



# Illinois Ethics Matters

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*Honesty, Integrity, Service*

A newsletter from the Office of Executive Inspector General for the Agencies  
of the Illinois Governor

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## Recent News

- The OEIG is pleased to announce the hiring of **George Emerson** as Accounting Clerk, and **LaTisha Haygood** as Human Resources Administrative Assistant.
- The OEIG's Diversity, Equity, & Inclusion Working Group issued its Year-End Report for July 2020 to July 2021. The report is available on the OEIG website [here](#).

## Conflicts of Interest Investigation

A recent OEIG investigation focused on conflicts of interest held by a former Teachers' Retirement System (TRS) employee.

The OEIG investigation revealed that the TRS employee was actively involved with the awarding of work to candidates provided by a subcontractor of which he was the President and Chief Executive Officer. Although the employee claimed to have resigned those positions and severed all ties with the subcontractor when he became a full-time TRS employee, the OEIG found that the employee and his relatives remained involved with the company. In addition, more than \$30,000 in payments were made by the company to a credit card account through transactions that referenced the employee, after he became a full-time TRS employee.

The OEIG concluded that the employee violated TRS' conflicts of interest policy. The OEIG also noted that senior TRS management had not performed a detailed enough analysis of whether the employee had truly severed all ties with the subcontractor. In addition to recommending that the employee not be rehired or used as a contractor, the OEIG recommended that TRS implement a more detailed process for addressing conflicts of interest issues. TRS responded to the OEIG's recommendations that it had retained outside counsel to evaluate its conflicts of interest policies, implemented changes to its procurement policies, and was establishing a whistleblower hotline

The report, [In re: Jay Singh \(OEIG Case #19-01857\)](#), is available on the OEIG website.

## EEC Defines "Substantial"

The Executive Ethics Commission (EEC) recently upheld an OEIG revolving door determination restricting an employee from accepting non-State employment.

The employee worked for the Illinois Environmental Protection Agency and had participated in the renewal of a permit to a subsidiary of his prospective employer. The OEIG restricted the employee from accepting the employment offer on the basis of his personal and substantial involvement in the permitting process.

On appeal to the EEC, the employee argued that he did not participate substantially in the issuance of the permit because his supervisors made all the substantial decisions. The EEC defined "substantial" as "direct, extensive, and substantive as opposed to peripheral or clerical or a mere formality." The EEC concluded that the employee's participation was "substantial" notwithstanding a high level of supervision.

The decision is available [here](#).