

IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

IN RE: GREGORY BRADSHAW) OEIG Case #14-02423

OEIG FINAL REPORT (REDACTED)

Below is an amended 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 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 Governor’s Executive Inspector General, and to Gregory Bradshaw at his last known address.

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

FINAL REPORT

I. INTRODUCTION

On December 3, 2014, the Office of Executive Inspector General (OEIG) received a complaint alleging that Department of Child and Family Services (DCFS) employee Gregory Bradshaw was continuing to receive monthly salary payments as a Chief Factory Inspector for the Illinois Department of Labor (IDOL) even though he had resigned from that position in March 2014.¹ In the course of the investigation into these allegations, the OEIG also learned that Mr. Bradshaw operated State vehicles while his driver’s license was suspended.

¹ The OEIG referred this matter to the Illinois Attorney General. On October 6, 2015, Mr. Bradshaw was charged with theft.

II. BACKGROUND

The Chief Factory Inspector² position at IDOL is a statutorily created³ position that is filled by gubernatorial appointment.⁴ Gregory Bradshaw was appointed the Chief Factory Inspector for IDOL in February 2013, at an annual salary of \$52,179. Mr. Bradshaw's appointment was confirmed by the State Senate on May 30, 2013. Mr. Bradshaw's term started on February 25, 2013, and was scheduled to expire on January 19, 2015. Mr. Bradshaw's duties included inspecting State, county, and municipal work places for unsafe conditions, reviewing workplace safety programs and records, preparing detailed inspection reports, and developing training material on occupational safety and health standards and presenting this material to public sector employees and members of the general public.

Mr. Bradshaw left his IDOL Chief Factory Inspector position on March 10, 2014, and was employed as a Legislative Liaison with DCFS from March 11, 2014 until January 31, 2015, at an annual salary of \$55,332.

III. INVESTIGATION

In this case, the OEIG found evidence, from documents and interviews discussed below, that Mr. Bradshaw: (1) violated DCFS policy by failing to report that he was receiving funds for an appointed position from which he had resigned, and by failing to return the funds as soon as he discovered the error; (2) violated State law, IDOL, and DCFS policies when he drove State vehicles during times when his driver's license was suspended; and (3) violated DCFS policy by making a false certification on the DCFS Driver's License Certification. These conclusions are discussed below.

A. Allegation That Gregory Bradshaw Improperly Accepted State Funds

DCFS policies regulating employee conduct state that employee "conduct occurring off duty may subject the employee to discipline up to and including discharge when the conduct raises reasonable doubt concerning the employee's suitability for continued state employment in the present assignment or position, or which adversely affects the confidence of the public in the integrity of the Department of Children and Family Services."⁵

1. Interview of State Office of the Comptroller Director of Budget and Fiscal Christine Belle

On December 22, 2014, the OEIG interviewed State Office of the Comptroller (Comptroller) employee Christine Belle. Ms. Belle explained that, when a State appointee resigns, he or she should submit a letter of resignation to the Office of the Governor. The Office of Executive Appointments within the Office of the Governor then forwards the letter to Ms. Belle

² This position title has since been changed to "Chief Safety Inspector" following amendments to the Illinois Civil Administrative Code (20 ILCS 5/1-1 *et seq.*) effective January 2015.

³ 20 ILCS 5/5-145.

⁴ 20 ILCS 5/5-605.

⁵ Department of Children and Family Services Employee Handbook, Employee Conduct.

to notify her that the appointment has terminated. Once Ms. Belle receives this letter, she stops the State appointee's payroll. Ms. Belle stated that she instructs State appointees to inform her if there are any changes in their payroll or benefit information. In Mr. Bradshaw's case, Ms. Belle said she did not receive a letter from the Office of Executive Appointments notifying her that Mr. Bradshaw's appointment had been terminated or that he had resigned from his appointment.

Ms. Belle stated a DCFS employee, who identified himself as [Employee 1] called her and informed her that Mr. Bradshaw was employed by DCFS. Ms. Belle said she followed up this phone call with her own research, which revealed that Mr. Bradshaw had been receiving paychecks from the State appointee payroll since his appointment in February 2013, and that he was also receiving paychecks from DCFS beginning March 2014. Mr. Bradshaw was removed from the State appointee's payroll as of the December 1- 31, 2014, pay period.

Ms. Belle said the Comptroller paid Mr. Bradshaw monthly by direct deposit and mailed him a pay stub. Ms. Belle said that the payments from the Comptroller and DCFS would not be combined into one deposit because they came from separate appropriations.

The OEIG called Christine Belle on October 15, 2015, to follow up on her interview and inquire if Mr. Bradshaw had returned the funds he received from the Comptroller after he resigned. Mr. Belle said that Mr. Bradshaw had not returned the funds, and if he had contacted someone at the Comptroller to do this, the request would have been routed to her.

2. Interview of DCFS [Employee 1]

On February 11, 2015, the OEIG interviewed DCFS [Employee 1]. [Employee 1] said that, when new employees are hired by or transferred to DCFS, they are required to complete new hire paperwork, which includes insurance enrollment information, direct deposit enrollment information, and a W-4 tax form. [Employee 1] said that, when Mr. Bradshaw started his employment at DCFS on March 11, 2014, he completed the appropriate new hire paperwork, which was then forwarded to the appropriate departments within DCFS. [Employee 1] stated that Mr. Bradshaw was employed as an Executive II in the DCFS Legislative Affairs Office until January 31, 2015.

After Mr. Bradshaw's name appeared on an insurance discrepancy list,⁶ [Employee 1] said he contacted the Comptroller employee Christine Belle, in approximately November 2014, to ask about Mr. Bradshaw's insurance deductions.

Following his talk with Ms. Belle, [Employee 1] said he contacted Mr. Bradshaw about the issue and asked if he was receiving paychecks from two different State agencies. According to [Employee 1], Mr. Bradshaw said that he did not know if he was and he would have to check his

⁶ A discrepancy list is a report generated by the CMS Group Insurance Financial Control System identifying discrepancies from the group insurance system in each pay period. [Employee 1] explained that the list is typically populated with the names of DCFS employees who either owe or are to be credited insurance premiums as a result of adding or eliminating dependents, employment suspensions, or taking a leave of absence, affecting their insurance eligibility.

bank accounts. [Employee 1] said he and Mr. Bradshaw did not contact each other after this conversation.

3. Interview of Former IDOL [Employee 2]

On March 23, 2015, the OEIG interviewed former IDOL [Employee 2] [identifying information redacted]. [Employee 2] said she directly supervised Mr. Bradshaw for part of the time he worked at IDOL, and indirectly supervised him after [Employee 3], an Assistant Manager of Enforcement, took over Mr. Bradshaw's direct supervision.

During her OEIG interview, [Employee 2] said she did not know who processed an IDOL State appointee's initial employment and termination paperwork. [Employee 2] said that she gave Mr. Bradshaw a copy of the previous Chief Factory Inspector's resignation letter to use as an example when writing his own resignation letter when he was leaving IDOL. [Employee 2] said she told Mr. Bradshaw that she thought it was proper procedure to turn in a resignation letter, and Mr. Bradshaw subsequently gave her a resignation letter. [Employee 2] said that she scanned the letter and sent it to the former IDOL Director Joseph Costigan and IDOL Human Resources. [Employee 2] said she further suggested that Mr. Bradshaw send a copy of his resignation letter to the Comptroller, but she did not know whether or not he sent the letter to the Comptroller.

4. Interview of Former Governor's Office [Employee 4]

On April 1, 2015, the OEIG interviewed former [redacted] for the Office of the Governor, Office of Executive Appointments [Employee 4]. [Employee 4] said that her office was tasked with notifying prospective appointees about the Senate confirmation process and the applicable hearing dates. [Employee 4] said that, after this initial communication with the State appointee, her office would not generally have any further communication with the State appointee unless the appointee contacted her office with a question. In addition, [Employee 4] said her office also notified the Secretary of State (SOS) and, in the case of paid appointees, the Comptroller, of new appointments.

[Employee 4] said that her office received all resignation letters from resigning State appointees and filed them with SOS. [Employee 4] said that letters of resignation typically came from the State appointees themselves and not a representative from the appointee's State agency, board, or commission. [Employee 4] said that even if the letter was addressed to another department within the Office of the Governor, the letter would eventually be routed to the Office of Executive Appointments. She did not recall receiving any notice of Mr. Bradshaw's resignation.

[Employee 4] said her office was also tasked with notifying the Comptroller that an appointment had ended and that payroll therefore needed to be stopped for that appointee. [Employee 4] said that receiving the resignation letter triggered her office's notification process to the Comptroller and SOS that the appointment had ended, and if a State appointee failed to notify her office of his or her resignation there would be no way to know that the appointee was no longer serving in their appointed position.

5. Review of Documents Related to Mr. Bradshaw's Position as Chief Factory Inspector

The OEIG requested Mr. Bradshaw's appointment file from the Office of the Governor. The Office of the Governor responded by sending Mr. Bradshaw's letter of appointment and a statement that, despite a search of their records, the Office of the Governor could not locate any additional documents left by former Governor Quinn's administration related to Mr. Bradshaw. The OEIG similarly requested Mr. Bradshaw's personnel file from IDOL and received a response from IDOL's Ethics Officer stating that, since Mr. Bradshaw was a gubernatorial appointee, the agency did not maintain a personnel file for him.

The OEIG obtained an email in which Mr. Bradshaw attached a letter of resignation to [Employee 2] on March 10, 2014 at 3:37 PM. The letter was addressed to IDOL Director Joseph Costigan and said that Mr. Bradshaw was resigning "effective March 10, 2014." [Employee 2] responded to Mr. Bradshaw's email on March 10, 2014, at 3:47 PM asking, "Did you send to the Comptroller too?" A review of Mr. Bradshaw's emails reflected that Mr. Bradshaw did not respond to [Employee 2's] email and the OEIG did find an email from Mr. Bradshaw sending his letter of resignation to the Comptroller.

6. Review of Documents Reflecting the Comptroller Payments to Gregory Bradshaw and Mr. Bradshaw's Banking Activity

The OEIG received and reviewed the Comptroller payroll documentation which showed that Mr. Bradshaw received three separate deposits per month from April 2014 through December 2014. Two of the deposits were based on his DCFS salary, while one was from the Comptroller for State appointees that he had been receiving since he became the Chief Factory Inspector.

The OEIG reviewed Mr. Bradshaw's U.S. Bank Checking account statements where payments from the State to him were direct deposited from February 21, 2014, through January 21, 2015. These records reflect that, between March and December 2014, Mr. Bradshaw received \$2,850.55 per month (totaling \$25,654.95) for his Chief Factory Inspector salary. Starting in April 2014, the records also reflect biweekly deposits of \$1,569.11, based on Mr. Bradshaw's DCFS salary.

The OEIG also received transaction logs of Mr. Bradshaw's online and mobile banking access from September 2014 through February 2015.⁷ These records reflected that Mr. Bradshaw accessed his U.S. Bank account online a total of 10 times on the following dates:

- September 12, 2014
- November 12, 2014
- November 13, 2014
- November 21, 2014
- January 14, 2015
- February 2, 2015 (twice)
- February 3, 2015
- February 9, 2015
- February 16, 2015

⁷ In response to the OEIG subpoena requesting information on Mr. Bradshaw's online and mobile banking transactions, U.S. Bank stated that it could only provide responsive records from September 2014 through present. Therefore, the OEIG could not confirm whether or not Mr. Bradshaw may have logged into his U.S. Bank account online prior to September 2014.

According to U.S. Bank, the person accessing the account was able to log in and see the balances on the account.

7. Interview of Former Chief Factory Inspector Gregory Bradshaw

On July 23, 2015, the OEIG interviewed Gregory Bradshaw. Mr. Bradshaw explained that he was appointed into the position of Chief Factory Inspector in March 2013. Mr. Bradshaw said that he left his IDOL appointment in March 2014 and started working at DCFS as a Legislative Liaison four or five days later. Mr. Bradshaw said that he was never given any direction on what to do if he ever left or resigned from his appointment.

Mr. Bradshaw said he notified [Employee 2], [Employee 3], and Mr. Costigan of his resignation from his appointed IDOL Chief Factory Inspector position. Mr. Bradshaw thought that in order to resign all he had to do was notify his supervisor, but he could not recall what steps he took when resigning from his position. Mr. Bradshaw said that [Employee 2] may have asked him to submit a letter of resignation, but he could not recall writing one. According to Mr. Bradshaw, no one at IDOL asked him to notify the Comptroller of his resignation. Mr. Bradshaw was shown a copy of an email from [Employee 2] in response to an email he had sent her with a copy of a resignation letter. [Employee 2's] email asked Mr. Bradshaw, "Did you send to the Comptroller too?" When asked why [Employee 2] asked him if he had forwarded his letter of resignation to Comptroller, Mr. Bradshaw said "I have no idea."

Mr. Bradshaw said that he did not remember if he notified anyone at former Governor Quinn's office of his resignation but added that he had spoken to former Governor Quinn's legislative team and they knew he was transitioning. Mr. Bradshaw said that no one at IDOL told him that they would notify the Comptroller or former Governor Quinn's office of his resignation.

Mr. Bradshaw said that, while working at DCFS, he was paid twice a month via direct deposit into his U.S. Bank checking account, and remembered receiving a paper copy of his monthly paycheck stubs from a DCFS secretary. As Chief Factory Inspector, Mr. Bradshaw said he was paid once a month via direct deposit, also to his U.S. Bank checking account, and said he thought he received the Comptroller paycheck stubs by U.S. Mail. Mr. Bradshaw said that he did not know how much he made at either IDOL or DCFS. When asked if he continued to receive monthly paycheck stubs from the Comptroller after he started at DCFS, Mr. Bradshaw said, "I don't think so. I think I was getting something from DCFS and that was basically it." Mr. Bradshaw said that his salary at DCFS was higher than his Chief Factory Inspector salary, but that the difference between the two salaries "wasn't much." Mr. Bradshaw estimated his DCFS monthly salary was \$2,700, and estimated his monthly salary as Chief Factory Inspector was \$2,500.

Mr. Bradshaw said that the only bank account he uses for his banking needs is his U.S. Bank account. Mr. Bradshaw said that no one else had access to his login information, he had not given his username or password to anyone else, and he had never suspected anyone of accessing and using that information. Mr. Bradshaw said that, while he also checked his U.S. Bank account balance "usually whenever I withdraw from time to time," he was not very good about checking his account balance. Mr. Bradshaw confirmed that the first thing he saw when he logged into his

U.S. Bank account online was his account balance. Mr. Bradshaw said that if he withdrew money from an Automated Teller Machine (ATM), he would review the remaining balance on the ATM receipt. Mr. Bradshaw said that checking his balance on ATM receipts was “basically” the only time he checked his bank account balances.

Mr. Bradshaw explained that during the first month of his employment with DCFS, it took a while for his payroll to be processed via direct deposit. Mr. Bradshaw said that he checked his bank account online in April 2014 in order to see if his DCFS paycheck had been deposited. Mr. Bradshaw stated that he “recognized” that he received a payment from the Comptroller for his Chief Factory Inspector salary and when he saw a payment from the Comptroller, he assumed it was a prorated payment for the part of March 2014 that he worked as the Chief Factory Inspector. When asked why he did not question why the prorated amount was the same as his regular monthly pay, Mr. Bradshaw responded, “I honestly just saw an amount, I couldn’t tell you how much I made at any job, or at either one of the agencies.” Mr. Bradshaw added, “I know that the money is coming in, that’s about it.” Mr. Bradshaw said that once he saw he had received the direct deposit of his DCFS paycheck, “that’s all I really needed to know.” Mr. Bradshaw said that he may have checked his bank account again in May 2014 to make sure his next DCFS paycheck had been deposited. Mr. Bradshaw denied having any knowledge of receiving the continued monthly payments from the Comptroller.

When asked to explain the rise in his bank account from his March 2014 account balance of \$6,259.92 to his December 2014 account balance of \$28,367.95, Mr. Bradshaw said he could not, and added that, “I don’t remember ever making or looking at my account and being like, oh, 28 thousand.” Mr. Bradshaw said that he could not remember if he ever noticed that he had that amount in his bank account. Mr. Bradshaw said, “I knew I was making good money and I didn’t have very many expenses, so I just assumed” that the funds were just growing monthly.

The OEIG asked Mr. Bradshaw if he recalled receiving a telephone call from DCFS [Employee 1] while Mr. Bradshaw was employed with DCFS. Mr. Bradshaw replied that, while he recalled getting the call in December 2014 or January 2015, he could not remember what [Employee 1] said to him.

B. Allegation That Gregory Bradshaw Drove State Vehicles While His Driver’s License Was Suspended.

During [Employee 2’s] interview with the OEIG, she mentioned that Mr. Bradshaw had taken a leave of absence because he was involved in a car accident. While investigating the circumstances surrounding Mr. Bradshaw’s leave of absence, the OEIG learned that Mr. Bradshaw’s driver’s license had been suspended during his State employment. The OEIG investigated further to determine whether Mr. Bradshaw violated any vehicle use policies.

1. Documents Reflecting Gregory Bradshaw’s Driver’s License Suspension and Use Of State Vehicles

The OEIG discovered that Mr. Bradshaw received a citation for Driving Under the Influence of Alcohol (DUI) in Montgomery County, Illinois and a Statutory Summary Suspension of his driver's license effective September 19, 2013, to November 14, 2014.

A review of IDOL Vehicle Mileage Logs reflected that, during the period Mr. Bradshaw's driver's license was suspended, he logged out IDOL State vehicles on the following dates:

Date	Miles Driven	Date	Miles Driven
9/25/2013	6	12/4/2013	194
9/26/2013	8	1/9/2014	2
9/27/2013	4	1/18/2014	404.9
10/18/2013	4	1/22/2014	210
10/23/2015	7	1/31/2014	4
10/23/2013	6	2/5/2014	17
10/24/2013	167	2/11/2014	62
10/24/2013	9	2/18/2014	290
10/28/2013	174	2/21/2014	616
10/29/2013	Not Recorded	2/28/2014	197
11/4/2013	156	3/4/2014	3
12/3/2013	3	3/5/2014	168
Totals Days	24	Total Miles	2,711.9

A similar review of DCFS Vehicle Mileage Logs reflected that Mr. Bradshaw logged out a State vehicle on April 16, 2014, for a trip of 447 miles.

IDOL requires employees to sign a Certification of Driver's License and Automotive Liability Coverage (IDOL Driver's License Certification) form certifying that the employee has a license to drive and agreeing to notify the employee's supervisor in the event the license is revoked or suspended. According to IDOL, they did not have an IDOL Driver's License Certification for Mr. Bradshaw because he was an appointee and not an IDOL employee.

The OEIG requested and reviewed Mr. Bradshaw's signed DCFS Driver's License Certification form. Mr. Bradshaw signed the form on March 6, 2014.

2. Interview of Former Chief Factory Inspector Gregory Bradshaw

Mr. Bradshaw said that his duties as Chief Factory Inspector required him to travel and that he drove IDOL fleet vehicles. Mr. Bradshaw said he could not remember how many times he had used IDOL fleet vehicles, but estimated it was about 20 times.

Mr. Bradshaw said that, when he started his job at IDOL, he remembered signing a form with IDOL certifying that he had a valid driver's license and automotive liability coverage, and IDOL made a photocopy of his driver's license. Mr. Bradshaw admitted that his driver's license was suspended following a car accident in August 2013, for which he was ticketed for DUI. Mr. Bradshaw said that he pleaded guilty to a charge of DUI and received a sentence of court supervision.

Mr. Bradshaw confirmed that he did not notify anyone at IDOL that his driver's license had been suspended. Mr. Bradshaw acknowledged that by not informing IDOL that his driver's license had been suspended, he violated the terms of the IDOL Driver's License Certification.

According to the records, between September 25, 2013, and March 5, 2014, Mr. Bradshaw recorded driving IDOL vehicles 24 times during the timeframe that his driver's license was suspended. Mr. Bradshaw acknowledged that he drove IDOL vehicles alone, while his driver's license was suspended "a majority of those times."

Mr. Bradshaw said that his duties as a DCFS Legislative Liaison required him to travel and that he drove DCFS fleet vehicles. Mr. Bradshaw acknowledged that, on March 6, 2014, when he signed the DCFS Driver's License Certification, his driver's license was still suspended. Mr. Bradshaw acknowledged that driving a State of Illinois vehicle with a suspended driver's license violated the terms of the DCFS Driver's License Certification that he signed. Mr. Bradshaw also acknowledged that driving any vehicle during a time when he had a suspended driver's license violated the law.

IV. ANALYSIS

Based on its investigation, the OEIG concludes that Gregory Bradshaw violated DCFS policy when he failed to inform the Comptroller that he was still receiving monthly pay for an appointed position he no longer held and made no effort to return the money he wrongfully received. Additionally, by driving IDOL and DCFS State vehicles while his driver's license was suspended, Mr. Bradshaw violated State law, IDOL policies, and DCFS policies.

A. Gregory Bradshaw Violated State Law and DCFS Policies By Continuing To Receive And Keep Payroll Funds That He Was Not Entitled To Receive

Mr. Bradshaw's failure to forward his letter of resignation to the Comptroller or the Office of the Governor caused the Comptroller to keep paying Mr. Bradshaw \$25,654.95 for a position he no longer held. While the evidence gathered in the OEIG investigation supports Mr. Bradshaw's claim that he was not explicitly instructed on what to do in case he resigned, he should have known that his letter of resignation should have been submitted to the Governor's Office or the Comptroller. Mr. Bradshaw knew that he was a Governor's appointee and had worked with the Governor's staff during the Senate confirmation process. In addition, emails obtained in the course of the investigation reflected that, when Mr. Bradshaw submitted his letter of resignation to [Employee 2], she responded by asking him if he had submitted the letter to the Comptroller. Therefore, when Mr. Bradshaw resigned, he should have known that he should submit his letter of resignation to the Governor's Office or the Comptroller.

Moreover, when Mr. Bradshaw should reasonably have discovered that he was still being paid for a position he no longer filled, he failed to contact anyone at the Comptroller or make any other reasonable efforts to stop the payments or return the erroneously deposited funds. Mr. Bradshaw denied having any knowledge of the extra funds that were deposited in his account. However, Mr. Bradshaw's statements with regard to his knowledge of the money he was receiving from the Comptroller were not credible.

When asked to explain the rise in his bank account from his March 2014 account balance of \$6,259.92 to his December 2014 account balance of \$28,367.95, Mr. Bradshaw said that he could not remember if he ever noticed that he had that amount in his bank account. The records show that Mr. Bradshaw accessed his account 10 times, and Mr. Bradshaw admitted that, when he logged into his account, the first screen he saw displayed his account balance. His disposable income doubled during that time period and his balance continued to grow, both of which should have been noticeable to Mr. Bradshaw.

Mr. Bradshaw made no effort to stop the erroneous payments or return the improperly paid money even after speaking with [Employee 1] in November 2014. [Employee 1] stated that he asked Mr. Bradshaw if he was getting paid by two different agencies and that Mr. Bradshaw stated that he did not know but would check his bank account. Bank records reflect that Mr. Bradshaw accessed his account online three times in November 2014 on dates that are consistent with the telephone call from [Employee 1].

By December 17, 2014, when his account balance was over \$28,000, and after [Employee 1] asked him about payroll from multiple agencies, it strains credulity for Mr. Bradshaw to claim he had no knowledge of the extra funds in his account. In any event, he was certainly aware of the issue following his interview with the OEIG on July 23, 2015, during which he was confronted with the documents showing that he had improperly received payments for the Chief Factory Inspector position. Even then, Mr. Bradshaw made no effort to return the improper payments to the State. As of December 4, 2015, Mr. Bradshaw had not returned the money and apparently had not contacted anyone at the Comptroller to discuss the issue.

Mr. Bradshaw's intent to permanently deprive the State of the funds he received in error can be inferred from his failure to contact anyone at the Comptroller to stop the payments that he was receiving in error, even after it was brought to his attention that he may be getting payments from two agencies. Mr. Bradshaw's behavior, although not in connection to his DCFS duties, would adversely affect the confidence of the public in the integrity of DCFS, and raises reasonable doubt concerning his suitability for continued state employment. Therefore, the allegation that Mr. Bradshaw exerted unauthorized control over State funds and failed to take reasonable steps to return the money to the State once he discovered he was being paid in error, with the intent to permanently deprive the State of the funds in violation of DCFS policy is **FOUNDED**.⁸

B. Gregory Bradshaw Violated State Law, IDOL, And DCFS Policies By Driving State Vehicles While His Driver's License Was Suspended.

The records gathered in the course of this investigation reflect that Mr. Bradshaw's driver's license was subject to a Statutory Summary Suspension from September 19, 2013, to November 14, 2014. Mr. Bradshaw admitted that he signed an IDOL Driver's License Certification agreeing to notify his supervisor if his license was suspended yet failed to do so when his license was suspended in September 2013. Mr. Bradshaw admitted, and records reflect, that when he took a

⁸ 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.

position with DCFS in March 2014, Mr. Bradshaw signed a DCFS Driver's License Certification certifying that he was "duly licensed" and agreed to notify his supervisor in the event his license was suspended. Mr. Bradshaw made this certification knowing his license to be suspended at the time and failed to sign the portion of the DCFS Driver's License Certification that would have acknowledged he did not have a valid driver's license and was not authorized to drive State vehicles. Additional records from IDOL and DCFS reflect that Mr. Bradshaw signed out State vehicles for use 24 times while at IDOL and once while working at DCFS. By his own admission when interviewed by the OEIG, Mr. Bradshaw drove State vehicles knowing that his license was suspended. Therefore, the allegation that Mr. Bradshaw violated State law, IDOL, and DCFS policies by driving State vehicles while his driver's license was suspended is **FOUNDED**.

Additionally, by providing false information on the DCFS Driver's License Certification, Mr. Bradshaw engaged in conduct which could affect adversely the confidences of the public in the integrity of DCFS. Therefore the allegation that Mr. Bradshaw violated DCFS policy by making a false certification on the DCFS Driver's License Certification is **FOUNDED**.

V. RECOMMENDATIONS

Following due investigation, the OEIG issues these findings:

- **FOUNDED** – Gregory Bradshaw violated DCFS policy by failing to report that he was receiving funds for an appointed position he had resigned and by failing to return the funds as soon as he discovered the error.
- **FOUNDED** – Gregory Bradshaw violated State law, IDOL, and DCFS policies when he drove State vehicles during times when his driver's license was suspended.
- **FOUNDED** – Gregory Bradshaw violated DCFS policy by making a false certification on the DCFS Driver's License Certification.

Based on the serious nature of the findings against Mr. Bradshaw, the OEIG recommends that a copy of this report be placed in Mr. Bradshaw's personnel file and that Mr. Bradshaw not be hired or appointed into any position in State government. Furthermore, because this case resulted in the loss of funds in an amount greater than \$5,000 and may give rise to criminal penalties, the OEIG has referred the matter to the Illinois Attorney General, pursuant to Section 20-80⁹ of the Ethics Act. The OEIG recommends the Governor's Office and the Comptroller take whatever steps are necessary to ensure Mr. Bradshaw reimburses the State for the approximately \$25,654.95 paid in salary after he resigned his Chief of Safety Inspector position.

The OEIG further recommends that IDOL ensure that, whether a driver driving IDOL vehicles is an employee or appointee, proper records are maintained to confirm that the driver is duly licensed and carries adequate automobile insurance.

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

⁹ 5 ILCS 430/20-80.

Date: December 4, 2015

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

Salome Kiwara-Wilson
Assistant Inspector General

Melissa Brandenburg
Investigator #160



Office of Executive Inspector General
for the Agencies of the Illinois Governor
 www.inspectorgeneral.illinois.gov

**AGENCY OR ULTIMATE JURISDICTIONAL AUTHORITY
 RESPONSE FORM**

Case Number: 14-02423

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:

Please see attached

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:

A

 Signature

*Ethics officer &
 Dept. of Labor / General Counsel*

 Print Agency and Job Title

Helen J. Kim

 Print Name

12/28/2015

 Date



ILLINOIS DEPARTMENT OF LABOR

Bruce Rauner
Governor

Hugo Chaviano
Director

MEMORANDUM

TO: Thomas Klein
Deputy Inspector General and
Chief of the Springfield Division
Office of the Executive Inspector General

FROM: Helen J. Kim
General Counsel and Ethics Officer
Illinois Department of Labor

COPY: Joe Hartzler
Special Counsel
Office of Governor Bruce Rauner

Georgia Man
Chief Compliance Officer and Associate General Counsel
Office of Governor Bruce Rauner

DATE: December 28, 2015

RE: IDOL Response to Final Report in OEIG Case No. 14-02423

The Illinois Department of Labor ("IDOL") received the Office of Executive Inspector General's ("OEIG") Final Report in OEIG Case No. 14-02423 on December 8, 2015, recommending that IDOL take action in areas related to the subject of the investigation. This memorandum details the steps IDOL has taken to implement the recommendations as it pertains to IDOL.

Recommendation 1: "[T]he OEIG recommends that a copy of this report be placed in Mr. Bradshaw's personnel file and that Mr. Bradshaw not be hire or appointed into any position in State Government."

Response: A copy of the OEIG Final Report has been placed in a file created for Mr. Bradshaw and filed under former IDOL staff members. Because Mr. Bradshaw was a gubernatorial appointee and not considered to be an employee of IDOL, Human Resources did

Michael A Bilandic Building
160 North LaSalle, Suite C-1300
Chicago, Illinois 60601-3150
(312) 793-2800
Fax: (312) 793-5257

900 South Spring Street
Springfield, Illinois 62701
(217) 782-6206
Fax: (217) 782-0596

Regional Office Building
2309 West Main Street, Suite 115
Marion, Illinois 62959
(618) 993-7090
Fax: (618) 993-7258

not maintain a personnel file for him or other appointees. IDOL has taken action to create files for all IDOL staff members, including appointees, which will be maintained in IDOL's Human Resources division. This should ensure that he will not be hired as an employee at IDOL in the future, but unfortunately there is very little that IDOL as an agency can do to ensure that he is not hired or appointed elsewhere in State Government.

Recommendation 2: "The OEIG further recommends that IDOL ensure that, whether a driver driving IDOL vehicles is an employee or appointee, proper records are maintained to confirm that the driver is duly licensed and carries adequate insurance.

Response: Currently, IDOL staff members who drive for State business must complete a Certification of License and Insurance at the time his/her performance evaluation is conducted. To ensure that all IDOL staff members, including executive appointees, complete the certification, beginning January 1, 2016, all current IDOL staff members who travel for IDOL business will be required to complete a Certification of License and Insurance form on an annual basis. In addition, new IDOL staff members, including executive appointees, will be required to complete the Certification of License & Insurance form upon starting with IDOL.

Records of those individuals who signed Certification forms will be kept by the Chief Fiscal Officer and a hard copy of the Certification form for each individual will be placed in that individual's file maintained by Human Resources. Those IDOL staff members who do not provide a signed Certification of License and Insurance form will appear on a list maintained by the Chief Fiscal Officer and will not be allowed to drive on State business, use State/OSHA vehicles, and/or be reimbursed for any rental charges, gasoline expenditures, or mileage for the use of personal vehicles.

Recommendation 3: "The OEIG recommends the Governor's Office and the Comptroller take whatever steps are necessary to ensure Mr. Bradshaw reimburses the State for the approximately \$25,654.95 paid in salary after he resigned his Chief of Safety Inspector position.

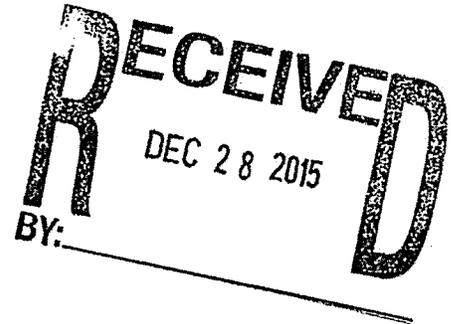
Response: IDOL has forwarded a copy of the Final Report to the Governor's Office and has made itself available to assist in any way it can to recover the salary improperly paid to Mr. Bradshaw.

Please contact me at (312) 793-1966 or Helen.J.Kim@Illinois.gov if you have any questions or concerns.

Illinois Department of
DCFS
Children & Family Services

Bruce Rauner
Governor

George H. Sheldon
Acting Director



December 15, 2015

Office of the Executive Inspector General
Thomas, Klein, Deputy Inspector General and Chief of the Springfield Division
607 East Adams, 14th Floor
Springfield, IL 62701-1634

Re: OEIG Case No. 14-02423

Dear Mr. Thomas,

Enclosed you will find the Department of Children and Family Services Response Form in reference to OEIG Case No. 14-02423, in accordance with 5 ILCS 430/20-50(a) as requested in your letter dated December 4, 2015.

We have implemented the OEIG recommendations as outlined in the Final Summary Report issued by the OEIG. If you have further questions regarding this matter, please contact me at 312-814-2074.

Respectfully,

[Handwritten signature]

[Handwritten initials]

George H. Sheldon
Acting Director



Office of Executive Inspector General
for the Agencies of the Illinois Governor
www.inspectorgeneral.illinois.gov

**AGENCY OR ULTIMATE JURISDICTIONAL AUTHORITY
 RESPONSE FORM**

Case Number: 14-02423

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: Based on the OEIG recommendations, the Department of Children and Family Services has completed the following actions:

1. A copy of the final summary report issued by the OEIG has been placed in Mr. Bradshaw's personnel file.
2. A notation will also be placed in Mr. Bradshaw's file indicating that he is not to be hired or appointed into any position in state government based on the findings of this final summary report.

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:

Signature

George H. Sheldon
 Print Name

Dept of Children & Family Services/ Acting Director
 Print Agency and Job Title

December 15, 2015
 Date



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

Public Integrity Bureau
100 W. Randolph, Chicago, Illinois 60601

February 28, 2017

Chad Fornoff
Executive Director
Executive Ethics Commission
401 S. Spring St.
513 Wm. Stratton Building
Springfield, IL 62706

RE: Gregory Bradshaw OEIG Case 14-02423

VIA EMAIL

Dear Mr. Fornoff,

This is to advise you that on February 27, 2017, former state employee, Gregory Bradshaw pleaded guilty in Sangamon County Circuit court to a single count of Theft of Mislaid Government Property, a class 4 felony. He was sentenced by Judge Peter Cavanaugh to 29 months probation and ordered to pay \$22,100 in restitution to the State of Illinois.

AAG Jonas Harger handled this case on behalf of the OAG based on a referral from the Office of the Executive Inspector General.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Navarro".

David Navarro
Chief,
Public Integrity Bureau
Office of the Illinois Attorney General

cc. Thomas Klein, OEIG