

IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

In re: JOEL CAMPUZANO and) OEIG Cases #11-00289 and 11-01820
RON PUCCILLO)

OEIG FINAL REPORT (REDACTED)

Below is a final summary report from an Executive Inspector General. The General Assembly has directed the Executive Ethics Commission (Commission) to redact information from this report that may reveal the identity of witnesses, complainants or informants and “any other information it believes should not be made public.” 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes-competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report’s factual allegations or legal conclusions before the Commission.

The Commission received a final report from the Governor’s Office of Executive Inspector General (“OEIG”) and a response from the agency in this matter. The Commission, pursuant to 5 ILCS 430/20-52, redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor’s Executive Inspector General and to Joel Campuzano and Ron Puccillo at their last known addresses.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52.

EXECUTIVE SUMMARY

The potentially dangerous sports of boxing and mixed martial arts are highly regulated by a host of State laws and regulations. Those laws and regulations are enforced by the Athletics Unit within the Illinois Department of Financial and Professional Regulation (“IDFPR”).

In 2011, the Office of Executive Inspector General (“OEIG”) received a series of allegations regarding mismanagement by the Executive Manager of the Athletics Unit, Joel Campuzano, and now-retired Director of the Athletics Unit Ron Puccillo. At about the time the OEIG received the allegations, IDFPR placed Mr. Campuzano on paid administrative leave, where he remains as of April 5, 2013. In light of the multiple allegations of misconduct, the OEIG conducted an investigation that included numerous interviews, a review of the Athletics Unit’s licensing records and procedures, and a review of other IDFPR-produced documents.

The OEIG’s investigation revealed that both Mr. Campuzano and Mr. Puccillo, despite having served in their positions for years, were inexplicably unaware of various legal requirements relating to their job duties, such as license qualifications, the collection and imposition of fees, and restrictions on ringside seating. The OEIG’s investigation revealed that at least one professional boxing license was approved by Mr. Campuzano for an applicant who did not meet the legal requirements for a professional boxing license. The OEIG also discovered that IDFPR staff collected various “fees,” such as license photo fees from contestants and officials without any legal authority to do so, stored cash in filing cabinets, and maintained inadequate record-keeping and basic accounting procedures to account for collected money. In addition, OEIG investigators learned that Mr. Campuzano permitted family members to sit ringside at boxing events, an area restricted for essential personnel under State law.

In light of the Athletics Unit’s improper maintenance of records and lack of accounting, OEIG investigators were unable to determine by examining IDFPR records:

- which IDFPR staff approved particular licenses;
- whether approved licensees were actually qualified to receive a license;
- how much money IDFPR staff collected in so-called “fees”; and
- how and on what IDFPR staff spent the collected fee money.

The lack of proper procedures and controls, among other things, allowed apparent conflicts of interest to emerge unchecked. For instance, at a boxing event in August 2010, Mr. Campuzano permitted his brother to serve as judge and his father to serve as a “second” to a boxing contestant who was managed by his good friend. In addition, Mr. Campuzano reviewed and approved a license application for his father. Although Mr. Puccillo, who was Mr. Campuzano’s supervisor, knew about Mr. Campuzano’s actions, he took no action to prevent these apparent conflicts of interest from occurring. In addition, in October 2011, Mr. Puccillo permitted a boxing event to proceed without any of the officials being properly licensed.

Based upon its investigation, the OEIG recommends that Mr. Campuzano be discharged, and in light of Mr. Puccillo’s retirement, that a copy of this Final Report be placed in his personnel file. The OEIG also recommends that IDFPR take other appropriate action based upon the OEIG’s investigative findings as set forth more fully in its Final Report.

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FINAL REPORT

I. INTRODUCTION

In March 2011, the Office of Executive Inspector General (“OEIG”) received a complaint alleging that Illinois Department of Financial and Professional Regulation (“IDFP”) employee Joel Campuzano engaged in misconduct in relation to the regulation of professional boxing by, among other things:

- permitting his brother to serve as a judge in a professional boxing contest in which his father worked as an assistant (“second”) on behalf of one of the boxers, who was managed by Mr. Campuzano’s friend; and
- providing ringside seating at boxing events for family and friends.

The OEIG assigned the above allegations the unique case number 11-00289.

During the course of investigating the foregoing allegations, the OEIG received additional complaints of misconduct against Mr. Campuzano, as well as complaints against former IDFPR Athletics Unit Director Ron Puccillo. Specifically, it was alleged that, among other things:

- Mr. Campuzano reviewed and approved license applications for relatives and friends; and
- Mr. Campuzano and Mr. Puccillo allowed photo “fees” and medical “fees” to be collected despite there being no statutory authority to collect such fees.

The above allegations were investigated as part of case number 11-00289.

Thereafter, the OEIG received an additional complaint, alleging that Mr. Puccillo allowed unlicensed officials to preside over a boxing event. The OEIG assigned the additional allegation the unique case number 11-01820.

In light of the fact that investigations 11-00289 and 11-01820 were similar in nature and both concerned the conduct of IDFPR employees within the same unit, the two matters subsequently were jointly investigated and both are addressed in this Final Report.

The OEIG received still more allegations during the course of investigating case numbers 11-00289 and 11-01820. More than ten additional allegations were made against Mr. Campuzano including, among others, that he:

[REDACTED]

[unfounded allegations redacted]

The OEIG also received at least three additional complaints against Mr. Puccillo (some of which were similar to complaints against Mr. Campuzano), including, among other things, that he:

[REDACTED]

[unfounded allegations redacted]

In response to the multitude of allegations, between March 2011 and March 2013, the OEIG conducted an investigation that included multiple interviews of the subjects of the allegations, interviews of twenty-six witnesses, some on several occasions, and the review of a voluminous quantity of documents. As discussed more fully below, it was discovered that the Athletics Unit’s record-keeping was in disarray. With respect to many of the allegations against

Mr. Campuzano, Mr. Puccillo, and [REDACTED] [name redacted, no founded allegations], the OEIG ultimately determined that they were either outside of the OEIG's one-year statute of limitations or that insufficient evidence existed to support either a finding of misconduct or further investigation of the claim.

The OEIG has determined, however, that certain of the allegations against Joel Campuzano and Ron Puccillo are founded, as follows:

The OEIG finds that Mr. Campuzano:

- demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to the review of qualifications for licenses;
- demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to the imposition and depositing of fees;
- demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to restrictions on ringside seating;
- demonstrated incompetence and inefficiency in his assigned duties by failing to maintain adequate records;
- created the appearance of impropriety or bias by permitting his brother to serve as a judge during a boxing match where his father worked as a second for a boxer managed by his good friend;
- created the appearance of impropriety or bias when he reviewed and approved the license application for his father [REDACTED];
- created the appearance of impropriety or bias by approving the license application for a boxer who was sponsored by his good friend;
- created the appearance of impropriety or bias by permitting his family members to sit in ringside seating at a boxing event; and,
- engaged in conduct unbecoming an IDFPR employee by his public mismanagement of the Athletics Unit.

The OEIG finds that Mr. Puccillo:

- demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to the review of qualifications for licenses;
- demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to the imposition and depositing of fees;
- demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to restrictions on ringside seating;
- demonstrated incompetence and inefficiency in his assigned duties by failing to maintain adequate records;

- created the appearance of impropriety or bias by allowing Joel Campuzano to permit his brother to serve as a judge during a boxing match where his father worked as a second for a boxer managed by Joel Campuzano’s good friend;
- permitted the appearance of impropriety or bias by allowing Joel Campuzano to review and approve the license application for his father [REDACTED];
- allowed the appearance of impropriety or bias by allowing Joel Campuzano to approve the license application for a boxer who was sponsored by Joel Campuzano’s good friend;
- created the appearance of impropriety or bias by permitting Joel Campuzano’s family to sit in ringside seating at a boxing event;
- demonstrated incompetence and inefficiency in his assigned duties by allowing officials who were not properly licensed to preside over a boxing event; and,
- engaged in conduct unbecoming an IDFPR employee by his public mismanagement of the Athletics Unit.

The OEIG recommends that Mr. Campuzano be discharged for his misconduct, and that a copy of this Final Report be placed in Mr. Puccillo’s personnel file, as he is no longer a State employee.

II. BACKGROUND

A. The Professional Boxing Act and the Boxing and Martial Arts Code

Professional boxing is a highly regulated activity and is governed by the Professional Boxing Act (“Boxing Act”)¹ and the Illinois Administrative Code Professional Boxing and Martial Arts Contests provisions (“Boxing Code”),² as well as numerous other rules and regulations. The Boxing Act states that it is a matter of public interest and concern that professional boxing and full-contact martial arts contests merit and receive the confidence of the public and that only qualified persons participate in such contests and events in the State of Illinois.³

B. The Illinois Department of Financial and Professional Regulation

The Boxing Act grants the IDFPR the power and duty to oversee boxing and full-contact martial arts contests held in the State of Illinois, including, among other things, reviewing the qualifications and fitness of license and permit applicants, and revoking, suspending, or refusing to issue or renew licenses and permits.⁴ The IDFPR also regulates and oversees professionals in

¹ 225 ILCS 105/0.05 *et seq.* Public Act 97-0119, effective on July 14, 2011, changed the title of the Professional Boxing Act to the Boxing and Full-Contact Martial Arts Act. Public Act 97-1123, effective August 27, 2012, enacted amendments involving martial arts. Most of the allegations in this complaint were alleged to have occurred prior to March 2011 and thus this report will cite the law in effect at the time of the alleged incidents.

² 68 Ill. Adm. Code 1371.10 *et seq.* On September 14, 2012, the Illinois Administrative Code, Title 68, Part 1371 Professional Boxing and Martial Arts Contests was repealed and a new Part 1370 Boxing and Full-Contact Martial Arts Act was adopted. This report will cite the provisions in effect at the time of the alleged incidents.

³ 225 ILCS 105/0.05.

⁴ 225 ILCS 105/5.

nearly 100 other industries and monitors the State's financial institutions.⁵ There are three IDFPR divisions, namely the:

- Division of Banking;
- Division of Financial Institutions; and
- Division of Professional Regulation ("DPR").

This investigation involves the DPR. DPR maintains two divisions, one of which is the Statewide Enforcement Division ("Statewide Enforcement"),⁶ which in turn includes the Athletics Unit, which oversees professional boxing.

C. Athletics Unit Staff

The Athletics Unit employs staff whose job duties and responsibilities vary. Additionally, inspectors are hired by IDFPR under personal services contracts to assist the Athletics Unit. When a boxing contest is scheduled, the Athletics Unit Director, staff, and inspectors are present to oversee various aspects of the entire event.

Among other duties and responsibilities, Athletics Unit staff ascertains the qualifications and fitness for professional boxing license and permit applicants, oversees payment of the required taxes by promoters for ticket sales, assigns officials to work professional contests, and oversees the weigh-ins conducted prior to professional boxing contests. IDFPR inspectors are also appointed to supervise boxing events and ensure that individuals who hold an Athletics Unit license adhere to all laws.⁷ An inspector is assigned to each boxing contestant for the purpose of observing the contestant, and inspecting the equipment, hand wrappings, and gloving of the contestant. Inspectors also monitor ringside and dressing room activities, assist with collecting fees, and warn of any potential rule violations pertaining to so-called "seconds."⁸

Below is a description of the former and present Athletics Unit staff members who are central to this investigation.

1. Ron Puccillo—Former Director/Boxing Commissioner

The OEIG interviewed Ron Puccillo on April 18, 2011, and April 4 and 24, 2012, and he stated that he had served as the Director of the Athletics Unit since 2008. According to Mr. Puccillo, the unofficial title for his Director position is Boxing Commissioner. Mr. Puccillo said he oversaw all aspects of professional boxing contests in Illinois, and that he was responsible for the processing and approval of all licenses issued by the Athletics Unit, including contest participants, managers, seconds, and officials. Mr. Puccillo said that he supervised four full-time and two temporary employees assigned to the Athletics Unit.

⁵ www.idfpr.com.

⁶ The other is the Licensing and Testing Division, but that division is not relevant to this investigation.

⁷ 68 Ill. Adm. Code 1371.10.

⁸ 68 Ill. Adm. Code 1371.100.

According to the position description for the Director of Athletics, the job duties include the development and implementation of statewide policies and procedures in enforcing the Boxing Act and rules promulgated by IDFPR. In addition, under the position description, the Director of Athletics is required to enforce the proper handling of transactions under the Boxing Act and supervise subordinate staff.

Mr. Puccillo retired from State service in June 2012.

2. Nancy Illg—Co-Director/Acting Boxing Commissioner

The OEIG interviewed Nancy Illg on several occasions in 2012. Nancy Illg stated that she serves as the DPR Policy Operations Coordinator for the Office of the Director. In April 2011, she was assigned to work as the Co-Director of the Athletics Unit and in July 2012 she was assigned as the Athletics Unit Acting Director. As Co-Director and Acting Director of Athletics, she reports directly to the Director of DPR.

According to Ms. Illg, her experience with regard to professional boxing consists of having assisted in the Athletics Unit since 2007. She said she had attended weigh-ins and events to help process paperwork and had reviewed rules applicable to the sports to ensure the rules are in line with the Administrative Rules. She also said her job duties included reviewing policies and procedures, including recommendations for policy implementation and improvements. As Co-Director of the Athletics Unit, Ms. Illg was required to oversee boxing events and said she and Ron Puccillo tried to split the events between themselves so that one of them was present to oversee every event. When she oversees a boxing event, she is considered Acting Boxing Commissioner.

3. Joel Campuzano—Executive Manager/Former Acting Director

The OEIG interviewed Joel Campuzano on April 23, 2012 and February 28, 2013. Joel Campuzano stated that he began his employment with IDFPR in 1995 as an Administrative Assistant. In 2003, he was promoted to the position of Executive Manager of the Athletics Unit. In 2008, he was appointed Acting Director of the Athletics Unit and served in that capacity for less than one year after which he returned to his Executive Manager position. As Executive Manager, he reported to the Director of Athletics.

Joel Campuzano's duties as the Executive Manager included processing Athletics Unit license applications, assigning inspectors, and working with promoters, matchmakers, and contestants to prepare for professional boxing events. He also said he attended and monitored weigh-ins and that he worked all 2010 boxing events. According to his position description, his duties included developing, implementing, and administering statewide policies and procedures for an enforcement and regulation program under the Boxing Act. The duties also included maintaining records of active contestants and compiling documentation on licensing requirements.

Mr. Campuzano was placed on paid administrative leave by IDFPR in March 2011.⁹

4. [Employee]—Executive II

The OEIG interviewed [employee] on several occasions in 2011 and 2012. [Employee] stated that his title was Executive II and he had worked in the Athletics Unit since 2005. His duties included processing registrations, reviewing contract signatures, ensuring that the promoters pay the event purse, attending weigh-ins to assist in collecting fees, and attending events to assist with processing.¹⁰

D. Licenses for Professional Boxing

The Athletics Unit issues licenses related to professional boxing. The sections below describe: (1) the types of professional boxing-related licenses; (2) applications for a professional boxing license; (3) the criteria for obtaining a professional boxing license; and (4) boxing licenses issued at the contestant's weigh-in.

1. Types of Professional Boxing-Related Licenses

In order to engage in professional boxing contests, the Boxing Act and Code require participants to be licensed and to maintain the license in good standing with IDFPR. Below is a list of the boxing-related individuals¹¹ who are required to obtain an IDFPR license and maintain it in good standing:

- promoters
- matchmakers
- contestants
- judges
- seconds
- timekeepers
- referees
- managers

Once issued, every license expires on September 30 of each odd-numbered year.¹² For example, a boxing contestant license issued anytime in 2012 would expire on September 30, 2013.

2. Applications for Professional Boxing Licenses

Persons who wish to obtain a professional boxing license are required to submit a completed Athletics Unit Application, supporting documentation, and the corresponding license fee. License documentation and fees may be hand delivered or mailed to the Athletics Unit or hand delivered to an Athletics Unit employee at a boxing weigh-in or event.

⁹ On March 8, 2011, IDFPR placed Joel Campuzano on paid administrative leave. On June 8, 2011, IDFPR's then-Senior Deputy General Counsel informed the OEIG that IDFPR was considering bringing Joel Campuzano back to work. On June 20, 2011, the OEIG was informed that IDFPR was planning to keep Joel Campuzano on paid administrative leave pending the outcome of the OEIG's investigation. On March 12, 2012, IDFPR's General Counsel informed the OEIG that IDFPR intended to initiate an internal investigation into allegations that Joel Campuzano used State resources for political purposes.

¹⁰ [Employee] was assigned to another DPR unit in June 2012.

¹¹ 225 ILCS 105/10.

¹² 68 Ill. Adm. Code 1371.270.

The standard license application form requires applicants to provide the following:

- type of license being applied for;
- personal information (name, age, address, date and place of birth, height, and weight);
- citizenship;
- emergency contact; and
- a passport size photograph.

The license application form also requires the applicant to answer a series of “yes/no” questions, including questions pertaining to convictions for any criminal offense, chronic disease, past denial of a professional license or discipline received, among other things. Applicants are also required to date and sign the application certifying that application answers are true and correct.

If an applicant meets the required criteria for a professional boxing license, an IDPFR employee approves the license and the information is entered into an IDPFR database. A license is then automatically printed in a Springfield IDPFR office and mailed to the Athletics Unit in Chicago which then mails the license to the applicant. If an applicant does not meet the required criteria for a license, the Athletics Unit notifies the applicant of the denial.

3. Criteria for Obtaining Professional Contestant’s Boxing Licenses

The criteria and fees needed to obtain a professional contestant’s boxing license are outlined in the Boxing Act and Code. For example, persons seeking to obtain a professional contestant’s boxing license are required to:

- be 18 years of age or older;
- be of good moral character;
- file an application stating name, date and place of birth, current residence, sworn statement that applicant is not currently in violation of federal, State, or local laws or rules governing boxing or full-contact martial arts;
- file a certificate from a physician attesting to physical fitness and qualification to participate in contests; and
- submit a payment of the required fee.¹³

The Boxing Code also requires persons applying for a license to submit proof of a physical examination by a physician, including laboratory tests that are no more than six months old from the date of the application.¹⁴ In addition, 48 hours before competing in any contest, contestants are required to provide certified copies of medical tests performed by a laboratory.¹⁵ All costs involved with the medical examinations and/or tests required by the Boxing Code are the responsibility of the license applicant.¹⁶

¹³ 225 ILCS 105/11 & 68 Ill. Adm. Code 1371.300.

¹⁴ 68 Ill. Adm. Code 1371.300(l).

¹⁵ *Id.* The medical tests include, but are not limited to, an EKG; chest x-ray; CT/MRI brain scan; eye exam by an ophthalmologist; blood test for HIV, sexually transmitted diseases, Hepatitis B & C; and testing for prohibited drugs.

¹⁶ 68 Ill. Adm. Code 1371.300(h).

The application fee and subsequent license renewal fee for each type of boxing license is listed in the Boxing Code and varies per the type of license issued. For example, the initial license fee for a boxing contestant is \$100 and a subsequent renewal fee is \$50.¹⁷

The Boxing Code further requires a first-time boxing contestant (amateur desiring to turn professional) to include with the license application proof of age and:

- documentation of two years' of boxing experience as an amateur; and,
- documentation reflecting a minimum of 20 bouts or demonstrating "exceptional fighting ability" as determined by DPR.¹⁸

The term "exceptional fighting ability" is not defined.

4. Boxing Licenses Issued at the Contestants' Weigh-In

The day prior to a professional boxing event, a weigh-in is conducted by the Athletics Unit staff and inspectors. At the weigh-in, all contestants are required to be weighed and submit to a pre-fight physical exam.¹⁹ The physician present at the weigh-in conducts examinations and tests necessary to attest to the fitness of the contestants and certifies in writing on an IDFPR form those contestants who are in good physical condition to compete.²⁰ The Athletics Unit Director and staff are present to monitor and assist with all activities, inspectors are present to collect fees, ensure that all contestants provide the required paperwork, and weigh the contestants.

Prior to October 2011, the Athletics Unit regularly accepted and processed boxing license applications and renewals at weigh-ins and events. License fees and other fees collected at a weigh-in were secured by an Athletics Unit employee and brought back to the event the next day. According to Nancy Illg, if an Athletics Unit employee accepted cash at a weigh-in from promoters, officials or contestants, the employee could be in possession of a significant amount of cash.

E. Athletics Unit Collection of Fees and Deposits at Boxing Contests

The Boxing Act states that fees for the administration and enforcement of the Boxing Act shall be set by rule and *all* of the fees, taxes, and fines collected under the Boxing Act shall be deposited into the General Professions Dedicated Fund.²¹ The Boxing Act further states that IDFPR shall assign judges, timekeepers, referees, and physicians to work a contest, whereas the promoter of the event is responsible for paying these individuals.²² The promoter is also required to pay the so-called "purse" or contestant's earnings for participation in an event.²³

¹⁷ 68 Ill. Adm. Code 1371.20.

¹⁸ 68 Ill. Adm. Code 1371.300(n).

¹⁹ 68 Ill. Adm. Code 1371.190(b).

²⁰ 68 Ill. Adm. Code 1371.190(b)(3).

²¹ 225 ILCS 105/23.

²² 225 ILCS 105/8(e).

²³ 225 ILCS 105/8(c) & 68 Ill. Adm. Code 1371.80(g).

The Boxing Code requires promoters to provide the compensation for the contestants and officials to DPR in cash, certified checks, money orders or other approved payment at or before the weigh-in.²⁴ An Athletics Unit staff member provides the promoter's payments to the contestants and officials and then gives a receipt of those payments to the promoter.²⁵ The receipt provided by the Athletics Unit staff is a Boxing and Wrestling Certification of Payment receipt and contains a signature line on which the contestant signs certifying receipt of the amount of the payment from the promoter.

Although not set forth in the Boxing Act or Code, according to witness interviews, if a licensee receiving payment from a promoter owed a fee to the Athletics Unit or the attending physician, the fee could be paid directly by the licensee or it could be deducted from the promoter's payment to the licensee and the promoter would then reimburse the Athletics Unit for those fees. Documents reviewed by the OEIG revealed that fee payments were typically reflected by hand-written monetary deductions noted on the top right-hand corner of the Boxing and Wrestling Certification of Payment receipts. For example, the OEIG located one payment receipt to a boxing contestant reflecting the following in the upper right-hand corner: "\$LIC. 103" and "PHYS. 50."

Below is a more detailed discussion of the photo fees and physicians' fees collected by the Athletics Unit.

1. Photo Fees

The Boxing Act states that a picture identification card shall be issued to all professionals licensed by IDFPFR who are residents of Illinois or any jurisdiction, state, or country that does not regulate professional boxing.²⁶ The picture identification card is required to be presented to IDFPFR or its representative upon request at weigh-ins.²⁷

The Athletics Unit issues two types of identification cards to contestants, an Association of Boxing Commissions Boxer's Federal Identification Card and an Association of Boxing Commissions Mixed Martial Arts National Identification Card.²⁸ To obtain an Association of Boxing Commissions identification card, a contestant must complete the application form, submit two passport size photographs, and provide two forms of identification. The identification cards include the contestant's name, date of birth, current address, height, weight, hair and eye color, identification card number, expiration date, and the contestant's signature and

²⁴ 68 Ill. Adm. Code 1371.80(g).

²⁵ *Id.*

²⁶ 225 ILCS 105/11(A). The Federal Professional Boxing Safety Act of 1996, requires boxing commissions to issue each professional registered boxer an identification card containing a recent photograph of the boxer and a personal identification number assigned to the boxer by a boxing registry. 15 U.S.C. 6305(b)(1).

²⁷ 225 ILCS 105/11(A).

²⁸ The Association of Boxing Commissions is a not-for-profit professional boxing organization that promotes uniform health and safety standards in boxing and mixed martial arts and consists of members that are state and tribal combative sports commissions in the United States and Canada. The Association of Boxing Commissions identification cards are obtained from the State in which a contestant resides and are required to compete in each sport. See www.abcboxing.com.

photograph. Neither the Boxing Act nor Code lists a fee that may be imposed for the issuance of a photo identification card.²⁹

2. Physicians' Fees

As noted above, in addition to the required documentation of a physician's examination at the time a contestant submits an application for a license, a physician is required to conduct an exam of each contestant before a contest and immediately after for possible injury.³⁰ The pre-fight physical exam is conducted by the physician at the weigh-in and must include the contestant's weight, pulse, blood pressure, examination of the lungs and heart, general physical condition, and any tests necessary to attest to the contestant's fitness.³¹ Neither the Boxing Act nor Code provides for the collection of physicians' fees for these exams by the Athletics Unit staff.

F. Athletics Unit Documents

The Athletics Unit uses various documents during the licensing process and the pre-contest, contest, and post-contest stages. Below are the names and brief descriptions of several of the documents that will be discussed in this Final Report:

Athletics Unit Document

Description of Document

<i>Schedule of Bouts:</i>	Document reflecting a list of the licensed participants for bouts at a boxing event.
<i>Certification of Payment Receipt:</i>	A certification from a contestant or official of the amount received from a promoter as payment for his participation in a boxing event.
<i>IDFPR Hand-Written Receipt:</i>	Receipt reflecting cash, check or money order received by IDFPR for an Athletics Unit license fee, permit fee, or taxes.
<i>Weigh-In Payment Checklist:</i>	Document utilized at weigh-in listing: the names of contestants or seconds obtaining a license; the amounts paid for a license, physical, and/or photo fee; whether the payment was paid in person or is to

²⁹ The Boxing and Full-Contact Martial Arts Act provisions of the Illinois Administrative Code enacted in September 2012, now provide a \$5 fee for the initial issuance of the Illinois National or Federal identification card. 68 Ill. Adm. Code 1370.30(e).

³⁰ 225 ILCS 105/12.

³¹ 68 Ill. Adm. Code 1371.190(b).

be deducted from a contestant's purse; and, the total amount collected per licensee.

Statements of Licenses and Permits Issued: Document identifying the licenses and permits issued, the total amount collected for each license or permit, and the fees and taxes paid by a promoter.

Deposit Slip: Ticket reflecting deposits by the Athletics Unit into the State account. On the slip, currency is listed as a total amount and checks are listed individually.

Official List or Official Pass List: A list created by the Athletics Unit and given to an event promoter containing the names of individuals working a boxing event who are permitted entry to the event without payment.

Contest Permit Application: Application submitted by a promoter to obtain an Athletics Unit permit required to hold a boxing event.

III. INVESTIGATION

As discussed earlier, the OEIG received numerous allegations involving Athletics Unit employees Joel Campuzano and Ron Puccillo. The investigation of the following allegations is discussed in this Section:

- (a) Joel Campuzano's role in the [REDACTED] v. [REDACTED] boxing contest wherein it was alleged that his brother was a judge and his father was a second;
- (b) Joel Campuzano's review and approval of license applications for relatives and friends;
- (c) the Athletics Unit's collection of professional boxing-related fees;
- (d) Joel Campuzano's provision of ringside seating for his family and friends; and,
- (e) Ron Puccillo's allowance of unlicensed officials to preside over a boxing event in Burbank, IL.

A. Joel Campuzano's Role in Regard to the [REDACTED] v. [REDACTED] Boxing Contest

To investigate Joel Campuzano's alleged involvement in several conflicts of interest in connection with a boxing contest between [boxer 2] and [REDACTED], the OEIG reviewed certain documents and conducted interviews of Mr. Campuzano, Mr. Puccillo, a boxing referee, the Lead Boxing Inspector, Athletics Unit employee [employee], and (boxer) [REDACTED]'s manager.

1. IDFPR Documents Relating to the [REDACTED] v. [REDACTED] Boxing Contest

On August 6, 2010, a boxing event was held at the University of Illinois at Chicago Pavilion which included a contest between [boxer 2] and [REDACTED] ("[REDACTED] fight"). The

OEIG obtained and reviewed various IDFPR documents from the event, including IDFPR Athletics Unit licenses, the Referee and Judge Assignments list, the Schedule of Bouts, and an Affidavit completed by [boxer 2] at the weigh-in prior to his fight. The OEIG also reviewed the contract between the promoter of the event, [REDACTED], and [boxer 2].

The Referee and Judge Assignments list for the [REDACTED] fight reveals that Joel Campuzano's brother ([first brother]) served as a judge. The Schedule of Bouts contains the names of the seconds for the [REDACTED] fight, but Joel Campuzano's father ([REDACTED]) is not listed as a second for the fight. The manager's signature line of the contract between the fighters and [REDACTED] contains the signature "[REDACTED]."

2. OEIG Interview of Joel Campuzano Relating to the [REDACTED] Fight

During his April 23, 2012, interview, Joel Campuzano acknowledged that he assigned his brother, [first brother], to serve as a judge for the [REDACTED] fight and that his father, [REDACTED], walked [boxer 2] into the ring as part of [boxer 2]'s entourage. Mr. Campuzano said that his father wore a "Team [boxer 2]" jacket, but said his father did not work as a second during the fight because his health would not allow it. Mr. Campuzano said that his father left the ring following the introductions and before the fight even began. Mr. Campuzano said that he made his father obtain a second's license prior to the event, but that his father's name would not have appeared on the Schedule of Bouts list because his father did not actually work as a second.

With regard to his friend [the friend] (who appeared to be [boxer 2]'s manager), Mr. Campuzano said that [the friend] was not really a manager/trainer for [boxer 2], but more of a boxing enthusiast who helped sponsor and pay young boxers' fees. However, after reviewing a copy of the contract between [boxer 2] and event promoter [REDACTED], Mr. Campuzano acknowledged that [the friend] did sign the contract as [boxer 2]'s manager. He said that [the friend] does not speak English and probably did not know what he was signing. Upon being presented with a copy of the Athletics Unit licensing file for [the friend], Mr. Campuzano acknowledged that [the friend] was in fact licensed as a boxing manager. Mr. Campuzano said that he and [the friend] have been friends for several years and that he had travelled with [the friend] to Mexico on two occasions to attend boxing events.

Mr. Campuzano said that he did not believe it was a conflict of interest for his father to escort [boxer 2] in to the ring, even though his brother served as a judge in the fight, because his brother is a good judge, and Mr. Campuzano did not question the integrity of his brother. Mr. Campuzano also said that there are three judges per bout to assure that the outcome of a fight is correct, and added that very few spectators know who his friends and family are. When asked how the situation might appear to the boxing community who knew his family and friends, he said, "It doesn't look good. I agree." Nevertheless, Mr. Campuzano said that the outcome of the fight was not influenced by the presence of his father or [the friend] and that the scores given to the fighters by his brother were consistent with the scores given by the other judges.

3. OEIG Interview of Ron Puccillo Relating to the Boxing Assignments for Officials for the [REDACTED] Fight

During his April 4, 2012 interview, Mr. Puccillo said that Joel Campuzano made the boxing assignments of the officials for the [REDACTED] fight. Mr. Puccillo also said that the Schedule of Bouts list is distributed by Joel Campuzano or Ms. Illg to all officials working at an event, and that inspectors use the form to restrict access to a contestant's corner. With regard to the general procedures regarding listing of individuals on a Schedule of Bouts list, Mr. Puccillo stated that, in the past, the Schedule of Bouts forms were completed by either Joel Campuzano or [employee], and that they are currently completed by Nancy Illg. He said that if a contestant changes a second on the day of the event, the change must be approved by himself, Joel Campuzano, [employee], or Nancy Illg. He said that in the past, the Athletics Unit permitted a second whose name was not on the Schedule of Bouts list to serve as a second for a fight, but now a change from who is on the list is allowed only in exigent circumstances. Mr. Puccillo said that when there is a last minute change, it is possible that the new second's name will not appear on the Schedule of Bouts.

With regard to the [REDACTED] fight in particular, Mr. Puccillo said that he was present at the [REDACTED] fight and was aware that [REDACTED] (Joel Campuzano's [first] brother) was serving as a judge, but did not become aware that [REDACTED] (Joel and [first brother]'s father) was to serve as a second for [boxer 2] until after the fight was underway. According to Mr. Puccillo, by the time he became aware that [the father] was a second for [boxer 2], it was "too late" to do anything. Mr. Puccillo said that, though he did have the authority to stop the fight at any time to make changes to officials or seconds, he chose not to do so. He said because he did not authorize any last minute change to add [the father] as a second, he assumed that Joel approved the change.

Mr. Puccillo also said he was aware that Joel Campuzano and [the friend] were "good friends," but did not believe the friendship had anything to do with the [REDACTED] fight assignments. Mr. Puccillo told OEIG investigators that the incident did not look good and could have been considered a conflict of interest if [the first brother's] judging scores were not consistent with the scores of the other judges. He said that he did not think IDFPR had a conflict of interest policy at that time, but he thought that Ms. Illg was working on a conflict of interest policy.³² He said that he was not happy about the incident, but did not formally counsel or discipline Joel Campuzano.

4. OEIG Interviews of Boxing Referee, the Lead Boxing Inspector, and Athletics Unit Employee [Employee] Relating to the [REDACTED] Fight

The OEIG interviewed the boxing Referee who officiated at the [REDACTED] fight. The Referee reviewed photos of the [REDACTED] fight, and identified [REDACTED] (Joel's father) standing in the boxing ring wearing a white and red "Team [boxer 2]" jacket next to [the friend] and directly behind [boxer 2]. The Referee said that [the father] served as a second for [boxer 2] that night and [the friend] served as [boxer 2]'s manager.

³² As detailed further below, IDFPR had maintained a policy since at least 2009 that employees must perform their duties in a professional and impartial manner and employees must avoid taking actions that may create the appearance of impropriety or bias in the discharge of regulatory or enforcement duties. IDFPR Policy & Procedure Manual, p. 11 (2009).

The OEIG also interviewed the Athletics Unit Lead Inspector who worked the [redacted] fight. The Lead Inspector reviewed photos from the event. In one of the photos, he identified [the father] wearing a white and red Team [boxer 2] jacket and [the friend] wearing a suit standing behind [boxer 2] in the ring. In another photo, he identified [the father] and [the friend] accompanying [boxer 2] to the ring for the fight. The Lead Inspector reviewed the Schedule of Bouts list for the [redacted] fight, and said that [the father's] name did not appear on the list as a second, but he nevertheless did recall seeing [the father] in [boxer 2]'s corner during the bout. He said that the Schedule of Bouts list is prepared several days in advance of an event and changes are often made to the list at the last minute. He said that when a contestant changes a second from who is listed on the form, the inspectors are informed of the change and make sure the new second is properly licensed before he can work. The Lead Inspector said that there would be no way for him to update all of the Schedule of Bouts lists with last minute changes and that the working list he used probably had handwritten changes. He said he does not maintain copies of the Schedule of Bouts lists after an event. He further stated that it was possible that [the father] was part of [boxer 2]'s entourage and may not have worked in the corner with [boxer 2] in between rounds. Finally, the Lead Inspector stated that he believed a conflict of interest was created with the presence of the three Campuzanos for the [redacted] fight and this should not have been allowed to occur.

[Employee] said that he also worked for the Athletics Unit at the [redacted] fight. [Employee] said [the father] did serve as a second for fighter [boxer 2] and that he saw [the father] work with fighter [boxer 2] in between rounds.

5. OEIG Interview of Boxer [redacted]'s Manager Relating to the [redacted] Fight

The OEIG interviewed boxer [redacted]'s manager who stated that he was not aware that Mr. Campuzano's [first] brother [redacted] worked as a judge and that Joel Campuzano's father [redacted] worked as a second for [boxer 2] until after a newspaper article disclosed those facts.³³ The manager said that had he known this information the night of the fight, he and others would have "raised hell." According to boxer [redacted]'s manager, [father]'s name was not on the Schedule of Bouts as a second. Despite these facts, the manager said he did not intend to file a protest because he did not want to anger the event promoter.

B. Joel Campuzano's Review and Approval of Licenses for Relatives and Friends

With respect to Athletics Unit license approval procedures, the OEIG interviewed Athletics Unit employees Ron Puccillo, Joel Campuzano, Nancy Illg, and [employee]—each of whom indicated that there were no formal or written internal procedures in place pertaining to the processing and approval of a license application. In addition, OEIG investigators learned that

³³ On March 12, 2011, an article appeared in the *Chicago Tribune* regarding a complaint that had been sent to IDFPR relating to the [redacted] fight and other matters.

no records were maintained that would indicate which Athletics Unit employee approved or did not approve a specific license.

A review of license applications revealed that employees did not place notations or their initials on the application indicating they approved an application packet. Moreover, although license-application forms contain a “For Official Use Only” box, witnesses stated that this section was only used as a note section and does not identify who approved a specific boxing license.

In that context, allegations were raised that Mr. Campuzano reviewed and approved Athletics Unit licenses for friends and family. Specifically, it was alleged that Joel Campuzano approved:

- a second’s license for his father [REDACTED];
- a martial arts judge’s license for his [second] brother [REDACTED];
- a boxing manager’s license for his good friend [REDACTED]; and,
- a professional boxing license for [boxer 1], whom [the friend] managed.

To investigate those allegations, the OEIG reviewed Athletics Unit licensing files and conducted interviews of Ron Puccillo, Nancy Illg, [employee], Joel Campuzano, and boxer [1]. That evidence is discussed below.

1. Review of Various Licensing Files

The OEIG obtained and analyzed the Athletics Unit licensing files for [the brother], [the father], [the second brother], [the friend], and [the boxer]. As noted above, the files do not indicate which Athletics Unit staff member approved a specific license. However, IDFPR’s then-Senior Deputy General Counsel stated that Joel Campuzano was responsible for reviewing applications and that Ron Puccillo was responsible for final approval.

As described above, the Boxing Code requires an amateur boxer desiring to turn professional to have documentation of 2 years of boxing experience as an amateur, and either have participated in a minimum of 20 amateur bouts or demonstrate “exceptional fighting ability” as determined by IDFPR. The OEIG analyzed the licensing file for boxer [1]. The file indicated that he signed an IDFPR application to become a licensed professional boxing contestant on November 14, 2009. The file contains a copy of [boxer 1]’s United States Amateur Boxing Passbook which was issued on January 16, 2009. The passbook indicates that [boxer 1]’s first amateur boxing bout was on January 16, 2009, and appears to list entries for 22 amateur bouts. Of the 22 amateur bouts listed, three of the fights appeared that to have been entered twice in the passbook because those fights contained similar information entered on the same, or nearly the same, dates. Therefore, it appears that [boxer 1] may have had only 19 amateur bouts as of the time he signed his application. IDFPR records indicate that [boxer 1] was issued a contestant’s license by the Athletics Unit on December 8, 2009. There is no documentation in the file indicating that [boxer 1] met the requirement of 2 years of boxing experience as an amateur, or that his license was approved because of any “exceptional fighting ability.”

2. OEIG Interview of Ron Puccillo Relating to License Approvals and Approvals of Licenses for Campuzano Family Members

In his April 4, 2012, interview, Ron Puccillo stated that there had been no record in the Athletic Unit application files, file documents, or database identifying the name of an Athletics Unit employee who approved a license application. He described the communication of any approval as verbal and occurring when the license application was provided to one of the employees who was inputting the license data. Mr. Puccillo said he did not know what the “For Official Use Only” box on the front page of the license application forms was used for and said he had never written anything in this section on the forms. He said he did not see any reason to have a policy covering the approval process because in the past there have never been any issue(s) with regard to who approved a particular license. At the time of his interview, Mr. Puccillo said that Nancy Illg may have been reviewing the license approval process, and he had not developed any policies and procedures for applications and was not reviewing the process.

Mr. Puccillo said that he did not approve the license application for Joel Campuzano’s father [REDACTED] or his [second] brother [REDACTED]. Mr. Puccillo said he was not even aware that [the second brother] had been licensed as a martial arts judge until he saw [the second brother] officiating at a martial arts event several years ago. Mr. Puccillo said that he asked Joel Campuzano who approved [the second brother]’s license and was told by Joel Campuzano that he (Joel Campuzano) had approved the license. He said that he did not further question Joel Campuzano because he felt that Mr. Campuzano knew what he was doing and had formerly served as the Acting Director of the Athletics Unit.

According to Mr. Puccillo, about eight months prior to this OEIG interview,³⁴ he and Nancy Illg reviewed the Athletics Unit licensing files for officials and determined that [the second brother] did not appear to be qualified to be licensed as a martial arts judge based on file documentation. He said that he also reviewed the file for [the first brother] and determined that he was qualified to serve as a boxing judge.

Mr. Puccillo stated that he did not review or approve the license application for boxer[1], but said he would have approved a license for [boxer 1] because he was a “good fighter.” However, after reviewing the IDFPR license file for [the boxer], Mr. Puccillo stated that, based on the documentation in [boxer 1]’s file, he [boxer 1] did not appear to qualify for a professional boxing license because he did not meet the minimum number of fights required. He stated that he (Mr. Puccillo) had not determined that [boxer 1] had exceptional fighting abilities prior to the issuance of [boxer 1]’s license. He also stated he was aware that [boxer 1] had several amateur fights in Mexico that were not in the file.³⁵ According to Mr. Puccillo, since he had not approved [boxer 1]’s license, Joel Campuzano would have done so. Mr. Puccillo acknowledged that ultimately he was responsible for the approval of [boxer 1]’s application.

Mr. Puccillo said there are no IDFPR policies prohibiting an Athletics Unit employee from approving a license application for a family member. He said that he did not think the

³⁴ As noted above, Mr. Puccillo was interviewed on April 4, 2012.

³⁵ As noted below, on February 13, 2013, the OEIG interviewed boxer [1]. [Boxer 1] told investigators that he had never boxed in Mexico.

Athletics Unit needed those types of policies because, in the past, he had not received complaints on the issue. He said that IDFPR was currently working on a policy pertaining to employees reviewing applications for family members.

3. OEIG Interviews of Nancy Illg and [Employee] Relating to License Approvals and [the boxer]

In her March 6, 2012 interview, Nancy Illg stated that after she became the Co-Director of the Athletics Unit, she and Ron Puccillo reviewed numerous license files for officials, including the files for judge licenses for [the second brother] and [the brother]. She said that those files, as well as files for two other officials,³⁶ did not appear to contain sufficient documentation revealing that applicants met the minimum license qualifications. She said that those four officials were notified that they needed to provide additional documentation to support their experience, certifications, and qualifications before they could officiate at any other event. According to Ms. Illg, Mr. Puccillo told her that some of the issued licenses had been processed without his approval.

During her March 6, 2012 and December 5, 2012 interviews, Ms. Illg was asked to review a copy of IDFPR's application file for boxer [1]. Ms. Illg said that based on the documentation in the file, she would not have approved [boxer 1] for a contestant's license because he did not appear to meet the minimum requirements regarding his prior amateur fighting experience. She said that while there was documentation in [boxer 1]'s file indicating the required 20 amateur bouts, there was no documentation indicating that [boxer 1] met the Boxing Code requirement of a minimum of two years of amateur boxing experience. She said that she would have required additional documentation or an amateur fight record from [boxer 1] in order to approve his boxing license application.

Ms. Illg stated that since she came to the Athletics Unit, she has overhauled the filing system, required all contestants to be licensed prior to an event, and implemented procedures to document the identity of the employee approving a license application.

[Employee] said that he would occasionally review a license application for completeness. However, he said he would forward the documentation to Mr. Puccillo, Joel Campuzano, or Ms. Illg for final approval. He said he had no knowledge of Joel Campuzano approving licenses for family members.

4. Initial OEIG Interview of Joel Campuzano Relating to License Approvals for his Family Members and [boxer 1]

As noted above, Joel Campuzano was interviewed twice by the OEIG, on April 23, 2012 and February 28, 2013. In his first OEIG interview, he stated that the license review process was very simple, either the applicant met the qualifications or they did not and thus, it did not matter who in the Athletics Unit approved or processed an application. He said that he has never seen an IDFPR policy stating that employees were to act in an impartial manner or refrain from situations that may create an appearance of impropriety. He also said he was not aware of any

³⁶ The other two officials are not implicated in this investigation.

IDFPR policies or rules that would prohibit an employee from approving a license application for a family member and that he did not believe that doing so was a conflict of interest or created the appearance of impropriety. He said that he had never approved a license for a family member who was not qualified for that license. He added that if a person does not meet the requirements for a license, a license could not be issued because the computer database will not allow it.

Joel Campuzano denied reviewing the license applications for his brothers [REDACTED] or [REDACTED], and said he believed Mr. Puccillo reviewed both applications. According to Joel Campuzano, both of his brothers were qualified to serve as officials. He said that a few years before he was placed on administrative leave, Mr. Puccillo issued a directive that he (Mr. Puccillo) wanted to review all license applications for approval. Joel Campuzano said that [the second brother]'s license was approved back in 2009 and by that time Mr. Puccillo had started reviewing the license applications. He said that he did not recall any conversations with Mr. Puccillo regarding [the second brother]'s martial arts license. Joel Campuzano said he did approve the boxing second application for his father [REDACTED] and that "anybody can be a licensed second."

With regard to [the boxer]'s professional boxing license, Mr. Campuzano stated that [boxer 1] was an excellent boxer and "absolutely" met the minimum qualifications to be licensed as a professional fighter. He said that he thought that he reviewed [boxer 1]'s professional contestant license application, but was not sure. He said that if he had determined that an applicant for a professional contestant license qualified because of exceptional fighting ability, he would place a letter in the file to that effect because he believes it is important to document everything.³⁷

Mr. Campuzano was asked to review a copy of [the boxer]'s license file. He stated that based on the file documentation, [boxer 1] met the minimum requirements to receive a professional boxing license because he had competed in over 20 amateur fights. Mr. Campuzano said that [boxer 1] also competed in several amateur fights that were not documented in his fighter's passbook and that [boxer 1] had another passbook containing a list of Golden Gloves fights that should have been in his file. Mr. Campuzano said that he did not determine if [boxer 1] had exceptional fighting abilities but that it was well known in the boxing community that he had the necessary skills to compete professionally.

Mr. Campuzano was then asked whether [boxer 1] met the requirement that an amateur have at least two-years of experience before they can turn professional. In response, Mr. Campuzano stated that he did not recall a two-year experience requirement for professional boxers in addition to the minimum 20 bout requirement. Mr. Campuzano was then presented with an IDFPR checklist from 2004 that was located on his State computer and which contained the two-year experience requirement for professional boxing applicants. After reviewing the document, Mr. Campuzano nevertheless said that he did not recall the two-year requirement. He said that if two years of experience was required, the requirements must have changed since he

³⁷ OEIG investigators did not discover any such letter in [boxer 1]'s file.

was placed on paid administrative leave.³⁸ He stated that despite the two-year experience requirement, he still considered [boxer 1] qualified to compete as a professional boxer.

With regard to whether he was a friend of [boxer 1]'s manager, Mr. Campuzano said that [boxer 1]'s manager is [REDACTED], not [REDACTED] (Mr. Campuzano's friend). He said that although [the friend] had a manager's license, he did not manage any fighters and was more like a sponsor. Mr. Campuzano stated that he may have approved [the friend's] boxing manager's license but was not sure. He said that he did not view the approval of a license for his friend as a conflict of interest because [the friend] met the qualifications to be a boxing manager. He said that his friendship with [the friend] had nothing to do with [boxer 1] receiving a professional boxing license.

5. OEIG Interview of Professional Boxer [1] Relating to His Boxing Application

On February 13, 2013, the OEIG interviewed professional boxer [1]. [Boxer 1] stated that his first amateur boxing match occurred on December 6 or 7, 2008. He said that he boxed as an amateur for one year and had his first professional boxing match on December 12, 2009. He said that when he was an amateur boxer, he was told by coaches, trainers, and other boxers that he was an outstanding boxer and should go professional. [Boxer 1] said that he decided to take his boxing to the next level and see how far he could go. He said that his trainer [REDACTED] shopped at a grocery store in Bensenville, IL, owned by [the friend], and that [the friend] liked to sponsor amateur fighters.

[Boxer 1] said that [the friend] agreed to sponsor him ([boxer 1]) and to pay his medical bills to become a professional boxer. He said that on a Saturday or Sunday evening [the friend] and Joel Campuzano met him at [REDACTED], a Mexican restaurant owned by [the friend]. [Boxer 1] said that Mr. Campuzano brought a professional boxing application to the restaurant and assisted [boxer 1] with filling out the application. He said Mr. Campuzano took his photo for the application. He said that after completing his boxing application, he gave the application to Mr. Campuzano at the restaurant. [Boxer 1] said that he then obtained the medical tests necessary to obtain the professional boxing license and that [the friend] paid for the tests.

[Boxer 1] said that [the friend] often purchased shirts, shorts, and shoes for amateur boxers containing the logo for [the friend's] businesses. [Boxer 1] said that [the friend] served as sort of an acting manager for him during his first professional fight, but after his initial professional fight, [REDACTED] became his manager. He said that [the father] was listed as a second for his first professional fight but was present more as part of his entourage than actually working as a second. He said that he did not know [the father] very well and he believed that [the father] was listed as a second for his first professional fight at the request of [the friend].

[Boxer 1] reviewed his amateur passbook and stated that the passbook contained all of his amateur fights. He said that he did not make the entries in the passbook, but that the entries were completed by the physicians and the people in charge of the boxing event. When questioned about what appeared to be possible double entries, [boxer 1] said that some of the entries did

³⁸ The two-year requirement was in place since 2002.

appear to be double entries and that, when those double entries were eliminated, he counted 19, possibly 20 amateur fights that he participated in. [Boxer 1] stated that he had never competed as an amateur boxer in Mexico, and had never informed either Mr. Puccillo or Joel Campuzano that he had competed as an amateur boxer in Mexico.

6. Subsequent OEIG Interview of Joel Campuzano Relating to License Approval for [boxer 1]

In his second interview with the OEIG, Mr. Campuzano said that he recalled taking a boxing application to [boxer 1] at the [REDACTED] restaurant. He said that he saved [boxer 1] the trouble by taking the boxing application to [boxer 1] at the restaurant because the restaurant was on his way of travel. Mr. Campuzano said that [the friend] did not own the restaurant, but [the friend's] son, [REDACTED], owned the restaurant. Mr. Campuzano said he did not recall taking [boxer 1]'s photo for the application at the restaurant. He said that [the friend] sponsored [boxer 1], but was not his manager. He could not recall if [the friend] paid [boxer 1]'s application fee.

Mr. Campuzano was presented with a copy of a form entitled Illinois Professional Boxing Board Requirements for Amateurs Turning Professional that OEIG investigators located on his State computer. That document includes the following requirement for a professional boxing license:

Minimum of two years of amateur boxing experience for amateurs and the total number of bouts and breakdown of wins and losses. The applicant shall have a minimum of 20 bouts or demonstrate exceptional fighting ability as approved by the Department.

Mr. Campuzano said that the date and initials at the bottom of the form, "JC/jc 08-04," indicated that he had revised the form in August, 2004. He said that the checklist is based on the actual requirements that are outlined in the law.

Mr. Campuzano was presented with a copy of the Athletics Unit license file for [the boxer]. Mr. Campuzano acknowledged that [boxer 1] had boxed as an amateur for less than one year based on the dates in his amateur passbook and the date on his professional boxing license application. Mr. Campuzano was presented with a checklist entitled IDFPB Athletics Unit Requirements for Amateur Boxers Desiring to Turn Professional, which also was in [the boxer]'s license file, and which is very similar to the Professional Boxing Board Requirements form described in the preceding paragraph, and found on Mr. Campuzano's State computer. Mr. Campuzano acknowledged that he had probably checked off certain items on the form. Mr. Campuzano was directed to item number two on the checklist, which is checked off and states:

Minimum of two (2) years of amateur boxing experience (for amateurs) and the total number of bouts, with breakdown of wins and losses. The applicant shall have a minimum of twenty (20) bouts or demonstrate exceptional fighting ability as approved by the Division.

Mr. Campuzano was asked why [boxer 1]'s professional boxing license was approved even though he did not have two years of amateur experience as required in the Boxing Code. In response, Mr. Campuzano stated that [boxer 1] had the required minimum number of fights, had exceptional fighting skills, and that the Boxing Code allowed Athletics Unit employees to make exceptions for amateurs who have exceptional fighting skills. Mr. Campuzano was reminded that during his previous interview, he stated that he had not approved [boxer 1]'s license based on exceptional fighting skills. In response, Mr. Campuzano said that he had seen [boxer 1] fight as an amateur on six occasions and that [boxer 1] was a boxing prodigy. He said that he approved [boxer 1]'s boxing license because he met the minimum number of required amateur fights and because of [boxer 1]'s exceptional fighting abilities. He said that he interprets the Boxing Code as allowing him to make exceptional fighter determinations. He said the Athletics Unit had no written procedure on how to make those determinations.

Mr. Campuzano said he recalled stating in his previous interview with the OEIG that if he had approved [the boxer]'s license based on exceptional fighting abilities, he would have put a letter in the license file to that effect. When asked why there was no such letter in [boxer 1]'s file, Mr. Campuzano said that either he made another mistake or he forgot to put a letter in the file. He said he did not recall preparing a letter for [boxer 1], nor did he recall attending any sparring sessions for [boxer 1] for the purpose of making an exceptional-fighting-ability determination. But he said there was no need to watch a sparring session because he had seen [boxer 1] box as an amateur.

Mr. Campuzano was asked to count the number of amateur bouts indicated in [the boxer]'s passbook. He initially counted 22 bouts. It was then pointed out to Mr. Campuzano that there appeared to be three fights that were entered twice in [boxer 1]'s passbook. Mr. Campuzano said any double entries in the passbook would be an issue and his failure to notice it would have been an oversight on his part. He said that one of the three possible double entries, however, listed dates that were two days apart when [boxer 1] allegedly fought a particular fighter. Joel Campuzano said that it was possible that was not a double entry, but that [boxer 1] fought that boxer two days apart in a tournament.

Mr. Campuzano denied approving [boxer 1]'s professional boxing application based on his friendship with [the friend]. Mr. Campuzano also stated that he would never license anyone based on who has the opportunity to make money.

C. IDFPR's Collection of Professional Boxing-Related Fees

In order to determine whether any IDFPR boxing-related fees were improperly collected, OEIG investigators requested that IDFPR produce copies of all documents reflecting the receipt of professional boxing related fees for a one-year period.³⁹ The OEIG also interviewed several persons, including IDFPR's then-Senior Deputy General, Nancy Illg, [employee], Ron Puccillo, and Joel Campuzano.

³⁹ The OEIG submitted several requests for documents over a period of many months to finally obtain all of the relevant documents that the IDFPR and/or Athletics Unit appears to have maintained. The final IDFPR response to OEIG document requests was received on March 21, 2013. As will be discussed throughout this Final Report, however, it appears that many of the requested documents simply do not exist or were not retained.

1. Documents Relating to Professional Boxing-Related Fees

In response to various document requests, IDFPR produced numerous documents, including Certification of Payment receipts, hand-written cash receipts, Weigh-in Payment Checklists, Statement(s) of Licenses and Permits Issued, and account deposit slips. Following is an analysis of each type of document that was obtained by OEIG investigators.

a. Certification of Payment Receipts for 2010

The OEIG reviewed Certification of Payment receipts for all 2010 boxing events. The Certification of Payment receipts include the following information typed on the form:

- the original amount a contestant or official was to receive from the promoter for participation in the event;
- the date and location of the event; and,
- the name of the event promoter providing the payment.

The Certification of Payment receipts also contain a signature certifying that the recipient (boxing contestant or official) received the amount indicated on the receipt for his (or her) participation in the event. According to witnesses, when a contestant's photo fee, physical-exam fee or other fee was deducted from the contestant's share of the purse, the fee amounts were handwritten on the upper right hand corner of the Certification of Payment receipt. The promoter then deducted fee amounts from the contestant's share of the purse and the promoter made one payment to the Athletics Unit for all collected fees. The Athletics Unit staff retained the photo fee money and if applicable paid the physician in cash for any physical exam conducted for a contestant in order to obtain a license.

The OEIG reviewed 284 Certification of Payment receipts. Approximately 50 of them contained a handwritten monetary figure in the upper right hand corner, and 38 of the 50 also contained a handwritten description next to the monetary figure. For example, some of the notations were as follows: "- \$103 LIC.," "- \$ PHYS. 50," and "-99 BLOOD." On the receipts with those figures, the original *typed* amount to be paid to the contestant or official by the promoter was typically crossed out and a new amount was handwritten on the receipt reflecting the difference between the typed amount and the handwritten amount. For example, a receipt dated December 17, 2010, contained a typed figure of \$1,500 to be paid to a boxer, but there was a handwritten notation in the upper right-hand corner of the receipt reflecting "-156 LIC." The typed \$1,500 amount was crossed out and the amount \$1,344 (or \$1,500 minus \$156) was handwritten above the original figure as being the amount of money the contestant certified having received from the promoter.

OEIG investigators analyzed the Certification of Payment receipts in an effort to calculate how much in various fees was collected. With regard to photo fees, based on witness statements that the photo fee was \$3, investigators noted all legible handwritten monetary figures ending in \$3 increments between \$3 and \$12. In addition, investigators calculated the fee amounts corresponding with legible notations for physical examinations and/or blood work. Based on the legible receipts reviewed, the OEIG found:

- 39 of the 284 Certification of Payment receipts contained deductions that appeared to be for photos fees ranging from \$3 to \$12 per receipt;
- 7 of the 284 Certification of Payment receipts appeared to contain a deduction for a blood test (typically \$99 per test); and
- 2 of the 284 Certification of Payment receipts indicated that money had been deducted for a physical examination.

In addition, approximately 12 of the 284 Certification of Payment receipts contained handwritten amounts ranging from \$103 to \$262 that were written in the right hand corner of the receipt, but contained no notation indicating the exact nature of what the deduction represented.⁴⁰

b. IDFPR Hand-Written Cash or Monetary Receipts for 2010

The OEIG analyzed the hand-written cash or monetary receipts reflecting payments collected by the Athletics Unit and found that money collected for photo fees or for the private physical examination performed by a physician were not generally reflected on any of the cash or monetary receipts, even though they might have been reflected on a Certification of Payment receipt. The hand-written cash or monetary receipts reflected only the amount collected for license-related fees. For example, one Certification of Payment receipt indicated that a contestant paid the Athletics Unit a total of \$153 (\$100 for a license, \$50 for a physical examination and \$3 for a photo fee). However, the cash or monetary receipt issued by the Athletics Unit for the same transaction reflected only the receipt of \$100 for the license fee, not the additional \$53 for the photo fee and physical examination.

c. Weigh-In Payment Checklist for 2010

The IDFPR provided the OEIG with two pages of a document entitled “Weigh-In Payment Checklist” for a June 19, 2010 boxing event. The Checklist provides the amounts collected for physicians’ fees and photo fees, both fees paid directly by the contestant and those that were deducted from the contestant’s share of the purse. However, IDFPR did not produce any Weigh-In Payment Checklist for any other 2010 event. According to IDFPR, it was not an established practice in the Athletics Unit to retain the Weigh-In Payment Checklists because they were so-called working papers used at the weigh-in prior to an event. Nancy Illg said that the checklists were considered a worksheet and were not maintained because they did not reflect fees paid by anyone other than contestants at a weigh-in.

d. Statement of Licenses and Permits Issued

The IDFPR also produced documents titled Statement of Licenses and Permits Issued for events held in 2010. The Statement identifies the licenses or permits issued, the total amount collected for each particular license or permit, and the fees and taxes paid by a promoter to the Athletics Unit. These records, however, do not reflect any other fees paid by contestants or officials, such as photo fees or fees paid to physicians for exams.

⁴⁰ Because not all receipts were complete or legible, the figures indicated above are approximate.

Moreover, according to Ms. Illg, the Statement of Licenses and Permits Issued were used only as a worksheet and did not accurately reflect all funds collected for a particular weigh-in or event. Ms. Illg said that the Athletics Unit retains the Statement of Licenses and Permits Issued worksheets, but the document is not used for any type of auditing purpose.

e. Deposit Slips for 2010

In order to determine the amount of money IDFP staff received and deposited, the OEIG obtained and analyzed the IDFP account deposit slips for boxing events held in 2010. The deposit slips indicated that deposits were made to the Division of DPR, Illinois Athletic Board, State Treasurer Clearing Account. However, although the deposit slips provide the total amount of cash and identify individual checks deposited, the deposits do not further break down the source of the deposited money.

2. OEIG Interviews of then-Senior Deputy General Counsel Relating to the Discovery of Cash

The OEIG interviewed the person who was IDFP's then-Senior Deputy General Counsel on multiple occasions in 2011 and 2012. The then-Senior Deputy General Counsel stated that on March 30, 2011, shortly after Mr. Campuzano was placed on administrative leave, he and IDFP's Chief of Staff searched Joel Campuzano's work area and found envelopes containing cash. He said he believed there was some indication on one of the envelopes that the cash represented photo fee money collected. He also said that he deposited all of the money they found into the IDFP account.

Subsequently, the then-Senior Deputy General Counsel provided the OEIG with copies of the envelopes and notes found in Joel Campuzano's filing cabinet. One envelope had approximately six notations, two of which list a date, the word "pic" and a monetary amount. The most recent date listed on the envelope was October 17, 2009, and the last total monetary amount listed appears to be \$254. The then-Senior Deputy General Counsel said that he found additional cash in Joel Campuzano's filing cabinet with the following notations:

- \$80 with a post-it note that read "[REDACTED] (For Broken Window)";
- \$50 with a post-it note that read "[REDACTED] PHYSICAL REFUND \$"; and
- \$100 attached to a boxing contestant's application for [REDACTED].

The then-Senior Deputy General Counsel also provided the OEIG with deposit slips and bank receipts indicating that the \$763 in cash, including \$533 indicated as "picture money," found in Joel Campuzano's filing cabinet was deposited on October 21, 2011, in the Division of DPR, Illinois Athletic Board, State Treasurer's Clearing Account.⁴¹

⁴¹ During a December 2011 interview with the OEIG, the then-Senior Deputy General Counsel said that he found \$526 in cash in Joel Campuzano's filing cabinet. However, a note supplied with the deposit slips revealed that \$532 rather than \$526 in cash was found and a bank deposit slip indicates that \$533 was deposited. When asked about the discrepancies, the then-Senior Deputy General Counsel indicated that the \$533 deposited was the actual amount of money in the "photo fee envelope" found in Joel Campuzano's filing cabinet.

3. OEIG Interviews of Nancy Illg Relating to Photo Fee Money Collected and Cash Discovered in Joel Campuzano's Filing Cabinet

During OEIG interviews on March 6 and 20, 2012, Ms. Illg stated that, prior to May 2011, Athletics Unit staff collected a \$3 photo fee along with license fees, and that at the end of the weigh-in the photo fee money was handed over to Joel Campuzano. Ms. Illg stated that she personally witnessed photo fee money used to purchase alcohol (beer) in about 2008 or 2009 when she, Ron Puccillo, Joel Campuzano, inspectors, and possibly [employee] went to a bar in Moline, IL after a martial arts event. Ms. Illg recalled hearing Mr. Puccillo tell Mr. Campuzano to use the photo fee money to pay the bar tab and said she saw Mr. Campuzano do so. She said that she did not say anything at the time about using the photo fee money to pay for alcohol because she was new to the Athletics Unit and did not know much about it.

Ms. Illg stated that Mr. Puccillo told her about two years ago that photo fee money had been used to purchase pizzas for an office going-away party. She said that she told Mr. Puccillo that he should not be using the photo fee money to buy pizza, but again, at the time she was new to the Athletics Unit, was only assisting on a part-time basis, and was not in a position of authority. When asked who in IDFPR management was aware of how the photo fee money was used, Ms. Illg said that the highest ranking IDFPR staff person aware of how the money was spent was the former Athletics Unit Director Ron Puccillo. Ms. Illg said that in 2011 someone raised the issue about the Athletics Unit collection of the photo fees to IDFPR's General Counsel and the General Counsel issued an immediate directive to stop collecting a photo fee.

Ms. Illg stated that she was present when the cash in Joel Campuzano's locked filing cabinet was found. She said that she believed the money that was attached to a boxing application for [REDACTED] was money that was to be refunded to [REDACTED]. She also said that she believed the money with a post-it stating "[REDACTED] (For Broken Window)" was an amount that Mr. Puccillo or Mr. Campuzano required a second to pay because the second had broken a church window during a weigh-in.

Ms. Illg said that she was not aware of the Athletics Unit employees collecting money for blood work, but she was aware that employees had passed through cash payments from a contestant to a physician when the physician performed an exam in order for a contestant to obtain a license. According to Ms. Illg, in June 2011, the Athletics Unit, on her recommendation, stopped serving as a go-between in regard to money that a boxing contestant may have owed a physician for services performed.

Ms. Illg estimated that the Athletics Unit processed about 300 to 350 licenses each year and collected \$3 to \$6 per license in photo fees. She said that she would roughly estimate that from 2008 through 2011, the Athletics Unit may have collected between \$4,000 and \$5,000 in photo fees. She said that she could not be sure of the amount collected because the Athletics Unit did not have proper accounting practices at that time.

During an OEIG interview on December 5, 2012, Ms. Illg reiterated that the Athletics Unit no longer collects cash and has stopped collecting photo and physicians' fees and said that

the Athletics Unit has implemented new accounting practices and forms to document the receipt of fee monies.

4. OEIG Interview of [Employee] Relating to the Collection of Photo Fee Money

[Employee] said that in about 2008 he questioned Mr. Campuzano about why the Athletics Unit was continuing to collect the photo fee after switching to digital cameras. According to [employee], Mr. Campuzano said that they were still collecting the fee because they were providing a service by taking the photographs.

[Employee] said that in early 2008, he was present with Mr. Puccillo, Mr. Campuzano and an inspector at a bar in Moline following a martial arts event, but did not recall Nancy Illg being present. He said that he did not hear Mr. Puccillo instruct Mr. Campuzano to use photo fee money to pay for the bar tab, nor did he see Mr. Campuzano pay the bar tab with photo fee money.

[Employee] roughly estimated that the Athletics Unit charged for about 300 to 500 photos per year, and said that IDFPR could have collected up to \$4,500 in photo fees since 2008.

5. OEIG Interview of Ron Puccillo Relating to Approval of Licenses at Events and Photo Fee Money Collected

During an interview with the OEIG, Mr. Puccillo said that he believed there was a policy or written procedure that covered the issuance of licenses and the approval of licenses processed at events, but was not sure. He could not recall if there were policies or written procedures in place that outlined the accounting practices used for the collection of fees or the recording or handling of money received or collected at weigh-ins or events. Mr. Puccillo said that Mr. Campuzano routinely handled all of the money collected at a weigh-in and, as far as he knew, Mr. Campuzano deposited the money the next working day. He said that he did not know where Mr. Campuzano kept the money prior to depositing it. Mr. Puccillo said that receipts are prepared when a fee is collected, and he assumed that Mr. Campuzano maintained those receipts along with the money after an event.

Mr. Puccillo said that he did not know who initially authorized the collection of photo fees, but that the practice of collecting the fee was in place when he started in the Athletics Unit. He said he never questioned the fee collection and just continued business as usual. Mr. Puccillo was aware that money collected from photos was never deposited, but he was unable to say where Mr. Campuzano stored the cash. He said Mr. Campuzano told him he maintained a spreadsheet, but he (Mr. Puccillo) never saw one.

Mr. Puccillo said that he was not aware of any statutory requirements that allowed for the collection of a photo fee. He said that he assumed the collection of the photo fee was an acceptable practice because everything was done in the open. He also said that at the time the fee was being collected, he was unaware that the Athletics Unit was required to deposit all fees collected and only learned of this requirement about a year before his interview. Mr. Puccillo

stated that he had no idea how many photographs have been taken since 2008 when the Athletics Unit began using a digital camera. He said that he thought Mr. Campuzano originally used the photo fee money to buy Polaroid film and then possibly to buy paper for printing photos. Mr. Puccillo said that he (Mr. Puccillo) later decided that the Athletics Unit would no longer collect a photo fee.

Mr. Puccillo said that on several occasions he did authorize Joel Campuzano to use photo fee money to purchase pizza—one time when a temporary employee left the agency a couple of years ago, and two or three times over the past few years to purchase pizza for boxing officials either before or after boxing events. Mr. Puccillo, however, denied using photo fee money to purchase alcohol in Moline and said he would be surprised if Mr. Campuzano used any photo fee money to pay a bar tab. He denied instructing Mr. Campuzano to use photo fee money to pay a bar tab or to buy alcohol.

Mr. Puccillo said that he was not aware that the Athletics Unit collected any fees for blood work. He said that the physician working at the weigh-in would conduct a physical exam for a contestant when a contestant did not have the required physical examination. Mr. Puccillo stated that the contestant or promoter would pay for the physical exam or have the money deducted from the contestant's purse, but he did not know how the physician actually received payment. He said that if the physicians' fee was deducted from a contestant's purse, the upper right hand corner of the purse receipt might indicate the amount of money deducted. He said that he was not familiar with the collection of fees because he does not involve himself with the process and is usually at the scale monitoring the fighter's weight. He also said Mr. Campuzano handled all of the money and said he had no idea how physicians were paid. When asked why he authorized physicians' fees to be collected and paid at the weigh-ins and events, Mr. Puccillo stated it was "business as usual" and that it had been done that way from the beginning.

6. Initial OEIG Interview of Joel Campuzano Relating to the Collection of Photo Fees and Other Fees

During his first interview with the OEIG, Joel Campuzano said that Athletics Unit inspectors collect fees during weigh-ins. He said that at the conclusion of a weigh-in, the money is counted and turned over to a full-time Athletics Unit employee, usually himself, Mr. Puccillo, or [employee]. He said that the employee maintains control over the money until the next working day when the money is deposited into the Athletics Unit account. Mr. Campuzano said that he has never seen a policy outlining the accounting practices required to be used for the collection of fees or the recording or handling of monies received.

Mr. Campuzano said that when contestants arrived at a weigh-in without a photo, the inspectors would take the contestant's photo and collect the photo fee during the weigh-in while processing the license applications. He said that at the end of the night, the photo fee money was separated out in cash and turned over to him. Mr. Campuzano said that he stored the photo fee money in his office inside a locked filing cabinet and that the Athletics Unit used the photo fee money as petty cash. He said that he did not maintain a spreadsheet or ledger to record expenditures associated with the photo fee money collected, but said he always wrote the current total on the outside of the envelope containing the photo fee money. He said that the photo fee

money was never deposited into the Athletics Unit account and he was unaware of any policy or rule that allowed for the collection of the photo fee or that required the photo fee money to be deposited in an Athletics Unit account.

Mr. Campuzano said that he had no idea how many photos were taken by Athletics Unit staff during his employment as Executive Manager, nor was he able to provide an estimate of the number of photos taken in a one-year period. He said the cash found in the envelope in his office may have been an accrual of a few years' of photo fee money collected. He added that he found an old book in the Athletics Unit that included records from the 1980s and said the records indicated that the photo fee was collected back then. According to Mr. Campuzano, the photo fee money was used to purchase Polaroid film until the Athletics Unit purchased a digital camera. The money was then used to purchase photo paper, tape to wrap competitor gloves, and rubber gloves for officials. Mr. Campuzano said that he kept receipts in a file in his office of items purchased with photo fee money, but that he did not always obtain or receive a receipt when he or Athletics Unit employees purchased items.

Mr. Campuzano did not recall using the photo fee money to buy pizza for a departing employee, but said that he could have done so. He said that he has never used the photo fee money to buy alcohol and was never instructed by Mr. Puccillo to use photo fee money to pay a bar tab or for the purchase of anything inappropriate.

Mr. Campuzano said that, on occasion, a contestant would arrive at a weigh-in without the required physical exam or blood work necessary to obtain a contestant's license. He said that if the physician chose to conduct the physical exam for the contestant, the physicians' fees for the services were collected by the inspectors during the licensing process and passed on to the physician in cash. He said that whoever took control of the money for that weigh-in, either he, Mr. Puccillo, or [employee], would pay the physician at the end of the weigh-in after the money was totaled. Mr. Campuzano added that he is not very familiar with the collection of fees at the weigh-in because he is usually at the scales assisting Mr. Puccillo.

7. Subsequent OEIG Interview of Joel Campuzano Relating to Discovery of Cash in his Filing Cabinet

During his subsequent OEIG interview, Mr. Campuzano was shown copies of notes that were affixed to cash and envelopes that contained cash and were found locked in his filing cabinet. Mr. Campuzano said that the writing on the envelope containing the word "pic" and various crossed out monetary amounts was his writing, and he thought that the envelope contained photo fee money. In response to being asked how anyone would know the envelope contained photo fee money, Mr. Campuzano said his accounting practice, "was pretty poor, I admit." Mr. Campuzano also said that there was no way to determine how much money should have been in the envelope or what all of the photo fee money had been used for.

a. "[REDACTED] for Broken Window" Note

In regard to the \$80 in cash with the note "[REDACTED] for Broken Window," Mr. Campuzano said that [REDACTED] was an MMA fighter who broke a window at an MMA event.

He said the promoter of the event asked him to withhold money from [REDACTED]'s purse to pay for the broken window, but at that time they did not know how much the window repair would cost. Joel Campuzano said he believed they withheld \$100 from [REDACTED]'s purse, and the window ultimately cost \$20 to repair. He said that he thought the \$80 was to be given to the promoter to return to [REDACTED].

b. "[REDACTED] Physical Refund \$" Note

Mr. Campuzano said that he did not know why he had \$50 in cash with a note "[REDACTED] Physical Refund \$" or how long he had the cash. He said that [REDACTED] was an MMA fighter and he assumed whoever handled the MMA event gave him the money to return to [REDACTED].

c. [REDACTED] License Application

Mr. Campuzano said that he remembered having a license application in his desk, but he did not specifically recall having in his desk an application from [REDACTED] with \$100 in cash attached that had been signed and dated on June 26, 2009. He said that it was a normal practice to hold an applicant's license fee money until the applicant provided all of the required documentation for the license. He said that he was probably waiting for [REDACTED] to supply additional documentation.

d. Certification of Payment Receipt—[REDACTED]

Mr. Campuzano was asked to review a Certification of Payment receipt issued to professional boxer [REDACTED] [REDACTED] that contained the following notations and deductions in the right hand corner of the receipt: "\$156" with "1 BOX" and "1 SEC." written underneath the figure and then "-358" written underneath all of the notations. Joel Campuzano said the notations most likely represented deductions for a boxer's license, second's license, photo fees, and possibly a physical or whatever else the promoter asked the Athletics Unit to deduct from [REDACTED]'s purse. He said there was no way to determine exactly what licensing fees [REDACTED] had paid for. Mr. Campuzano was shown a separate cash receipt to [REDACTED] in the amount of \$100, but was not able to explain why all of the fees deducted from [REDACTED]'s purse were not indicated on the cash receipt.

e. Certification of Payment Receipt—[REDACTED]

Mr. Campuzano was presented with another Certification of Payment receipt for professional boxer [REDACTED] [REDACTED] that included the following notations: "-53" with "- SEC" underneath that figure and "-99 BLOOD" underneath both notations. Mr. Campuzano said that the "-53" represented \$50 for a second's license and \$3 for a photo fee and "-99 BLOOD" represented the contestant's payment for blood work. When asked why he earlier said that the Athletics Unit did not collect fees for blood tests, Mr. Campuzano said that the promoter probably paid the contestant's blood work fee and the fee was being deducted from the contestant's fee. He said that blood tests are not performed by a physician for a contestant at a weigh-in or event. Mr. Campuzano was asked what legal authority existed for the Athletics Unit

to deduct fees from a boxer's purse for blood work, photographs, and physical exam, and he said that he had no idea.

f. Retention of Weigh-In Payment Checklists

Mr. Campuzano was asked about the retention of the Weigh-In Payment Checklists by the Athletics Unit. He said that he had used the forms at events, but he did not know what was done with the Weigh-In Payment Checklists after events.

D. Ringside Seating at Boxing Events for Joel Campuzano's Family and Friends

To investigate the allegation that Joel Campuzano improperly arranged for ringside seating for his friends and family at boxing events, OEIG investigators reviewed photographs and relevant documents, and conducted interviews of two boxing officials, Nancy Illg, a boxing promoter, Ron Puccillo, and Joel Campuzano.

1. Review of Event Photographs and Official Pass Lists

The OEIG obtained photos of the ringside area during a boxing event held on January 28, 2011, in Chicago, which included a match between boxers [REDACTED] and [REDACTED] ("[REDACTED] fight"). The photos depict approximately nine persons with seats inside the ringside area who were alleged to be family and friends of Joel Campuzano. The OEIG also reviewed documentation of officials assigned to work the [REDACTED] fight and the documentation indicates that [the first brother] worked as a boxing judge for the event.

OEIG also requested that IDFPR produce the Athletics Unit's Official Pass Lists containing the names of various individuals, including staff members, inspectors, doctors, paramedics, referees, judges, announcers and timekeepers, who receive a credential and are permitted entry into an event by the promoter. IDFPR informed the OEIG that the Athletics Unit did not retain such lists after a boxing event. With respect to the time period when Joel Campuzano was overseeing events, IDFPR produced one Official Pass List from September 2010, which did not contain the names of any of Joel Campuzano's family members (other than [the second brother] working as a judge at the event).⁴²

2. OEIG Interviews of [REDACTED] Fight Referee and Inspector

OEIG investigators showed ringside photos of the [REDACTED] fight to a former boxing referee and an Athletics Unit boxing inspector. The Referee and the Inspector each identified in the photos various family members of Joel Campuzano sitting in the ringside area, including Joel Campuzano's wife, daughter, father, and brothers [the second brother] and [the first brother]. The Referee also identified Joel Campuzano's son and [the friend] in the photos. The Inspector stated that Joel Campuzano's family members sat ringside at approximately fifty percent of the boxing events and that it was common to see Joel Campuzano's wife, daughter, father, and brothers [the second brother] and [the first brother] sitting ringside during boxing events.

⁴² IDFPR also produced Official Pass Lists for March 25 and April 1, 2011, which were events taking place after Mr. Campuzano was placed on administrative leave.

3. OEIG Interview of Nancy Illg Relating to Ringside Seating

Ms. Illg said that the area around a boxing ring was limited to persons approved by the promoters, which are usually celebrities, IDFPR staff, medical staff, officials, seconds, and news media. She stated that the law required essential personnel to be seated in the ringside area and that medical staff and officials were considered essential personnel.⁴³ Ms. Illg said that the Official Pass List was maintained by the Athletics Unit in the event file. She said that on several occasions she saw Joel Campuzano's family members sitting ringside at boxing events and that it was not uncommon to see four or five of Joel Campuzano's family members sitting in the restricted area. She said that she and Mr. Puccillo were present at the [REDACTED] fight, and at the fight, Mr. Puccillo told her that the number of Joel Campuzano's family members sitting ringside caused him concern. When shown photos of the event, she identified Joel Campuzano's wife, brothers, daughter, son, and father sitting in the restricted ringside area.

Ms. Illg said that on January 4, 2012, the Athletics Unit instituted an IDFPR Ringside Policy⁴⁴ which identifies who is permitted in the ringside area and who qualifies as essential personnel. She said that she also recently instituted ringside sequestered seating at events so that the individuals who are permitted in the ringside area are assigned to sit in specific areas and she is able to identify who is present and in what capacity.

4. OEIG Interview of [REDACTED] Fight Boxing Promoter

The OEIG interviewed the promoter of the event in which the [REDACTED] fight took place. He said that his company promoted the [REDACTED] fight and he was present at the event. He said he saw Joel Campuzano's family members seated together in the general seating area. The promoter said he knew Joel Campuzano's family was friends with fighter [REDACTED] and, because he likes Joel Campuzano and his family, he personally invited the family members to sit in the restricted ringside area that is reserved for the promoter. The promoter said that Mr. Campuzano was not involved in the decision to move the family members to the restricted area.

5. OEIG Interview of Ron Puccillo Relating to Ringside Seating

Mr. Puccillo said that the restricted area around the ring is divided into sections, and IDFPR and the promoter control the seating in this area. He said that technically IDFPR controls this restricted area, but IDFPR has to work with the promoter. He said that he is responsible for

⁴³ The Illinois Administrative Code describes a ringside area within eight feet of the fighting area platform for the use of specified personnel and within the jurisdiction of DPR. *See* 68 Ill. Admin. Code 1371.80(o).

⁴⁴ The OEIG obtained a copy of the IDFPR Ringside Seating Policy dated January 4, 2012 that states: "Effective immediately, the area surrounding ringside which is under the control of and reserved for the use of the Illinois Department of Financial and Professional Regulation (IDFPR) in regulating athletic events held under IDFPR authority, hereinafter referred to as the 'ringside area,' shall be used only by IDFPR officers, employees, and agents unless otherwise approved by the Director or Co-Director of IDFPR's Division of Professional Regulation (DPR) Athletic Unit. Such approval must be in writing, include the rationale, and be signed and dated by the grantor. A copy of the approval shall be submitted to the Director of the DPR and the original shall be placed in the event file. This policy does not apply to third parties that are essential to the production of the athletic event."

allowing access to the restricted area that is controlled by IDFPR and that the promoter has a section directly across the ring to which the promoter authorizes access and seating. Mr. Puccillo said that the public cannot purchase a ticket for this restricted area and that sometimes a promoter will move attendees seated in the non-restricted area to seating in the restricted area. He said that the news media often sits near the promoters section and that paramedics, physicians, additional judges and referees, boxing managers, seconds and ring card girls fill the remaining sections around the ring.

Mr. Puccillo stated that at the [REDACTED] fight, Joel Campuzano had several family members seated in IDFPR's restricted section of the ringside area. He said that upon seeing all of the family members he thought it was ridiculous and asked Mr. Campuzano, "Did you forget a few neighbors?" He stated that Mr. Campuzano said that all of the family members had purchased tickets and there was room for them in the restricted area. Mr. Puccillo said that he then informed Mr. Campuzano not to do it again. He said that at that time, IDFPR did not have a policy on who was allowed in the restricted area. Mr. Puccillo said that he did not believe the Illinois Administrative Code addressed who was permitted to sit in the restricted area.⁴⁵

6. Initial OEIG Interview of Joel Campuzano Relating to Ringside Seating

In his first interview with the OEIG, Joel Campuzano said that the Official List or Official Pass List contains the names of the officials and IDFPR employees working an event and that he usually completed these lists. He said that everyone on the list receives a credential or wristband at the gate, which allows a person access to the event. He said that these lists are maintained in the event files. Mr. Campuzano said that the IDFPR and the promoter control the safety zone around the boxing ring. He said that the judges, timekeepers, and IDFPR Boxing Commissioner maintain control of all four areas of the ring apron and the promoter controls the seating in the safety zone against the security railing.

According to Mr. Campuzano, tickets cannot be purchased for the seats controlled by the promoter and that IDFPR had no policy on who was permitted to sit in the restricted area, but there is a section reserved for the paramedics, ring doctors, additional judges, and referees. He said that he has placed the names of family members of IDFPR employees who were working an event on the list so that a family member was able to enter the event at the same time as the IDFPR employee. Mr. Campuzano said that these family members are still required to pay for their admission to the event. He said that he had placed the names of his wife and Mr. Puccillo's wife on the Official Pass List. Mr. Campuzano said that event promoters have often allowed his wife and other family members to sit ringside with him during events. He said that he prefers to have his wife seated with him for security reasons because tension is often high during events, and he has received many threats because of his IDFPR position.

Mr. Campuzano also said that the [REDACTED] fight event promoter saw five of his family members at the event and invited them to move and sit in the restricted area. He said his [first] brother [REDACTED] was seated in the ringside area because he was working as an

⁴⁵ However, as described above, the Illinois Administrative Code specifies which persons may use the area and requires the area to be kept free of non-essential personnel. *See* 68 Ill. Admin. Code 1371.80(o).

official at the event. He also said he and Mr. Puccillo never discussed having his family members sit in the restricted area at this event. He said that he did not believe it was a conflict of interest to have his family members seated in the ringside area, but agreed that in hindsight it did not look good to have that many family members seated ringside.

7. Subsequent OEIG Interview of Joel Campuzano Relating to Ringside Seating

In his second interview with the OEIG, Mr. Campuzano said that his family members paid for access to the [REDACTED] fight and the promoter of the event moved his family to the ringside area. Mr. Campuzano was provided with a copy of the Boxing Code provision that states that the space immediately within eight feet of the fighting area platform was to be free of non-essential personnel.⁴⁶ Mr. Campuzano said that his family members were not essential personnel, except for his [first] brother [REDACTED], if he were officiating at an event. When asked, Mr. Campuzano stated that since his job was to make sure the laws were followed at boxing events, he guessed that he did violate the law because he never told his family they could not sit in the ringside area after they were moved there by the promoter.

Joel Campuzano said that he thought he had placed his family members on the Official Pass List fewer than five times and that his family members always paid for their admission to an event. He said he thought his family members sat in the ringside area at less than fifty percent of the boxing events.

E. Ron Puccillo's Allowance of Unlicensed Officials to Preside Over an October 7, 2011 Boxing Event.

To investigate the allegation that Ron Puccillo allowed officials who were not properly licensed to preside over a boxing event, the OEIG reviewed records relating to a boxing event that occurred on October 7, 2011, in Burbank, IL ("Burbank event"), and conducted interviews of an IDFPR Information Technology employee, Nancy Illg, [employee], a referee, and Ron Puccillo.

1. OEIG Review of Documents Regarding Burbank Event

The OEIG obtained and analyzed IDFPR records identifying the officials who worked the Burbank event, the license files for those officials, and written communications between September and November 2011 pertaining to the licensing of those officials. The records indicated 14 officials worked the Burbank event, including nine judges, three referees, and two timekeepers. The license files for those officials indicated the following regarding the renewal of the licenses at the time of the Burbank boxing event:

- one person submitted an undated application;
- five persons had an eye exam prior to the event;
- seven persons had an eye exam after the event;

⁴⁶ 68 Ill. Admin. Code 1371.80(o).

- one person had an undated eye exam;
- one person had no documentation of an eye exam;⁴⁷
- two referees had a physical exam completed prior to the event; and,
- one referee had a physical exam within a week after the event.

Among the communications produced by IDFPR was a September 6, 2011, email from Nancy Illg to an IDFPR Information Technology employee. In that email, Ms. Illg asked whether renewal notices had been sent out for Athletics Unit licenses that would be expiring on September 30, 2011. By email dated September 6, 2011, the employee responded:

Nancy

We haven't sent renewal notices to Athletics since 2003. We don't even put them into renewal. This is due to the fact that the folks working Athletics reinstate any existing license at the time of a match. At the end of the license cycle, we non-renew any active license that expires. That usually occurs in the month of November of the expiring (odd) year. All licenses are given a 30 day grace period to renew except physicians are given 90.

I would assume that any non active licensee is reinstated at the time of a match.

Hope that helps!

2. OEIG Interview of IDFPR Information Technology Employee

The OEIG interviewed the author of the September 6, 2011 email noted above. This employee works in the IDFPR Springfield Information Technology division. He stated that the 30-day grace period he was referencing in his email to Ms. Illg was an "unwritten rule" and that it was a "system grace period" that allowed time for his office to process all of the renewals after the license expiration dates. The employee stated that this "system grace period" did not mean that an expired license was still valid, and that the date on the license should be used to determine the validity of a license.

3. OEIG Interviews of Nancy Illg and [Employee] Relating to Licensing Renewal Process

Nancy Illg stated that when she came to the Athletics Unit, she was unfamiliar with the license renewal process. She said that in July 2011 she began making inquires to Mr. Puccillo and [employee] about the renewal process because licenses would be expiring on September 30, 2011. She said that Mr. Puccillo and [employee] assured her that renewal notifications had been sent.

⁴⁷ The Boxing Code requires timekeepers, referees, and judges to have an eye examination by a physician licensed to practice medicine in all its branches who specialized in ophthalmology, dated more than 6 months prior to the date of the application. 68 Ill. Adm. Code 1371.310(j). Almost all of the eye examination documentation indicated that the Burbank event officials had eye examinations performed by an optometrist, not an ophthalmologist. However, an Order Granting Variance was signed by DPR's Director on October 14, 2011, permitting timekeepers, referees, and judges to obtain the required eye exam from either an ophthalmologist or an optometrist.

Ms. Illg stated that she also spoke with an IDFPR Springfield employee prior to the Athletics Unit license expiration date, and, in the above referenced email dated September 6, 2011, the employee informed her of a 30-day grace period. She said that she again asked [employee] about the renewal notices in early October 2011, and he told her that the notifications had been sent out the prior week. Ms. Illg said that she was “extraordinarily angry” with [employee]’s response because at that time (early October 2011) the licenses were past the September 30, 2011, expiration date and she had been wrongly told that the notifications had been completed in July and August 2011. Ms. Illg stated that she was not present at the Burbank event and that Mr. Puccillo and [employee] would have collected the applications, fees, and supporting documentation at the event. Ms. Illg stated that Mr. Puccillo would have ultimately been responsible for all licensing for the Burbank event. She stated that sometime between October 11 and 13, 2011, she learned that there was not a 30-day grace period. She said that once she learned there was no grace period, she started requiring officials to turn in their license renewal packets prior to an event in order to work that event.

[Employee] said that in previous years Joel Campuzano handled the renewal process and contacted all officials prior to the expiration dates to obtain documents. He said that the current renewal process was different because no one took over Joel Campuzano’s duties regarding renewals. He said that for the last renewal cycle, he sent notifications to officials via email and also sent a hardcopy through the mail sometime around the license expiration date. [employee] stated that at the Burbank event some officials did not submit all required documents and some did not pay the required fee, but despite this, Mr. Puccillo told him to proceed with licensing those officials. He stated that his understanding was that an official was licensed once IDFPR received the completed application and fee.

4. OEIG Interview of October 7, 2011 Referee

The OEIG interviewed the Referee serving at the Burbank event. The Referee said that typically he received his renewal application in the mail prior to the October license expiration dates, but that for the October 2011 expiration date he did not receive a renewal application in the mail. He said that he completed his license renewal application at the Burbank event and submitted the required medical documentation the following week.

5. OEIG Interview of Ron Puccillo Relating to the October 7, 2011 Event

Mr. Puccillo stated that he was not sure whether in the past license expiration notifications were sent out to officials. He said that license renewals were conducted at weigh-ins or when the documents were submitted to the Athletics Unit. He said that [employee] or Joel Campuzano mailed a renewal application to an official if the official requested one. Mr. Puccillo said that most recently Athletics Unit licenses expired on October 1, 2011, and a boxing event was scheduled in Burbank on October 7, 2011. He said that he was aware that the licenses were expiring shortly before the Burbank boxing event, but was told one or two days prior to the event by Nancy Illg that there was a 30-day grace period to renew Athletics Unit licenses.

Mr. Puccillo said that none of the officials who worked the Burbank boxing event had supplied a complete application at the event. He said that, in his mind, they were licensed the

night of the Burbank fights because he had been told by Nancy Illg that there was a 30-day grace period for renewals. He said he therefore allowed the Burbank boxing event to proceed because of the 30-day grace period. He added that all of the officials working the Burbank event were competent with “at least 20 years experience” and were licensed prior to the expiration date, and that he would not have cancelled the show when everything was ready to go.

Mr. Puccillo said that he found out there was not a 30-day grace period for the licenses after the Burbank event when the news media began printing allegations of unlicensed officials at the event. He said that he had been working in the Athletics Unit for 14 years, and that there had never been a problem with renewals prior to the Burbank event. He said that Ms. Illg was working with the IDFPR Springfield office to begin notifying officials “a good amount of time” prior to the license expiration date so that this does not occur again.

IV. ANALYSIS

The Rules of Personal Conduct in the IDFPR Policy and Procedure Manual (“IDFPR Policy”) state that employees may be disciplined up to and including discharge for, among other things, “[i]ncompetence or inefficiency in the performance of an assigned duty.”⁴⁸ The IDFPR Policy also states that employees must perform their duties in a professional and impartial manner and employees must avoid taking actions that may create the appearance of impropriety or bias in the discharge of regulatory or enforcement duties.⁴⁹ Lastly, grounds for discipline include committing conduct that is unbecoming an IDFPR employee, including conduct that brings IDFPR into disrepute or reflects discredit upon the employee as a representative of IDFPR or that tends to impair the operation, efficiency, or integrity of the Department or the employee.⁵⁰ The OEIG finds that Joel Campuzano and Ron Puccillo violated this IDFPR Policy in numerous ways, as described below.

A. Joel Campuzano and Ron Puccillo’s Failure to Know and Enforce Applicable Laws and Policies Demonstrated Incompetence and Inefficiency in Their Assigned Duties.

The Athletics Unit is in charge of regulating and monitoring professional boxing and martial arts events, two potentially dangerous sports that can result in serious injuries and even death. As the Executive Manager and Director, respectively, Mr. Campuzano and Mr. Puccillo were both charged with enforcing the policies and regulations relating to the Boxing Act.

Despite their duties and the number of years each of the two men served in their positions, they claimed *not to* know of various laws or policies relating to the qualifications for licenses, imposition and depositing of fees, and restrictions on ringside seating. In addition, both men failed to enforce laws and policies they were required to as part of their duties and responsibilities.

1. Review of Qualifications for Licenses

⁴⁸ IDFPR Policy & Procedure Manual, p. 11 (2009).

⁴⁹ IDFPR Policy & Procedure Manual, p. 11 (2009).

⁵⁰ IDFPR Policy & Procedure Manual, p. 13 (2009).

The Boxing Code states that for a first-time contestant's license application to be approved it shall include documentation of 2 years of boxing experience as an amateur and a minimum of 20 amateur bouts or a demonstration of exceptional fighting ability.⁵¹

Applicant [boxer 1] was issued a professional boxing license after only having competed as an amateur for one rather than two years. In addition, [boxer 1]'s official file contained no documentation revealing that he had been licensed because he demonstrated exceptional fighting abilities. Therefore under State law, [boxer 1] was not qualified to receive a professional license.

Mr. Puccillo told investigators that although he did not review or approve this application, he *would have* approved a license for [boxer 1] because he was a "good fighter." However, after reviewing [boxer 1]'s license file documentation, Mr. Puccillo stated that [boxer 1] did not appear to be qualified for a professional boxing license. Nevertheless, Mr. Puccillo said based on what he saw of [boxer 1] fighting as a professional boxer, [boxer 1] should have been approved for a professional boxing license. In any event, it remains clear that [boxer 1] did not meet the legal requirements under State law for a professional license at the time he was issued one. Mr. Puccillo acknowledged that he was ultimately responsible for Mr. Campuzano's approval of the application.

The evidence shows that Mr. Campuzano approved the license for [boxer 1]. Mr. Campuzano provided the OEIG with different bases for his approval. During his first OEIG interview, he stated that [boxer 1] was qualified based on the number of fights. During his second OEIG interview, Mr. Campuzano stated he made a determination that [boxer 1] had "exceptional fighting ability" even though there was no documentation to that effect in the file. What is particularly disturbing is that Mr. Campuzano claimed to *not know* about the legal requirement that amateurs needed two years of experience in order to obtain a professional license.

The allegation that Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties relating to the review of license qualifications is **FOUNDED**. The allegation that Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties relating to the review of license qualifications is also **FOUNDED**.

2. Imposition and Depositing of Unauthorized Fees

The Boxing Act states that licensed professionals shall be issued a picture identification card,⁵² but lists no fee for the service of having IDFPR staff take a photo for the identification card. Moreover, there is no statutory or other provision authorizing the Department to collect fees for services performed by a physician. The Boxing Act requires fees for administration and enforcement to be set by rule and for those fees to be deposited into a dedicated fund.⁵³

⁵¹ 68 Ill. Adm. Code 1371.300(n).

⁵² 225 ILCS 105/11(A).

⁵³ 225 ILCS 105/23.

The evidence reveals that Mr. Campuzano and Mr. Puccillo permitted fees to be charged and collected for photographs and for services performed by physicians when those fees were not authorized to be charged by the Boxing Act or Code. In fact, Mr. Campuzano said that he had *no idea* what authority existed for the Athletics Unit to deduct various fees from a boxer's purse. Likewise, Mr. Puccillo said he was *not aware* of any statutory basis for a photo fee and stated that the collection of fees was "business as usual" and a prior practice of the Athletics Unit.

In addition, Mr. Campuzano and Mr. Puccillo did not deposit fees collected as required into a dedicated fund. Rather than being deposited into an official dedicated fund, the collected photo fee money was kept in envelopes and in piles in Mr. Campuzano's work area and file cabinets. Mr. Campuzano said the photo fee money was used as petty cash for the Athletics Unit and that photo paper, duct tape for the contestants, and rubber gloves for the officials had been purchased with the money. Moreover, Mr. Puccillo and Mr. Campuzano both acknowledged that the photo fee money may have been used to purchase pizza on occasion. In any event, regardless of how it was ultimately used, the photo fee money was not processed or accounted for in the manner required by State law.

Whatever the prior practice of collecting fees for photos and physicians, Mr. Campuzano and Mr. Puccillo had the duty to conform their actions to State law and conduct Athletics Unit business accordingly. At a minimum, the Executive Manager of the Athletics Unit and the Director of the Athletics Unit should have realized that maintaining collected cash in an office drawer or filing cabinet without a proper accounting was inappropriate and unacceptable.

Based on the foregoing, the allegations that Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties by collecting fees not authorized by law and failing to deposit collected fees in the appropriate fund are **FOUNDED**. In addition, the allegations that Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by collecting fees not authorized by law and failing to deposit collected fees in the appropriate fund are **FOUNDED**.

3. Restrictions on Ringside Seating

Mr. Campuzano and Mr. Puccillo did not know and enforce restrictions on who was permitted in the secured ringside area. The Boxing Code states:

Spectator seats shall be at least 8 feet from the apron of the fighting area platform. A physical barrier approved by the Division shall be placed 8 feet from the fighting area platform and shall have 2 entrances. Security shall be placed at each of these 2 entrances. The space immediately within 8 feet of the fighting area platform shall be under the jurisdiction of the Division for use by designated working officials, contestants, their seconds, timekeepers, judges, referees, physicians, announcers, medical representatives and others approved by the Division. Promoters are responsible for seeing that the working area is controlled and free of non-essential personnel.⁵⁴

⁵⁴ 68 Ill. Adm. Code 1371.80(o).

Despite these Boxing Code provisions describing the use of the area by specific essential personnel, Mr. Campuzano and Mr. Puccillo inexplicably said that there were *no policies* restricting who was permitted in the restricted area.

According to witnesses, numerous family members of Mr. Campuzano were frequently permitted to sit in the restricted area during boxing events. For the █████ v. █████ fight in January 2011, at least five of Mr. Campuzano's immediate family members sat inside the restricted area near the boxing ring. Mr. Campuzano said he did not put his family members in the restricted area for that event, but that the promoter of the event invited his family to move to that area. The promoter also stated that he invited Mr. Campuzano's family members to move from the general seating area to the promoter's section in the restricted area at the event. Even if the event promoter invited Mr. Campuzano's five family members to the restricted area, the area is under the jurisdiction of IDFPR, and Mr. Campuzano's family members clearly do not qualify as essential personnel as defined by the Boxing Code. Additionally, Mr. Puccillo saw Mr. Campuzano's family sitting in the restricted area and took no action other than to tell Mr. Campuzano not to let it happen again. As Mr. Campuzano's supervisor and the Director of Athletics, Mr. Puccillo should have taken action to make certain his employees complied with State law.

Because Mr. Campuzano permitted numerous non-essential personnel to sit in the restricted area without any apparent regard for the Boxing Code, the allegation that Joel Campuzano demonstrated inefficiency and incompetence in his assigned duties with respect to ringside seating is **FOUNDED**. The allegation that Ron Puccillo demonstrated inefficiency and incompetence in his assigned duties with respect to ringside seating is also **FOUNDED**.⁵⁵

B. Joel Campuzano and Ron Puccillo's Failure to Maintain Adequate Records Demonstrated Incompetence and Inefficiency in Their Assigned Duties.

Despite their assigned duties to oversee licensing matters for the Athletics Unit, Mr. Campuzano and Mr. Puccillo *failed* to maintain any records that would identify the Department employee who approved or disapproved license applications. Both men also failed to maintain complete license files. Neither man took steps to create Department policies regarding the collection and accounting of fees, several of which, as described above, were not authorized to be collected.

The lack of file documentation allowed Department employees to remain unaccountable for their actions because the particular employee taking an action on a license transaction was not recorded. For instance, Mr. Puccillo claims that he did not know what the portion of the license application form marked "For Official Use Only" was used for and had never used it himself, even though he was the "official" in charge of the Athletics Unit.

⁵⁵ IDFPR has attempted to address the ringside seating issue by creating the January 4, 2012 Ringside Seating Policy stating that the ringside area shall be used only by IDFPR officers, employees, and agents unless otherwise approved in writing by the Director or Co-Director of the Athletics Unit. Additionally, Nancy Illg has adopted sequestered seating at events so that individuals seated in the restricted area can be easily identified.

The OEIG discovered that for boxing events in 2010 that the only record of various cash fee transactions relating to photos, tests, and physicians' fees were simple handwritten notations at the top of "Certification of Payment Receipts" that did not completely describe (when the notations were legible) what the fees were for. Moreover, documents that might have helped to account for fees, such as the "Weigh-In Payment Checklists," were treated as working documents and discarded.

As noted above and a particular example of poor accounting practices, Mr. Campuzano maintained collected photo fee cash in an envelope in a filing cabinet. Mr. Campuzano claims he accounted for the cash by writing the balance on the outside of the envelope containing the cash. He used the cash to make purchases, but did not obtain receipts for all of the purchases. Because of the absence of any effective record-keeping mechanism relating to photo fees, the total amount of money collected in photo fees over the years and how that money was disposed of cannot be properly determined. [Employee] and Ms. Illg roughly estimated that the Athletics Unit could have collected between \$4,000 and \$5,000 in photo fees from 2008 through the present. By his own admission, Mr. Campuzano's accounting practices were "pretty poor." Mr. Puccillo stated that Mr. Campuzano told him he maintained a spreadsheet for the cash, but he (Mr. Puccillo) had never seen it, and the investigation revealed that none existed.

Mr. Campuzano and Mr. Puccillo were assigned duties requiring them to properly process and account for Athletics Unit licensing records. Joel Campuzano's failure to maintain complete and accurate records demonstrates incompetence and inefficiency in his assigned duties, and the allegation is **FOUNDED**. Ron Puccillo's failure to ensure Mr. Campuzano or others maintained complete and accurate records demonstrates incompetence and inefficiency in his assigned duties, and that allegation is also **FOUNDED**.

C. The [REDACTED] v. [REDACTED] Fight

The following section describes apparent conflicts of interest that arose in relation to the [REDACTED] v. [REDACTED] fight held in August 2010.

1. **Joel Campuzano Permitted his Brother to Serve as a Judge While his Father Worked as a Second for a Boxer Managed by his Good Friend.**

Joel Campuzano worked as the Athletics Unit representative overseeing the [REDACTED] v. [REDACTED] fight making assignments and in doing so assigned his [first] brother [REDACTED] to serve as a judge and allowed his father to escort [boxer 2] to the ring while wearing a "Team [Boxer 2]" second's jacket. Although Joel Campuzano stated that his father did not actually work as a second during the fight, others dispute this fact. Moreover, despite claiming that his father did not serve as a second, Mr. Campuzano admittedly required his father to obtain a second's license prior to the fight. In any event, there is no dispute that Joel Campuzano's father was in [boxer 2]'s entourage.

Joel Campuzano's efforts to describe his good friend [REDACTED] more as a sponsor for [boxer 2] rather than his manager fail for a number of reasons. First, [the friend] possessed a boxing manager's license. Second, [boxer 2]'s contract with the event promoter contains a manager's signature of "[REDACTED]." Lastly, [the friend] was identified by the Referee of the fight as the Manager for [boxer 2].

The assignment of his brother as a judge for a bout involving a boxer managed by his good friend, and who also had as a second his father, created the appearance of a conflict of interest. As opposing boxer [REDACTED]'s manager stated, had he known Joel Campuzano's brother was a judge and his father was a second for the opposing fighter, he would have "raised hell" about the situation.

Mr. Campuzano's actions in scheduling his brother to judge a bout in which his father was in the corner of one of the fighters, and his good friend was the manager or sponsor of the same fighter, created the appearance of a conflict of interest and therefore created the appearance of impropriety or bias. Accordingly, the allegation that Joel Campuzano engaged in conduct that created the appearance of impropriety or bias is **FOUNDED**.

2. Ron Puccillo Failed to Take Supervisory Action to Correct the Apparent Conflicts of Interest.

Ron Puccillo said that he knew that [the first brother] was serving as a judge for the [REDACTED] v. [REDACTED] fight, but was not aware that [the father] would be working as [boxer 2]'s second until the fight was underway. In any event, despite observing the situation at the fight, Mr. Puccillo took no action and allowed the fight to proceed.

As Joel Campuzano's supervisor and the Director of the Athletics Unit, Ron Puccillo had the responsibility to address the issue and remedy the situation. However, Mr. Puccillo allowed the situation to occur without taking any action to correct it. Accordingly, the allegation that Ron Puccillo engaged in conduct that created the appearance of impropriety or bias is **FOUNDED**.

D. Review of Licenses for Relatives and Friends

The following section describes apparent conflicts of interest that arose when Mr. Campuzano reviewed license applications for his father and for boxer [1], who was sponsored by his good friend, [REDACTED].

1. Joel Campuzano Reviewed and Approved a License Application for his Father.

Mr. Campuzano admitted that he approved a license application for his father as a second for the [REDACTED] v. [REDACTED] fight. Although Mr. Campuzano denied reviewing license applications for other relatives, such as for his brothers,⁵⁶ he said he saw no issue with an Athletics Unit

⁵⁶ Nancy Illg and Ron Puccillo both stated that they reviewed numerous license files and determined that some officials, including [REDACTED] (Joel's [second] brother), did not appear to be qualified for the license

employee reviewing a license application for a relative as long as the applicant was qualified. Regardless of whether a family member may ultimately qualify for a license, permitting employees to review applications for family members may create the appearance of impropriety or bias in the discharge of regulatory duties. Therefore, the allegation that Joel Campuzano created an appearance of impropriety or bias in the discharge of his regulatory or enforcement duties by reviewing a license application for his father is **FOUNDED**.

2. Ron Puccillo Allowed Mr. Campuzano to Review and Approve a License Application for his Father.

In similar fashion to Mr. Campuzano, Mr. Puccillo said there is no IDFPR policy prohibiting an IDFPR employee from approving a license application for a family member. In addition, he said that he did not think such a policy was necessary because, in the past, he had not received any complaints on the issue. Although IDFPR policy does not appear currently to expressly prohibit an IDFPR employee from approving licenses for family members, IDFPR policy does in fact require employees to avoid taking actions that may create the appearance of impropriety or bias in the discharge of regulatory or enforcement duties. As Director of the Athletics Unit, Mr. Puccillo should have been aware of such policies and enforced them. The allegation that Ron Puccillo created an appearance of impropriety or bias in the discharge of regulatory or enforcement duties by allowing Joel Campuzano to review a license application for his father is also **FOUNDED**.

3. Joel Campuzano Reviewed and Approved a License Application for a Boxer Sponsored by a Good Friend.

Joel Campuzano stated that he may have approved the boxing manager's license for his good friend [REDACTED], but he was not sure. He said that he saw no conflict of interest in approving a license for his good friend if the friend met the qualifications for the license. In any event, as with other applications, because the Athletics Unit maintained no records of who approved any license, there is no way to verify whether Joel Campuzano is the employee who approved [the friend]'s manager's license.

On the other hand, the evidence shows that Mr. Campuzano approved a professional boxing license for [the boxer], who was sponsored or managed by his good friend [REDACTED]. [boxer 1] said that when he was an amateur, Joel Campuzano and [the friend] met him at a restaurant with the professional boxing application. [The boxer] said that [the friend] paid the

they had been issued. Because the Athletics Unit maintained no records of who approved a license, they were unable to determine who had approved the license. Mr. Puccillo denied approving the license application for Joel Campuzano's [second] brother [REDACTED]. He stated that Joel Campuzano said that he (Joel Campuzano) had approved [the second brother]'s license. The OEIG does not make a finding on the review of the other Campuzano family member license applications, other than to note it is another example of a lack of accountability resulting from inadequate record-keeping.

fees for the required medical tests to become a professional boxer and served as sort of an acting manager for [boxer 1]'s first professional boxing match.

The allegation that Joel Campuzano created an appearance of impropriety or bias in the discharge of his regulatory or enforcement duties by reviewing and approving the license application for [the boxer] is **FOUNDED**.

4. Ron Puccillo Allowed Mr. Campuzano to Review and Approve a License Application for a Boxer Sponsored by his Good Friend.

Mr. Puccillo said that he never questioned Joel Campuzano about [boxer 1]'s license application, but acknowledged that he would be ultimately responsible for [boxer 1]'s license being approved. Allowing Mr. Campuzano to review and approve a license application for a boxer sponsored or managed by a friend gives rise to the appearance that those regulatory duties may not be executed faithfully or accurately. Mr. Puccillo again failed to exercise proper oversight over Mr. Campuzano and the operations of the Athletics Unit. Therefore, the allegation that Ron Puccillo created an appearance of impropriety or bias in the discharge of his regulatory or enforcement duties in connection with [boxer 1]'s license application is **FOUNDED**.

E. Joel Campuzano and Ron Puccillo Created an Appearance of Impropriety By Allowing Ringside Seating for Mr. Campuzano's Family.

As described above, at least five members of Mr. Campuzano's family sat in the restricted ringside area for the [redacted] v. [redacted] fight in January 2011. Aside from allowing non-essential personnel to occupy the restricted area, Mr. Campuzano and Mr. Puccillo allowed Mr. Campuzano's family members to benefit from this ringside seating, which creates a particular appearance of a conflict of interest given Mr. Campuzano's official role. Mr. Campuzano agreed that in hindsight, having so many of his family members sitting in the restricted area did not look good. Mr. Puccillo, despite thinking the Campuzano family members sitting in this area was "ridiculous," did not take immediate action to rectify appearance of the situation, such as re-seating the family members.

The allegation that Joel Campuzano created an appearance of impropriety or bias by permitting numerous members of his family to sit inside the restricted ringside area at an event is **FOUNDED**. The allegation that Ron Puccillo created an appearance of impropriety or bias by permitting numerous members of Joel Campuzano's family to sit inside the restricted ringside area at an event also is **FOUNDED**.

F. Ron Puccillo Demonstrated Incompetence and Inefficiency in His Assigned Duties by Allowing Improperly Licensed Officials to Preside Over the October 7, 2011 Burbank Boxing Event.

The Boxing and Full-Contact Martial Arts Act⁵⁷ and the Boxing Code require all timekeepers, referees, and judges to be licensed and in good standing with IDFPR in order to participate in a professional contest. It further requires that applicants complete an application provided by the Athletics Unit, including the corresponding license fee, a government issued photo identification, an eye examination by a physician who specializes in ophthalmology, and documentation of the applicant's experience.⁵⁸ Additionally, applicants for a referee's license shall provide proof of a physical examination by a physician.⁵⁹ The Boxing and Martial Arts Code states that every license will expire on September 30 of each odd numbered year and that a license holder may renew a license by paying the required fee and completing the required forms.⁶⁰ The Boxing and Martial Arts Code also states that before the start of a contest, an inspector must check that contestants and officials, including timekeepers and referees, are licensed by the DPR and that any of those persons without a current license shall not participate in the contest, unless and until an application and fee have been received and the application is approved by the DPR.⁶¹ Furthermore, the Boxing and Full-Contact Martial Arts Act states that the IDFPR may issue temporary licenses as approved by rule.⁶² There are no provisions under State law for a license renewal "grace period."

The Burbank event was held on October 7, 2011, and the licenses for the officials who worked that event expired September 30, 2011. The officials partially renewed their licenses the night of the fight by completing the applications, submitting the required documentation, and some paid required fees, but *none of the officials* submitted all of the required documentation and/or fees. Therefore, no official at the Burbank event was properly licensed the night of the event under State law. Nancy Illg stated that, based on her conversation and email from an IDFPR Information Technology employee, she believed at the time of the Burbank boxing event that there was a 30-day grace period for license renewals. Despite serving as Director, Mr. Puccillo said he was unfamiliar with the process for renewing licenses. He said he relied on Ms. Illg's statement that there was a so-called grace period, presumably because Mr. Campuzano had previously handled renewals, and apparently he (Mr. Puccillo) failed to put a license renewal process in place after Mr. Campuzano was placed on administrative leave in March 2011.

Nevertheless, as the head of the Athletics Unit, Ron Puccillo was ultimately responsible for ensuring that all participants were licensed for boxing events. It is clear that after Mr. Campuzano was placed on administrative leave in March 2011, Mr. Puccillo took no measures to ensure that officials whose licenses were set to expire on September 30 were properly renewed for the October 7, 2011 Burbank event. Instead, he apparently relied on a new Athletics Unit employee without any legal basis for doing so. Therefore, the allegation that Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by allowing officials who were not properly licensed to preside over a boxing event is **FOUNDED**.

⁵⁷ As stated earlier, Public Act 97-0119 was effective July 14, 2011, and renamed the Boxing Act as the Boxing and Full-Contact Martial Arts Act. Because the Burbank event occurred in October 2011, this allegation is analyzed under the Boxing and Full-Contact Martial Arts Act.

⁵⁸ 225 ILCS 105/10 and 68 Ill. Adm. Code 1371.310.

⁵⁹ 68 Ill. Adm. Code 1371.310.

⁶⁰ 68 Ill. Adm. Code 1371.270.

⁶¹ 68 Ill. Adm. Code 1371.100.

⁶² 225 ILCS 105/11.

G. Joel Campuzano and Ron Puccillo Engaged in Conduct Unbecoming IDFPR Employees by their Public Mismanagement of the Athletics Unit.

IDFPR employees are prohibited from committing conduct that is unbecoming an IDFPR employee, including conduct that brings IDFPR into disrepute or reflects discredit upon the employee as a representative of IDFPR or that tends to impair the operation, efficiency, or integrity of the Department or the employee.⁶³

As described above, the OEIG investigation revealed that the Athletics Unit was severely mismanaged under Mr. Campuzano and Mr. Puccillo's leadership. In multiple instances, Mr. Campuzano and Mr. Puccillo:

- did not know the applicable law and policies and thus failed to apply them;
- maintained poor record-keeping practices;
- maintained inappropriate accounting practices;
- failed to know which staff member approved licenses and on what basis; and
- failed to maintain proper procedures and controls which led to situations in which highly visible conflicts of interest could and did emerge unchecked in the [REDACTED] v. [REDACTED] fight.

With regard to the [REDACTED] v. [REDACTED] fight, Mr. Campuzano permitted his brother to serve as a judge and his father to serve as a second to a contestant managed by Mr. Campuzano's good friend, Mr. [REDACTED]. When Mr. Campuzano was asked how this situation might appear to the boxing community who knew his family and friends, he said, "It doesn't look good. I agree."

In summary, the shortcomings of the Athletics Unit went beyond internal book-keeping irregularities but rather revealed conduct that clearly brings IDFPR into disrepute or reflects discredit upon the employee as a representative of IDFPR. Therefore, the allegation that Joel Campuzano engaged in conduct unbecoming an IDFPR employee is **FOUNDED**. The allegation that Ron Puccillo engaged in conduct unbecoming an IDFPR employee is also **FOUNDED**.

V. FINDINGS AND RECOMMENDATIONS

Following due investigation, the OEIG issues these findings with respect to Joel Campuzano and Ron Puccillo:

Joel Campuzano

- **FOUNDED** – Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to the review of qualifications for licenses.

⁶³ IDFPR Policy & Procedure Manual, p. 13 (2009).

- **FOUNDED** – Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to the imposition and depositing of fees.
- **FOUNDED** – Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties by failing to know and enforce applicable laws and policies relating to restrictions on ringside seating.
- **FOUNDED** – Joel Campuzano demonstrated incompetence and inefficiency in his assigned duties by failing to maintain adequate records.
- **FOUNDED** – Joel Campuzano created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by permitting his brother to serve as a judge during a boxing match where his father worked as a second for a boxer managed by his good friend.
- **FOUNDED** – Joel Campuzano created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties when he reviewed and approved the license application for his father [REDACTED].
- **FOUNDED** – Joel Campuzano created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by approving the license application for a boxer who was sponsored by his good friend.
- **FOUNDED** – Joel Campuzano created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by permitting his family members to sit in ringside seating at a boxing event.
- **FOUNDED** – Joel Campuzano engaged in conduct unbecoming an IDFPR employee by his public mismanagement of the Athletics Unit.

Based upon the evidence, the OEIG recommends that Joel Campuzano be discharged for repeatedly demonstrating incompetence and inefficiency in his assigned duties, creating the appearance of impropriety in the discharge of his duties, and engaging in conduct unbecoming an IDFPR employee.

Ron Puccillo

- **FOUNDED** – Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to the review of qualifications for licenses.
- **FOUNDED** – Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to the imposition and depositing of fees.
- **FOUNDED** – Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by failing to enforce applicable laws and policies relating to restrictions on ringside seating.
- **FOUNDED** – Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by failing to maintain adequate records.
- **FOUNDED** – Ron Puccillo created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by allowing Joel Campuzano to permit his brother to serve as a judge during a boxing match where his father worked as a second for a boxer managed by Joel Campuzano’s good friend.

- **FOUNDED** – Ron Puccillo permitted the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by allowing Joel Campuzano to review and approve the license application for his father [REDACTED]
- **FOUNDED** – Ron Puccillo allowed the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by allowing Joel Campuzano to approve the license application for a boxer who was sponsored by Joel Campuzano’s good friend.
- **FOUNDED** – Ron Puccillo created the appearance of impropriety or bias in the discharge of regulatory or enforcement duties by permitting Joel Campuzano’s family to sit in ringside seating at a boxing event.
- **FOUNDED** – Ron Puccillo demonstrated incompetence and inefficiency in his assigned duties by allowing officials who were not properly licensed to preside over the Burbank boxing event.
- **FOUNDED** – Ron Puccillo engaged in conduct unbecoming an IDFPR employee by his public mismanagement of the Athletics Unit.

Because Ron Puccillo is no longer a State employee, the OEIG is unable to recommend discipline against him. However, the OEIG recommends that IDFPR place a copy of this report in Mr. Puccillo’s personnel file.

In addition, the OEIG recommends that IDFPR take whatever remaining steps are necessary to:

- (1) adequately document the review of license applications;
- (2) institute appropriate procedures for the accounting and disposition of fees; and
- (3) halt the imposition and collection of unauthorized fees.⁶⁴

The OEIG also recommends that all Athletics Unit staff be reminded of applicable IDFPR conflict of interest policies and the January 2012 policy governing ringside seating. Lastly, the OEIG recommends that IDFPR take any additional necessary steps to ensure that Athletics Unit staff members perform their duties consistent with State law.

No further investigative action is warranted and these cases are considered closed.

Date: **April 5, 2013**

Office of Executive Inspector General
 for the Agencies of the Illinois Governor
 607 E. Adams Street, 14th Floor
 Springfield, IL 62701

⁶⁴ According to Nancy Illg, the Athletics Unit no longer accepts cash at weigh-ins and events for payment of fees, photo fees are not collected at all, and physicians’ fees for private services are not collected by Athletics Unit employees. She also described that the license filing system was being overhauled, including measures to identify the Athletics Unit employee approving a license application, and an accounting system implemented to track collected fees. She also provided the OEIG with a new ringside seating policy enacted in 2012.

Melissa Rollins
Assistant Inspector General

William Parker
Investigator #121

Kasey Cook
Investigator #119



Illinois Department of Financial and Professional Regulation
Office of Legal Affairs

PAT QUINN
Governor

Manuel Flores
Acting Secretary

Richard DiDomenico
General Counsel

April 23, 2013

Neil P. Olson
Deputy Inspector General
Office of Executive Inspector General
607 East Adams, 14th Floor
Springfield, Illinois 62701

Re: OEIG Case Nos. 11-00289 & 11-01820

Deputy Inspector General Olson,

Please be advised that the Illinois Department of Financial & Professional Regulation (IDFPR) is in receipt of the Office of the Executive Inspector General's (OEIG) Final Report and Recommendations in the above referenced case numbers. IDFPR's response to the Recommendations follows.

1. Mr. Campuzano is an American Federation of State, County and Municipal Employees Council 31, AFL-CIO (AFSCME) union member. In accordance with Article IX (Discipline), Section 4 (Pre-Disciplinary Meeting), of the Agreement between the State of Illinois and AFSCME Council 31, a Pre-Disciplinary Meeting has been scheduled for April 29, 2013. Mr. Campuzano has five (5) days to provide a written rebuttal. IDFPR has forty-five (45) days to review OEIG's findings and Mr. Campuzano's rebuttal to determine if discipline is warranted and if so, the level of discipline warranted. IDFPR will notify the OEIG when the process has concluded.
2. IDFPR will adhere to the recommendation that a copy of this report be placed in Mr. Puccillo's personnel file.
3. IDFPR has previously addressed the OEIG additional recommendations as noted on page forty-eight (48) of the Office of the Executive Inspector General's (OEIG) Final Report and Recommendations as provided in footnote 64.

IDFPR continues to review its policies, procedures and practices to insure and promote the safety of licensees and integrity of the department.

Sincerely,

Richard DiDomenico



Illinois Department of Financial and Professional Regulation
Office of Legal Affairs

PAT QUINN
Governor

Manuel Flores
Acting Secretary
Richard DiDomenico
General Counsel

August 1, 2013

Deputy Inspector General Laura K. Bautista
Chief of Springfield Division
Office of Executive Inspector General
607 East Adams, 14th Floor
Springfield, Illinois 62701

RECEIVED
AUG 06 2013
BY: _____

Re: OEIG Case Nos. 11-00289 & 11-01820

Deputy Inspector General Bautista,

Please be advised that the Illinois Department of Financial & Professional Regulation (IDFPR) has concluded the disciplinary process and has reviewed the reply of April 25, 2013 to IDFPR's response of April 23, 2013 to the Office of the Executive Inspector General's (OEIG) Final Report and Recommendations in the above referenced case numbers. IDFPR further responds to the Recommendations as follows.

1. Mr. Campuzano is an American Federation of State, County and Municipal Employees Council 31, AFL-CIO (AFSCME) union member. In accordance with Article IX (Discipline), Section 4 (Pre-Disciplinary Meeting), of the Agreement between the State of Illinois and AFSCME Council 31, a Pre-Disciplinary Meeting was scheduled for April 29, 2013. Mr. Campuzano had five (5) days to provide a written rebuttal. Mr. Campuzano, by and through AFSCME steward Jim Clark, requested and was granted an extension of time in accordance with the terms and conditions of the Collective Bargaining Agreement (CBA) for purposes of rebutting the findings contained in the OEIG's Final Report and Recommendations. IDFPR had forty-five (45) days to review OEIG's findings and Mr. Campuzano's rebuttal. IDFPR determined discipline was warranted and implemented the recommendation of the OEIG. IDFPR discharged Mr. Campuzano effective July 12, 2013. Pursuant to Article V, Grievance Procedure, Section 4 of the CBA, the Special Grievances Memorandum of Understanding (MOU) requires a special Step 3 grievance settlement meeting within fifteen (15) working days of becoming aware of the action. A special Step 3 grievance settlement meeting was initiated by AFSCME on July 10, 2013 and held on July 22, 2013. The Step 3 formal response that the grievance was denied by IDFPR was provided on July 22, 2013. AFSCME requested a 4(a) arbitration hearing on July 26, 2013 with Central Management Services (CMS) Office of Employee and Labor Relations. The MOU Section 6 provides that arbitration hearings be scheduled within thirty (30) days of the grievance being moved to arbitration by the Union pursuant to Step 4(b) following Step 4(a) of the grievance procedure. The parties shall make every effort to have the dispute heard at an arbitration hearing to be held within sixty (60) days following a Step 4(a) signoff.

2. IDFPR adhered to the recommendation that a copy of this report be placed in Mr. Puccillo's personnel file.
3. In its April 25, 2013 letter, the OEIG recommended that "all Athletic Unit staff (a) be reminded of applicable IDFPR conflict of interest policies and (b) the January 2012 policy governing ringside seating" and requested "a written update on how IDFPR has implemented this recommendation." IDFPR followed the OEIG's recommendation as follows:
 - (a) On January 11, 2012, Athletic Unit Director Ron Puccillo and Co-Director Nancy Illg were informed via email (attached hereto) that the Ringside Policy was effective immediately. Puccillo and Illg are the core employees responsible for enforcement of the policy at athletic events; and
 - (b) All IDFPR personal service contract (PSC), temporary and full time employees are required to complete ethics training under the Ethics Act within thirty (30) days of the commencement of their appointment or employment, and all employees are required to complete ethics training annually, which includes conflicts of interest training. IDFPR does not have an IDFPR-specific conflict of interest policy.

IDFPR continues to review its policies, procedures and practices to insure and promote the safety of licensees and the integrity of the department.

Sincerely,

Richard DiDomenico

enclosure

From DiDomenico, Richard **Date** Wednesday, January 11, 2012 11:07:00 AM
To Puccillo, Ron; Illg, Nancy
Cc
Subject Ringside Policy

[Ringside Policy - Final.doc](#) (28 KB HTML)

Please see attached Ringside Policy effective immediately.

Richard DiDomenico

Senior Deputy General Counsel

Illinois Department of Financial and Professional Regulation

100 W. Randolph, Suite 9-401

Chicago, IL 60601

312-814-3230

richard.didomenico@illinois.gov

www.ildpr.com

1/4/2012

Ringside Access Policy

Effective immediately, the area surrounding ringside which is under the control of and reserved for the use of the Illinois Department of Financial and Professional Regulation (IDFPR) in regulating athletic events held under IDFPR authority, hereinafter referred to as the "ringside area", shall be used only by IDFPR officers, employees, and agents unless otherwise approved by the Director or Co-Director of IDFPR's Division of Professional Regulation (DPR) Athletic Unit. Such approval must be in writing, include the rationale, and be signed and dated by the grantor. A copy of the approval shall be submitted to the Director of the DPR and the original shall be placed in the event file. This policy does not apply to third parties that are essential to the production of the athletic event.



Illinois Department of Financial and Professional Regulation
Office of Legal Affairs

PAT QUINN
Governor

Manuel Flores
Acting Secretary

Richard DiDomenico
General Counsel

December 31, 2013

Deputy Inspector General Laura K. Bautista
Chief of Springfield Division
Office of Executive Inspector General
607 East Adams, 14th Floor
Springfield, Illinois 62701

Re: OEIG Case Nos. 11-00289 & 11-01820

Deputy Inspector General Bautista,

Please be advised that the Illinois Department of Financial & Professional Regulation (IDFPR) has concluded the disciplinary process in the above referenced case numbers. IDFPR responded, in part, to the Office of the Executive Inspector General's (OEIG) Final Report and Recommendations on August 1, 2013, as follows.

- 1. Mr. Campuzano is an American Federation of State, County and Municipal Employees Council 31, AFL-CIO (AFSCME) union member. In accordance with Article IX (Discipline), Section 4 (Pre-Disciplinary Meeting), of the Agreement between the State of Illinois and AFSCME Council 31, a Pre-Disciplinary Meeting was scheduled for April 29, 2013. Mr. Campuzano had five (5) days to provide a written rebuttal. Mr. Campuzano, by and through AFSCME steward Jim Clark, requested and was granted an extension of time in accordance with the terms and conditions of the Collective Bargaining Agreement (CBA) for purposes of rebutting the findings contained in the OEIG's Final Report and Recommendations. IDFPR had forty-five (45) days to review OEIG's findings and Mr. Campuzano's rebuttal. IDFPR determined discipline was warranted and implemented the recommendation of the OEIG. IDFPR discharged Mr. Campuzano effective July 12, 2013. Pursuant to Article V, Grievance Procedure, Section 4 of the CBA, the Special Grievances Memorandum of Understanding (MOU) requires a special Step 3 grievance settlement meeting within fifteen (15) working days of becoming aware of the action. A special Step 3 grievance settlement meeting was initiated by AFSCME on July 10, 2013 and held on July 22, 2013. The Step 3 formal response that the grievance was denied by IDFPR was provided on July 22, 2013. AFSCME requested a 4(a) arbitration hearing on July 26, 2013 with Central Management Services (CMS) Office of Employee and Labor Relations. The MOU Section 6 provides that arbitration hearings be scheduled within thirty (30) days of the grievance being moved to arbitration by the Union pursuant to Step 4(b) following Step 4(a) of the grievance procedure. The parties shall make every effort to have the dispute heard at an arbitration hearing to be held within sixty (60) days following a Step 4(a) signoff.*

An arbitration hearing was initially scheduled for October 24, 2013. The hearing was rescheduled and commenced on December 3, 2013. Upon presentation of the parties' arguments and evidence, Arbitrator Steven Bierig found and ordered that:

1. Employer lacked just cause to discharge Grievant, Joel Campuzano.
2. Just cause exists for Employer to suspend Grievant
3. Employer is to rescind and expunge the discharge of the Grievant, and shall instead suspend Grievant for ten (10) days.
4. The Grievant shall serve the ten (10) day suspension during the period of July 13, 2013-July 23, 2013.

Mr. Campuzano was reinstated to his position as a Public Service Administrator I on December 16, 2013.

If you have any questions please do not hesitate to contact me.

IDFPR continues to review its policies, procedures and practices to insure and promote the safety of licensees and the integrity of the department.

Sincerely,

Richard DiDomenico

IN THE MATTER OF THE ARBITRATION BETWEEN

GRIEVANT: JOEL CAMPUZANO

THE STATE OF ILLINOIS, DEPARTMENT OF FINANCIAL
AND PROFESSIONAL REGULATION

ISSUE: DISCIPLINE

AND

CMS NO. 6731

THE AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES,
COUNCIL 31, LOCAL 2081

AFSCME NO. 2103-07-40098

ORDER

Upon presentation of the parties' arguments and evidence, it is hereby found and ordered that:

1. This Order is entered on a non-precedential basis and shall not be cited by the parties in any other proceeding except in a proceeding concerning this Order.
2. Employer lacked just cause to discharge Grievant, Joel Campuzano.
3. Just cause exists for Employer to suspend Grievant.
4. Employer is to rescind and expunge the discharge of the Grievant, and shall instead suspend Grievant for ten (10) days.
5. The Grievant shall serve the ten (10) day suspension during the period of July 12, 2013—July 21, 2013.
6. The Grievant shall be on an unpaid leave of absence during the period of July 22, 2013—September 15, 2013.
7. The Grievant is to receive three months of backpay, during the period of September 16, 2013—December 15, 2013, minus all applicable taxes and deductions.
8. Grievant is to return to work, reinstated to his position as a Public Service Administrator in the Illinois Department of Financial and Professional Regulation, on December 16, 2013.
9. The parties shall share arbitral fees.
10. The undersigned shall retain jurisdiction to resolve any disputes which may arise under the terms of this order.

Steven Bierig

Digitally signed by Steven Bierig
DN: cn=Steven Bierig, o=Steven M.
Bierig Attorney Arbitrator Mediator,
ou, email=arb438@comcast.net, c=US
Date: 2013.12.11 12:45:24 -06'00'

Steven M. Bierig, Arbitrator
Dated: December 11, 2013