IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

IN RE: SANDY AGUIRRE )
) OEIG for the Agencies of
) the Illinois Governor
) Case #19-00664

PUBLICATION OF REDACTED VERSION OF
OEIG FINAL REPORT

Below is the redacted 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 and others uninvolved. To balance these interests, the Commission may redact certain information contained in this report. Additionally, the Commission redacts certain information that relates to allegations against a person who was found not to have committed a violation. 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. Further, in publishing the below redacted final summary report, the Commission makes no finding of law or fact for or against any individual or entity referenced therein.

The Commission received this 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 Executive Inspector General for the Governor, and Sandy Aguirre’s last known address.

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

On April 2, 2019, the Office of Executive Inspector General (OEIG) received a complaint alleging that University of Illinois at Chicago (UIC) employee Sandy Aguirre engaged in prohibited political activity in violation of the State Officials and Employees Ethics Act (Ethics Act). Specifically, it was alleged that Ms. Aguirre worked on her campaign for a school board election during State time. Investigators also investigated whether Ms. Aguirre misappropriated State resources for political reasons.

II. BACKGROUND

A. Sandy Aguirre

Sandy Aguirre is a Human Resources Clerk for UIC’s Office of Community Engagement and Neighborhood Health Partnerships (Community Office) where she works from 9:00 a.m. to 5:00 p.m. As a Human Resources Clerk, Ms. Aguirre’s duties include preparing and processing payroll timesheets, processing time off requests, maintaining personnel files, and arranging hiring interviews. Ms. Aguirre’s supervisor during the relevant period of this investigation was Human Resources Associate [UIC Employee 1]. Ms. Aguirre last completed Ethics training on November 29, 2018.

B. Sandy Aguirre’s Campaign for Elective Office

In 2019, Ms. Aguirre ran for one of three open seats on the Proviso Township School District 209 Board of Education (Board). Ms. Aguirre created her campaign committee, Sandy for 209, on January 25, 2019. [Campaign Staffer 1], a State employee working at the [State Agency], worked as Ms. Aguirre’s campaign treasurer and [Campaign Staffer 2] worked as Ms. Aguirre’s campaign chairperson. [Campaign Volunteer 1], a paralegal for [Campaign Donor 1], a law firm that provided in-kind contributions to Ms. Aguirre’s campaign, also assisted Ms. Aguirre with her campaign. The election occurred on April 2, 2019, where Ms. Aguirre lost to the incumbent Board members.

1 5 ILCS 430/1 et seq.
2 Ms. Aguirre did not complete 2019 Ethics training conducted in October 2019 due to a leave of absence.
3 During her campaign, Ms. Aguirre had a campaign website located at www.sandyfor209.org which has since been disabled.
5 Id.
III. INVESTIGATION

A. Campaign-Related Emails

OEIG investigators obtained Ms. Aguirre’s State email account for the period from October 1, 2018 to April 15, 2019 and reviewed those emails for content related to her campaign. In total, the OEIG found nearly 50 emails related to Ms. Aguirre’s campaign and unrelated to UIC business. Many of these emails were sent from Ms. Aguirre’s personal email address to her State email account.8 Below is a summary of some of the campaign-related emails:

1. Campaign Expenditure and Contribution Emails

i. February 20, 2019 at 1:50 p.m.: Ms. Aguirre sent an email from her personal email to her State email with the subject, “Donations.” The email attached two images of checks to “Sandy L. for 209” from [Campaign Committee][Campaign Donor 2] for $5,000 and [Political Party] for $500.

ii. April 4, 2019 at 11:16 a.m.: Ms. Aguirre sent an email from her personal email to her State email, which attached a photograph of a check to “[Vendor 1]” from “Sandy L. For 209” checking account for $750.00 for “50 hrs. Early Voting.”

iii. April 4, 2019 at 11:18 a.m.: Ms. Aguirre sent two emails from her personal email to her State email, which each attached a photograph of a check from a “Sandy L. For 209” checking account: one email attached a check to “[Vendor 2]” for $195.00 for “13 hrs. Early Voting” and another email attached a check to [Vendor 7] for $120.00 for “8 hrs. pd Early Voting.”

iv. April 5, 2019 at 5:57 p.m.: Ms. Aguirre sent an email to her State email from her personal email, which attached a photograph of a check made out to “[Vendor 3]” from her “Sandy L. For 209” checking account for $2,689.09.

v. April 5, 2019 at 5:57 p.m.: Ms. Aguirre sent an email to her State email from her personal email, which attached a photograph of a check made out to “[Vendor 4]” from “Sandy L. For 209” checking account for $687.50.

vi. April 5, 2019 at 6:02 p.m.: Ms. Aguirre sent an email to her State email from her personal email, which attached two images. The attachments are a screen capture of a text message with [Campaign Staffer 1] discussing the balance price of doorhangers and a photograph of a check made out to “[Vendor 5]” from the “Sandy L. for 209” checking account for $2,030.

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8 The OEIG confirmed Ms. Aguirre’s personal email address through her UIC personnel file records.
9 Ms. Aguirre also sent these images from her personal email to her State email at 11:31 a.m. on March 29, 2019.
10 Ms. Aguirre also sent this same image from her personal email to her State email at 12:06 p.m. on March 22, 2019.
11 Ms. Aguirre also sent this same image from her personal email to her State email at 3:26 p.m. on March 26, 2019.
2. Campaign Literature Emails

i. **January 18, 2019 at 2:42 p.m.**: Ms. Aguirre was sent an email from [Campaign Volunteer 3] with the subject “bio” where the body of the email included a draft of Ms. Aguirre’s biography in relation to Proviso Township. Ms. Aguirre replied to the email from her State email stating, “Thank you!!!!”

ii. **February 21, 2019 at 5:01 p.m.**: Ms. Aguirre forwarded an email from [Campaign Volunteer 1] from her personal email to her State email with the subject, “Flyer to Print.” The email from [Campaign Volunteer 1] attached a flyer for her District 209 Board of Education campaign and advised her to print 1,500 copies.

iii. **February 28, 2019 at 2:43 p.m.**: Ms. Aguirre forwarded an email from [CEO] of [Vendor 6] to her State email from her personal email. The email from [CEO] attached the campaign flyer and stated “[e]dits are done as requested, send to printer.” The campaign flyer included information about Ms. Aguirre including background information and information about why constituents should vote for her.

iv. **March 15, 2019 at 3:14 p.m.**: Ms. Aguirre sent an endorsement flyer from her personal email to her State email. The flyer included a photo of Ms. Aguirre and stated voters should “punch #117.” The flyer also stated that Ms. Aguirre is highly recommended by former Village [Mayor] [Campaign Supporter 1]

v. **March 21, 2019 at 4:08 p.m.**: Ms. Aguirre sent a flyer, criticizing her opponents’ records, from her personal email to her State email. The flyer also stated, “It’s time to elect a Board of Education to Proviso Township High School District 209 who will work for all of Proviso Township” and that voters should “reject” her opponents.

3. Candidate Questionnaire Emails

i. **February 21, 2019 at 3:02 p.m.**: Ms. Aguirre forwarded an email from [Campaign Volunteer 1] from her personal email address to her State email address, with the subject, “[Campaign Supporter 2] Questionnaire.” [Campaign Volunteer 1] stated in his original email that he filled out the attached seven-page questionnaire to the best of his ability and asked Ms. Aguirre to review the answers; the email attached a candidate questionnaire from the [Campaign Supporter 2].

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12 Ms. Aguirre also sent a draft of this biography from her State email address to her State email address on January 18, 2019 at 7:32 p.m. and again on January 24, 2019 at 5:01 p.m.

13 Ms. Aguirre also sent this email from her State email to [personal email address] at 10:12 a.m. on February 22, 2019.

14 Ms. Aguirre also again forwarded this email from her personal email to her State email at 3:15 p.m. and 3:17 p.m. on February 28, 2019.

15 All of [Campaign Volunteer 1]’s emails to Ms. Aguirre were from his [Campaign Donor 1] email address.
ii. February 22, 2019 at 11:07 a.m.: Ms. Aguirre sent an email to [personal email address] and attached a [Campaign Supporter 2] 2019 Candidate Questionnaire from her State email. Ms. Aguirre forwarded a completed seven-page questionnaire from her State email to her personal email at 1:12 p.m.  

4. Campaign Canvassing Emails

i. February 21, 2019 at 3:04 p.m.: Ms. Aguirre forwarded an email from [Campaign Volunteer 1] from her personal email to her State email, with the subject, “SD 209 Phone List.” [Campaign Volunteer 1] stated in his original email that he attached the a 236-page phone list for District 209 and a copy of “the script.” The email attached a “Proviso SD 209 – Phone List (2019).pdf” document, which contained a list of names, addresses and phone numbers of District 209 constituents, and a document called “Aguirre Voter Contact Script v3.pdf,” which included talking points and information for volunteers of Ms. Aguirre’s campaign. [Campaign Volunteer 1] also instructed Ms. Aguirre in his email on how campaign volunteers should complete the phone list and to retain the phone list data.

ii. March 15, 2019 at 4:25 p.m.: Ms. Aguirre sent an email from her personal email address to her State email address with the subject “Confirmation of your [Vendor 8] VoterMapping Order.” The original email, dated February 21, 2019, was a confirmation of an order from [Vendor 8] sent from [Campaign Volunteer 1] to Ms. Aguirre’s personal email.

iii. March 15, 2019 at 4:28 p.m.: Ms. Aguirre sent an email from her personal email address to her State email address with the subject “Aguirre Voter Contact Script v3.pdf.” The email attached a one-page document titled, “SD 209 Voter Contact Script,” which included talking points and information volunteers for Ms. Aguirre’s campaign could use.

iv. April 4, 2019 at 5:48 p.m.: Ms. Aguirre forwarded an email from her personal email from [personal email address] to her State email account with the subject, “Volunteer information.” The email includes names and addresses of campaign volunteers and a prior email from Ms. Aguirre’s personal email stating, “Hola [Campaign Volunteer 2], I need the complete names and addresses of the volunteers. For my report. Thank you!”

16 Ms. Aguirre also sent this completed candidate questionnaire from her personal email to her State email at 4:37 p.m. on February 21, 2019 and scanned the candidate questionnaire from a State scanner to her State email at 4:33 p.m. on February 21, 2019 and again at 10:43 a.m. on February 22, 2019.
17 Ms. Aguirre previously sent the same email from her personal email address to her State email on February 21, 2019 at 3:04 p.m.
18 [Vendor 8] is a company that sells voter records. https://[Vendor 8]political.com/ (last visited May 4, 2020).
19 Ms. Aguirre’s State emails also reflected that Ms. Aguirre scanned a printed copy of this email using a State scanner on April 5, 2019 at 4:09 p.m.
v. April 5, 2019 at 5:16 p.m.: Ms. Aguirre sent an email from her personal email to her State email with the subject, “Sandy for 209 Volunteer list for Precincts [sic].” Ms. Aguirre attached a three-page spreadsheet listing the names, addresses, phone numbers, locations, and times for each volunteer on her campaign.

5. Campaign Event Emails

i. February 19, 2019 at 2:18 p.m.: Ms. Aguirre forwarded an email from the Executive Director of the [Association 1] from Ms. Aguirre’s personal email to her State email. The subject of the email was “Candidate’s Forum” and included an attachment labeled, “ParadeApp2019.pdf.” The email chain included information about a candidate’s forum and attached a flyer for the [Association 1] 23rd Annual St. Patrick’s Day Parade.

ii. February 22, 2019 at 2:31 p.m.: Ms. Aguirre forwarded an email from the Executive Director of the [Association 1] from her personal email to her State email with the subject, “March 6 Candidate’s Forum” and attached a one-page document titled, “2019 Cand Forum Letter.pdf.” The email and attachment included information about a candidate’s forum for District 209 candidates hosted by the [Association 1] and [Newspaper].

6. Other Campaign-Related Emails

i. January 18, 2019 at 6:07 p.m.: Ms. Aguirre sent an email from her personal email to her State email which included two image attachments. The first attachment was a screen capture image of a text message conversation between [Campaign Staffer 2] and Ms. Aguirre occurring earlier that day at approximately 4:58 p.m., where Ms. Aguirre asked [Campaign Staffer 2] to help canvass with her and assist on election day. [Campaign Staffer 2] said he could help on some Saturdays and asked Ms. Aguirre if she had any campaign flyers. The second attachment appeared to be a photograph of a computer screen showing a Google search result for a [Financial Institution] in Melrose Park, which Ms. Aguirre used as her campaign financial institution.

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20 Ms. Aguirre also sent this same email from her personal email to her State email on February 21, 2019 at 9:20 a.m.
21 The OEIG interviewed [Campaign Staffer 2] on November 26, 2019 regarding his communications with Ms. Aguirre. [Campaign Staffer 2] stated he could not recall the content of any text messages with Ms. Aguirre, and specifically could not recall whether any were campaign-related. When shown a copy of the screen capture of the January 18, 2019 text message conversation with Ms. Aguirre, [Campaign Staffer 2] admitted to texting Ms. Aguirre about her campaign on this date, and confirmed he helped Ms. Aguirre out on election day by passing out campaign flyers. [Campaign Staffer 2] also acknowledged he was on Ms. Aguirre’s campaign paperwork as her chairperson but stated that his name was on the paperwork because Ms. Aguirre needed to provide officers on her campaign forms and that he did not work on her campaign.
ii. January 18, 2019 at 7:44 p.m.: Ms. Aguirre sent an email from her State email to her State email with the subject, “Campaign [sic] Information.” The email included information designating [Campaign Staffer 2] and [Campaign Staffer 1] as the campaign president and campaign treasurer, respectively, and listed their contact information. The email also listed the address and phone number for Ms. Aguirre’s campaign financial institution.

iii. March 15, 2019 at 4:08 p.m.: Ms. Aguirre sent an email from her personal email address to her State email address with a 48-page attachment labeled “Proviso Township Precincts- 7, 9, 22, 64, 82 & 83.pdf.” The attachment includes maps of Proviso Township from [Vendor 9].

iv. March 27, 2019 at 4:38 p.m.: Ms. Aguirre sent an email from her State email to UIC employees [UIC Employee 2] and [UIC Employee 3] with the subject “Us.” In her email, Ms. Aguirre stated, “Hi. Attached you will find the documents for the part-time fun.” Ms. Aguirre also listed her phone number and said, “[UIC Employee 2] has the list.” The email attached three images, including a flyer promoting vocational, trade, continuing trade education schools, a screen capture of her candidate biography being sent to “[Campaign Volunteer 4],” and an endorsement letter from the [Campaign Supporter 2].

v. March 28, 2019 4:01 p.m.: Ms. Aguirre forwarded an email chain from her personal email to her State email, which reflected a conversation between [Campaign Volunteer 1] and Ms. Aguirre, through her personal email, from 11:35 a.m. that day. The email chain reflected that [Campaign Volunteer 1] sent Ms. Aguirre election day universal poll watcher credential forms with instructions on how to fill them out. The email chain also reflected that Ms. Aguirre asked [Campaign Volunteer 1] to call her at her office and provided her State phone number.

Investigators also found many other emails in Ms. Aguirre’s State email account that were arguably campaign-related, including emails with information and attachments about admission information for Proviso Township schools, performance information about Proviso Township high schools, revenue and expenditure information about Proviso Township high schools, Proviso Township curriculum information, and Proviso Township Board of Education information.

23 [Vendor 9] is a “location data platform” that provides maps and location data to customers. https://www.[Vendor 9].com/about/company/ (last visited May 4, 2020).
24 Ms. Aguirre also sent these same image attachments from her personal email to her State email on March 27, 2019 at 4:32 p.m. and 4:33 p.m.
25 Ms. Aguirre also forwarded herself this email from her personal email to her State email at 11:26 a.m. on March 28, 2019.
26 Investigators were unable to confirm this phone call when searching [Campaign Volunteer 1]’s number against Ms. Aguirre’s State phone number due to UIC State phone records being retained for only a limited time.
B. Campaign Documents Ms. Aguirre Asked Other UIC Employees to Print

When reviewing campaign-related emails from Ms. Aguirre’s State email account, investigators discovered additional emails where Ms. Aguirre asked other UIC employees to print campaign-related documents on UIC property. Below is a summary of the emails and documents Ms. Aguirre asked UIC employees, including Administrative Assistant [UIC Employee 4] and Nutrition Peer Educators [UIC Employee 5] and [UIC Employee 2] to print.

1. February 21, 2019 at 4:31 p.m.: Ms. Aguirre sent Community Office Administrative Assistant [UIC Employee 4] a draft of a [Campaign Supporter 2] 2019 Candidate Questionnaire. The email, sent from Ms. Aguirre’s State email to [UIC Employee 4]’s State email, asked [UIC Employee 4] to print the attached seven-page questionnaire in her office.

2. February 22, 2019 at 12:28 p.m.: From her State email account, Ms. Aguirre sent to [UIC Employee 4]’s State email account, a flyer for the [Association 1] 23rd Annual St. Patrick’s Day Parade asking [UIC Employee 4] to print the attached flyer “when [she] can.”

3. March 22, 2019 at 3:08 p.m.: Ms. Aguirre sent an email from her State email to UIC Nutrition Peer Educator [UIC Employee 5]’s State email with the subject “Favor.” In the email, Ms. Aguirre asked [UIC Employee 5] to print three sets each of the three attachments and stated, “My printer isn’t working. Don’t let anyone see you [please].” The three attachments were District 209 Walking Lists, the first attachment was 26 pages, the second attachment was 17 pages, and the third attachment was 10 pages. All three attachments included constituent names, addresses, phone numbers, ages, and genders. Additionally, Ms. Aguirre forwarded this email with the three attachments at 3:08 p.m. to [UIC Employee 2]. The email to [UIC Employee 2] stated, “Thank you.”

C. Interviews Regarding Ms. Aguirre Asking UIC Employees to Print Campaign Documents

Investigators interviewed [UIC Employee 4], [UIC Employee 5], [UIC Employee 2], as well as Ms. Aguirre’s direct supervisor, Human Resources Associate [UIC Employee 1], about Ms. Aguirre’s use of State property to work on her campaign during State hours. Each confirmed that they were aware of Ms. Aguirre’s campaign for Proviso Township School District 209, and that Ms. Aguirre asked them to help out with her campaign, though each initially denied doing so. In fact, [UIC Employee 1] said she assumed everyone in her office knew about Ms. Aguirre’s campaign because Ms. Aguirre knew everyone on their floor and had a circle of friends in the

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27 Investigators were unable to interview Ms. Aguirre because she went on a leave of absence shortly after the April 2, 2019 election and did not return to work prior to the issuance of this report.
28 [UIC Employee 4] was interviewed on October 21, 2019, [UIC Employee 5] was interviewed on January 13, 2020, [UIC Employee 2] was interviewed on January 29, 2020, and [UIC Employee 1] was interviewed on February 26, 2020.
29 [UIC Employee 4] stated that Ms. Aguirre asked her to help with her (Ms. Aguirre’s) campaign by passing out campaign literature on the weekends, which she declined to do because she was too busy. However, she stated that she contacted four people to ask them to be “poll watchers” for Ms. Aguirre’s campaign at Ms. Aguirre’s request.
office comprised of [UIC Employee 5] and [UIC Employee 4], among others. [UIC Employee 1] said she never gave Ms. Aguirre permission to campaign in the office on State time and that she had no knowledge of Ms. Aguirre working on her campaign during State time. [UIC Employee 1] also denied having any knowledge of Ms. Aguirre using her office printer to print campaign materials and stated that she never gave Ms. Aguirre permission to do so.

[UIC Employee 1] said that most of the administration staff, including Ms. Aguirre, had printers in their offices and that there was also a main printer for large job printing. [UIC Employee 1] said it is not part of the nutrition peer educators’ duties to print documents for other employees, but that [UIC Employee 4], as an Administrative Assistant for Chicago Partnership for Health Promotion, would print documents for her supervisor and the nutrition peer educators if the main office printer was down. She also said that Ms. Aguirre printed documents, such as personnel files and other confidential information, as part of her official duties. [UIC Employee 1] confirmed that none of Ms. Aguirre’s duties required doing anything related to Proviso Township School District or its school board election.

[UIC Employee 4] admitted to printing the [Campaign Supporter 2] 2019 Candidate Questionnaire and the St. Patrick’s Day Parade Flyer for Ms. Aguirre and acknowledged she knew they were for Ms. Aguirre’s campaign. [UIC Employee 4] said she printed these for Ms. Aguirre, in part because she felt guilty for not helping with Ms. Aguirre’s campaign, but also because she did not want to anger her.

[UIC Employee 5], when asked about the walking lists sent to her by Ms. Aguirre, admitted that the walking lists were campaign-related. [UIC Employee 5] also admitted she likely printed the walking lists for Ms. Aguirre, though she did not recall the walking lists or the email Ms. Aguirre sent her. She explained that she often prints things for other employees because it is not unusual for office computers to have printing issues, but that she does not look at the content of the documents she prints for others. [UIC Employee 5] acknowledged that when Ms. Aguirre said in the email “don’t let anyone see you [please],” that it meant it was probably not a good idea for her ([UIC Employee 5]) to be printing the walking lists.

[UIC Employee 2] also stated that it was not uncommon for employees to ask other employees to print documents for them because the printers are down in the office. [UIC Employee 2] said he did not remember receiving an email with walking lists from Ms. Aguirre and did not recall if he printed the walking lists at her request. [UIC Employee 2] admitted that he probably printed the walking lists for Ms. Aguirre because he usually printed documents when people asked him to, and he would have done a favor for Ms. Aguirre even if he knew it was wrong. Despite his assertion that he did not recall the email from Ms. Aguirre with the walking list attachments, [UIC Employee 2] acknowledged that he knew the walking lists were campaign-related because he recalled Ms. Aguirre handing him a stack of walking lists in their office when she asked him to help with her campaign, though he could not recall whether this happened during State time.
D. Ms. Aguirre’s [Social Media] Posts

The OEIG obtained and reviewed [Social Media] posts from a [Social Media] account titled “One Proviso Sandy for D209” (Campaign [Social Media] account). Based on Ms. Aguirre’s timekeeping records, investigators confirmed that Ms. Aguirre was on State-compensated time during the times each of these [Social Media] posts were made.

1. **February 13, 2019 at 10:55 a.m., and 2:05 p.m.**: posts to Ms. Aguirre’s Campaign [Social Media] account with an image of a campaign flyer stating “Sandy Aguirre for District 209 Board. Inclusion = Equality.”

2. **February 13, 2019 at 11:00 a.m.**: post to Ms. Aguirre’s Campaign [Social Media] account, which showed an image of a campaign flyer with Ms. Aguirre’s name, District 209 and “Inclusion = Equality.” The post further contains a message stating “Inclusion = Equality. Everyone plays a vital part in the success of our district and our students. We need you to vote! We need each other!”

3. **March 20, 2019 at 11:04 a.m.**: post to Ms. Aguirre’s Campaign [Social Media] account, which showed an image of a campaign flyer with her name, and information telling voters to “Punch #117” to vote for her for Proviso High School District 209 Board of Education. The post included a message stating: “4 YEARS AGO PROVISO EAST WAS LOWEST PERFORMING (SEE LINK BELOW; ILLINOIS REPORT CARD) AND IT REMAINS IN THE SAME CONDITION. THE FACTS DON’T LIE. BE AN INFORMED VOTER. INTEGRITY AND TRANSPERANCY OVER POLITICS.” The post further contains a link to the Illinois Report Card website detailing information on Proviso East High School’s performance.

E. Phone Records

Investigators subpoenaed phone records for Ms. Aguirre’s personal cell phone from her phone carrier from the months of November 2018 to May 2019. Investigators searched for calls between known phone numbers for [Campaign Staffer 1] who worked as Ms. Aguirre’s campaign treasurer; [Campaign Staffer 2] who worked as Ms. Aguirre’s campaign chairperson; [Campaign Volunteer 1], who as emails above show, worked on Ms. Aguirre’s campaign; and Ms. Aguirre.

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30 During her campaign, Ms. Aguirre had a Campaign [Social Media] page located at https://[Social Media].com/SandyFor209 which has since been disabled. Investigators sent a subpoena to [Social Media] for records related to Ms. Aguirre’s Campaign [Social Media] page, but records were unavailable due to the page being disabled.

31 Ms. Aguirre’s timesheets do not account for time off from lunch, however, investigators confirmed from [UIC Employee 1] that Ms. Aguirre took her lunch from 1:00 p.m. to 2:00 p.m., and thus, investigators excluded any [Social Media] posts made during Ms. Aguirre’s lunch break between 1:00 p.m. and 2:00 p.m.


33 Investigators also obtained phone numbers of [Campaign Staffer 1], [Campaign Staffer 2], and [Campaign Volunteer 1] from Ms. Aguirre’s State emails.
Based on Ms. Aguirre’s timekeeping records, investigators confirmed that Ms. Aguirre was on State-compensated time\textsuperscript{34} during the times of these phone calls.\textsuperscript{35}

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\textbf{F.} [Pursuant to footnote 49, the OEIG concludes that an allegation is “founded” when it has determined that there is reasonable cause to believe that a violation of law or policy has occurred, or that there has been fraud, waste, mismanagement, misconduct, nonfeasance, misfeasance, or malfeasance. The information in this subsection is redacted because it relates to an allegation that the OEIG determined was unfounded. Therefore, the Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(a).]\textsuperscript{38}

\textsuperscript{34} Investigators excluded any calls made during Ms. Aguirre’s lunch break between 1:00 p.m. and 2:00 p.m.

\textsuperscript{35} Investigators also determined that in addition to the phone calls, Ms. Aguirre had text message conversations with [Campaign Staffer 2] and [Campaign Volunteer 1] between January 2019 to April 2019 during State time, including the January 18\textsuperscript{th} text message discussed above. During those months, there were a combination of nine text messages between [Campaign Staffer 2] and Ms. Aguirre and 65 text messages between Ms. Aguirre and [Campaign Volunteer 1] on Statetime.

\textsuperscript{36} In response to a subpoena for records, Ms. Aguirre’s phone carrier provided call logs that included times in the Universal Time Coordinated (UTC) time zone. For the purposes of this report, those times were converted to Central Standard Time (CST).

\textsuperscript{37} Times are expressed in the format Minutes:Seconds.

\textsuperscript{38} OEIG investigators issued a subpoena to compel [Campaign Volunteer 1] to appear for an interview. Despite numerous requests by investigators to schedule an interview, [Campaign Volunteer 1] refused to comply with the OEIG’s subpoena.
IV. ANALYSIS

The Ethics Act prohibits State employees from performing “any prohibited political activity during any compensated time (other than vacation, personal, or compensatory time off).” The Ethics Act also prohibits State employees from “intentionally misappropriating any State property or resources by engaging in any prohibited political activity for the benefit of any candidate for elective office . . . .” “Prohibited political activity” includes, but is not limited to: (i) preparing for, organizing, or participating in any political meeting or other political event, (ii) soliciting votes on behalf of a candidate for elective office, (iii) preparing or reviewing responses to candidate questionnaires, (iv) distributing, or preparing for distribution, campaign literature or related materials on behalf of any candidate for elective office, (v) campaigning for any elective office, and (vi) managing or working on a campaign for elective office. An activity is “political” within the meaning of the Ethics Act if it is done “in support of or in connection with any campaign for elective office or any political organization.” Under the Ethics Act, “campaign for elective office” means “any activity in furtherance of an effort to influence the selection, nomination, election, or appointment of any individual to any federal, State, or local public office . . . .” In addition, UIC policy prohibits employees from “participating in any political activity or meeting while scheduled for work.”

The evidence obtained in this investigation reflects that Ms. Aguirre engaged in several activities in furtherance of her campaign for elective office, while on State-compensated time, or using State resources, or both, all of which constitute prohibited political activity and thus violate the Ethics Act. Further, Ms. Aguirre’s political activities, to the extent they occurred while Ms. Aguirre was scheduled to work, violated UIC policy.

First, Ms. Aguirre sent nearly 50 campaign-related emails to and from her State email—a State resource—both during State-compensated time and uncompensated time. Several of these

[The information in this paragraph is redacted because it relates to an allegation that the OEIG determined was unfounded. Therefore, the Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(a).]

[The information in this paragraph is redacted because it relates to an allegation that the OEIG determined was unfounded. Therefore, the Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(a).]

40 [The Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(b).]
41 University employees are State employees as defined under the Ethics Act. 5 ILCS 430/1-5.
42 5 ILCS 430/5-15(a).
43 Id.
44 5 ILCS 430/1-5.
45 Id.
46 Id.
emails contained attachments reflecting campaign contributions and expenditures, including images of donation checks to Ms. Aguirre’s campaign, as well as checks from her campaign checking account to campaign staff and vendors. In other emails, Ms. Aguirre attached campaign literature and materials, such as a campaign biography and various campaign flyers. Ms. Aguirre also sent herself several documents related to campaign canvassing, including District 209 phone lists, voter contact scripts, and campaign volunteer lists. Further, Ms. Aguirre sent incomplete and completed copies of a [Campaign Supporter 2] Candidate Questionnaire to and from her State email, which given the timing of when the emails were sent, indicate that Ms. Aguirre was likely preparing and reviewing responses to the candidate questionnaire with the assistance of [Campaign Volunteer 1] during State-compensated time. Finally, while on State time, Ms. Aguirre emailed [UIC Employee 4], [UIC Employee 5], and [UIC Employee 2]—UIC employees—and asked them to print documents related to her campaign for elective office on State printers.

Given the volume of campaign-related emails sent to and from Ms. Aguirre’s State account, it is clear that these emails were not sent accidentally or unintentionally. It is also clear that these emails were sent in furtherance of Ms. Aguirre’s campaign as demonstrated by her requests to other UIC employees to print out campaign materials for her, including a candidate questionnaire, a parade flyer, and walking lists. In one of these emails to [UIC Employee 5], Ms. Aguirre wrote “My printer isn’t working. Don’t let anyone see you [please].” This statement, coupled with the sheer number of campaign-related attachments Ms. Aguirre sent to her State email account, show that Ms. Aguirre sent these materials so she could print them using a State printer or otherwise work on her campaign while she was on State time. Ms. Aguirre’s request to keep such activity hidden further demonstrates her knowledge of the impropriety of her actions.

In sum, the OEIG finds sufficient evidence that Ms. Aguirre misappropriated State resources, namely her State email, State printers, and State personnel, to further her campaign for elective office, both during State-compensated and non-compensated time. These actions constitute prohibited political activity as defined by the Ethics Act and are also prohibited by UIC policy to the extent these political activities occurred while Ms. Aguirre was scheduled for work. As such, the allegation that Ms. Aguirre engaged in prohibited political activity in violation of the Ethics Act and UIC policy is FOUNDED.49

Additionally, the evidence reflects that Ms. Aguirre violated UIC policy by using State time, property, and personnel for reasons “other than officially approved activities.” [UIC Employee 1] stated that Ms. Aguirre would not have any reason to work on anything related to Proviso Township School District or its school board election as a part of her official duties and that she never gave Ms. Aguirre permission to campaign on State time. And yet, as described above, Ms. Aguirre sent numerous emails to and from her State email account, both during and outside work hours, which were on their face related to either Ms. Aguirre’s campaign or Proviso Township High School District 209. Ms. Aguirre also used State personnel and State printers to print campaign-related materials, which again, were unauthorized and wholly unrelated to her State duties. Thus, the allegation that Ms. Aguirre violated UIC policy when she used time,

49 The OEIG concludes that an allegation is “founded” when it has determined that there is reasonable cause to believe that a violation of law or policy has occurred, or that there has been fraud, waste, mismanagement, misconduct, nonfeasance, misfeasance, or malfeasance.
property, and personnel in connection with her campaign, an activity that was not officially approved by UIC, is **FOUNDED**.

Finally, Ms. Aguirre violated the Ethics Act and UIC policy by making at least four campaign-related posts, on a [Social Media] page that was specifically devoted to her campaign for elective office, during State-compensated time. First, Ms. Aguirre’s Campaign [Social Media] account reflected two postings of a campaign flyer stating, “Sandy Aguirre for District 209 Board. Inclusion = Equality.” Second, Ms. Aguirre’s Campaign [Social Media] account reflected a post with the message, “These are the conversations that spur me on! We are One Proviso! Time to stand up and vote! Let’s make a change!” with screen captures of a text message conversation. Although this post does not specifically say to vote for her, the post was made from Ms. Aguirre’s Campaign [Social Media] page and thus clearly intended to solicit votes on her behalf and further her campaign for elective office. Lastly, Ms. Aguirre’s Campaign [Social Media] account reflected a post of an image of a campaign flyer, which included her name, the position she was running for, and to “Punch #117.” On its face, this post was intended to solicit votes on her behalf and further Ms. Aguirre’s campaign for elective office. Each of these posts constitute prohibited political activity as defined by the Ethics Act in that they involve the distribution of campaign material, campaigning, and working on a campaign for elective office during State compensated time.

When the OEIG interviewed [Campaign Staffer 1] and [Campaign Staffer 2], Ms. Aguirre’s campaign treasurer and campaign chairperson, respectively, both stated they were minimally involved in Ms. Aguirre’s campaign. Specifically, [Campaign Staffer 1] explained he was only involved in submitting financial documentation for her campaign, while [Campaign Staffer 2] stated he was involved in her campaign in name only. Given the evidence in this case, there is reasonable cause to believe that Ms. Aguirre made these posts or at least they were made at her direction. Accordingly, the allegation that Ms. Aguirre engaged in prohibited political activity by making campaign-related [Social Media] posts on State-compensated time, in violation of the Ethics Act and UIC policy is **FOUNDED**.

[The information in this paragraph is redacted because it relates to an allegation that the OEIG determined was unfounded. Therefore, the Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(a).]

**V. FINDINGS AND RECOMMENDATIONS**

As a result of its investigation, the OEIG concludes that there is **REASONABLE CAUSE TO ISSUE THE FOLLOWING FINDINGS**:

- **FOUNDED** – Ms. Aguirre engaged in prohibited political activity by sending campaign-related emails to and from her State email, a State resource, and exploiting State personnel to print campaign-related documents on State printers, in violation of the Ethics Act and UIC policy.
- **FOUNDED** – Ms. Aguirre abused State time, personnel, and property to work on her campaign for public office, an activity that was not officially approved by UIC, in violation of UIC policy.

- **FOUNDED** – Ms. Aguirre engaged in prohibited political activity by posting material related to her campaign to her Campaign [Social Media] page while on State-compensated time, in violation of the Ethics Act and UIC policy.

- [The information in this paragraph is redacted because it relates to an allegation that the OEIG determined was unfounded. Therefore, the Commission exercises its discretion to redact this subsection pursuant to 5 ILCS 430/20-52(a).]

Based on these findings, the OEIG recommends that UIC take whatever disciplinary action against Ms. Aguirre that it deems appropriate, up to and including termination.

No further investigative action is needed and this case is considered closed.

Date: May 11, 2020

Office of Executive Inspector General for the Agencies of the Illinois Governor
69 W. Washington Street, Ste. 3400
Chicago, IL 60602

By: Alexa Vouros
Assistant Inspector General
Please check the box that applies. (Please attach additional materials, as necessary.)

□ We have implemented all of the OEIG recommendations. Please provide details as to actions taken:

X We will implement some or all of the OEIG recommendations but will require additional time to do so.

We will report to OEIG within ___110____ days from the original return date.

In Article V of the Final Summary Report issued by the Office of Executive Inspector General (the “OEIG”) in Case No. 19-00664, the OEIG recommends “that UIC take whatever disciplinary action against Ms. Aguirre that it deems appropriate, up to and including termination.” Please be advised that it is currently the intention to make diligent efforts to implement some or all of the OEIG’s recommendations in the Final Summary Report within the next 90 days.

Ms. Aguirre’s employment with the University is governed, in part, by the State Universities Civil Service Act (the “Civil Service Act”). See 110 ILCS 70/36e. Pursuant to Section 36o(a) of the Civil Service Act, a non-probationary employee, such as Ms. Aguirre, cannot be “removed or discharged except for just cause, upon written charges, and after an opportunity to be heard . . . .” 110 ILCS 70/36o(a).

The process the University must follow in order to pursue the action up to and including discharge of an employee such as Ms. Aguirre is described in Section 250.110(f) of Title 80 of the Illinois Administrative Code (80 Ill. Adm. Code §250.110(f)). Because this process involves the preparation of written charges and, if requested, a full evidentiary hearing before a hearing officer appointed by the Merit Board of the State Universities Civil Service System, it can last several months.

Please note that Ms. Aguirre is not currently being paid by the University, and it is our understanding that she has been receiving [redacted] from the State Universities Retirement System (“SURS”). It is unclear what impact, if any, Ms. Aguirre’s status may have on the University’s ability to timely implement some or all of the recommendations in the Final Summary Report.
Based on the foregoing circumstances, the University hereby requests an additional 90 calendar days from the original return date of May 31, 2020 to report to the OEIG regarding the University’s efforts to implement some or all of the OEIG’s recommendations in this matter. We calculate that date as **Saturday, August 29, 2020**.

Additionally, the Final Summary Report states that the OEIG is in possession of evidentiary materials not provided to the University. **The University requests all investigative supporting documentation in anticipation of future implementation of some or all of the report recommendations.**

☐ We do not wish to implement some or all of the OEIG recommendations. Please provide details as to what actions were taken, if any, in response to OEIG recommendations:

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Signature

University of Illinois, University Ethics
Officer

Print Agency and Job Title

_Donna McNeely_ ____________________________  __5/29/2020__________________

Print Name  Date
We have implemented all of the OEIG recommendations. Please provide details as to actions taken:

UIC is in the process of moving forward with termination of the subject. The charge letter has been developed and is currently being reviewed by University Counsel. Upon completion of their review, the notice of intent to discharge will be issued to the employee.

We will implement some or all of the OEIG recommendations but will require additional time to do so.

We will report to OEIG within _______ days from the original return date.

We do not wish to implement some or all of the OEIG recommendations. Please provide details as to what actions were taken, if any, in response to OEIG recommendations:

University Ethics Officer

Signature

Donna S. McNeely

Print Name

Print Agency and Job Title

Date

09/17/2020
March 22, 2021

Deputy Inspector General Diana Villamil Zuver
Office of Executive Inspector General
for the Agencies of the Illinois Governor
69 West Washington Street
Suite 3400
Chicago, IL 60602

Re: Case Number 19-00664

Deputy Inspector General Zuver,

I write to inform you that on March 18, 2021, UIC sent the Notice of Discharge for Sandy Aguirre to the State Universities Civil Service System based on the findings of the OEIG. Because Ms. Aguirre was on [redacted] at the time of the issuance of the OEIG report and remains on [redacted], the final disposition regarding the Notice of Discharge is now beyond the control of the University. We wait for resolution through the State Universities Civil Service System.

Sincerely,

[Redacted]

Donna S. McNeely
MBA, CPA, CIA, CIG, CFSA, CGAP
Executive Director of University Ethics and Compliance
Case Number: 19-00664

Return 20 Days After Receipt

Please check the box that applies. (Please attach additional materials, as necessary.)

☐ We have implemented all of the OEIG recommendations. Please provide details as to actions taken:

As an update to our previous response, Ms. Aguirre was formally separated from the University effective March 30, 2021. Any and all appeal rights have been forfeited.

☐ We do not wish to implement some or all of the OEIG recommendations. Please provide details as to what actions were taken, if any, in response to OEIG recommendations:

________________________________________
Signature

University of Illinois, University Ethics Officer

Print Agency and Job Title

_Donna
McNeely_______________________  ____9/30/2021_______________
Print Name  Date