

Protecting Our Water Environment

Metropolitan Water Reclamation District of Greater Chicago

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April 14, 2026

Transmittal Via Email Only

Honorable Kari K. Steele
and Honorable Members of the Metropolitan Water
Reclamation District of Greater Chicago Board of Commissioners
100 East Erie Street
Chicago, Illinois 60601

Re: Interim Inspector General Quarterly Report (1st Qtr. 2026)

Dear President Steele and Honorable Members of the Board of Commissioners:

On April 3, 2025, the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago (MWRD or District) enacted the Office of the Interim Inspector General Ordinance, O25-011 (September 4, 2025) in accordance with the MWRD Act, 70 ILCS 2605/4. On May 17, 2025, the MWRD Office of Interim Inspector General (Interim IG Office) initiated operations.¹ The purpose of the Office of the Interim IG is to detect, deter and prevent corruption, fraud, waste, mismanagement, unlawful political discrimination, misconduct or criminal activity in relation to MWRD operations and to assure that no interference or influence external to the Office of the Interim IG adversely affects the independence and objectivity of the office. This report is being submitted in accordance with the Interim IG Ordinance to apprise you of the activities of the office during the period of January 1, 2026 through March 31, 2026.²

¹ On September 4, 2025, the Interim IG Ordinance was amended (O25-011) by the Board of Commissioners to (a) clarify the distribution of confidential summary reports and the maintenance of confidential information, (b) create penalties for violation of the ordinance provisions related to the failure to cooperate and the improper disclosure of confidential information, and (c) expand the scope of authorized public statements by the Interim IG in relation to investigations involving District waste and mismanagement. Metropolitan Water Reclamation District of Greater Chicago, Board of Commissioners Meeting Agenda, Item 2 (File # O25-011) (Sept. 4, 2025), mwrld.legistar.com.

² In accordance with Article VII of the Interim IG Ordinance, this office reports on a quarterly basis (a) the number of complaints received along with the number and type of investigations initiated, concluded and pending, (b) any recommendations made by the Interim IG during the reporting period and whether such recommendations were adopted by the MWRD and (c) any concluded investigations that require a response from the District. Interim IG Ordinance, O25-011, art. VII, para. A-C.

Office of the Interim IG Case Activity

The office received a total of 16 complaints during this reporting period. This number includes those matters resulting from my own initiative (Interim IG Ordinance, art. IV, para. 2).³ Six of these matters are proceeding as an IG Inquiry at this time while a total of 12 IG Inquiries remain pending. Three IG Investigations have been initiated during this reporting period. These investigations relate to alleged conduct involving managerial practices, waste and conflicts of interest. Three investigations have been completed this reporting period as set forth below while five Interim IG investigations are currently pending. Due to administrative reasons, two matters remain pending beyond 180 days.⁴

Office of the Interim IG Concluded Investigations

During the 1st Quarter of 2025, the Office of the Interim IG issued three summary reports. The following provides a general description of each matter. Specific identifying information is being withheld in accordance with the Office of the Interim IG Ordinance where appropriate.

Case No. OIG 25-022: This investigation was initiated after receiving an anonymous complaint stating, in part:

At the September 18, 2025, Board of Commissioners' meeting it was announced that the District will have a team of employees performing in an "Operator's [sic] Challenge" at the National Water Environment Federation conference in Chicago. I really question what was the benefit to the taxpayers for this?

The employees involved with the "Sewer Rats" team spend hundreds of hours of paid time throughout the year to practice for this competition. The training is occurring during normal work hours. There is a training facility that was prepared at a remote site specifically for this training and requires practice materials, equipment and utilities, as well as uniforms. When the employees are training and competing on paid time, not only are they not

³ Upon the receipt of a complaint, the Interim IG Office will undertake an analysis of each complaint as part of the intake process and determine whether a formal investigation should be initiated or whether the matter should proceed as an "IG Inquiry." This level of review involves a determination of the existence of corroborating evidence before proceeding with a formal investigation. When an IG Inquiry reveals the existence of corroborating evidence, the matter will be upgraded to a formal investigation. Should additional information be developed negating the viability of the complaint, the matter will be closed without further inquiry.

⁴ See Interim IG Ordinance, art. VIII, para. D.

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performing the work they were hired to do, [but they are also] working outside of their job classification as well. For example, mid-level engineers are performing work designed as union trade work, i.e. cutting and fitting pipe or maintaining pumps, as well as master mechanics and tradespersons performing laboratory work. Over the history of the District's involvement with this National, and also local competitions, several employees have been injured during practice causing the loss of their ability to perform their normally compensated work as well [as] the cost of their care and recovery.

The District does not appear to have [a] budget line for this competition.... Instead, the cost is hidden in the budget as normal time at work, supplies and training.... It is therefore requested that the Office of the Interim Inspector General look into the cost and benefits to the taxpayers for the District's involvement in the [Operations Challenge]....

Accordingly, this investigation was undertaken to ascertain whether the District's participation in the Operations Challenge represents a violation of the District's fiduciary duty as set forth in the Ethics Ordinance.

Art. II, sec. B. Fiduciary Duty, states:

Commissioners, Officers and Employees shall at all times in their performance of their public duties owe a fiduciary duty to the District. The fiduciary duty owed by Commissioners, Officers and Employees shall include, but is not limited to, the following duties:

4. Conserve District property and assets and avoid their wasteful use.⁵

WEFTEC Operations Challenge

The Water Environment Federation's Technical Exhibition and Conference (WEFTEC) is the largest annual water quality exhibition in North America and offers water quality professionals

⁵ The Office of the Interim Inspector General is charged with detecting and deterring, among other things, waste in government operations. See Interim IG Ordinance, O25-011, art. II. The ordinance further defines "waste" as the "thoughtless or careless expenditure or abuse of resources to the MWRD's detriment, or potential detriment. Waste also includes, but is not limited to, incurring unnecessary costs from inefficient or ineffective practices, systems or controls." *Id.* At art II (C).

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water quality education and training.⁶ Water Environment Federation (2025), Title. About WEFTEC, <https://www.weftec.org/about>. WEFTEC describes the Operations Challenge as the water sector's "best professional development program wrapped up in a competition" and states that the "Wastewater Olympics" is a "showcase of excellence where skilled teams of professionals compete in timed events that simulate real-world challenges faced in the operation and maintenance of wastewater treatment facilities. Through this competition, participants highlight the critical role of efficient and environmentally responsible wastewater management, fostering camaraderie and promoting best practices within the water sector." *Id.* WEFTEC and the Operations Challenge takes place every year exchanging locations between Chicago and New Orleans and is scheduled to expand to Atlanta in 2030. *Id.*

The Operations Challenge, which hosted 57 competing teams in three divisions in 2025, involves five component events that are designed to test the technical skills and teamwork of the water quality professionals participating. The component events are:

- Process Control: Teams complete a timed written test and use computer-based simulators to solve complex wastewater treatment plant operational scenarios and math problems;
- Laboratory: Competitors analyze wastewater samples to determine metrics like Total Suspended Solids (TSS) and conductivity, following strict standard methods and procedures;
- Collection Systems: In this event, teams simulate a rapid pipe repair by cutting out a leaking section and installing a new 4-inch PVC lateral connection to an 8-inch sewer pipe while it is supposedly "in service";
- Vaughan Maintenance: Teams must perform mechanical repairs and maintenance on a specific Vaughan submersible conditioning pump, often including "lock out tag out" safety procedures and rebuilding components;
- Safety: This event simulates a confined space rescue where teams must safely enter a manhole or similar space to rescue an unconscious worker and repair a piece of equipment, such as a check valve. *Id.*

Office of the Interim Inspector General Investigation

This investigation included the interview of three current or former District team captains and a team member of the Second City Sewer Crew, as well as consultation with District officials from General Administration, Human Resources and Public Affairs. This investigation also included the review of budgetary disclosures and open source web platforms where substantial social media coverage of the Operations Challenge and WEFTEC itself are available for review.

Second City Sewer Crew Interviews

The first Operations Challenge was held in 1998 at the WEFTEC conference in Dallas. In 2007-2008, District officials first assigned one of its engineering staff to serve as the first team

⁶ WEFTEC reports that attendance is between 20,000 and 23,000 annually.

captain of the “Windy City Wizards” to compete in the Operations Challenge. The Windy City Wizards, subsequently known as the “Sewer Rats” (2013) and now known as the “Second City Sewer Crew” (2023), has participated in the Operations Challenge since that time with interruption, most recently during the COVID-19 era.⁷ The team captains interviewed stated the Second City Sewer Crew participates under the banner of a “Member Association” based on territory. The District’s team participates under Illinois Water Environment Association (ILWEA). The Operations Challenge takes place during WEFTEC over 2 days and involves 5 component events. The non-laboratory events are changed once every four years on a rotating basis which requires the Second City Sewer Crew team to adapt their training methods and equipment yearly. The District has recently joined Division 1 and received recognition in 2025 by finishing in 2nd place in the process control component event.

Each participating team consists of 4 team members and coaches/alternates although the number of coaches and alternates can change from year to year. The Second City Sewer Crew also relies on District employees to serve as experts to coach the team during practice. The current roster consists of 4 members, including the team captain, one alternate and one laboratory related expert/coach. All team members attend all practice sessions and events although the laboratory coach may not always be present depending on the nature of the scheduled practice. It is generally understood among team members when joining the team that attendance at each scheduled practice and event is required although team coaches providing expert advice will not routinely attend every practice. Approximately 50 - 100 District employees support the team in competition during the Operations Challenge when WEFTEC takes place in Chicago. In 2026, a \$1,300 flat rate is paid for the team’s participation at WEFTEC. Generally, team members are individually responsible for their \$180 annual membership dues to WEFTEC. Travel, hotel and per diem expenditures will cost approximately \$2,000 per team member to attend WEFTEC in New Orleans this year.

In the modern era, the team has practiced at the Ridgeland Avenue Solids Management Area (RASMA) facility. This facility holds 3 truck wash bay areas that are set up to allow the Second City Sewer Crew to practice the pipe break, pump repair and safety components of the WEFTEC Operations Challenge. Recently, however, the team has been practicing at Stickney WRP due to ongoing construction at the Ridgeland Avenue facility.

The Ridgeland Avenue facility is an open air facility that can be cold during the winter months. Therefore, when the team practiced at RASMA, practices would begin in April and extend to October when the Operations Challenge normally occurs. At that time, team members, alternates and coaches would schedule a practice session for 1 day per week from 7:00 a.m. to 10:00 a.m. and increase to 2 days per week during the weeks leading up to the Operations Challenge. Team members/alternates and coaches then continue to their assigned work locations to complete their workdays. Currently, only 1 team member is required to return to an assigned District work location outside of Stickney WRP. Normally, a minimum of 5-6 employees attend the practices.

⁷ The participants interviewed provided substantially similar statements when recollecting their personal involvement in the Operations Challenge.

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The team is generally comprised of employees holding the titles of Treatment Plant Operator, Tradesman, Operating Engineer, Operations Manager, Engineer and Engineering Technician. Since the team practices have shifted to Stickney WRP, which allows for indoor practices, the team has extended practice time into the cold weather months. In preparation for the 2026 Operations Challenge, practices began in November 2025 at a rate of 1 day per month. In early March, practices increased to 1 day per week and beginning in July, the team will increase the number of practices to 2 days per week through the WEFTEC event scheduled for September 26, 2026 in New Orleans. The increased number of practices is believed to be necessary to compete in Division I. The practices are held during compensated time of the District. The compensated time expended during the work week is accrued using “Code 5 – off site District work.” The team’s activities occurring on weekends while participating in WEFTEC and other regional events is uncompensated time.

There are a number of international teams that normally practice with the District’s team the Saturday prior to WEFTEC when it occurs in Chicago. The District hosts the ½ day event at the practice location and has involved the use of a large tent to accommodate participants that is erected by District staff as well as the provision of food and refreshments associated with hosting the event.

In order to effectively compete in the Operations Challenge, it has been necessary to purchase equipment that allows team members to practice under the conditions they will be exposed to at WEFTEC. Since the COVID-19 pandemic period, the District has updated the equipment necessary to prepare for the Operations Challenge due to changes in the format of the component events. As indicated above, WEFTEC changes 1 of 4 of the 5 component events every year which requires the team to make investments to adapt their training to the changes. When the team returned to competition after COVID-19, approximately \$20,000 in equipment was purchased. This year, the safety related component challenge will be new and has required the team to spend approximately \$1,800 on new equipment. Last year, the lab component event was new and required the team to expend approximately \$7,000 - \$8,000. A new pump is also necessary and cost approximately \$8,000 although the retired pumps provide continued service to the District during normal operations. The collections component event required an expenditure of approximately \$600. Accordingly, approximately \$4,500 of equipment is purchased each year. The funds used to support the team are budgeted under the M&O “101 Fund.”

Uniforms are supplied for the team and consist of a jersey, collared shirt, pants, gloves, custom hard hats and duffel bag for each team member. The items are not necessarily purchased every year depending on whether new team members are added. Uniforms are passed down to new members if possible.

There are also regional events taking place around the country that track the component events of WEFTEC and are referred to as “mini-WEFTECs.” The Second City Sewer Crew normally participates in one such event that takes place in June in either Ohio or Colorado. These 3-day events normally include weekend travel and requires a team registration fee plus travel time

and hotel/per diem expenditures for the team members at a cost of approximately \$1,500 per team member. The Second City Sewer Crew is scheduled to participate in the regional competition known as the “Rockey Mountain Rivalry” hosted by the Rocky Mountain Water Environment Association on July 13 - 14, 2026 in Briton, Colorado.

Every other year, the team also travels to Des Moines, Iowa to practice with “The Reclaimers” team. This is a 2-day driving trip requiring travel time over the weekend along with hotel/per diem expenditures for the team members.

The team members were each asked to reflect on the benefits of participating in the Operations Challenge. The following points were identified:

- (a) Professional development, especially for younger professionals;
- (b) District employees are exposed to the entire wastewater process and develop skills outside of their job titles;
- (c) Networking among participating teams as a career building endeavor;
- (d) Morale boosting for participants and District staff as a whole;
- (e) Benefits associated with team building and camaraderie;
- (f) Stature in the wastewater community.⁸

Similarly, team members were also asked to reflect on what they view as the negatives associated with participation:

- (a) Time commitment for team members and coaches can cause a backlog of work;
- (b) Financial costs associated with supporting the team;
- (c) Potential operational strain that occurs when team members are away from work assignments;
- (d) Past injury to a team member;
- (e) Team turnover occurs when employees receive a promotion or increased responsibilities due to time constraints;
- (f) District staff in general could feel annoyed that co-workers are able to engage in this activity during compensated hours of the District.

One former team captain was asked if he believed there was potential for a labor dispute arising because team members are asked to “work” outside of their classifications as covered employees under collective bargaining agreements. The former team captain stated that the District and unions “hammered out a deal” in the early days of the District’s participation in the Operations Challenge in light of the parties’ recognition that participation in the Operations Challenge was for “demonstration purposes only.” The former team captain did not know if this agreement had been memorialized in writing though he believed that if such a dispute did arise,

⁸ The Board of Commissioners has provided its support for the Second City Sewer Crew in the Operations Challenge and recognized the team’s success in 2025. *See* MWRD Board of Commissioners Regular Meeting, September 18, 2025 (Time: 39:30 – 41:22) and October 2, 2025 (Time 27:58 – 30:02). <http://mwrld.legistar.com>.

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the issue would be appropriately viewed as a “past practice” of the employer and, therefore, a permissible work assignment.

Public Affairs

This office consulted with Public Affairs to ascertain its level of support for the Operations Challenge and the Second City Sewer Crew which it does as part of its regular work. In 2025, Public Affairs staff dedicated approximately sixteen hours of staff time covering the Operations Challenge along with the awards ceremony and while supporting the joint practice event taking place with visiting international teams. This support included coordination and purchase of food and water. The total cost to Public Affairs in 2025 was approximately \$1,611 representing staff time and expenditures for supplies. Public Affairs officials stated that, for the District, the Operations Challenge “provides an international platform to demonstrate the District’s operational excellence” while supporting employee “development and morale.” Additionally, this activity “reinforces the District’s reputation as a forward-thinking, workforce-focused agency, supporting the need to attract skilled workers.”

Compensated Time Calculations

This office obtained the 2026 salary data pertaining to each team member (4), alternate (1) and coach (1) and calculated the team’s combined hourly rate as \$375 per hour. Using the practice schedule in place for the 2026 Operations Challenge and including the team’s scheduled participation in the Rocky Mountain Rivalry, the team is expected to dedicate approximately 156 District work hours to preparing for WEFTEC. Using the combined hourly rate for the team and scheduled hours for practice and participation in a regional competition, it is estimated that approximately a \$58,500 salary equivalent will be required to prepare for competition this year. Actual attendance at WEFTEC and participation in the Operations Challenge are not included in this calculation.

Equipment, Travel, Hotel and Per Diem Expenditures

In 2026, estimated costs as outlined above include \$1,300 WEFTEC team entry, \$12,000 travel, hotel and per diem at WEFTEC in New Orleans, \$7,500 for travel, hotel and per diem for the Rocky Mountain Rivalry and \$1,600 for safety related equipment purchases this year for a combined total of \$22,400. This amount does not include those costs related to uniforms and miscellaneous driving expenses.

Department of Human Resources

This office consulted with a senior Human Resources official to obtain his cost-benefit perspective to the District in relation to the Second City Sewer Crew’s participation in the Operations Challenge. The official recognized the positive outcomes generated by sponsoring this endeavor including morale, professional development opportunities and the importance of

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building upon the District's strong reputation for leadership among water quality professionals. However, despite the success the team has achieved along with other undeniable benefits, the Human Resources official also believed that the analysis should include consideration of whether these resources could be better applied to further the professional development needs of a greater number of staff.

In September 2019, a Treatment Plant Operator III practicing for the team injured his shoulder while cranking a winch to lift a 100-pound manikin from a confined space during a rescue simulation. The injury required the team member to undergo surgery and an eighty-eight work-day period of disability. The total costs incurred by the District as a result of this injury were \$160,150.86. On March 2, 2023, the Board of Commissioners granted authority to settle the related Illinois Worker's Compensation Commission claim. MWRD Board of Commissioners Regular Meeting, March 2, 2023, Agenda Item No. 23-0220.

Findings and Conclusion

The question of whether the District's participation in the Operations Challenge is reasonable and appropriate or should otherwise be classified as the "thoughtless or careless expenditure or abuse of resources" or be viewed as "incurring unnecessary costs" rests on the careful and objective consideration and balancing of the positive and negative outcomes derived from participation. *See* Interim IG Ordinance, O25-011, art. II. C. To be sure, however, notwithstanding that reasonable minds may reach different conclusions on this question, I have found no evidence in this investigation to suggest the current or former Second City Sewer Crew participants approached their involvement in the Operations Challenge with anything but good intentions, dedication, and professionalism. Similarly, although this investigation did not involve direct consideration of the structure or management of the Operations Challenge by WEFTEC, it appears that the endeavor itself is credible and meaningful.

Positive Outcomes

The positive outcomes relating to participation involve the professional development, career building and networking opportunities available to team members along with the team building, morale boosting and leadership development that occurs through participation. While these outcomes may appear limited to those who participate, the benefits derived from the hard work and success of the Second City Sewer Crew are evident on a larger level as well. The District has shown enthusiasm and pride in the team's participation and success. Moreover, the District's participation in the Operations Challenge undoubtedly supports the District's professional standing in the water quality community. The interviews conducted and consultation with District officials has revealed a consistent acknowledgement that these outcomes are tangible and positive. The relative weight to be assigned to these positive outcomes must be considered in light of the existence of the negative outcomes.

Negative Outcomes

The negative outcomes include the time commitment required of team members to be away from their work assignments to practice and participate. During interviews, the team members discussed how their time commitment impacts their ability to manage workload creating a backlog of work due to their participation and, according to one team member, this reality is a central reason for turnover among team participants. The level of time commitment by team members also suggests that a potential strain to District operations is triggered as a result of team members' absence from their work assignments. One team member stated, however, that the operational strain is minimal and can be minimized with planning.

One way to measure the negative outcome associated with the time commitment is to recognize the cost to the District of work hours lost to the time dedicated to practice and preparation for the Operations Challenge. Approximately 156 work hours representing \$58,500 in salary equivalency will be required to compete in the 2026 event. The overall effect to District operations due to the lost work hours is difficult to assess but is otherwise undeniable when considering the time commitment itself and resulting lost work hours to District operations.

The actual cost to the District for equipment, travel, hotel and per diem expenditures is estimated at \$22,500 for 2026. This number will fluctuate year-to-year based upon the location of WEFTEC, nature of equipment purchases required for the year and level team turnover. The financial costs related to the potential for injury to a team member is also a real factor in light of the expenditures related to the 2019 injury documented above.

The negative outcomes associated with the potential for jealousy or annoyance among District employees is difficult to calculate though also an undeniable consequence of the team's participation. Related to this negative outcome is the observation by a Human Resource's official that the resources dedicated to this endeavor could be applied in another way to directly benefit the professional development of a greater number of District employees.

Recommendations

Based on all of the foregoing, the following recommendations are made:

1. District management should undertake its own cost-benefit analysis to evaluate the projected costs, in all forms, against the anticipated benefits of participating in the Operations Challenge. This analysis should include an objective consideration of the weight to apply to each factor identified here, as well as those that management identifies.
2. As part of its analysis, management should also consider options to reduce the overall impact of negative outcomes, such as considering participation in the Division 2 or 3 levels of the Operations Challenge; reducing the number of lost work hours and

consequential reduction of compensated time by convening team practices on off duty hours; and participating in the Operations Challenge only when it occurs in Chicago when travel is not required.

3. The costs associated with participation are not clearly identified in one source. In order to facilitate transparency, should management determine to continue participation in the Operations Challenge, it is recommended that management present its decision to the Board of Commissioners seeking authority in the same manner when authority is sought from the Board of Commissioners to participate in annual parade events.

The recommendations are currently pending.

Case No. OIG 25-024-A: This investigation was initiated following a complaint by a District employee that she has been the subject of threats and harassment by her former husband who is also an MWRD employee. In summary, the complainant explained that during the period of their divorce in the Spring of 2025, the subject called her cellular telephone and “threatened” her that he was going to file a complaint against her and that she would be subject to an Inspector General investigation and lose her job as a result and ruin her life. The complainant explained that the telephone threats were so numerous that she had to change her cellular number. The complainant also stated that the harassment ceased when the divorce proceedings concluded. This matter also included consideration of alleged off duty conduct by the subject that resulted in his arrest and detention in late 2024. These issues were addressed separately under OIG 25-024-B, below.

This investigation was undertaken to ascertain whether the subject violated the District’s Code of Conduct as set forth in the Ethics Ordinance, wherein it admonishes all District personnel not to engage in “behavior constituting harassment, discrimination, violence, bullying, threats, intimidation or retaliation.” Ethics Ordinance, O22-004, Art. I, sec. B. 12 (April 7, 2022). This investigation involved the interview of eight employees, including the subject, analysis of various telephone records obtained pursuant to subpoena and consideration of records maintained by the Circuit Court of Cook County and Chicago Police as well as District personnel files and related employment records.

Each of the District personnel interviewed in this case offered their recollection of interactions with the complainant or subject as part of their District duties. The subject disputed the allegations during his interview taken under oath and claimed that it was common for he and the complainant to call each other during the time frame identified by the complainant and beyond.⁹

The subpoenaed cellular records reveal a pattern of communication between the complainant and the subject which was being initiated, at various intervals, by each involved

⁹ Clerk of the Circuit Court of Cook County records reveal that a petition for the dissolution of marriage was filed on February 26, 2025 and judgment entered on April 25, 2025.

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employee during the time period under review and beyond. The records also confirm that the complainant's cellular number changed during this time although the new cellular number continued to be used to engage in a pattern of communication with the subject. The factual allegations in this matter are disputed. The statements and documentary evidence developed in this matter failed to provide direct or indirect evidence to demonstrate that the subject engaged in harassment and making employment related threats against the complainant. Without such corroborating evidence to support the allegations, insufficient evidence exists to support the claim. Accordingly, based upon the preponderance of the evidence, the allegation that the subject threatened and harassed the complainant were not sustained.

Case No. OIG 25-024-B: This matter arises out of allegations involving threats and harassment involving formerly married employees of the District that have been considered under OIG 25-024-A. The issues raised here pertain to observations made during the course of the underlying investigation. Central to these observations is the manner in which the District manages the incidence of employee arrests occurring off premises during non-duty hours.

In summary, Cook County Circuit Court and Chicago Police records reveal that the subject was arrested on November 22, 2024 and held in custody until January 4, 2025 on charges of domestic battery. On Monday November 25, 2024, a family member of the subject reported to the District that the subject had been arrested and was in custody and it was unknown when he could return to work. It was not immediately known to the District that the alleged victim was also a District employee. During the ensuing weeks, managers within the District became aware of this fact and monitored the criminal proceedings to ascertain whether the subject would be convicted of a crime. The underlying charges were subsequently dismissed and the subject returned to work. Because the subject lacked sufficient accrued leave to cover his absence while in custody, he was considered absent without leave and faced disciplinary action upon his return to duty which was imposed in February 2025.

OIG 25-024-B - Findings and Conclusion

The fact that an employee arrest occurs outside of work cannot be the basis for the imposition of disciplinary action. Nonetheless, the fact that an employee becomes the subject of a public arrest can and should trigger the legitimate necessity for government managers to engage in careful consideration of various potential issues. For example, whether the underlying factual circumstances could have involved the rare circumstances when a fitness-for-duty examination is warranted or even whether the factual basis for the arrest, supported by probable cause before the court, could require the consideration of other issues impacting employee safety. *See generally Bodenstab v. Cook County*, 569 F.3d 651 (7th Cir. 2009).

As outlined separately in OIG 25-024-A, District supervisors and managers became aware of Employee A's arrest and then subsequently became aware that the alleged victim giving rise to the arrest was a District employee. The manner in which this information was reported and shared among managers, while being at all times professional, did not appear to be clearly or efficiently

communicated and there appears to be no existing internal guideline to foster communication of this important information among managers and Human Resources in an efficient manner. This is not to say that management and communication of these issues did not take place, however, a sense of hesitancy was observed due to the confidential nature of the issues as well as the lack of administrative clarity in the proper reporting and handling of the information.

Accordingly, this office recommended:

1. The District consider the promulgation of a written rule, procedure or code of conduct mandating an employee report to the District the fact of an (felony or misdemeanor) arrest within a proscribed period using an approved method of notification;
2. The District should consider the implementation of a guideline or policy directing managers to report the incidence of an arrest to Human Resources; and
3. Human Resources should implement an internal guideline setting forth the method to be used in collecting, managing and considering arrest information.

These recommendations are currently pending.

Interim IG Quarterly Report – January 8, 2026

When an Interim IG summary report is issued with recommendations for disciplinary or remedial action, the District is required to respond within 45 days or, if approved, a 30-day extension thereof. *See* Interim IG Ordinance, art VII, para C. Two outstanding matters remained pending at the time of the January 8th Quarterly Report. The following information serves to update you with the status of these pending matters.

Case No. OIG 25-004: This investigation was initiated after receiving an anonymous complaint stating that a District “boss” and an “employee” were engaged in a personal romantic relationship. This investigation was undertaken to ascertain whether such a relationship between a supervisor and subordinate existed and, if so, whether the fiduciary duty and/or conflicts of interest provisions of the Ethics Ordinance have been implicated. The original summary of this investigation is more fully set forth in the *Interim Inspector General Quarterly Report*, pp. 2-7 (4th Qtr. 2025)(January 8, 2026).¹⁰

OIG 25-004 - Recommendations

This case demonstrates the need for a District-wide policy to address circumstances of this nature. Workplace issues related to bias and preferential treatment combined with those associated with preventing harassment, discrimination and retaliation should form the basis for exploring the

¹⁰ https://mwrdd.org/sites/default/files/2026-01/OIG_Quarterly_Report_4th_Quarter_2025.pdf.

implementation of guidelines to address personal relationships in the workplace. Guidelines addressing acceptable behavior that include disclosure requirements of personal romantic relationships and managing the workplace risks related to them should be considered. I also recommend that these guidelines address personal relationships involving contractors and their employees working in District facilities.

Finally, this case also highlights the vulnerability contained in the Ethics Ordinance wherein it seemingly *permits* commissioners, officers and employees to directly supervise or evaluate a relative's job performance if the supervisor-subordinate relationship existed prior to April 7, 2022. Ethics Ordinance, art. II, sec. C. 6 (Supervision and Employment of Relatives). This provision should also be amended to eliminate the existing vulnerabilities associated with the supervision and performance review of relatives by relatives in the District.

The District is currently in the process of developing a policy to address personal relationships in the workplace, including contractors. This office will update this matter pending the implementation of any policy or ordinance changes.

Case No. OIG 25-026: This investigation was self-initiated in accordance with the Interim IG Ordinance (art. IV. sec. A. 2.) to ascertain whether prohibited political activity¹¹ was occurring within the District in relation to a political fundraiser held on Sunday September 28, 2025 called "Women for [Commissioner]" that took place in connection with the Commissioner's campaign for election. The original summary of this investigation is more fully set forth in the *Interim Inspector General Quarterly Report*, pp. 7-13 (4th Qtr. 2025)(January 8, 2026).

OIG 25-026 - Recommendation

The preponderance of evidence developed in this investigation supports the conclusion that a Commissioner's Assistant knowingly used District resources, electronic mail, during paid work time to engage in prohibited political activity as defined by the Ethics Ordinance. Moreover, the Commissioner's Assistant also prepared/amended political campaign material (September 29, 2025) and sought assistance of a third party to engage in political work on behalf of the campaign (August 15, 2025) all done during District compensated time while using District IT resources.

Finally, the conduct of the Commissioner's Assistant also stands in violation of the provisions of the MWRD Administrative Procedures Manual, 4.11.0, Acceptable Use of Information Technology Resources (June 6, 2025) when the Commissioner's Assistant used District technology resources in a manner that is unlawful and against District policy. Accordingly, a recommendation that the Commissioner's Assistant be disciplined through a written admonishment as to the importance of ensuring compliance with her ethical and employment obligations to the District. In this case, her obligation to refrain from engaging in political activity during compensated time while using IT resources of the District.

¹¹ The term "Prohibited Political Activity" is defined by the Ethics Ordinance, art. I. sec. C. 27 (a-p).

Honorable Kari K. Steele and Honorable Members
of the Metropolitan Water Reclamation District
of Greater Chicago Board of Directors
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The District adopted this recommendation and disciplinary action has been appropriately imposed on the Commissioner's Assistant.

Conclusion

Thank you for your time and consideration with these issues. Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Very truly yours,



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