

Protecting Our Water Environment



Metropolitan Water Reclamation District of Greater Chicago

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July 13, 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: Office of the Interim Inspector General Quarterly Report (2nd 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)(Interim IG Ordinance) 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 or misconduct 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 April 1, 2026 through June 30, 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 23 complaints during this reporting period. This number includes those matters resulting from my own initiative (Interim IG Ordinance, art. IV, para. 2).³ Eight 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 benefits fraud, contractor misconduct and employee misconduct. Five 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 2nd Quarter of 2026, the Office of the Interim IG issued five summary reports. The following summary provides a general description of each matter and the investigation conducted along with recommendations made, if any. Specific identifying information is being withheld in accordance with the Office of the Interim IG Ordinance where appropriate.

Case No. OIG 25-008

In accordance with the Interim IG Ordinance (art. IV. sec. A), this investigation was initiated after receiving a complaint alleging the subject Senior Official exhibited favoritism toward a subordinate Department Employee when the Senior Official sought the creation of a high level New Position and during the selection process leading to the promotion of the Department Employee into the New Position. This investigation was undertaken to ascertain whether the alleged conduct occurred and, if so, whether the fiduciary duty provision of the Ethics Ordinance has been implicated.

During the course of this investigation, this office obtained records via Interim IG subpoena from both the Cook County Office of the Independent Inspector General (OIIG) for its file pertaining to IIG19-0579 and Private HR Consultants for its records and source materials related to the preparation of the *Job Analysis and Examination Plan for [New Position]* (March 2024) that was prepared by Private HR Consultants for the District in relation to the posting for the New Position. This office also secured the Human Resources file related to the creation of the New Position as well as the hiring sequence itself. Additionally, this office conducted meetings and interviews with the complainant and various current and former District staff, as well as the

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" or otherwise be referred or closed. 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.

interview of Senior Official. Finally, this office also conducted several electronic mail searches focusing on the process of creating the New Position as well as the selection process resulting in the promotion of Department Employee into the New Position.

Governmental 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:

1. Commissioners, Officers and Employees *shall act impartially* in the performance of their duties, so that no private organization or individual is given preferential treatment.
2. Commissioners, Officers and Employees have a special relationship of trust with the public and therefore *must avoid conduct that gives the appearance of impropriety* and/or that they are violating their fiduciary duties to the District. Whether particular circumstances create an appearance of impropriety or can be considered a violation of fiduciary duties to the District shall be determined from the *perspective of a reasonable person* with knowledge of the relevant facts.... (emphasis added).

Office of the Independent Inspector General Investigation No. IIG19-0579⁵

In this investigation, the OIIG received information suggesting that Senior Official's close family member was friends with Department Employee and that this association fostered a biased and preferential process facilitated by Senior Official which resulted in Department Employee being selected for a vacant position in the department. The OIIG found a preponderance of the evidence supported the conclusion that Department Employee received special considerations during the process, including an offsite private meeting with Senior Official to discuss the vacant position prior to formal interviews. The OIIG determined that the special considerations afforded to Department Employee elevated her standing among all applicants despite the professional judgement of Human Resources wherein Department Employee was assessed below many of the other qualified candidates for the vacant position.

The OIIG determined that a strong appearance of impropriety permeated the selection of Department Employee over the other applicants and recommended, *inter alia*, the imposition of

⁵ This case is reported in the MWRD Office of the Independent Inspector General Quarterly Report, at pp. 2-3 (April 15, 2021)(https://mwrdd.org/sites/default/files/2025-05/OIG_Quarterly_Report_1st_Quarter_2021.pdf).

disciplinary action by counselling and admonishment of Senior Official against future hiring decisions creating an appearance of impropriety.

On May 14, 2021, a former senior official issued a District interoffice memorandum to the Inspector General responding to the subject recommendation by writing “an independent investigation of [Senior Official] is on-going, and the results will be transmitted to your office upon its completion.”

This office contacted the former senior official to ascertain the outcome of the District’s review of the sustained finding. The former senior official explained that “[a]s to the investigation, [another senior official] and I sat down with [Senior Official] and discussed the situation. As a result, I counseled [Senior Official] then at that time, and she agreed that HR would handle all aspects in the future of the hiring process.” The former senior official also explained that there was not any formal documentation produced of the meeting and stated “it was just the meeting and the verbal counseling.” And we would have then contacted the OIIG with that information.

This office also interviewed the other former senior official present during the counselling session involving Senior Official. The other senior official recalled the meeting and the counselling provided wherein the former senior official explained that the hire of Department Employee “didn’t look good” and placed the MWRD in a negative light. However, this senior official did not specifically recall whether the former senior official instructed Senior Official to refrain from involving herself in future hiring sequences or whether a memorandum was generated to memorialize the meeting.

Interview of Senior Official

Senior Official was asked to turn her attention to the creation of the New Position in 2023. Senior Official was asked when she determined that the New Position was necessary and she responded that for “two or more years” she had been seeking the creation of the New Position. Senior Official specifically recalled that a former HR senior official opposed the creation of the position. However, Senior Official explained that she would raise the issue of the creation of the New Position periodically because of its overall importance to the department.

In connection with the time period leading to the Senior Official’s signed June 16, 2023 interoffice memorandum to HR Director entitled “Request Consideration for [New Position],” Senior Official was asked to explain Department Employee’s involvement in bringing this request forward. Senior Official denied, to the best of her recollection, that Department Employee was involved in the process.

Senior Official was presented a February 2, 2023 email from Department Employee to Senior Official with an attached draft “Position Content Questionnaire (PCQ)” for the New Position. Senior Official stated that a PCQ is required for each new position. Senior Official was asked if Department Employee initiated the draft PCQ or provided any of the narrative contained in the draft PCQ of February 2nd and Senior Official said she could not recall but explained that

“at some level, [Department Employee] was involved” in drafting the subject PCQ for the New Position. Senior Official then explained Department Employee had the “most knowledge” of what was being asked for in the New Position because Department Employee was already performing those tasks which were “above and beyond” the duties of Department Employee at the time. Those additional “special duties” would become job responsibilities covered in the New Position. Therefore, Senior Official thought it was important that Department Employee was involved in documenting those special duties and to “help shape” the New Position.

On June 15, 2023, Department Employee again emailed a copy of the February 2nd draft PCQ to Senior Official. Senior Official could not recall the circumstances surrounding the June 15th email and its attachment. Similarly, Senior Official had no recollection of the June 20, 2023 email she sent to Department Employee stating “[p]lease spell check and correct all misspellings. Thx” with an attached draft PCQ reflecting changes made from the June 15th draft PCQ. Later in the afternoon on June 20, 2023, Department Employee emailed Senior Official stating “[c]ompleted, please see attached” and attached a revised draft PCQ for the New Position.

Senior Official was asked to turn her attention back to the June 16, 2023 memorandum to the HR Director entitled “Request Consideration for [New Position].” Senior Official stated that this memorandum was a necessary part of the process in seeking the creation of the New Position. When asked if Department Employee assisted in drafting the document, Senior Official stated that she drafted the document. Senior Official was then presented a Friday June 16, 2023 email from herself to Department Employee stating “[p]lease review and include additional tasks that we do in the [department] that I may have missed.”

Senior Official was presented an email from Department Employee to Senior Official also sent on June 16th less than one hour later stating “[p]lease see an updated version” that included a draft of the memorandum containing 10 bullet point additions to the draft memorandum previously sent by Senior Official to Department Employee. The following bullet points were added to the draft memorandum by Department Employee:

- Maintain the District’s InSite Webpage.
- Provide new Board members and Commissioner’s aides training on meeting and agenda procedure.
- Act as liaison to answer questions from board staff.
- Schedule court reporters for board meetings and maintain transcripts per the Open Meetings Act[.]
- Keeper of District Seal and signor of District contracts in physical and electronic form.
- Maintain the rules of the Board, prepare standard operating procedures and training documents for Agenda Management Solution.
- Required Designee for the Open Meetings Act annual training and facilitate District compliance with OMA requirements[.]
- System Administrator of [System], the records management system.
- Distribute the quarterly P-card reports to District staff[.]

- Facilitate the Records Disposal Process by working with District staff and the state archives records management section to sign and file the District's records disposal certificates.

Senior Official's signed version of the June 16th interoffice memorandum to the HR Director includes six⁶ of the proposed bullet points contained in Department Employee's June 16th version of the draft memorandum to the HR Director. The following bullet points proposed by Department Employee are included in Senior Official's final version of the inter-office memorandum:

- Provide new Board members and Commissioner's aides training on meeting and agenda procedure.
- Act as liaison to answer questions from board staff.
- Keeper of District Seal and signor of District contracts in physical and electronic form.
- Maintain the rules of the Board, prepare standard operating procedures and training documents for [System 2].
- Required Designee for the Open Meetings Act annual training and facilitate District compliance with OMA requirements.
- System Administrator of [System], the records management system, supervise and train staff.⁷

Senior Official explained that she relied on Department Employee's input because of Department Employee's handling of the "special duties" that were above and beyond her then responsibilities that needed to be captured in the request to the HR Director. Senior Official stated further that "I used her only because [Department Employee] was in her position" at the time and able to supply the necessary information.

Senior Official was asked whether she was aware during this period that Department Employee would seek a promotion into the New Position if it was approved and Senior Official acknowledged that she was then aware of Department Employee's interest in the position. Senior Official was asked whether her reliance on Department Employee's input in seeking approval for the New Position created a potential appearance of impropriety. Senior Official responded "I guess that could be" a viewpoint and "I could see that now but that was not my intent" to create an appearance of impropriety.

Senior Official was asked to recall her involvement in an Office of the Independent Inspector General investigation (IIG19-0579) regarding Department Employee's hire into her former position. Senior Official stated she did. Senior Official also recalled meeting with former

⁶ A portion of an additional (7th) bullet point contained in Department Employee's draft also is found in Senior Official's signed June 16, 2023 interoffice memorandum where the following language was used: "[w]ork with District staff and the state archives records management to sign and file the District's records disposal certificates."

⁷ The signed version of the June 16, 2023 interoffice memorandum by Senior Official includes the words "supervise and train staff" that were not contained in Department Employee's draft that was returned by email on June 16, 2026.

senior officials wherein Senior Official was counselled to refrain from future hiring decisions creating an appearance of impropriety. However, Senior Official could not recall being specifically admonished to recuse herself in future hiring sequences by either of the former senior officials present during the meeting.

Human Resources Interoffice Memorandum Regarding 2024 Budget Request

On July 21, 2023, the HR Director sent an interoffice memorandum to a former senior official concerning the 2024 budget and the proposed addition of the New Position. The budget request for the New Position outlines the basis for the budget request and includes a stated reliance on the PCQs that were submitted to HR with the request for the New Position.

New Position Job Specification

The Human Resources job specification created in January 2024 contains a section entitled *Essential Job Functions* reflecting 14 separate bullet points that are described as essential job functions that are “fundamental core functions, common to positions.” The New Position job specification contains six bullet points that include descriptive language found in Department Employee’s June 16th draft to Senior Official.

Recommendation for New Position Appointment

On August 6, 2024, following the posting and selection process, Senior Official issued an interoffice memorandum to former senior official recommending Department Employee for appointment to the New Position. The appointment was approved the same day.

Findings and Conclusion

The District’s Ethics Ordinance makes clear that District commissioners, officers and employees shall, at all times in the performance of their public duties, owe a fiduciary duty to the District (art. II, § B) that specifically requires impartiality in the performance of their duties, so that no private organization or individual is given preferential treatment (art. II, § B. 1.). Moreover, because District employees have a special relationship of trust with the public they “*must avoid conduct that gives the appearance of impropriety and/or that they are violating their fiduciary duties to the District*” (art. II, § B. 2.)(emphasis added). As set forth in the Ethics Ordinance, whether particular circumstances create an appearance of impropriety or can be considered a violation of fiduciary duties to the District shall be determined from the *perspective of a reasonable person* with knowledge of the relevant facts.... (art. II, § B. 4.)(emphases added).

Based on all of the foregoing, the preponderance of evidence developed in this matter supports the conclusion that Senior Official violated her fiduciary duty when she involved Department Employee in the process leading to the creation of the New Position. Senior Official actively sought Department Employee’s insight in the drafting of both the PCQ document as well as the interoffice memorandum of June 16, 2023 which were both integral in the process and relied

upon by Human Resources when assessing the request for the New Position and by the Private HR Consultants in its *Job Analysis and Examination Plan for [New Position]* (March 2024). In this regard, Department Employee was invited by Senior Official to “help shape” the parameters of the New Position, as she described Department Employee’s role during her interview. Suggested language contained in Department Employee’s proposed draft of June 16, 2023 ultimately was adopted by Senior Official in her official request to the HR Director of the same date and subsequently used in the *[New Position] Job Specification* (January 2024). The subject PCQs, which Department Employee also aided in preparing, were relied on throughout the process and allowed Department Employee an advantage because of the strong familiarity she had with the duties and the future role of the New Position.

During her interview, Senior Official was presented with this information and she acknowledged that these circumstances demonstrate the potential for an appearance of impropriety. However, Senior Official explained that it was not her intent to create the appearance of impropriety and believed that Department Employee had the “most knowledge” of the role of the New Position and her involvement was valuable. The problem with this rationale rests with the fact that Senior Official was admittedly aware that Department Employee would be seeking promotion into the New Position if it was approved. These circumstances should have triggered the formation of an ethics wall and the recusal of Department Employee from all aspects of the internal process, including the preparation of the PCQs and the official interoffice memorandum to Human Resources requesting the creation of the New Position. The failure to establish an ethics wall in these circumstances tainted the process and created the appearance of impropriety. These concerns are heightened with the recognition that Senior Official has been the subject of counselling in 2021 in relation to OIIG Summary Report No. IIG19-0579 (April 15, 2021).⁸

Recommendation

In accordance with the Interim IG Ordinance (art. VIII, § B. 3.) and the District’s Employee Handbook, Section VII, A. 2. J. addressing Major Cause infractions, Senior Official should be (a) subject to disciplinary action and admonished through a written warning as to the importance of ensuring compliance with her ethical obligations to the District and (b) in recognition of the reoccurring nature of this issue, consideration should also be given to the recusal of Senior Official from future employment activities. These recommendations are currently pending.

Case No. OIG 25-016

In accordance with the Interim Inspector General Ordinance (art. IV. sec. A), this investigation was initiated after receiving an anonymous email complaint from an individual

⁸ The former senior official recalled counselling Senior Official to both avoid the appearance of impropriety, as well as to refrain from involvement in future hiring sequences. The other senior official present and Senior Official do not recall this detail of the counselling session. Moreover, there is a lack of documentation memorializing the parameters of the counselling. Accordingly, insufficient evidence exists to place reliance on the former senior official’s recollection of his admonishment of Senior Official to recuse herself in future hiring sequences.

alleging that District Employee, an employee of the District since 2016, resides outside of the District's territorial boundaries and has done so since the beginning of his employment with the District.

Office of the Interim Inspector General Investigation

This investigation involved the interview of several private individuals, analysis of records obtained through open sources or pursuant to subpoena or official request from Nicor, ComEd, MWRD Credit Union, Illinois Secretary of State, Illinois Board of Elections and the Village of Frankfort. This office also considered District Employee's personnel file and conducted a physical surveillance of the employee to attempt to verify his true domicile.

Metropolitan Water Reclamation District Act

In accordance with the Metropolitan Water Reclamation Act, (70 ILCS 2605):

Sec. 4.38. Any person who first becomes employed under this Act after December 31, 1987, or any former employee who returns to employment after that date, *must be domiciled within the territorial boundaries of the sanitary district*; provided that an employee on probationary status shall not be required to be domiciled within the territorial boundaries until 6 months after successful completion of probation. Failure to comply with the requirements of this Section shall be cause for removal or discharge from employment....⁹ (emphasis added).

Personnel File – District Employee

A review of District Employee's personnel file reveals that he successfully completed his probationary period and began his full-time employment with the District in 2016. At the time of his application with the District, District Employee's Illinois Driver's License showed his residency in Frankfort, Illinois, which is in Will County and outside of the District's territorial boundaries.

In August 2016, District Employee executed a *New Hire Residency Agreement* acknowledging he understood the District's requirement that all new hires must reside within the District's boundaries or agree to move within such boundaries within 6 months of successfully completing their probationary period. In September 2016, District Employee submitted documentation to include a recent ComEd electric bill and a lease agreement to support his claim that he was in compliance with the *New Hire Residency Agreement*. The lease agreement indicated he was then residing in his first Avers Avenue, Alsip, Illinois, address which is within the District's

⁹ The domicile requirement is also set forth in the District's *Admin. P. Manual*, 10.27.0, Human Resources, Sec. 3, Intolerable Offenses. para. n. and *Employee Handbook (Represented)*, Sec. VII. A. 3. Intolerable Offenses, para. m.

boundaries. The landlord on the submitted lease agreement was District Employee's mother-in-law.

In June 2022, District Employee submitted a "Change of Address" form to the District indicating that he had re-located to another location on Avers Avenue in Alsip. Accompanying the "Change of Address" form, was a signed "Affidavit of Compliance with the District's Domicile Requirement" indicating District Employee was still residing within the District's territorial boundaries. District Employee also submitted a new lease agreement reflecting that he was a tenant at the second location on Avers Avenue and the landlord on this lease was Owner A.

Results of Request to the Illinois State Board of Elections and Secretary of State

This office contacted the Illinois State Board of Elections and Illinois Secretary of State to obtain information related to District Employee's voter registration address, Illinois driver's license and vehicle registration information. The Board of Elections informed this office that District Employee's current address is listed on Avers Avenue in Alsip and that District Employee had updated his address from the first Avers Avenue address in Alsip to the second Avers Avenue location in June, 2022.

The Secretary of State's records reveal District Employee's driver's license application from 2022 noted an address change from the first Avers Avenue location to the second Avers Avenue location. The Secretary of State also informed this office that District Employee's vehicles were licensed and registered at this location.

Results of Subpoena to Commonwealth Edison

Commonwealth Edison (ComEd) provided records to this office related to District Employee's Frankfort address and for his reported second Alsip address. The records reveal District Employee assumed responsibility for the electricity bills for the Avers Avenue property in May 2022 from Owner A. The results provided by ComEd are, in part, as follows:

Account: XXXXXXXXX22
Property billing and service address: Avers Avenue, Alsip, IL.
Customer: District Employee
Rate schedule: ComEd Electric Residential Single
Activity range includes September 29, 2023 to September 30, 2025.
Start Date: May 20, 2022

Account: XXXXXXXXX11
Property billing and service address: Frankfort, IL.
Customer: District Employee's Spouse
Rate Schedule: ComEd Electric Residential Single
Activity range includes October 2, 2023 to September 30, 2025
Start Date: December 14, 2012

Account: XXXXXXXXX22

Property and billing and service address: Avers Avenue, Alsip, IL.

Customer: Owner A

Start Date: January, 2005

End Date: May 20, 2022

Subpoena to Northern Illinois Gas Company (NICOR)

This office served a subpoena on NICOR Gas Company seeking billing, payment and all notices related to the property in Frankfort and for such information as it relates to District Employee for the previous four years. The records produced by NICOR indicate that District Employee's spouse is the responsible billing party for the address in Frankfort. There were no records produced indicating any NICOR service being provided to a District Employee at the Frankfort or Alsip addresses.

Subpoena to the Village of Frankfort, Illinois

A subpoena served on the Village of Frankfort for records/documents pertaining to the property located in Frankfort covering the previous four year period to include village payment records, property inspections, police responses or ordinance violations that may identify the occupants of the address. The results produced no relevant records.

Subpoena to the MWRD Credit Union

A subpoena issued to the MWRD Credit Union requesting information relating to District Employee revealed no records pertaining to District Employee.

Interview of MWRD Police Official

Pursuant to Interim IG request, the police official informed this office that District Employee normally arrives at his assigned work location shortly before 7:00 a.m. each weekday and provided photo images from the security gate camera which indicated District Employee drives a vehicle that matches records obtained through the Secretary of State.

Surveillance at the Frankfort, Illinois Property

On March 18 and March 19, 2026, this office conducted a surreptitious morning surveillance at the Frankfort, Illinois location to ascertain if District Employee could be observed departing that address to report to his MWRD work assignment. During the surveillance of March 18th, the District Employee's registered vehicle was observed departing the residence at approximately 6:05 a.m. The vehicle observed matched the vehicle described by MWRD police official as being the vehicle seen entering the MWRD work location on a regular basis and driven by District Employee. Due to hazardous weather conditions and darkness, the surveillance unit

was unable to safely follow the vehicle long enough to observe its general destination and the surveillance was terminated.

On the following morning, March 19, 2026, a morning surveillance was again conducted at the Frankfort location and at approximately 6:05 a.m., the subject vehicle registered to District Employee was again observed departing the residence driven by a white male. The vehicle was observed travelling from the residence onto west bound I-80 towards northbound I-355 when it was lost in heavy traffic. After the surveillance was terminated, this office learned from MWRD police official that District Employee had arrived at his work location after 7:00 a.m. that morning driving the same vehicle that was observed departing from the Frankfort location earlier that morning.

Interview of Neighbor on Avers Avenue

Neighbor was interviewed at her home and stated that she is familiar with the owners of the neighboring property, Owner A and Owner B, and indicated that the home was then occupied by Owners A and B, and she indicated their adult son also lives at the home on occasion. Neighbor also stated she is not aware of anyone ever residing there other than the members of the Owner A and Owner B family. Neighbor was provided with a physical description of District Employee, and she stated she did not recall observing anyone matching District Employee's description at the location. Neighbor was asked if she believed it was possible for someone to be residing anywhere on Owners A and B's property without her being aware, and she replied she did not believe that was possible.

Interview of Owner B

Owner B was interviewed on two separate occasions by this office. During the initial interview, conducted at his home on Avers Avenue, Owner B stated he and his wife (Owner A) did not have tenants residing in their home, and that although he did not know District Employee, he acknowledged his wife "may be acquainted with him." During the interview, Owner B stated that in 2022, he and his wife (Owner A) had vacated their home on Avers Avenue to attend to a property they had inherited in Tennessee. Owner B indicated that during this time, one of their children would live in and care for their home.

Owner B was also interviewed on a subsequent occasion about District Employee. At that time, Owner B stated that his wife (Owner A) had entered into a lease agreement with District Employee to allow him to move into their home while they were in Tennessee, but that he was unaware of the specifics of the lease agreement although stated his wife (Owner A) was more familiar with District Employee. Owner B recalled District Employee "may have been responsible for the utilities, while [his son] would pay the property taxes." Owner B was unsure of the form of payment used by District Employee for the lease but stated his wife would know more details of the specifics of the lease.

Interview of Owner A

Owner A stated she and her husband (Owner B) owned the home on Avers Avenue in Alsip. Owner A indicated she had become acquainted with District Employee through mutual friends and learned he was looking for a place to stay. Owner A indicated she entered into a lease agreement with him “sometime in 2022” to bring him in as a tenant in their home. Owner A indicated she had put the home’s utilities in District Employee’s name in addition to charging him a monthly rent of \$1,000.00. Owner A indicated that District Employee paid the monthly rent in cash and she would collect the money whenever she and her husband returned from Tennessee to check on the home. Owner A stated her son was also residing at the home during the period District Employee resided in the home, but that her son was not there on a full-time basis. Owner A explained that in early April 2026, she and her husband returned from Tennessee to prepare the home to be placed on the market for sale which necessitated that District Employee vacate the home. Owner A stated that although District Employee moved out in April 2026 and she has not seen him since that time, he still had personal items in the home that needed to be collected.

Interview of District Employee

On April 30, 2026, District Employee was interviewed and stated that he is married and, at the time of his hiring, he was living with his wife at the Frankfort, Illinois property. District Employee indicated he and his wife moved there after it was built in 2013. Due to his home address being outside of the District’s territorial boundaries, District Employee acknowledged receiving a letter from the District in 2016 requiring him to move into the District’s boundaries. District Employee was shown a copy of his signed *New Employee Residency Agreement* and the *Employee Affidavit of Compliance With the District’s Domicile Requirement* that he executed and had notarized on August 1, 2016, acknowledging he understood the District’s residency requirements. District Employee was then shown a copy of documents he sent to the District in 2016 indicating he had changed his primary residence to the first Avers Avenue location. As proof he was living within the District’s boundaries, District Employee provided the District with a utility bill and a lease agreement with the owners of the property. District Employee acknowledged that the property owners were his in-laws. When asked how often he stayed with his in-laws, District Employee stated, “on and off, depending on my wife’s health.” When asked to explain the comment about his wife, he initially stated his wife had [a serious illness] and that was the primary reason for him to move out, but he added he and his wife were having marital issues caused by his wife experiencing [a physical condition] and he “couldn’t be in the same house as her.” District Employee was asked how the choice to move in with his in-laws while his wife was addressing health issues was something that would be of benefit to either he or his wife. District Employee failed to provide a clear explanation.

District Employee explained that his arrangement with his in-laws lasted until 2022 when his mother-in-law passed and his father-in-law moved into a retirement home and the Avers Avenue home was sold. District Employee stated that someone he could not recall recommended that he move to the second Avers Avenue location in a home owned by Owner A and Owner B.

District Employee subsequently notified the District he was residing at a different address on Avers Avenue.

District Employee explained that Owners A and B had then recently inherited a farm in Tennessee and were moving to live on the farm. District Employee indicated he had the full run of the house when the Owners A and B moved to Tennessee. District Employee also stated that he executed a lease agreement with Owner A and that he seemed to vaguely recall that Owners A and B had two sons. He stated he thought one of the sons was in the military but was not clear which son that was. When asked how much he paid in rent, District Employee stated \$1,200 per month which he said he would pay in cash taken from his safe at the Frankfort home and pay Owners A and B when he would see them.

District Employee was advised that surveillance by the Interim IG's Office in March 2026 revealed he appeared to be residing at the Frankfort address. District Employee replied that since Owners A and B returned from Tennessee "around Easter of 2026," he "has been kind of homeless" and "bopping around" sometimes staying with friends or the Frankfort residence with his wife. District Employee explained further that he needs to spend time at his Frankfort property to "fix things and cut the grass." District Employee stated he occasionally spends the night at the Frankfort home but could not provide an exact number of times this would occur in a given period only stating, "maybe three times a week...if I'm tired, I'll stay, and if I'm not tired, I'll spend the night somewhere else." When questioned further, District Employee stated he would go to the Frankfort home "depending on what needed to be done around the house" and talk to his wife and try to "iron out the marriage." District Employee stated further that this would occur "2 – 3 times per week, sometimes less and sometimes more."

District Employee indicated that he was reluctant to sell the Frankfort home because his wife wants to keep the home and he does not want to give up his marriage. Additionally, District Employee explained he has put a lot into the Frankfort home making it a significant financial investment and that he has a significant amount of personal property in the Frankfort home to include motorcycles and an 800 pound safe. District Employee stated that he and his wife continue to have marital problems and that he "does not know if he could live [in the Frankfort location] full time because of her."

Findings and Conclusion

Legal Standard

As outlined above, the MWRD Act establishes that all District employees "*must be domiciled within the territorial boundaries of the sanitary district*" (70 ILCS 2605/4.38)(emphasis added). Similarly, the *District's Administrative Procedural Manual* and *Employee Handbook* require employees to be "domiciled" in the District's territorial boundaries and to supply evidence of this fact to Human Resources. *Admin. P. Manual*, 10.27.0, Human Resources, Sec. 3, Intolerable Offenses. para. n. and *Employee Handbook (Represented)*, Sec. VII. A. 3. Intolerable Offenses, para.

m. The “domiciliary” requirement is further explained in the District’s *New Hire Residency Agreement* that District Employee executed on August 1, 2016, wherein it stated:

It is important to note that domicile means you are actually living, on a day-to-day basis, at your residence. Renting or using another person’s address, while actually living elsewhere, does not satisfy the statutory requirement to be domiciled within the District.

The distinction between the terms “domicile” and “residence” is important here. That is, a person may have multiple residences but claim only one actual domicile. A person’s domicile serves as a strict legal standard used to ascertain whether an employee actually intends to make a specific address one’s permanent home. *Black’s Law Dictionary* (2nd Ed.) defines the term “domicile” as a place that is true, fixed, a principal and permanent home. The term “residence” refers to a place one may live or use as a dwelling or place of habitation. It may be transient in nature and does not necessarily suggest long term intent to remain, such as temporary attendance at a school.

District Employee’s Leased Dwellings and Frankfort Home

This investigation included a careful review of District Employee’s residencies from his initial employment with the District in 2016 to the present to determine whether District Employee met the standard necessary to be and remain in compliance with the District’s domicile requirement.

Based on this investigation, it is evident that District Employee undertook various steps from 2016-2026 to demonstrate his compliance with the District’s domicile requirements. Beginning in 2016, when District Employee acknowledged and agreed to be domiciled in the District’s boundaries he was living in the Frankfort home with his wife which was purchased in approximately 2013. District Employee then sought to demonstrate compliance by presenting leases for two separate homes on Avers Avenue in Alsip, Illinois. The first lease covering 2016 to 2022 indicated he was paying rent to live in a home owned and occupied by his in-laws. Due to the passing of District Employee’s mother-in-law and the subsequent sale of that home, this office was unable to independently corroborate the nature of his living arrangements at this leased property. After his in-law’s home was sold, District Employee presented the District with a new lease, evidence of ComEd billing and changed his address with the Secretary of State and Board of Elections indicating he had moved to a home located a few blocks away from his in-law’s former home. Interviews conducted with the owners of that home along with a neighbor, coupled with District Employee’s own statements reveal conflicting details of the extent of District Employee’s day-to-day relationship with that dwelling.

District Employee also stated that by April 2026, he was no longer a tenant at either of the Alsip Avenue locations. Surveillance by this office in March 2026 confirmed that District Employee was residing at the Frankfort residence he shares with his wife. District Employee has acknowledged that since Owners A and Owner B returned from Tennessee “around Easter of 2026,” he has been “kind of homeless” and has been staying at various locations since that time to include staying with friends and at his Frankfort home. Nonetheless, District Employee has acknowledged that

throughout his tenure with the District, his Frankfort home is where he maintains most of his personal property to include a large safe, motorcycles and other items and also serves as a significant personal financial investment.

District Employee's explanation and the evidence provided by him to support his claim that he remained in compliance with the District's domicile requirement between 2016-2026 is deficient. As stated, residency and domicile are not synonymous. It is our conclusion that the totality of the evidence, including District Employee's own admission that he stays at the Frankfort home "maybe three times a week..." demonstrates that his home in Frankfort is, in fact, his legal domicile. District Employee maintains his personal property in Frankfort and continues to support and maintain a fully furnished home in Frankfort that he and his wife purchased in approximately 2013. The fact that District Employee's wife remains at the Frankfort home is also indicative that his true domicile remains in Frankfort outside of the District's territorial boundaries. District Employee's connections to the Alsip locations appear transient and certainly not of the nature to be District Employee's true domicile in light of his overarching connections to his Frankfort home.

Moreover, District Employee's relationship with both of the Alsip properties elapsed as of April 2026 and District Employee has failed to provide confirmation that his domicile is within the District's territorial boundaries. Human Resources has confirmed that, as of June 23, 2026, the District has not received any updates from District Employee concerning his compliance with the domicile requirement.

Based on all of the forgoing, the preponderance of the evidence supports the conclusion that District Employee is in violation of the MWRD Act and the District's domicile requirements contained in both of the District's (a) *Administrative Procedural Manual*, 10.27.0, Human Resources, Sec. 3, Intolerable Offenses. para. n. and (b) *Employee Handbook (Represented)*, Sec. VII. A. 3. Intolerable Offenses, para. m.

Recommendations

We recommend that the District initiate disciplinary action against District Employee for his failure to maintain his domicile within the District's territorial boundaries. We also recommend that the District seek the imposition of discipline that is consistent with the level of discipline imposed in other similar cases of an employee's failure to adhere to these requirements. These recommendations are currently pending.

Case No. OIG 26-040

On January 20, 2026, a Senior District Official and Department Head met with the undersigned to review a potential practice of a Commissioner assigning staff member duties that

support the operations of Private Water Association, a 501(c)(6) entity.¹⁰ The Commissioner is also an officer of Private Water Association, Illinois Chapter, and, as set forth in the Commissioner's private company's website under the "Practice Area" tab, the Commissioner "has ongoing work as a Principal Investigator (PI) with [Private Water Association]. Based on this information, this investigation was initiated to ascertain whether (a) the assignment of staff in support of Private Water Association is appropriate and (b) whether the Commissioner holds a pecuniary interest in the Private Water Association as a Principal Investigator giving rise to, *inter alia*, a conflict of interest.¹¹

Review of Electronic Mail

An initial search of District electronic mail activity was undertaken to ascertain the frequency of email activity by the Commissioner's staff member relating to Private Water Association. The search focused on two electronic mail addresses used by the subject staff member for District business and the name Private Water Association. The search revealed that the subject sent or received 402 emails containing the term Private Water Association. A similar search focusing on the same email addresses and a term commonly used to refer to Private Water Association identified 224 emails sent or received by the subject staff member during the review period.

This office also conducted a search focusing on the two email addresses used by the Commissioner for District business and the same two search terms. The identified emails along with those sent or received by the subject staff member were analyzed to ascertain the nature and extent of the activities being addressed in relation to Private Water Association. The following notable exchanges were identified and are summarized below:

- On December 19, 2024, the Commissioner emailed a member of the Law Department to discuss "job descriptions for Commissioner Aids before I hire a 2nd full time person. My staff job descriptions are evolving, but roughly... Policy Director... Support [Private Water Association]... Support new IL Chapter of Private Water Association (MWRD is a founding member) – does this comply with ethics?"
- On January 3, 2025, the Commissioner emailed the former Executive Director asking whether the Commissioner's proposed staff job descriptions were acceptable to HR. The former Executive Director responded that he would follow-up the following week.
- On June 27, 2025, the staff member wrote that "I have recently joined Commissioner XXXXX's staff at the Metropolitan Water Reclamation District of Greater Chicago. In

¹⁰ A 501(c)(6) is a tax designation for nonprofit organizations promoting common business interests or industry conditions as opposed to 501(c)(3) nonprofit charities that benefit the general public. *See* 26 U.S.C. §501(c)(3) and (6).

¹¹ The District's Ethics Ordinance states that "No Commissioner, Officer or Employee shall make, or participate in making, any District governmental decision with respect to any matter in which the Commissioner, Officer or Employee or their Relative, has any economic interest distinguishable from that of the general public." MWRD Ethics Ordinance, O22-004, art. II, § C. 1. (Conflicts of Interest).

addition to my work with the Commissioner, I will be supporting the launch of the new Illinois chapter of [Private Water Association].”

- On September 12, 2025, the staff member wrote to an employee of Private Water Association stating “We’re finalizing our chapter by-laws and hoping you can advise on next steps, both related to getting [the by-laws] passed/finalized and updated on the website....”
- On September 12, 2025, the staff member wrote to the President of Private Water Association, Illinois Chapter, asking if he was able to share the Illinois by-laws with the Private Water Association’s Board of Trustees for final approval.
- On October 1, 2025, the staff member was thanked by an employee of Private Water Association for all her work in relation to completing the Illinois Chapter by-laws and requested that the staff member send the final version of the by-laws for inclusion in the Private Water Association “board book” for final approval by the Board.
- On October 10, 2025, the staff member wrote to an employee of Private Water Association concerning chapter voting, nominations, eligibility to serve on the Illinois Chapter board and clarifying related language to the Illinois Chapter by-laws.
- On December 10, 2025, the Commissioner emailed a welcome note to a new member of the Illinois Chapter of Private Water Association and introduced her staff member as the [Illinois Chapter Private Water Association] “section coordinator.”
- Following an email from the Director of Programming of Private Water Association calling for volunteers from the Illinois Chapter to staff a water conference (Chicago June, 2026), the Commissioner responded by volunteering her “MWRD office staff.” In the same email chain, the Commissioner’s staff member supplied her contact information and listed her title as “[Private Water Association] Illinois Chapter Assistant Secretary.”
- On December 23, 2025, the Commissioner emailed her staff requesting they track their work hours and provided “[g]uiding principles” including that “[i]f MWRD has a membership in the organizing[sic], I think it should be should be [sic] fair to bill time to support organizations that MWRD is a member of... I also asked for approval to use my staff time to support [Private Water Association] – former [Executive Director] said there was no reason not to.”
- On January 8, 2026, the Commissioner emailed the Senior District Official stating “I am following up on a request to approve scope of work for my staff to include support for [another private water association] and [Private Water Association] ... including the [Private Water Association] IL Section. I sent the attached job descriptions to [the former Executive Director] shortly after being sworn in. His last response was a verbal question as to whether there was any know [sic] issues. I’m asking for clarification in writing, especially in light of recent IG inquiries in commissioner offices.”

OIG Request for Information

This office issued a request to the Commissioner’s staff seeking information in relation to their work with various not-for-profit organizations, including Private Water Association and the amount of District time dedicated to the work. The Commissioner’s staff member responded, by email, writing “[m]y involvement is limited to research and scheduling support for the

Commissioner's participation in the [Private Water Association] Illinois Chapter. The Commissioner does not assign me deliverables related to these organizations, outside of research and scheduling support. Any involvement is strictly in support of the Commissioner and is aligned with the District, our Strategic Planning, the MWRD water reuse resolution passed this summer, and/or constituent services." The Commissioner's staff member also stated that the Commissioner recently asked for an estimate of her average weekly time for hiring and job description purposes. The Commissioner's staff member produced a chart tracking her estimated time to various tasks, including to "[Private Water Association] Illinois chapter logistics (e.g. emails, scheduling, setting up newsletter, committees)" and listed 2.5 hours per week or 7.14% of her time.

Job Posting for the Commissioner's Policy Coordinator Position

The Commissioner utilized a job posting through LinkedIn from which the Commissioner's staff member initially sought employment. The posting contained the following language:

HIRING: I'm looking for a Policy Coordinator in my MWRD office to support the new Illinois Chapter of the [Private Water Association]. Work includes coordinating with national [Private Water Association], organizing state meetings, coordinating with government agencies, writing newsletters and reports, office administrative tasks, and serving as a judge for middle and high school science fair competitions.

Interview of Commissioner's Staff Member

The staff member was asked to turn her attention to a June 27, 2025 email wherein she wrote that "[i]n addition to my work with the Commissioner, I will be supporting the launch of the new Illinois chapter of [Private Water Association]." The staff member stated that she understood her employment would involve supporting the Commissioner in her role with Illinois Chapter of the Private Water Association such as scheduling, providing administrative support and conducting research. However, her involvement picked up when she became involved in scheduling and coordination of an Illinois Private Water Association event taking place after a water conference that took place in Chicago in 2025. In connection with scheduling, the Commissioner's staff member schedules meetings for the quarterly Private Water Association, Illinois Chapter meetings.

The Commissioner's staff member was asked about her use of the title "Assistant Secretary" in email communications in relation to her involvement with the Illinois Chapter of Private Water Association. The staff member stated that this was not a "real title" and that they believed "it made sense as a functional title." However, the Commissioner and the staff member later discussed the use of the title and the Commissioner informed her that it may be an inappropriate use of the title. The staff member subsequently chose the title [Illinois Chapter Private Water Association] "section coordinator." This title was also approved by the

Commissioner. The staff member was asked if she has been asked to perform functions by other Private Water Association, Illinois Chapter members other than the Commissioner. The staff member explained that the President of the Illinois Chapter has requested her to undertake scheduling duties and possibly other members of the Illinois Chapter leadership as well.

The staff member was also asked to provide information in relation to her work in drafting Illinois Chapter by-laws. The staff member stated that she sought to collect by-law related information from other chapters of Private Water Association in order to develop the Illinois Chapter by-laws and described her role as the “point person” in guiding the project forward for the Illinois Chapter. Ultimately, the by-laws were approved by the national Private Water Association.

The staff member has also been active in identifying volunteers to support Private Water Association this summer in connection with a water conference in Chicago in June 2026. The staff member volunteered herself but denied being on the “host committee” which will be responsible for planning and hosting tours and activities during the conference.

The staff member is also responsible for the Illinois Chapter meeting agendas and stated that this was a designated task by the Commissioner. The staff member also attends meetings of the Illinois Chapter and is tasked with creating the chapter newsletter which, according to the staff member, is a task that requires hours and not a day or days to complete.

Human Resources Official

This office met with a senior Human Resources (HR) official to discuss job descriptions for the Administrative Aide/Assistant to Commissioner title. The HR official explained that there are currently no District prescribed job descriptions for the Commissioner Aide positions. The HR official recalled that following an Office of the Cook County Independent Inspector General (OIIG) investigation in IIG21-0183 (March 30, 2022),¹² a memorandum was drafted initiating the process of establishing a uniform job description for this position. The HR official provided a copy of the April 19, 2022 Interoffice Memorandum from the former Executive Director to the President and Members of the Board of Commissioners which outlined the process. The HR official also provided a draft job specification for the position of Administrative Assistant to Commissioner and explained his understanding that the former HR Director and former Executive Director never finalized the task and there is currently no uniform job description for commissioners’ staff. In general terms, the HR official stated that some commissioners have created their own job descriptions and titles for their staff members. The HR official believed that the endeavor is important and he would like to see “uniformity and consistency” in staff job descriptions because this is the “backbone of the system.”

On January 8, 2026, the subject Commissioner spoke to the HR official about using her staff to support her in her official role with Private Water Association by delegating work

¹² This case is reported in the MWRD Office of the Independent Inspector General Quarterly Report, at p. 3 (April 14, 2022)(https://mwrdd.org/sites/default/files/2025-05/OIG_Quarterly_Report_1st_Quarter_2022.pdf).

associated with this role to her staff. The Commissioner specifically asked for his support in writing. The HR official explained to the Commissioner that the Administrative Aide to the Commissioner role must remain compliant with the MWRD statute and be consistent with positions such as secretary or administrative professional. The HR official felt “slightly uncomfortable” about the Commissioner’s request and instead suggested that this issue is better addressed by the Legal Department. When asked why he felt slightly uncomfortable with the Commissioner’s request, the HR official referred to the prohibition of working on non-District matters during compensated time. The HR official stated that he never provided the Commissioner with the written approval which was sought and forwarded the Commissioner’s request to the Legal Department.

OIIG Investigation No. IIG21-0183

The OIIG conducted this investigation based on information suggesting the District Commissioners’ staff do not have uniform written job descriptions and involved the interview of each District Commissioner to gain a better understanding of the role of their Administrative Assistant to Commissioner staff. The findings revealed that all other positions within the District utilize job descriptions that provide minimum qualifications while outlining the duties of the position. The OIIG concluded that “[w]e believe that no justifiable rationale exists to support a distinction between MWRD employees and Commissioner staff members when it relates to the existence of job descriptions and corresponding salary tables for the positions.... Accordingly, we recommend that Commissioners work with the HR Department to set minimum qualifications and scope of duties for the Aide positions. These qualifications, duties and functions should also correlate with established salary ranges of MWRD positions with similar qualifications and duties.” Cook County Office of Indep. Inspector Gen., Summary Report regarding Commissioner Aide Positions (March 22, 2022).

As stated above, on April 19, 2022, an Interoffice Memorandum was issued by the former Executive Director to the Board of Commissioners stating that the HR Department will conduct a job analysis for each involved classification and requested District Commissioners to request their staff to complete a Position Content Questionnaire (PCQ) to aid in the development of the job descriptions.¹³ This process resulted in the development of a draft Administrative Assistant to Commissioner job specification which was created in August 2022. On October 5, 2022, the former Executive Director issued an Interoffice Memorandum to the OIIG informing that the HR Department collected information from the Board of Commissioners and prepared a draft job specification for the position of Administrative Assistant to Commissioner for review and comment which was then pending finalization.

¹³ The subject job specifications included Administrative Aide to President, Administrative Assistant to Commissioner – Secretary, Administrative Assistant to Commissioner – Special Projects and Administrative Clerk to Commissioner classifications.

Interview of the Commissioner

The Commissioner was asked to describe her efforts to obtain permission to use her staff in support of her work with Private Water Association. The Commissioner stated that guidance was sought from the former Executive Director in early 2025 and was told by him verbally that “[i]t sounds like a better use of staff time than the other commissioners’ staff’s time.” Despite several requests, the Commissioner did not receive a definitive response. The Commissioner subsequently discussed her effort to obtain clarification in writing from several other District senior officials.

The Commissioner was asked whether it was her position that if the District has a membership in an organization such as Private Water Association it should be permissible to support those organizations with staff time? The Commissioner stated that she did not believe that this would be appropriate.

In connection with the Commissioner’s staff member, the Commissioner stated that she was hired to perform policy work. In connection with Private Water Association, the Commissioner stated that the staff member would undertake scheduling, note taking and follow-up on action items per guidance from the Law Department although the Commissioner stated that very recently, the Illinois Chapter has determined that it will enter into a yearly contract with the subject staff member to perform several hours of work per week for the Illinois Chapter providing coordination services. This arrangement is similar to what other chapters of Private Water Association have done to secure professional support due to the busy schedules of the chapter leadership.

In connection with the staff member’s work to develop Illinois Chapter by-laws, the Commissioner explained that the work was limited to collecting other examples from other chapters and was not a significant output of work for Private Water Association.

In connection with the staff member’s use of the term “Assistant Secretary” to refer to herself in relation to the Illinois Chapter, the Commissioner stated that this was something the staff member did though the Commissioner could not recall that this title was ever used in an email. The Commissioner further explained that the staff member is now referred to as Private Water Association, Illinois Chapter “section coordinator.”

In connection with the Illinois Chapter Board agendas for the quarterly meetings, the Commissioner stated that “90%” of the work is done by the Commissioner while her staff member completes the remainder.

The Commissioner was shown a copy of the Commissioner’s private company’s web page wherein it states that Commissioner “has ongoing work as a Principal Investigator (PI) with [Private Water Association]” and asked to detail the compensation associated with it. The Commissioner explained, however, that she has not served as a PI since 2018. The Commissioner

further stated that she does not receive compensation from any water related associations, including Private Water Association.

Law Department

On February 11, 2026, the Law Department provided the Commissioner with a written analysis and opinion in response to the Commissioner's inquiries relative to the (a) staff member's work in support of the Illinois Chapter and (b) the permissible job functions of commissioners' staff. In summary, the Law Department determined that work performed by staff during compensated time cannot include personal business or work for another entity including for Private Water Association. Additionally, the Law Department determined that duties and responsibilities are inherent in the role of Commissioner's Aide or Assistant and include general office and administrative support functions such as scheduling, maintaining records, drafting correspondence, constituent outreach and research related to the Commissioner's District duties and other related tasks.

Conclusion and Recommendations

The preponderance of the evidence developed in this matter supports the conclusion that the staff member's efforts in support of Private Water Association were limited although not *de minimus* in nature and were expended, at times, directly on behalf of Private Water Association as distinguished from acts undertaken solely in support of the Commissioner's role with the District. For example, the staff member has stated that she was the "point person" in bringing the Illinois Chapter by-laws to completion, that the staff member took assignments from the Illinois Chapter President and leadership in relation to scheduling, and was responsible for drafting an Illinois Chapter newsletter and assisting in preparing Illinois Chapter meeting agenda and "launching the new Illinois chapter." The staff member also addressed issues related to chapter voting, nominations and eligibility to serve on the Illinois Chapter Board. This level of involvement in the affairs of Private Water Association appear to be outside the scope of duties normally undertaken on behalf of the District in the Assistant to Commissioner job title. The staff member's assigned title as "section coordinator" of the Illinois Chapter also reflects her role in directly supporting Private Water Association. However, to be sure, this set of facts developed after the Commissioner sought guidance on this issue from a former Executive Director as early as December 2024 prior to the subject staff member being hired into the District. According to the Commissioner, the guidance received was supportive of the staff member's role with the Private Water Association. In other words, the Commissioner acted in good faith and with transparency in attempting to resolve this question. Accordingly, we decline making any finding or recommendation in connection with the Commissioner or her staff member in relation to their activities supporting Private Water Association.¹⁴ To be sure, however, while the mission of Private Water Association may align with the District's mission in certain circumstances they do not overlap and without a legislative enactment, the protections afforded by Article VIII, § 1 of the Illinois Constitution,

¹⁴ Similarly, this investigation did not reveal evidence that the Commissioner held a pecuniary interest in Private Water Association as a Principal Investigator that could point to, *inter alia*, a conflict of interest. Accordingly, this aspect of the investigation is not sustained.

which dictate that public funds shall only be used for public purposes, strongly caution against dedicating resources of the District for the benefit of Private Water Association, Illinois Chapter.

Importantly, this case demonstrates that the conditions that existed in 2022 leading to the OIIG's findings and recommendations set out in the Cook County Office of Indep. Inspector Gen., Summary Report on Commissioner Aide Positions (March 22, 2022) continue to exist. Accordingly, we recommend that the District renew its efforts to set minimum qualifications and scope of duties for the Assistant/Aide to the Commissioner positions. As previously noted in IIG21-0183, these qualifications, duties and functions should also correlate with established salary ranges of MWRD positions with similar qualifications and duties. *Id.* This recommendation is pending.

Case No. OIG 26-049

In accordance with the Interim IG Ordinance (art. IV. §. A), this investigation was initiated after receiving a complaint alleging a District Senior Environmental Research Technician (Supervisory Employee) was exhibiting favoritism to a subordinate Environmental Research Technician (Subordinate Employee) when scheduling work assignments within their assigned unit. At all relevant times, the Supervisory Employee and Subordinate Employee have been involved in a consensual romantic relationship and are currently engaged. This investigation was undertaken to ascertain whether the alleged conduct occurred and, if so, whether the fiduciary duty and/or conflict of interest provisions of the Ethics Ordinance have been implicated.

Art. II, §. 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:

1. Commissioners, Officers and Employees *shall act impartially* in the performance of their duties, so that no private organization or individual is given preferential treatment.
2. Commissioners, Officers and Employees have a special relationship of trust with the public and therefore *must avoid conduct that gives the appearance of impropriety* and/or that they are violating their fiduciary duties to the District. Whether particular circumstances create an appearance of impropriety or can be considered a violation of fiduciary duties to the District shall be determined from the *perspective of a reasonable person* with knowledge of the relevant facts.... (emphasis added).

Art. II, §. C. 1. Conflicts of Interest, states:

- a) No Commissioner, Officer or Employee shall make, or participate in making, any District governmental decision with respect to any matter in which the Commissioner, Officer or Employee or their Relative, has any economic interest distinguishable from that of the general public....¹⁵

Interview of Senior Environmental Research Scientist

The Senior Environmental Research Scientist (Senior Supervisor) stated he has supervisory responsibility over the supervisors in his unit, including the Supervisory Employee. Senior Supervisor stated it is well known within the unit that the Supervisory Employee and the Subordinate Employee are engaged in a personal relationship. Upon learning of the relationship, Senior Supervisor explained he contacted Human Resources (HR) to seek guidance in addressing the relationship from a management standpoint. After being advised by HR that there was no District policy prohibiting employees involved in a personal relationship from working in the same department, Senior Supervisor took the step of ensuring that Supervisory Employee was not a “rating” official nor engaged in performance evaluations of Subordinate Employee and ensured that the other unit supervisor served as the Subordinate Employee’s supervisor and rating official. As it relates to the allegations of this complaint, Senior Supervisor stated that Supervisory Employee does not have scheduling responsibilities involving the ERTs of the unit, including the Subordinate Employee. The Senior Supervisor, however, stated there are instances in which Supervisory Employee will perform scheduling assignments when the other unit supervisor is unavailable.

Interview of Supervisory Employee

The Supervisory Employee is one of two supervisors in the unit and acknowledged to be in a consensual romantic relationship with Subordinate Employee in his unit. Supervisory Employee stated he does not supervise the Subordinate Employee, nor does he participate in her performance evaluations. Supervisory Employee stated the scheduling of all ERT assignments within the unit are handled primarily by the other unit supervisor. Supervisory Employee acknowledged also that there are occasions when he performs scheduling duties when the other unit supervisor is unavailable.

Supervisory Employee indicated that management in his unit is “hypersensitive to the perception of favoritism” due to his relationship with the Subordinate Employee and, as a result, he is careful to ensure fairness when he is required to set ERT schedules in his colleague’s absence. Supervisory Employee stated that whoever is tasked with the scheduling of assignments, an effort is made to ensure that all ERTs have equal opportunities to experience a wide range of assignments.

¹⁵ On April 7, 2022, the District amended the Ethics Ordinance, art. II, §. C. 6. (Supervision and Employment of Relatives). “Commissioners, Officers and Employees shall not directly supervise or evaluate a Relative's job performance. This prohibition shall not apply to supervisory relationships in effect prior to the passage of this amended ethics ordinance.” This section of the Ethics Ordinance does not extend to romantic relationships that may exist among unmarried District employees.

Interview of Second Unit Supervisor

The unit supervisor acknowledged his awareness of the personal relationship between Supervisory Employee and Subordinate Employee. The unit supervisor also explained that unit management is generally aware of the potential issues that may arise when two employees in the same department are involved in a personal relationship. For this reason, the unit supervisor stated that he maintains supervisory authority over the Subordinate Employee and that he is her rating official. The unit supervisor stated that he is responsible for scheduling and assigning duties to the unit ERTs. The unit supervisor added there have been situations in which he is unable to handle the scheduling duties and, on those occasions, the Supervisory Employee covers the assignment of duties for ERTs, including the Subordinate Employee. The unit supervisor stated he was unaware of favoritism occurring within the unit.

Findings and Conclusion

The preponderance of evidence developed in this matter fails to support the allegation that Supervisory Employee exhibited favoritism toward Subordinate Employee. While the evidence establishes the existence of the subject consensual personal relationship, investigation revealed management's efforts to consult with Human Resources and take proactive steps to reassign supervisory duties over Subordinate Employee to another unit supervisor. Accordingly, there is no violation by Supervisory Employee of his fiduciary duty to the District or evidence of biased activity.

While this investigation has not disclosed evidence of favoritism or bias in the administration and scheduling of ERT activities in the unit, it was noted that, in certain limited circumstances, the Supervisory Employee will handle scheduling of the ERTs, including those related to the Subordinate Employee. The Senior Supervisor, Supervisory Employee and the unit supervisor have each acknowledged this occasional though direct oversight responsibility of the duties of the Subordinate Employee by the Supervisory Employee. In this regard, we believe that continued direct oversight by Supervisory Employee of Subordinate Employee carries the risk of creating the appearance of impropriety which may implicate the Ethics Ordinance. This is true despite the limited occasions in which Supervisory Employee scheduled the activities of Subordinate Employee. In other words, a "reasonable person" could, quite appropriately, view such continued proximity between the Supervisory Employee and Subordinate Employee as giving the appearance of impropriety which is prohibited by the Ethics Ordinance (*See* Art. II, B. 2.).

Additionally, this case is analogous to the matters under review in Summary Report No. OIG 25-004 (December 19, 2025) where it was stated that:

[A]ny supervisor-subordinate type relationship must be considered in light of the legal and policy framework that exist to guard against sexual harassment, discrimination and retaliation. That is, it is appropriate to assess these circumstances not only from the perspective of preventing favoritism, preferential treatment and conflicts of interest, a critical assessment of these circumstances

should also involve preventing harassment and discrimination in the workplace. *See* District Administrative Procedures Manual, 10.5.0 (March 23, 2018); *see also* Title VII of the Civil Rights Act of 1964, 42 USC Sec. 2000e *et seq.*¹⁶ This District policy specifically states that:

A supervisor is defined as any District employee who has the authority to undertake or recommend a tangible employment action decision, write the performance review or *direct a daily work activity* of at least one other employee, regardless of whether the supervisor is in the employee's own chain-of-command. A supervisor is also defined as any employee who has real or perceived authority over another employee or one who is *temporarily authorized to direct the daily work activities* of another employee, regardless of whether the person acting as a "supervisor" receives acting pay. (10.5.0, Responsibilities, B. Managers and Supervisors) (emphasis added).

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 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, §. C. 6 (Supervision and Employment of Relatives). This provision should also be amended to address the existing vulnerabilities associated with the supervision and performance review of relatives by relatives in the District.

Recommendations

In accordance with the Interim IG Ordinance (art. VIII, § B. 3.) and based on the foregoing investigation, the following recommendations for remedial action are respectfully made:

¹⁶ A supervisor's involvement in creating a "hostile work environment" has been the focus of significant Title VII litigation. *See Gates v. Bd. of Education of the City of Chicago*, 916 F.3d 631 (7th Cir. 2019) and *Vance v. Ball State University*, 570 U.S. 421 (2013).

1. All direct oversight responsibilities by the Supervisory Employee over the Subordinate Employee should be removed and reassigned, even when the oversight only occurs intermittently;
2. The District should consider the implementation of a District-wide policy addressing personal relationships in the workplace including issues related to employee disclosure of personal relationships and managing the workplace risks associated with them.
3. Similarly, the District should eliminate the current statutory vulnerability contained in the Ethics Ordinance (art. II, §. C. 6.) wherein it permits commissioners, officers and employees to directly supervise or evaluate a relative's job performance if the relationship existed prior to April 7, 2022.

These recommendations are currently pending.¹⁷

Case No. OIG 26-050

Office of the Interim Inspector General Intake Record

On March 13, 2026, this office received an anonymous one page complaint stating:

It is recommended that the Inspector General look at an email address that is being used by an aid to a Commissioner that gives the appearance of the email coming from an official District email account.

Specifically, [Employee A] is an aid to [Commissioner A]. [Employee A] uses the personal email address: XXXX.mwrd@gmail.com to conduct official District business. This has caused confusion as to whether such emails are being sent in a personal capacity or [are] coming from the District. The use of this personal email address also may be an attempt to end-run around any Freedom of Information Act (FOIA) requests.

At a minimum, the use of this [G]mail email address containing reference to "MWRD" is misleading and should be stopped.

[Commissioner A] should also be looked at as to whether she is using the same type of [G]mail account to conduct official District business. Thank you for your attention to this matter.

¹⁷ Recommendations number 2 and 3 were initially provided in Summary Report OIG 25-004 (December 19, 2025) and are currently pending as set forth in Interim Inspector General Quarterly Report (1st Qtr. 2026) issued on April 14, 2026.

Anonymous

This office further determined that Commissioner A possesses the following private email account – XXXXXXmwr@gmail.com.

Office of the Interim Inspector General Investigation

Search of District Email Activity

This office has undertaken a search of District email activity for the email address XXXXX.mwr@gmail.com allegedly used by Employee A to conduct District business. This search identified 204 emails being issued using this email address and 46 emails directed to this address within the District's system. Similarly, this office also conducted a search of District email activity during the same time period for the email address XXXXXXmwr@gmail.com allegedly being used by Commissioner A to conduct District business. The search identified 116 emails being issued using this email address and 376 emails directed to this address within the system.

Interview of Employee A

Employee A was asked about her use of the email address XXXXX.mwr@gmail.com and Employee A explained that it was recommended by Commissioner A due to the utilization of the Gmail platform for scheduling purposes. Employee A also explained that Commissioner A also utilizes a private Gmail account for District purposes. Employee A stated that she has not encountered any potential issues or concerns in using a private email address for District purposes. Employee A clarified that she primarily uses Gmail when communicating with anyone working outside the District, such as performing constituent services. Employee A was asked whether she is aware of any FOIA requests seeking emails in the Commissioner's office and Employee A stated she was not aware of any such requests.

Interview of Commissioner A

Commissioner A was asked why she and Employee A use unofficial Gmail accounts resembling MWRD email? Commissioner A stated that she uses the separate email because "it is so difficult to log into" the MWRD email while Gmail offers a more convenient and less cumbersome method of scheduling matters within her office. Commissioner A stated that she has not consulted with the Legal Department about this issue.

Findings, Conclusion and Recommendation

The preponderance of the evidence supports the factual allegations made, that Employee A and Commissioner A utilize a private email address that closely resembles the official email addresses prescribed by the District for official use. Commissioner A has specifically authorized the use of the private Gmail address making it a custom and practice of the Commissioner's office. Commissioner A and Employee A have explained that the Gmail address and platform offer better

efficiencies for office management purposes. Notwithstanding that the factual allegations are sustained; the central question is whether this custom and practice adopted by the Commissioner's office is violative of any rule or guideline of the District or is otherwise detrimental or potentially detriment to the District's operations.

The District's provisions of the Rules of Conduct, Administrative Procedures (10.27.0), District's Ethics Ordinance and IT use policies do not specifically address the use of private email addresses in the conduct of official District business. Rather, this is a question of whether the subject custom and practice is detrimental or potentially detrimental to the District. In reaching this determination, it should be recognized that the subject practice is designed to serve a legitimate governmental interest – creating efficiencies in office scheduling and management.

The complaint alleges that by using an email address with "mwrdr" as part of the address itself it becomes "misleading." We believe that by including "mwrdr" in the Gmail address itself, it is reasonable to conclude, if not undeniable, that the practice is misleading. In fact, the use of "mwrdr" is designed to signal or suggest official business. Yet Gmail is not an official email prescribed by the District. Therefore, from the perspective of those who receive the Gmail or respond to it and recognize the subtle distinction between "[XXXXXX.mwrdr@gmail.com](#)" or "[XXXXXXmwrdr@gmail.com](#)" and the official addresses prescribed by the District, they are left to speculate why this divergent practice is being used. The public perception of the District is thereby impacted in a negative manner.

Moreover, this office also sees additional potential detriment to District operations. Legitimate concerns related to managing cybersecurity, record retention compliance under the Illinois Local Records Act, FOIA compliance¹⁸ and litigation discovery obligations of the District are each affected and would require the District to manage them accordingly if the custom and practice were to continue.

In balancing the legitimate government interest identified by Commissioner A and Employee A of developing efficiencies in managing the Commissioner's office against the security, transparency, compliance and professionalism concerns of the District, this office recommends that the District adopt a clear business model requiring all official business of the District be conducted using the District's official email account. Exceptions for emergencies and pre-approved deviations by management should be permissible.

¹⁸ On December 17, 2018, the District Executive Director issued an Interoffice Memorandum to the Board of Commissioners outlining the *City of Champaign v. Madigan*, 992 N.E.2 629 (Il. App. 4th Dist. 2013) case while discussing the District's obligations under FOIA. There, it was stated that "[b]ased upon FOIA related caselaw over the last several years, the Law Department also continues to recommend that the Board of Commissioners and District staff members attempt to limit or altogether avoid using personal electronic devices and personal email accounts when conducting public business."

Interim IG Quarterly Report – January 8, 2026 and April 14, 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.

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, 026)(https://mwrdd.org/sites/default/files/20261/OIG_Quarterly_Report_4th_Quarter_2025.pdf).

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 25-022

This investigation was undertaken after receiving an anonymous complaint questioning the District’s participation in the Operations Challenge in connection with the Water Environment Federation's Technical Exhibition and Conference (WEFTEC). Specifically, 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 or should otherwise be considered a careless expenditure or abuse of resources to the MWRD’s detriment, or potential detriment. *See* Interim IG Ordinance, art. II (C). The original summary of this investigation is more fully set forth in the *Interim Inspector General Quarterly Report*, pp. 2-11(1st Qtr. 2026) (https://mwrdd.org/sites/default/files/2026-04/OIG_Quarterly_Report_1st_Quarter_2026.pdf).

Recommendations

The following recommendations were 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.

On May 1, 2026, the District responded to these recommendations indicating that (1) the District will adopt the analysis of the positive and negative outcomes outlined in the summary report, (2) reduce the number of hours District participants in the Operations Challenge are required to be away from normal work duties, as well as to modify the practice schedules and out-of-town team trips each year, and (3) seek authority from the Board of Commissioners to enable the District to participate in the Operations Challenge.

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. The original summary of this investigation is more fully set forth in the *Interim Inspector General Quarterly Report*, pp. 11-13 (1st Qtr. 2026) (https://mwrdr.org/sites/default/files/2026-04/OIG_Quarterly_Report_1st_Quarter_2026.pdf).

Recommendations

The following recommendations were made by this office:

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.

Honorable Kari K. Steele and Honorable Members of the Metropolitan
Water Reclamation District of Greater Chicago Board of Commissioners
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On May 31, 2026, the District responded to these recommendations by stating “the Human Resources Department will work with the Law Department to explore the development of a policy to address employee arrests and reporting requirements.”

Conclusion

Thank you for your time and consideration to 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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cc: John T. Joiner, Administrative Aid to the President
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