



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

December 30, 2021

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

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

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

Office of the Senate Republican Leader  
309G Capitol Building  
Springfield, Illinois 62706

Honorable Leaders of the General Assembly:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul D. Thompson", with a long, sweeping flourish extending to the right.

Paul D. Thompson  
Interim Inspector General



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2021 SOS IG Annual Report

**Complaint Process**

The Office of the Inspector General (OIG), which also includes the Executive Inspector General (EIG), receives complaints, including anonymous complaints, through many avenues, by telephone, letter, fax, email, in person, and through its website, [www.ReportItNow.net](http://www.ReportItNow.net). The OIG documents all complaints on a complaint form and assigns a complaint reporting number (CRN). A supervisor or designee reviews each complaint for the proper disposition. Some complaints do not fall within the jurisdiction of the OIG so these complaints may be forwarded to the appropriate entity or be returned to the complainant with suggestions as to the appropriate entity for the complaint. If a complaint falls within the jurisdiction of the OIG and contains a sufficient basis to believe that a violation of SOS policy or rules, state or federal law has occurred, the OIG initiates an investigation and assigns it to an Inspector for further proceedings. If the complaint does not contain a sufficient basis to show that there has been such a violation, but contains allegations that might, if supplemented, be sufficient to show such a violation, the OIG may assign the case to an Inspector to conduct a preliminary investigation to determine whether there is other supporting evidence of a violation. Lastly, some complaints raise issues that are managerial or supervisory in nature, or raise questions regarding the proper interpretation of departmental rules, and the OIG refers these cases to the relevant departmental Director for disposition.

Investigations generally entail witness interviews and document review. On occasion, OIG investigations also have utilized surveillance or electronic information gathering. The OIG also conducts investigations in conjunction with the Illinois Secretary of State Police and other law enforcement or investigative agencies. At the conclusion of

an investigation, the Inspector prepares a written Summary Report to document the investigation. A supervisor reviews these Summary Reports to determine whether to investigate further. If the investigation is complete, the supervisor documents any determination for referral, if necessary, to the relevant Directors for informational purposes or for further action by the agency or law enforcement.

Primarily, OIG investigations involve allegations of violations of policies or procedures, or other non-criminal workplace misconduct. The OIG refers these types of cases, as stated above, for administrative disposition. However, some investigations result in findings of criminal misconduct. In those instances, the OIG forwards the Summary Report to the appropriate law enforcement or prosecutorial entity. The ethics enabling laws mandate that the OIG refer to the Attorney General certain matters in which the State of Illinois sustained a substantial loss.

### **Special Report Process**

The OIG has statutory authority to “review, coordinate, and recommend methods and procedures to increase the integrity of the Office of the Secretary of State.” This authority includes the authority to assess programs and Departments with the goal of identifying or correcting waste, fraud, mismanagement or other issues. In the exercise of that authority, the OIG continually evaluates the operation of the various Departments and programs of the Office of the Secretary of State. Randomly, the OIG may determine that it is appropriate to conduct a review of a particular Department or program to ascertain whether it complies with its mandated function or whether there are potential issues that require management attention. Upon completion of a review, the OIG prepares a written Special Report. The Special Report identifies any potential problem areas, as well as identifies those programs or Departments that comply with their assigned functions.

Occasionally the OIG identifies an issue or problem during the course of an investigation that requires management consideration beyond the scope of that

investigation. In those instances, the OIG may choose to prepare a Special Report. If the issue appears to be programmatic, the OIG may conduct a review of the Department or the program in preparation of the Special Report. An Audit Review Committee comprised of Department Directors and senior management reviews the Special Reports and determines an appropriate response. It is within the discretion of management to choose how it responds to the identified issues.

## **Ethics**

The OIG also serves as a monitor over the enforcement of specific ethics reform laws. Within this additional jurisdiction, the OIG focuses on two areas – lobbyists and procurement compliance. The provisions regarding lobbyists provide that the OIG shall receive and investigate allegations regarding entities or individuals who conduct lobbying activities and make associated expenditures without having registered as lobbyists with the State or who in the course of their lobbying activities commit any type of harassment or discrimination. In addition, the OIG monitors registered lobbyists and lobbying entities to ensure compliance with their anti-harassment, discrimination, and ethics training, client disclosure and expenditure reporting mandates. The OIG, through the Procurement Monitor, also oversees acquisitions of goods and services by SOS to insure compliance with the governing procurement requirements.

The Executive Inspector General monitors enforcement with regard to the gift ban provisions, prohibitions on ex parte communications, ethics training, prohibited political activities, work-time requirements, workplace harassment, sexual harassment, discrimination, and employment matters including revolving-door restrictions. The revolving door rules are intended to prevent conflicts of interest in situations where employees leave their SOS employment to accept employment with entities with which they previously had executive, regulatory or contractual authority. The EIG instituted an acknowledgement system for both hired and terminated employees, as applicable, to ensure compliance.

## **Facilities Visits**

Each SOS facility is assigned to an OIG Inspector. Each Inspector is responsible for conducting random visits to their assigned facilities. The purpose of the visits is to allow the Inspectors to meet with facility managers and personnel to discuss any problems or concerns that the facility personnel may have. The Inspectors complete a reporting form to document the visits.

The visits also serve to professionally network with employees, to encourage greater communication between the facility staff and the OIG. It is the philosophy of the OIG that personnel are more willing to report potential issues or problems if there is some type of arm's length communication and a specific contact point, as opposed to personnel viewing the OIG as just another internal affairs or auditing office.

## **Security and Fraud Eradication**

The OIG has also initiated a standing Data Mining Project. These project efforts include, but are not limited to, the analysis of information for the detection and prevention of fraud or misconduct by employees and/or the public that may violate SOS policies, federal or state laws or regulations. The Data Miner research includes the examination of underlying identification documents presented by applicants for various services offered by the Secretary of State, including driver's licenses and vehicle titling. The primary mission of the Data Mining Project is to ensure the integrity of information presented to the Secretary of State. The methods used by the Data Mining Project for gathering information relevant to the Secretary of State systems involve the collection of public and non-public information in order to determine its underlying value and to enable the analyst to make recommendations to management based on that information.

## **CALENDAR YEAR 2021**

### **Investigations**

The OIG received 1043 complaints during calendar year 2021. The OIG reviewed each complaint to determine the proper disposition. The OIG initiated 122 investigations or inquiries for the complaints, with the EIG initiating several investigations. The OIG referred 700 complaints to Departmental Directors as managerial or supervisory matters. Six complaints were referred to the Illinois Attorney General's Office, 44 complaints were referred to the Governor's EIG or another applicable IG's Office, and 43 complaints were referred to law enforcement. In 2021, the OIG completed 116 investigations, forty-four of which resulted in some form of disciplinary action. Eighteen investigations remained open as of the end of 2021.

### **Special Reports**

During calendar year 2021, the OIG prepared and submitted pre-decisional, deliberative materials in the form of special reports to the Audit Review Committee. The submitted reports related to preliminary recommendations on the operations of departments, policies or programs.

### **Lobbying Activity**

The OIG received six complaints in 2021 alleging improper lobbying activity. The OIG investigated the cases through preliminary inquiry, written correspondence, document collection, and personal interviews. The complaints were resolved through registration and training, fee payment, EEC Referral, or with submission of an exemption from the registration requirements. Additionally, the OIG assisted with the administrative enforcement of the annual lobbyist ethics/harassment training, expenditure filings and reporting requirements for the 1818 registered lobbyists, representing 2464 registered lobbying entities.