Section 5-45(a) or (b) of the Act. Such a determination must be in writing, signed and dated by the Executive Inspector General, and delivered to the subject of the determination within 10 calendar days.* [5 ILCS 430/5-45(f)]
- e) *A copy of such a determination shall also be forwarded to the ultimate jurisdictional authority, the Attorney General and the Commission.* [5 ILCS 430/5-45(g)] If an Executive Inspector General fails to make a determination within 10 calendar days after receiving a notification described in subsections [(c)]⁹ and (d), the EIG shall report this failure to the Attorney General and Commission immediately.
- f) *An Executive Inspector General's determination may be appealed to the Commission by the person subject to the determination or the Attorney General no later than the 10th calendar day after the date of the determination.* [5 ILCS 430/5-45(g)]
- 1) The appeal filed with the Commission shall contain a copy of the Executive Inspector General's written determination and a verified statement that explains

⁹ The original text of § 1620.610 refers to subsection (e).

the basis for arguing that the determination was in error. Copies of the appeal shall be sent to the relevant Executive Inspector General and shall also be sent to the subject of the determination, if filed by the Attorney General, or the Attorney General, if filed by the subject of the determination.

- 2) The Attorney General shall serve a complete copy of the Executive Inspector General's revolving door determination file on the appellant with a copy to the Commission within 48 hours after the appeal is filed with the Commission.
 - 3) Any objection to the appeal by the subject of the determination or by the Attorney General shall be filed with the Commission within 5 calendar days after the filing unless the Commission grants an extension of time.
 - 4) *The Commission shall seek, accept and consider written public comments regarding a determination.* A copy of the appeal will be posted on the Commission's web site and be posted at the Commission's offices, with instructions on how written public comments may be forwarded to the Commission for consideration. *The Commission shall assess, in addition to any other relevant information, the effect of the prospective employment or relationship upon the decisions referred to in Section 5-45(a) or (b) of the Act, based upon the totality of the participation by the former officer or employee in those decisions.* [5 ILCS 430/5-45(g)]
 - 5) The Commission shall decide whether to uphold an Executive Inspector General's determination within 10 calendar days after receiving the appeal. Copies of the Commission's decision shall be sent to the former officer or employee, the Attorney General, the relevant Executive Inspector General, and the ultimate jurisdictional authority.
- g) *Any State employee in a position subject to the policies required by Section 5-45(c) or a determination of Section 5-45(d) of the Act, who is offered non-State employment during State employment or within a period of one year immediately after termination of State employment, but fails to provide the required notice set forth in subsection (c), shall be subject to a fine pursuant to Section 50-5(e) of the Act* [5 ILCS 430/5-45(f)].
- h) Any employee or officer who receives offers of non-State employment during State employment or within a period of one year immediately after termination of State employment and who is concerned about the effect of accepting the employment offer vis-à-vis the revolving door prohibition may seek a determination as provided in this Section.¹⁰

¹⁰ Subsection (h) appears in the original text.

POLICY 6.20: OEIG Revolving Door Forms

Pursuant to Admin. Code § 1620.610, the OEIG has made available on its website¹¹ and attached to this Manual the Notification of Non-State Employment Offer (OEIG FORM 500). The contents of Notification of Non-State Employment Offer (OEIG FORM 500) are consistent with Admin. Code § 1620.610 set forth above.

¹¹ Available at https://www.illinoistreasurer.gov/Executive_Inspector_General/RevolvingDoorPolicy

CHAPTER VII

MANDATED REPORTING

POLICY 7.10: Compliance with Mandated Reporting

The OEIG will provide reports to the Executive Ethics Commission consistent with Admin. Code §§ 1620.300(c)(4) & .810, which state in part:

Section 1620.300 Conduct of Investigations

. . .

- (4) Each EIG shall disclose the opening of all investigation files, as described in Section 1620.330, in writing to the Executive Ethics Commission. The disclosure shall identify the affected office, agency or agencies, the date the investigation was opened, and the investigation's unique tracking number. Reports on all investigations opened in a calendar month shall be submitted to the Commission on or before the 15th day of the following month.

Section 1620.810 Quarterly and Six-Month Status Reports

- a) Each Executive Inspector General shall file a quarterly activity report with the Commission that reflects investigative activity during the previous quarter on or before January 15, April 15, July 15 and October 15 of each year. The activity report shall include:
 - 1) *The number of investigations opened during the preceding quarter, the affected offices or agencies, and the unique tracking number for new investigations.*¹²
 - 2) *The number of investigations closed during the preceding quarter, the affected offices or agencies, and the unique tracking number for closed investigations.*
 - 3) *The status of each on-going investigation that remained open at the end of the quarter, the affected office, agency or agencies, the investigation's unique tracking number, the date opened, and a brief statement of the general nature of the investigation at the time the status report is filed.* [5 ILCS 430/20-65(a)]
 - 4) A statement of the amount of public funds at risk of loss as a result of the alleged misconduct under investigation.
 - 5) A statement of whether the alleged misconduct may give rise to criminal penalties. If law enforcement was notified of the allegations, the report should indicate the date of the notification and the identity of the law enforcement entity notified. If law enforcement was not notified, the report should explain why notification has not occurred.
 - 6) Other information deemed necessary by the Commission to fulfill its duties.

¹² The italics set forth in this section are in the original text.

- b) On January 15, April 15, July 15 and October 15 of each year, *the Attorney General shall submit a report to the Commission indicating:*
- 1) *the number of complaints received from each Executive Inspector General since the date of the last report;*
 - 2) *the number of complaints for which the Attorney General has determined reasonable cause exists to believe that a violation has occurred since the date of the last report; and*
 - 3) *the number of complaints still under review by the Attorney General.* [5 ILCS 430/20-86]
- c) *If any investigation is not concluded within 6 months after its initiation, the appropriate Executive Inspector General shall file a 6-month report with the Commission by the 15th day of the month following it being open for 6 months. The 6-month report shall disclose:*
- 1) *The general nature of the allegation or information giving rise to the investigation (and present allegations or information being investigated, if different), the job title or job duties of the subjects of the investigation, and the investigation's unique tracking number.*
 - 2) *The date of the last alleged violation giving rise to the investigation.*
 - 3) *Whether the Executive Inspector General has found credible any allegations of criminal conduct.*
 - 4) *Whether the allegation has been referred to an appropriate law enforcement agency and the identity of the law enforcement agency to which those allegations were referred.*
 - 5) *If an allegation has not been referred to an appropriate law enforcement agency, the reason for the failure to complete the investigation within 6 months, a summary of the investigative steps taken, additional investigative steps contemplated at the time of the report, and an estimate of additional time necessary to complete the investigation.*¹³
 - 6) *A statement of the amount of public funds at risk of loss as a result of the alleged misconduct under investigation, if the amount of loss is greater than \$5,000.*
 - 7) *If an ultimate jurisdictional authority is a subject of the investigation reported under this Section, the EIG shall inform the Commission separately of this fact.*
 - 8) *Any other information deemed necessary by the Executive Ethics Commission in determining whether to appoint a Special Executive Inspector General. The Commission may direct the Executive Inspector General to provide the*

¹³ The italics set forth in this section are in the original text.

Commission a complete copy of any investigation file. When additional information is needed to determine whether a Special Executive Inspector General should be appointed, the Commission deems the EIG's disclosure of the additional information to the Commission to be "necessary" as provided at 5 ILCS 430/20-95(d).

- d) The Executive Inspector General shall continue to report each investigation not concluded within 6 months on the 15th day of each month, in accordance with subsection (c), until the investigation has been concluded. Each monthly report shall contain a personal verification by the EIG stating: "I have read this report and after thorough examination I believe that this report contains a complete and accurate listing of all investigations required by 2 Ill. Adm. Code 1620.810(c)."
- e) *If an Executive Inspector General has referred an allegation to an appropriate law enforcement agency and continues to investigate the matter, the future reporting requirements of this Section are suspended. [5 ILCS 430/20-65(c)]*¹⁴
- f) All reports shall be provided to the Commission in paper form, electronically or both, as directed by the Commission.

¹⁴ The italics set forth in this section are in the original text.

CHAPTER VIII

FILING A COMPLAINT WITH THE EEC

POLICY 8.10: Filing a Complaint with the Executive Ethics Commission

The OEIG will comply with the provisions of Admin. Code § 1620.300(d), which states as follows:

- d) Any person may complain to the Commission, in writing, concerning an EIG's alleged violation of the Act or this Part. Upon receipt of a complaint, the Commission may notify the EIG and require him or her to provide information related to the investigation in order to determine whether any conduct has occurred that would require the Commission to appoint a Special Executive Inspector General pursuant to 5 ILCS 430/20-21. Under those circumstances, the Commission deems the EIG's disclosure of that information to the Commission to be "necessary" as provided at 5 ILCS 430/20-95(d).

POLICY 8.20: Executive Inspector General Investigation

The OEIG will conduct all investigations relating to complaints made to the Executive Ethics Commission in the same manner as investigations are conducted pursuant to this Policy and Procedures Manual and not inconsistent with Section 20-21 of the Ethics Act.

APPENDIX

OEIG Forms

Table of Forms

FORM 100	Complaint Form
FORM 200	Request to Record Interview
FORM 300	Administrative Rights Form
FORM 400	Request for Documents or Physical Objects
FORM 500	Revolving Door Notification of Non-State Employment Offer



Office of Executive Inspector General for the Illinois State Treasurer

ISTO OEIG Form 100

COMPLAINT FORM

Please print clearly and return the completed form to: Office of Executive Inspector General, Illinois State Treasurer, Marine Bank Building, 1 East Old State Capitol Plaza, Springfield, IL 62701. The form may also be emailed to oig@illinoistreasurer.gov or oeig@illinoistreasurer.gov.

The Office of Executive Inspector General accepts anonymous complaints; *however, please note that the inability to contact you to discuss the complaint may hinder us from thoroughly reviewing and/or resolving your allegations.*

Contact Information:

Name _____ Date: _____

Gender: ☐ Man ☐ Woman ☐ Transgender ☐ Non-binary Date of Birth: _____

Please select the pronouns you use : ☐ she/her/hers ☐ he/him/his ☐ they/them/theirs

Please share your pronoun if it is not listed: _____

Street Address: _____

City

State

Zip Code

Please circle preferred method(s) of contact:

Home Number: _____ Business Number: _____

Other Number: _____ E-Mail: _____

Are you a State of Illinois Employee? ☐ YES ☐ NO

If YES, which agency? _____

Is your complaint related to your State employment? ☐ YES ☐ NO

Complaint Information:

Is your complaint against an employee or vendor of the Illinois State Treasurer? ☐ YES ☐ NO

If NO, our office lacks the authority to review or investigate your complaint. The Office of Executive Inspector General for the Illinois State Treasurer is only authorized to investigate complaints relating to employees of the Illinois State Treasurer and vendors or others doing business with the Illinois State Treasurer.

Have you notified any other Federal, State, or local agency of your complaint? ☐ YES ☐ NO

If YES, with what agency did you file a complaint? _____

What is the complaint number? _____

Has your complaint been resolved? ☐ YES ☐ NO

If YES, briefly summarize the results: _____

Have you previously filed a complaint with the Office of Executive Inspector General? 0 YES 0 NO

If YES, please list any known case number(s): _____

Is this complaint related to your previously filed complaint? 0 YES 0 NO

May we refer your complaint to the appropriate agency, if necessary? 0 YES 0 NO

(Once your complaint is referred, you may be contacted by that agency as part of its investigation)

If your complaint is referred, do you want your name and contact information removed? 0 YES 0 NO

Please provide as much detailed information as possible about the individual(s) you are complaining about.

Subject of Complaint's Name: _____ Phone: _____

Approximate Age: _____ Gender: ☐ Man ☐ Woman ☐ Transgender ☐ Non-binary

Street Address: _____

City

State

Zip Code

Please summarize your complaint, including the date and time of alleged incident(s). Please attach any documentation or other evidence in support of your complaint.

[illegible]

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

Please list other person(s) who could be a witness to the complaint you have alleged:

Name	Any identifying information (Agency, Title, Telephone Number, Email, etc.)
Name	Any identifying information (Agency, Title, Telephone Number, Email, etc.)
Name	Any identifying information (Agency, Title, Telephone Number, Email, etc.)

Please mail the completed form to:

Office of Executive Inspector General
Illinois State Treasurer
Marine Bank Building
1 East Old State Capitol Plaza
Springfield, IL 62701

Or email the form to:

oig@illinoistreasurer.gov or
oeig@illinoistreasurer.gov

Illinois law provides that the identity of any individual providing information to an Executive Inspector General shall be kept confidential and may not be disclosed without the consent of that individual or when disclosure of the individual's identity is otherwise required by law. 5 ILCS 430/20-90a. Illinois law states that any person who intentionally makes, to an Executive Inspector General, a false report alleging a violation of the State Officials and Employees Ethics Act is guilty of a Class A misdemeanor. 5 ILCS 430/50-5(d).



Office of Executive Inspector General for the Illinois State Treasurer

ISTO OEIG Form 200

REQUEST (CONSENT) TO RECORD INTERVIEW

Date: _____ Location: _____ Case Number: _____

I/We _____

of (City, State) _____

hereby authorize investigator(s) _____ and _____

from the Executive Inspector General for the Illinois State Treasurer to record our interview/conversation on

(Date) _____ at _____ am/pm.

I understand that I am not required to consent to such recording but have been asked whether I am willing to consent. **I have given this written permission** to the above-named investigator(s) freely and voluntarily and without threats or promises of any kind.

Employee Name (printed)

Employee Signature

Witness Name (printed)

Witness Signature

NOTICE: You have the right to refuse to have the interview recorded. You have the right to stop the recording of the interview at any time. Refusing to consent to have the interview recorded or stopping the recording at any time shall not constitute failure to cooperate in the investigation or otherwise subject you to any discipline or penalty. However, asking to stop the recording WILL NOT STOP THIS INTERVIEW. At any time, you may request that the interview be recorded.

I understand that I am not required to consent to such recording but have been asked whether I am willing to consent.

At this time **I DO NOT CONSENT** to the recording of this interview.

Employee Name (printed)

Employee Signature

Witness Name (printed)

Witness Signature



Office of Executive Inspector General for the Illinois State Treasurer

ISTO OEIG Form 300

ADMINISTRATIVE RIGHTS

NAME _____ DEPT _____ TITLE _____

DATE _____ TIME _____ LOCATION _____

I understand that I am here today to be interviewed by _____ and
_____ from the Office of Executive Inspector General (“OEIG”) for the
Illinois State Treasurer.

I have been informed that this is an administrative investigatory interview and I understand that this
investigatory interview is part of an official administrative inquiry, and that pursuant to the State Officials
and Employees Ethics Act, 5 ILCS 430/20-70, I am obligated to cooperate.

I further understand that:

- Refusal to cooperate in this investigatory interview could subject me to disciplinary action, up to and including discharge.
- As part of my duty to cooperate, the OEIG is requesting that I keep any information learned as part of this interview confidential.
- Any false, inaccurate, or deliberately incomplete statements by me, or my refusal to answer, could result in disciplinary action up to and including discharge.
- Any statement made by me in the course of this interview could be used as the basis for disciplinary action up to and including discharge.
- My duty to cooperate and the OEIG’s request to keep any information learned as part of this investigation confidential still requires me to inform any other investigative or auditing authority, e.g., the Illinois Auditor General, about any knowledge or information I may have regarding fraud, abuse or other misconduct.
- Statements made by me during the course of this administrative interview, and the fruits thereof, **CANNOT** be used against me in a subsequent criminal proceeding.
- I may have a union representative, attorney, or coworker uninvolved in the investigation present with me at this investigatory interview.

I also understand that I have the right to have this interview audio-recorded and the right to decline to have it recorded. Withholding consent to audio-record this interview does not amount to non-cooperation. By affixing my signature I am acknowledging that this form was presented to me and I have had a full opportunity to read it and that I understand my administrative rights.

Employee Signature Date

Witness Signature Date

Witness Signature Date



Office of Executive Inspector General for the Illinois State Treasurer

ISTO OEIG Form 400

REQUEST FOR DOCUMENTS OR PHYSICAL OBJECTS

To: _____ Department: _____

Address: _____ Date: _____

Case Number: _____

The Office of Executive Inspector General for the Illinois State Treasurer ("OEIG") is conducting an official investigation. Our investigation involves the collection of information that may be in your possession or control. Pursuant to the authority granted the OEIG under 5 ILCS 430/20-20(2) and Illinois Administrative Code tit. 2, § 1620.300 (2010), we request that you produce the following documents or physical objects in your agency's custody or control:

We request that you produce the above documents on or before: _____

If you believe the release of the above documents or subject matter of this request might violate existing rights or protections under State or federal law, or is personal or confidential in nature, legally privileged or otherwise sensitive, you may seek a determination from the Illinois Executive Ethics Commission ("EEC") relative to such rights or protections. You may assert any existing rights or protections under State or federal law with respect to the request, and such assertions made in good faith do not constitute failure to cooperate with this investigation.

If, in the judgment of the Executive Inspector General ("EIG"), security concerns demand the removal of documents or physical objects, the EIG shall issue a subpoena for the immediate seizure and re-moval of the evidence. If at the time of seizure, you notify the OEIG of your appeal to the EEC, then the OEIG will hold the evidence under seal pending the decision of the Commission.

Evidence obtained by the OEIG in violation of the governing administrative rule will be inadmissible in any proceeding before the EEC.

If you have any questions, please contact the Executive Inspector General.

Submitted by: _____



OFFICE OF EXECUTIVE INSPECTOR GENERAL FOR THE ILLINOIS STATE TREASURER

Revolving Door Notification of Non-State Employment Offer

Please note that, if your state position has been identified as being subject to Section 5-45(c) of the State Officials and employees Ethics Act, 5 ILCS 430/5-45(c), you are required to submit this form to the OEIG and notify the Treasurer's ethics officer **before** accepting any new offer of employment or any new offer from a prospective client that you receive during state employment or within a period of one year after the date of termination of your state employment.

I. Personal Information

State employee's or former State employee's full name:

Personal street address:

City:

State:

Zip code:

Home phone:

Personal cell phone:

State work phone or cell phone:

Personal e-mail:

State e-mail:

Date of hire by state:

Date of birth:

Date of hire by current or last State agency for which you worked:

End date or anticipated end date of State employment:

II. State Employment Information

State employment status:

☐ Current State employee

☐ Former State employee

I am notifying the OEIG of an employment offer because (check all that apply):

☐ I participated in the issuance of contracts or change orders.

☐ I participated in regulatory or licensing decisions.

☐ I am required to notify the OEIG under 5 ILCS 430/5-45(f).

Provide the following information for all job/working titles you held during the past year. Use a separate sheet if necessary.

Position 1

Position 2

Job/working title:

Job/working title:

State agency:

State agency:

Responsibilities:

Responsibilities:

Supervisor name:

Supervisor name:

Supervisor title:

Supervisor title:

Supervisor phone:

Supervisor phone:

Dates position held:

Dates position held:

III. Prospective Employment Information

Prospective employer's name:

Supervisor name:

Job/working title:

Supervisor phone:

Responsibilities:

Describe your prospective employer and its ownership and corporate structure, including the identity of its parents and subsidiaries, if any (use a separate sheet if necessary):

IV. Prospective Client Information

* Complete this section only if you expect to receive compensation directly from one or more of your own clients.
You are required to submit a separate Notification of Offer form for each prospective client.

Prospective client's name:

Services to be provided:

Describe the prospective client, and, if applicable, its ownership and corporate structure, including the identity of its parents and subsidiaries, if any (use a separate sheet if necessary):

V. Prospective Employer or Client's Contracting, Regulatory or Licensing Involvement with the Illinois State Treasurer

Please answer "Yes" or "No" to the following question:

Has the prospective employer or client entered into any contracts with, or been the subject of any regulatory or licensing decisions by the Illinois State Treasurer, within the past 12 months?
(You must verify this information with the prospective employer or client.)

Yes

☐

No

☐

Name, phone number and e-mail address of the individual at the prospective place of employment or the client who verified the information in the question above.

If the prospective employer or client entered into contracts with, or was the subject of regulatory or licensing decisions by the Illinois State Treasurer within the past 12 months, please provide the names, phone number and e-mail addresses of the individual(s) they were in contact with at the Office of the Illinois State Treasurer.

VI. Employee's Contracting, Regulatory or Licensing Involvement with Prospective Employer or Client

Please answer "Yes" or "No" to the following question.

Yes No

- 1.) In the year prior to termination of State employment, did you have any dealings or interactions with your prospective employer or client, its employees or agents, or its parent or subsidiary, other than interviewing for the prospective employment or business relationship?

☐☐

If you answered "Yes" to the previous question, please elaborate below and use a separate sheet if necessary.

- a) Provide detailed information regarding the nature of these dealings, including the names and phone numbers of the employees of the prospective employer or client you had these dealings with.

- b) If you participated in the award of a State contract(s), issuance of State contract change orders or any regulatory or licensing decisions involving your prospective employer or client, please describe these activities, including the monetary value of the contract(s) and a detailed description of your personal involvement in each:

VII. Additional Information

Is there any additional information that might be relevant and helpful to the OEIG in making a determination of eligibility for employment or compensation? If so, please state it here. Use a separate sheet if necessary.

VIII. Certification

I certify and solemnly affirm that all the information provided in the attached Revolving Door Notification and all attachments are true, accurate, complete, to the best of my ability, and reflects the full extent of my participation in the award of any State contracts or the issuance of State contract change orders or regulatory or licensing decisions applicable to the prospective employer or client or its parent or subsidiary during the preceding year or during the year preceding termination of my State employment. I understand that should it be determined that the information provided by me, by means of my written notification to the Office of Executive Inspector General for the Illinois State Treasurer and/or provided by me during a related interview conducted by the OEIG is not true, accurate, and complete, to the best of my ability, I may be found to be in violation of the State Officials and Employees Ethics Act (5 ILCS 430/5-45) and/or other applicable laws.

Signature

Print Full Name

Date

IX. Instructions For Submission

Please submit a completed copy of this form to the OEIG at:

oig@illinoistreasurer.gov or oeig@illinoistreasurer.gov

or

Office of Executive Inspector General
Attn: Revolving Door Determinations
Illinois State Treasurer
Marine Bank Building
1 East Old State Capitol Plaza
Springfield, IL 62701

If you have any questions or require assistance to complete this form please contact:

Heather A. Stone, Executive Inspector General
(217) 557-1972
HStone@illinoistreasurer.gov

Laura Duque, Ethics Officer
(312) 814-3573
LDuque@illinoistreasurer.gov

X. Statement of Division Head

Please review Sections II, III, IV, V, VI and VII of this form. If necessary, please provide any additional information you may have pertaining to the questions in these sections:

Please state whether you, as the employee's supervisor, believe that the current or former State employee should be barred from accepting the employment or compensation offer. **Yes** ☐ **No** ☐

If you answered "Yes" to the question above, please provide an explanation of any conflicts or other issues of which you are concerned:

Certification

I have reviewed the above information and have informed myself with regard to these matters. I certify, to the best of my ability, that the information in Sections II, III, IV, V, VI, VII and X of this form are accurate. If necessary, I have provided information to make the responses more complete.

Signature of Division Head

Print Full Name

Date

XI. Statement of Ethics Officer

Please review Sections II, III, IV, V, VI, VII and X of this form. If necessary, please provide any additional information you may have pertaining to the questions in these sections:

Please state whether you, as the Ethics Officer for the Illinois State Treasurer believe that the current or former State employee should be barred from accepting the employment or compensation offer. **Yes** ☐ **No** ☐

If you answered "Yes" to the question above, please provide an explanation of any conflicts of interests or other issues of which you are concerned:

Has the prospective employer entered into contracts, change orders or been the subject of any licensing or regulatory decisions by the Illinois State Treasurer in the past 12 months? **Yes** ☐ **No** ☐

If you answered "Yes" to the question above, please describe the contract(s) or change order(s) and names of the employees involved from the Office of the Illinois State Treasurer:

Certification

I have reviewed the above information and have informed myself with regard to these matters. I certify, to the best of my ability, that the information in Sections II, III, IV, V, VI, VII, X and XI of this form are accurate. If necessary, I have provided information to make the responses more complete.

Signature of Ethics Officer

Print Full Name

Date

OFFICE OF EXECUTIVE INSPECTOR GENERAL FOR THE ILLINOIS STATE TREASURER



1 East Old State Capitol Plaza
Springfield, IL 62701
(217) 557-1972

oig@illinoistreasurer.gov
oeig@illinoistreasurer.gov

Ethics & Compliance Line:
(833) 966-1651

www.illinoistreasurer.gov/Executive_Inspector_General/

ISTO OEIG INVESTIGATIONS POLICY AND PROCEDURES MANUAL
REVISED 11/2023