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 that **Travis Howard** recently began employment as an Investigator in the Springfield office.
- The Executive Ethics Commission released an OEIG founded report, *In re: Donald Johnson (Case #17-01432)*, regarding misuse of a State email account.

Executive Ethics Commission Levies Largest Ethics Act Fine for Revolving Door Violation: $154K

The Executive Ethics Commission (EEC) recently issued a decision in which it fined former Illinois Department of Human Services (IDHS) employee Mark Doyle **$154,056.10** for violating the State Officials and Employees Ethics Act's revolving door prohibition. This is the largest fine ever assessed by the EEC for a violation of the Ethics Act.

Mr. Doyle had been responsible for overseeing the closure of State-operated developmental disability and psychiatric care centers and for moving the residents of these centers to community-based settings. To assist with these closures and transitions, IDHS had contracted with Community Resource Associates, Inc. (CRA). CRA was controlled by the same person as CRA Consulting (CRA-C), which had entered into a contract with the State of Georgia to perform similar services.

CRA-C offered Mr. Doyle an opportunity to work on the Georgia contract, but the OEIG restricted Mr. Doyle from accepting that job opportunity in a revolving door determination. The EEC affirmed the OEIG's restricted determination based on Mr. Doyle's personal and substantial participation in the award of the contract to CRA, which the EEC determined was essentially the same entity as CRA-C. *In re: Mark Doyle (15-EEC-007)*.

About a month later, Mr. Doyle submitted a revolving door determination request to the OEIG to provide consulting work for another different entity called BennBrook, Inc. However, he did not disclose to the OEIG that BennBrook was contracting with CRA-C to do the same work in Georgia that the OEIG and EEC had previously found to be restricted. In this latest case, the EEC found that BennBrook was acting merely as a "pass through" organization or conduit for the improper compensation from CRA-C to Mr. Doyle, and thus violated the revolving door prohibition.

The $154,056 fine represents the amount Mr. Doyle billed to BennBrook for the year after he left State service. The Ethics Act provides that an employee may be fined up to 3 times the total annual compensation that was or would have been obtained in violation of the revolving door prohibition. The prior largest financial outcome in a case before the EEC also involved a revolving door case in which the former director of the Illinois Department of Healthcare and Family Services agreed to pay $100,000 to settle the matter. *Meza v. Maram (13-EEC-006)*.

A copy of the decision, *Haling v. Doyle (17-EEC-003)*, is available on the OEIG website.

To file a complaint with the OEIG, please visit www.inspectorgeneral.illinois.gov or call the hotline number above.