

Office of the Inspector General City Colleges of Chicago

Office of the Inspector General Bi-Annual Report July 1, 2014 – December 31, 2014

Prepared pursuant to Article II, Section 2.7.5 of the Board Bylaws

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To: Cheryl L. Hyman, Chancellor
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From: John A. Gasiorowski, Inspector General

Date: February 12, 2015

RE: OIG *Bi-Annual Report* for the period of July 1, 2014 through December 31, 2014

This *Bi-Annual Report* is being provided to the Chancellor and the Board of Trustees of Community College District No. 508 pursuant to Article 2.7.5 of the Board Bylaws. This *Bi-Annual Report* covers the period of July 1, 2014 through December 31, 2014. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of July 1st through December 31st is required no later than March 1st each year.

Article 2.7 et seq. of the Board Bylaws authorizes the Office of the Inspector General ("OIG") for the City Colleges of Chicago to conduct investigations regarding waste, fraud and misconduct by any officer, employee, or member of the Board; any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to the City Colleges of Chicago; and any program administered or funded by the District or Colleges.

The OIG would like to thank the Chancellor, the Board of Trustees and the administration of the City Colleges of Chicago for their cooperation and support.

Office of the Inspector General Bi-Annual Report

Mission of the Office of the Inspector General

The Office of the Inspector General (“OIG”) of the City Colleges of Chicago (“CCC”) will help fuel CCC’s drive towards increased student success by promoting economy, efficiency, effectiveness and integrity in the administration of the programs and operations of CCC by conducting fair, independent, accurate, and thorough investigations into allegations of waste, fraud and misconduct, as well as by reviewing CCC programs and operations and recommending policies and methods for the elimination of inefficiencies and waste and for the prevention of misconduct.

The OIG should be considered a success when students, faculty, staff, administrators and the public:

- perceive the OIG as a place where they can submit their complaints / concerns in a confidential and independent setting;
- trust that a fair, independent, accurate, and thorough investigation will be conducted and that the findings and recommendations made by the OIG are objective and consistent; and
- expect that the OIG’s findings will be carefully considered by CCC administration and that the OIG’s recommendations will be implemented when objectively appropriate.

New Developments

For Fiscal Year 2015, the new title of Assistant Inspector General was created. Effective August 11, 2014, Lamesha Smith was promoted to serve as Assistant Inspector General. Since her hire in December 2010, Lamesha Smith, an attorney, served as an Investigator III with the OIG. The number of employees assigned to the OIG remains at nine full-time employees and one part-time employee.

Updates to Investigations Documented in the Previous Bi-Annual Report

In the *Bi-Annual Report* submitted for the January 1, 2014 to June 30, 2014 reporting period, the OIG summarized sixteen reports documenting investigations which resulted in sustained findings of waste, fraud and misconduct. At the time the *Bi-Annual Report* was submitted, disciplinary action was pending regarding several of the investigations. The following table documents updates of disciplinary actions recommended by the OIG regarding CCC employees as well as the actions taken by CCC.

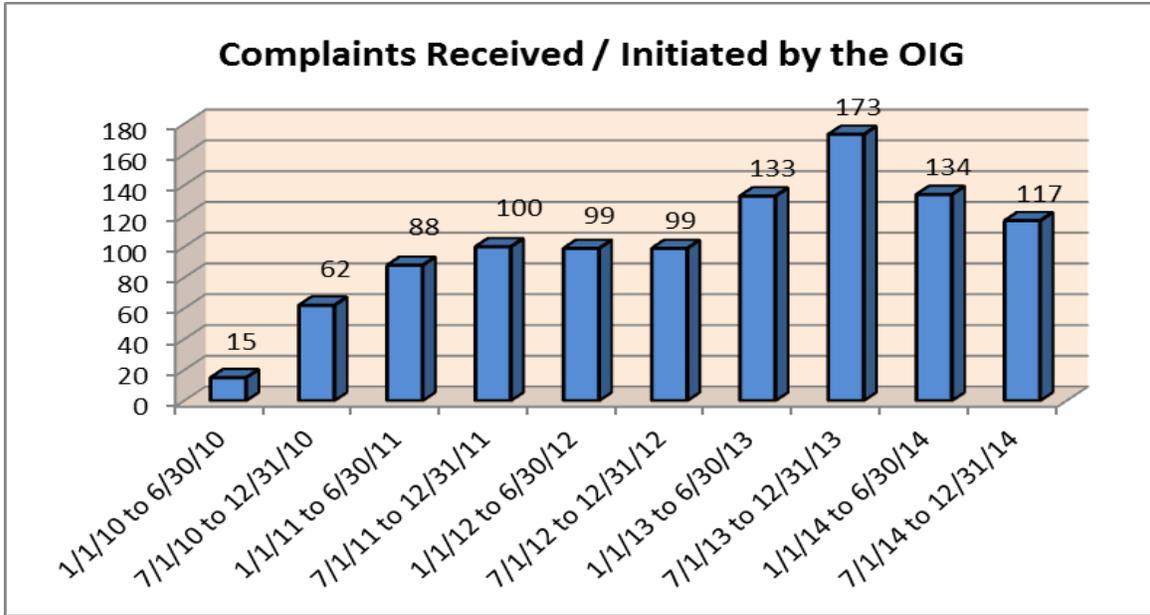
Updates Regarding Disciplinary Action Recommended during January 1, 2014 through June 30, 2014			
Case Number	Subject	Recommended Action	Action Taken
13-0141	College Clerical Assistant	Termination / DNRH ¹	Termination / DNRH
13-0141	Supervisor	Appropriate Discipline	Written Warning
14-0012	College Bursar Assistant	Termination / DNRH	Termination / DNRH
14-0022	Adult Educator	Appropriate Discipline	Resignation
14-0024	Adult Educator	Appropriate Discipline	Retirement / DNRH
14-0069	Manager	Appropriate Discipline	3-day suspension
14-0121	College Lab Assistant II	Termination / DNRH	Termination / DNRH
14-0137	Full-Time Faculty	Termination / DNRH	Termination / DNRH
14-0183	Full-Time Faculty	Termination / DNRH	Termination / DNRH
14-0138	Full-Time Faculty	Appropriate Discipline	1-day Suspension
14-0208	Security Officer	Termination / DNRH	Termination / DNRH
14-0162	Director	Appropriate Discipline	Written Warning
14-0172	Janitor Supervisor	Appropriate Discipline	2-day suspension
14-0172	Janitor	Transfer	Transfer
14-0182	Veteran's Services Specialist	Appropriate Discipline	Termination / DNRH
14-0199	Manager	DNRH (following resignation)	DNRH
14-0250	Full-Time Faculty	Termination / DNRH	Termination / DNRH
14-0255	Janitor	Termination / DNRH	Termination / DNRH

Complaints Received

For the period of July 1, 2014 through December 31, 2014, the OIG received 117 complaints. These 117 complaints included complaints forwarded to the OIG from outside sources as well as investigations (or audits / reviews) initiated based on the OIG's own initiative.² For purposes of comparison to the number of complaints received during the period of July 1, 2014 through December 31, 2014, the following table documents the complaints received by the OIG during previous reporting periods.

¹ "DNRH" means "do not re-hire." In such cases, the OIG recommended that the employee be designated ineligible to be re-hired and that such designation be documented in the employee's personnel records.

² Under Article 2.7.2 of the Board Bylaws, the powers and duties of the OIG include: c) To investigate and audit the conduct and performance of the District's officers, employees, members of the Board, agents, and contractors, and the District's functions and programs, either in response to a complaint or on the Inspector General's own initiative, in order to detect and prevent waste, fraud, and abuse within the programs and operations of the District...



The 117 complaints received represent a variety of subject matters. The table to follow documents the subject matters of the complaints received.

Subject Matter (Allegation)	Number	Percentage
Violation of the CCC procurement policies	2	1.71%
Incompetence in the performance of the position	2	1.71%
Excessive tardiness	2	1.71%
Use of CCC property for unauthorized purposes	2	1.71%
Drinking alcohol during working hours	3	2.56%
Engaging in conduct in violation of the Illinois Compiled Statutes	4	3.42%
Discourteous treatment	5	4.27%
Sexual or other harassment	6	5.13%
Fraud (including financial aid / tuition)	7	5.98%
Violation of CCC Ethics Policy	8	6.84%
Violation of miscellaneous CCC policies	9	7.69%
Misappropriation of funds / Theft	9	7.69%
Fraud in securing employment	9	7.69%
Falsification of attendance records	13	11.11%
Residency	14	11.97%
Inattention to duty	22	18.80%
Totals	117	100.00%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of June 30, 2014, the OIG had 135 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2014 through December 31, 2014, the OIG closed 141 complaints. These complaints were closed for a variety of reasons, including the following: the complaint was sustained following an investigation and a report was submitted; the complaint was not sustained following an investigation or no policy violation was found; the complaint was referred to the appropriate CCC department; the subject of the complaint retired or resigned from CCC employment prior to or during the course of the investigation; a review was completed and recommendations were made; and other reasons. The following chart categorizes the reasons that the OIG closed the 141 complaints during the current reporting period.

Complaints Closed Between July 1, 2014 and December 31, 2014		
Reason Closed	Number	%
Sustained	15	10.64%
Not sustained / No policy violation	67	47.52%
Not sustained with recommendations	1	0.71%
Review with recommendations	1	0.71%
Referred / Deferred	35	24.82%
Subject inactive	13	9.22%
Duplicate complaint	7	4.96%
Employee previously disciplined	1	0.71%
Complaint included with another active investigation	1	0.71%
Totals	141	100.00%

Regarding the complaints closed during the period of July 1, 2014 to December 31, 2014, the table below documents the number of calendar days between the date that the complaint was received and the date that the complaint was closed as compared to the average number of calendar days between the date that complaints were received and the date that complaints were closed for complaints closed during the previous reporting period (January 1, 2014 through June 30, 2014).³

³ A complaint is considered closed only after the investigative activity of the investigator to whom the complaint was assigned has been reviewed and approved by a Supervising Investigator and the Inspector General. In situations where a complaint is sustained, the complaint is not considered closed until the Investigative Summary documenting the investigation is prepared and submitted pursuant to Article 2.7.3 of the Board Bylaws.

Reason Closed	1/1/14 to 6/30/14		7/1/14 to 12/31/14	
	Number	Average Days to Close	Number	Average Days to Close
Sustained	15	188	15	130
Not Sustained / No Policy Violation	44	181	67	369
Not Sustained with Recommendations	0	0	1	29
Referred / Deferred	51	1.37	35	1
Other	19	153	23	161
Totals	129		141	

As of December 31, 2014, the OIG had 111 pending complaints. Forty-five of these 111 pending complaints (40%) were received between July 1, 2014 and December 31, 2014, and 34 of these 111 pending complaints (31%) were received between January 1, 2014 and June 30, 2014.

OIG Reports Submitted – July 1, 2014 through December 31, 2014

During the reporting period of July 1, 2014 through December 31, 2014, the OIG submitted twenty reports.⁴ These twenty reports included: one report documenting an OIG review; seventeen reports documenting sustained findings of waste, fraud and/or misconduct; one report documenting not sustained findings but in which the OIG made a recommendation; and one report documenting not sustained findings, which due to the public nature in which the allegations were made, the OIG determined that a report was necessary.

Report Submitted Documenting an OIG Review

OIG Case Number 12-0026

Based on observations made during unrelated investigations of CCC vendors as well as to detect and limit the risk of fraud in CCC’s procurement activities, the OIG initiated a review of the CCC vendor records contained in the PeopleSoft Finance system vendor database (“vendor database”). This review revealed the following:

- The vendor database did not contain taxpayer identification numbers for 4,647 (30.68%) of the 15,146 active vendors.

⁴ Pursuant to Article 2.7.3 of the Board Bylaws, the Inspector General submits reports to the Chancellor, the Board Chairman, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

- Amongst the 15,146 active vendors, the vendor database contained 103 taxpayer identification numbers that were used across 219 different vendor accounts.
- Based on data received from the Internal Revenue Service by the CCC Financial Control and Compliance Department and analyzed by the OIG, of 7,410 active vendors in the CCC vendor database for which the Financial Control and Compliance Department requested the verification of taxpayer identification numbers from the Internal Revenue Service, 945 (12.75%) contained incorrect taxpayer identification numbers.
- The vendor database contained numerous instances of multiple accounts for the same vendor.
 - 324 vendors had multiple accounts in the vendor database.
 - The 324 vendors have a combined total of 680 accounts amongst them.
 - 132 of the 324 vendors received payments that were recorded in more than one of their accounts in the vendor database.
 - 163 of the 324 vendors received payments that were recorded in only one of their accounts in the vendor database.
 - 29 of the 324 vendors did not have any payments recorded in any of their accounts in the vendor database.

The OIG found it problematic that the vendor database contains multiple accounts for the same vendors because there are various risks related to having multiple accounts for the same vendor in the vendor database. Some of these risks include the following: exceeding the purchasing threshold from a vendor which requires a formal bidding process and/or Board approval; making duplicate payments to the same vendor; maintaining and reporting incomplete information regarding the payments made to vendors; making it more difficult to identify blocks of purchases that qualify for volume rebates; and increasing the chance that some payments have inaccurate or missing cash discount terms.

During the review, the OIG found that some of the risks of having multiple accounts for the same vendor were actually realized. The following risks were in fact realized:

- CCC authorized purchases from vendors that exceeded the purchasing threshold that necessitates formal competitive bidding and/or Board approval without conducting the required formal competitive bidding process and/or obtaining the required Board approval.
- CCC made various duplicate payments to vendors with multiple accounts in the CCC vendor database. Fortunately, such duplicate payments have not been made since September 2009. Additionally, the OIG review

revealed that CCC also received duplicate credits from vendors with multiple accounts in the CCC vendor database.

- Although Board Report 29816 requires the CCC Procurement Services Department to provide the Board with monthly spending reports regarding payments made to consortium vendors, due to duplicate vendor accounts, the CCC Procurement Services Department failed to report several payments that were made to a consortium vendor to the Board.

Based on the review, the OIG made various recommendations. The Office of Finance and the Department of Procurement Services responded and indicated that they concurred with the OIG's findings. The OIG's recommendations, followed by management's response/planned actions, are documented below:

- The OIG recommended that the CCC Procurement Services Department, in conjunction with the CCC Financial Control and Compliance Department, inactivate and/or archive the superfluous vendor account(s) of vendors with multiple accounts in the CCC PeopleSoft Finance vendor database. However, before inactivating and/or archiving superfluous vendor accounts, the history of payments made to each vendor should be consolidated under a single active vendor account.
 - Management Response/Planned Actions
 - i. Query the PeopleSoft database of suppliers and identify duplicate suppliers listed. Inactivate and archive duplicate suppliers and default to a single supplier number of each.⁵
 - ii. Re-run query to ensure that duplicate suppliers have been addressed.
 - iii. Deactivate and archive unused suppliers annually.
- The OIG recommended that the CCC Procurement Services Department, in conjunction with the CCC Financial Control and Compliance Department as well as the Office of Information Technology, develop and implement controls in the vendor database to detect and reject the inclusion of multiple accounts for the same vendor. These controls should include, but not be limited to, making taxpayer identification numbers a required field as well as making the taxpayer identification number field a control field to prevent the creation of multiple accounts under that same taxpayer identification number. Additionally, prior to including a vendor's taxpayer identification number in the vendor database, the accuracy of the taxpayer identification number should be verified via the Internal Revenue Service ("IRS") website.

⁵ The OIG subsequently provided the Chief Procurement Officer with a spreadsheet of the duplicate vendors, as well as those lacking tax identification numbers, as revealed during the OIG review.

- Management Response/Planned Actions
 - i. Query the PeopleSoft database of suppliers and identify suppliers without tax identification numbers.
 - ii. Create system generated error message when the tax identification number is not inserted upon supplier setup that will not allow input without identification number.
 - iii. Verification of tax identification number with batch file submission to the IRS.
 - iv. Update database with corrections (if any) from the IRS.
 - v. Correspondence to suppliers without a Federal Employer Identification Number.
 - vi. Update supplier database for missing Federal Employer Identification Number(s).
 - vii. Develop an exemption list for governmental entities.

- The OIG recommended that the CCC Procurement Services Department develops and implements a process whereby it can periodically confirm whether active vendors in the CCC vendor database are properly registered to conduct business in the city, state, and/or country.
 - Management Response/Planned Actions
 - i. It is not a requirement that all suppliers be registered with the city or state to do business with CCC. However, the following actions will be performed based on OIG recommendation:
 1. Review all active suppliers for city or state registration.
 2. Add a check box to the supplier registration form and request certification for file.

- The OIG recommended that the CCC Procurement Services Department develops and implements a process whereby it inactivates vendors included in the CCC vendor database with which CCC no longer does business, such as vendors who are classified as “employees” who are no longer employed by CCC, “students” who are no longer associated with CCC, and/or other vendors who have not been used for a significant period of time, such as after twenty-four months.
 - Management Response/Planned Actions
 - i. Move all employees out of the Procurement module to HR module of PeopleSoft (except COBRA recipients and retired employees who must be paid from Accounts Payable).
 - ii. Remove all suppliers not actively involved in supplying products or services to CCC.
 - iii. Develop auto archiving method for inactive suppliers over 24 months.

- The OIG recommended that the CCC Procurement Services Department updates the Vendor's List Application Form. This application form should be updated to include, at the very least, the following: a) any assumed names that the vendor uses; and b) whether the vendor previously submitted an application form.
 - Management Response/Planned Actions
 - i. Revised existing Supplier Application Form. Utilize a short form for small dollar suppliers.
 - ii. Introduce "eSupplier" (self-updating supplier web page with controls) through PeopleSoft.

Reports Submitted Documenting Sustained Findings of Waste, Fraud and/or Misconduct

Pursuant to the provisions of Article 2.7.5 of the Board Bylaws, the following are summaries of the OIG investigations for which reports were submitted documenting sustained findings of waste, fraud or misconduct during the period of July 1, 2014 through December 31, 2014.

OIG Case Number 14-0300

The OIG received a complaint that a college clerical assistant II assigned to a City College forged a letter on college letterhead and forwarded the letter to a health care provider, which also serves as a CCC College to Careers partner, on behalf of another. The OIG investigation revealed that on two occasions in 2014, the college clerical assistant created letters on the City College's letterhead and faxed the letters to the health care provider falsely verifying that her cousin was enrolled in nursing classes at the City College. The letters were provided to the health care provider in order to fraudulently make the health care provider believe that the cousin, an employee of the health care provider, was enrolled in classes at the City College, and the cousin's purported class schedule prevented her from working late hours for the health care provider. In fact, the cousin was never enrolled in nursing classes at the City College, and she had not been enrolled as a CCC student since the Spring 2002 term. Additionally, on one of these letters, the signature of the former director of nursing at the City College, who resigned from her position weeks before the date on which she purportedly signed the letter, was forged. The actions of the college clerical assistant constituted the crime of forgery, contrary to 720 ILCS 5/17-3(a)(1) and (2) and violated Section IV, Paragraphs 15 and 50 of the CCC District-Wide Employee Manual.

Prior to the conclusion of the investigation, the college clerical assistant resigned from her position with CCC. Based on the investigation, the OIG recommended that the college clerical assistant be designated ineligible to be re-hired and that her personnel records reflect this designation. Subsequently, the college clerical assistant was designated ineligible to be re-hired.

Additionally, based on the fact that the college clerical assistant's actions constituted the crime of forgery contrary to 720 ILCS 5/17-3(a)(1) and (2), the OIG submitted the results of this investigation to the Cook County State's Attorney's Office for review for possible criminal prosecution.

OIG Case Number 14-0303

The OIG received a complaint from a City College that a lecturer assigned to that City College conducted a nursing skills lab class at an off-campus nursing facility while she was also on duty for the nursing facility. The OIG investigation revealed the following:

- On numerous occasions, the lecturer was on duty with and being paid by the off-campus nursing facility at the same time that she was on duty with and being paid by CCC for conducting skills and clinical courses at the nursing facility. The total hours during which her CCC time overlapped with her nursing facility time exceeded sixty-three hours.
- On at least three occasions during the Summer 2014 term, the lecturer cancelled her classes without informing anyone at the City College. On two of those occasions, the lecturer was on vacation in Brazil, but received full pay.
- The lecturer reduced the length of the skills classes held at the off-campus nursing facility by one-half hour without informing anyone, purportedly so that her students had sufficient time to travel to and/or from their lecture classes held at the City College.

Due to her actions documented above, the lecturer violated Section IV, Paragraphs 3, 7, 12, 17, 42, and 50 of the CCC District-Wide Employee Manual as well as the Outside Employment Policy provided in Section III of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the lecturer be terminated. The OIG further recommended that the lecturer be designated ineligible to be re-hired and that her personnel records reflect this designation. Additionally, the OIG recommended that CCC utilizes all legal but fiscally responsible remedies to recoup appropriate pay from the lecturer for the three days that she cancelled a total of four classes without informing anyone at the City College.

Following the disciplinary process, the lecturer was terminated, and she was designated ineligible to be re-hired.

OIG Case Number 14-0294 (Security Officer)

The OIG received complaints that a security officer (part-time) assigned to a satellite facility of a City College had a felony conviction. The OIG investigation revealed that in 1990, the security officer was convicted of the federal felony offenses of racketeering conspiracy and racketeering, and he was sentenced to serve a forty-two month term of imprisonment and a five-year term of probation to run consecutively. The security officer served his prison term from the late summer of 1990 to January 1993. This conviction stemmed from misconduct engaged in by the security officer when he was a Chicago Police Officer.

The OIG investigation further revealed that on CCC employment applications that he submitted in 1990, 1993 and 2000, the security officer provided a false answer to the question of whether he was ever convicted of a crime. Additionally, the security officer made at least two false statements regarding his criminal history during interviews with the OIG, and he made at least four false statements during an inquiry by the CCC Equal Employment Opportunity Office. Based on these actions, the security officer violated Section IV, Paragraphs 6, 8, 9, and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the security officer be terminated, that he be designated ineligible to be re-hired, and that his personnel records reflect this designation.

Following the disciplinary process, the security officer was terminated, and he was designated ineligible to be re-hired.

OIG Case Number 14-0294 (Administrators)

During the course of the investigation documented above, the OIG learned that a lead security officer, who was a supervisor of the security officer discussed above, testified in a September 2013 pre-disciplinary hearing concerning the security officer.⁶ During her testimony, the lead security officer stated that the security officer had a criminal background. After the hearing, the human resources director at a City College and the director of safety and security at the same City College asked the lead security officer why she stated that the security officer had a criminal background, and she stated that the security officer was one of the Wentworth 9, a group of nine Chicago Police officers who were indicted in 1988 and subsequently convicted of various federal corruption offenses.

Only after the security officer inexplicably complained to the OIG and the CCC Equal Employment Opportunity Office that the lead security officer had slandered him by stating that he was a convicted felon (when, in fact, he is a convicted

⁶ The pre-disciplinary hearing concerned an allegation of misconduct by the security officer that was not related to the issues investigated by the OIG.

felon) did the issue arise again. In support of his complaint, the security officer authorized a criminal background check. After the CCC background check vendor conducted this background check and it erroneously came back “clean,” the lead security officer was issued an oral reprimand for conduct unbecoming a public employee. The lead security officer was further instructed to “refrain from communicating in any manner that (the security officer) has been arrested for any crime.”

The OIG investigation clearly revealed that the lead security officer should not have been issued the oral warning. The lead security officer accurately stated that the security officer had a criminal background. The security officer was in fact convicted of two felonies in 1990.

Additionally, from September 2013 until at least May 2014, the director of security and the human resources director failed to act on the knowledge that the security officer may be a convicted felon. The director of security failed to notify his supervisor, the vice chancellor of safety and security, that the security officer may have a criminal background. Likewise, the human resources director failed to notify the College president or the vice chancellor of human resources and staff development of such fact. The fact that the security officer may have a criminal background should have been communicated by each of them to their respective superiors. The failure of the director of security and the human resources director to act on the knowledge that the security officer may be a convicted felon demonstrates their inattention to the duties of their respective positions, in violation of Section IV, Paragraph 38 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended the following:

- The OIG recommended that CCC retracts the oral warning issued to the lead security officer on July 31, 2014 for conduct unbecoming a public employee and removes any record of this reprimand from her CCC personnel records.
- The OIG recommended that CCC takes appropriate disciplinary action against the director of security.
- The OIG recommended that CCC takes appropriate disciplinary action against the human resources director.

Following the disciplinary process, the director of security was issued an oral reprimand. No disciplinary action was taken against the human resources director. As of the date of this report, the oral warning issued to the lead security officer has not yet been retracted.

OIG Case Number 14-0294 (Vendor)

During the course of the investigations documented above, the OIG became aware of problematic background screenings of two individuals that were conducted on behalf of CCC by CCC's background screening and education verification vendor ("the vendor"). The problematic background screenings were conducted regarding the security officer discussed above and an applicant for a senior payroll analyst position at the District Office. Based on these problematic background screenings, the OIG initiated a review of the background check process utilized by CCC and the vendor.

The OIG investigation revealed that the vendor provided CCC with criminal background screenings that erroneously indicated that the two subjects of the background screenings did not have criminal records. While problematic, such results were reasonably understandable since:

- The first criminal background check provided by the vendor regarding the security officer did not include a check for convictions in federal courts based on the scope of the services to be provided by agreement between CCC and the vendor.
- The second criminal background check provided by the vendor regarding the security officer, which did include a check for convictions in federal courts, did not reveal the security officer's 1990 federal conviction due to the fact that on the Public Access to Court Electronic Records ("PACER") system, the security officer was not listed as a party in the federal case in which he was convicted. This likely occurred since the security officer, as well as sixteen of thirty-three other co-defendants in the 1990 case, did not file anything in federal court regarding that same case after the implementation of the PACER system in the federal court district in which the case was heard.
- The criminal background check provided by the vendor regarding the applicant for the senior payroll analyst position did not reveal the applicant's extensive criminal background since she provided a different version of her name and another individual's social security number and date of birth on the authorization form that she provided to the vendor.

Based on the OIG investigation, the OIG did not recommend that any action be taken regarding the vendor for providing CCC with criminal background screenings that erroneously indicated that neither the security officer nor the applicant had criminal records.

The OIG recommended that the CCC Office of Human Resources and Staff Development takes action to ensure that all prospective employees are also screened for convictions that occurred in a federal court in addition to the

screening for convictions in county and state courts that are currently procured. The OIG also recommended that the CCC Office of Human Resources and Staff Development takes action(s) to ensure the veracity of information supplied regarding the subjects of background checks that is/was provided to the vendor.

The CCC Office of Human Resources and Staff Development took action to ensure that all prospective employees are also screened for convictions that occurred in a federal court in addition to the screening for convictions in county and state courts.

OIG Case Number 15-0024

The OIG received a complaint that a security officer (part-time) assigned to the same facility as the security officer discussed above regarding OIG Case Number 14-0294, had a criminal conviction. The OIG investigation revealed that in early 1972, while employed as a police officer for the Chicago Police Department, the security officer was arrested by the Federal Bureau of Investigation for the felony offense of extortion. Subsequently, following a jury trial, the security officer was convicted of the felony offense of extortion, and he was sentenced to serve a two-year term of imprisonment.

Effective March 12, 1996, the security officer was hired by CCC. On a CCC employment application that he submitted on March 11, 1996, the security officer failed to provide an answer to the application question regarding whether he was ever convicted of a felony. As such, the security officer violated Section IV, Paragraphs 6 and 9 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the security officer be terminated. The OIG further recommended that the security officer be designated ineligible to be re-hired and that his personnel records reflect this designation.

Subsequently, the security officer resigned from his position with CCC, and he was designated ineligible to be re-hired.

Additionally, based on the fact that for the second time in a little more than one month, the OIG issued an Investigative Summary reporting that a security officer who was hired before the CCC conducted background checks failed to disclose a felony conviction in the application process, the OIG recommended that CCC seeks written consent to conduct a background check of every CCC security officer who did not undergo a background check at the time of his/her hire and procures a background check of these individuals.

OIG Case Number 15-0046

The OIG received a complaint that a security officer (part-time) assigned to a City College was never a sworn law enforcement officer; thus, he was not eligible for the position of security officer. The OIG investigation revealed that since 1996, CCC Job Descriptions for the position of security officer require, among other qualifications, that one has to have at least two years of experience as a law enforcement or corrections officer. Likewise since 2004, the collective bargaining agreement between CCC and the CCC Police Officers Association has defined security officer as a “security employee who is either an active or retired sworn officer with a law enforcement or corrections agency.”

The OIG investigation further revealed that the security officer in question was hired by CCC in 2002 as a security officer. By his own admission, the security officer had no experience as a law enforcement or corrections officer. The OIG investigation did not reveal any evidence that the security officer provided any false documentation or otherwise fraudulently misrepresented his background to CCC; however, the security officer did not meet the qualifications for the position of security officer.

Based on the investigation, the OIG recommended that the security officer be reclassified to the position of security assistant and that his salary be adjusted to the appropriate pay rate for the position of security assistant.

The security officer was subsequently reclassified to the position of security assistant, and his salary was adjusted to the appropriate pay rate for the position of security assistant.

OIG Case Number 15-0080

Similar to the investigation summarized above, the OIG received a complaint that a security officer (part-time) assigned to a City College was never a sworn law enforcement officer; thus, he was not eligible for the position of security officer. The OIG investigation further revealed that the security officer was hired by CCC, effective September 28, 1998, as a security assistant. The security officer served as a security assistant until March 18, 2007, when he was reclassified to the position of security officer. By his own admission, the security officer had no experience as a law enforcement or corrections officer. The OIG investigation did not reveal any evidence that the security officer provided any false documentation or otherwise fraudulently misrepresented his background to CCC; however, the security officer did not meet the qualifications for the position of security officer. During an interview with the OIG, the former director of security at the City College who recommended the promotion of the security officer stated that he did so because the security officer, as a security assistant, was performing the duties of a security officer, he knew the job, he was performing

the job well, and no one else wanted or could work the specific shift hours worked by him.

Based on the investigation, the OIG recommended that the security officer be reclassified to the position of security assistant and that his salary be adjusted to the appropriate pay rate for the position of security assistant.

The security officer was subsequently reclassified to the position of security assistant, and his salary was adjusted to the appropriate pay rate for the position of security assistant.

OIG Case Number 14-0304

The OIG received a referral from CCC Internal Audit that a coordinator assigned to a City College twice received reimbursement for the same expense. The OIG investigation revealed that the coordinator requested reimbursement from CCC in the amount of \$2,840.40 for personal items that he claimed were damaged in the flood that occurred at a City College in 2012. Subsequently, the coordinator received two CCC reimbursement checks for \$2,840.40 each. Despite the fact that the coordinator knew that he was only entitled to one reimbursement check in the amount of \$2,840.40, the coordinator accepted and endorsed both reimbursement checks, and he subsequently separately deposited both checks, totaling \$5,680.80, into bank accounts for his own use. As a result, the coordinator misappropriated City Colleges of Chicago funds, in violation of Section IV, Paragraph 17 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the coordinator be terminated, that he be designated ineligible to be re-hired, and that his personnel records reflect this designation. The OIG further recommended that CCC uses all legal and fiscally responsible remedies to recoup \$2,840.40 from the coordinator.

Following the disciplinary process, the Board of Trustees approved the termination of the coordinator, and he was subsequently designated ineligible to be re-hired.

It should be noted that contemporaneously with his pre-disciplinary hearing, the coordinator submitted a check to CCC in the amount of \$2,840.40.

OIG Case Number 15-0071

The OIG received a report that a CCC student, who was enrolled in a Fundamentals of Swimming class, drowned in a City College swimming pool during her class, but was ultimately rescued and resuscitated. During the course of the investigation, the OIG reviewed security video of the incident. The OIG also interviewed relevant City College staff and nine students who were enrolled

in the Fundamentals of Swimming class as well as two students who were not enrolled in the class but were in the swimming pool area at the time of the incident.

The OIG investigation revealed that the Fundamentals of Swimming class was taught by a part-time lecturer. Two part-time lifeguards assigned to the City College were scheduled to perform lifeguard duties on the day of the incident during the Fundamentals of Swimming class, which was scheduled to be held from 2:00 p.m. until 3:21 p.m. However, at 1:30 p.m., one of the lifeguards (“off-duty lifeguard”) informed the lecturer that he was leaving at 2:00 p.m. that day. There were fourteen students enrolled in this class, but no more than ten were present on the day of the incident.

During the course of the investigation, the OIG also learned that although he was hired as a lifeguard, the off-duty lifeguard often acted as an assistant swimming instructor during the Fundamentals of Swimming class.

Based on the investigation, the OIG made the following findings:

- The lecturer acted negligently in the course of his employment as a swimming instructor (lecturer), was inattentive to his duty, and was incompetent in the performance of his duties, in that he failed to be present during the entire duration of his scheduled class time, and he failed to monitor and provide instruction to students while the students were in and around the pool, which led to injury to a student, in violation of Section IV, Paragraphs 34, 38, and 39 of the CCC District-Wide Employee Manual.
- The lifeguard acted negligently in the course of his employment as a lifeguard, was inattentive to his duty, and was incompetent in the performance of his duties, in that he failed to be present during the entire duration of scheduled class time, and he failed to monitor activities in and near the pool through patron surveillance, which led to injury to a student, in violation of Section IV, Paragraphs 34, 38, and 39 of the CCC District-Wide Employee Manual.
- The OIG did not find that the off-duty lifeguard violated any CCC policies.

The OIG made the following recommendations:

- The OIG recommended that both the lecturer and the lifeguard be terminated. The OIG further recommended that both the lecturer and the lifeguard be designated ineligible to be re-hired and that their personnel records reflect this designation.

- The OIG recommended that the off-duty lifeguard be restricted to performing the duties that he was hired to perform, that of a lifeguard and not an assistant swimming instructor. Accordingly, CCC should then assess whether it would be necessary to hire an assistant swimming instructor to assist during swimming classes in order to provide the safest and most effective swimming instruction.
- The OIG recommended that CCC develops, implements, and distributes clear District-Wide policies and procedures regarding pool safety and swimming instruction.

The disciplinary processes regarding the lecturer and the lifeguard are pending.

OIG Case Number 14-0135

The OIG received a complaint from a City College that a full-time faculty member assigned to that City College was verbally abusive and demeaning to her clinical students. The OIG investigation revealed that based on interviews of six students, who were enrolled in some of the full-time faculty member's classes during the Fall 2012, Spring 2013, and Fall 2013 terms, the full-time faculty member verbally abused and otherwise belittled these or other students during their clinical classes. All of these students have since graduated from the City College, and four of the six students graduated with honors or high honors. The interviews of these students established that the full-time faculty member engaged in discourteous treatment in violation of Section IV, Paragraph 22 of the CCC District-Wide Employee Manual. Likewise, the full-time faculty member engaged in conduct unbecoming a public employee, in violation of Section IV, Paragraph 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the full-time faculty member.

The full-time faculty member was issued a verbal warning.

OIG Case Number 14-0306

The OIG received a complaint that as much as \$989.92 in unspent per diem funds was stolen from the office of the director of student activities at a City College. The OIG investigation did not reveal who, if anyone, stole the cash and receipts from the director of student activities' desk. However, the OIG investigation did reveal that the director of student activities failed to deposit with the City College's Business Office or otherwise appropriately safeguard, the Student Government Association funds consisting of the unspent per diem money that students submitted to him upon their return from a conference. In fact, for a period of at least two months, the director of student activities kept that unspent cash in an unlocked drawer in his office, and then he left that cash out

on his desk overnight before he reported the cash and receipts as stolen. The director of student activities' failure to appropriately safeguard the unspent per diem funds violated Section IV, Paragraphs 37, 39, and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the director of student activities.

The director of student activities was issued a verbal warning.

OIG Case Number 15-0058

The OIG received a complaint that an assistant teacher assigned to a Child Development Laboratory School at a City College inappropriately restrained a three-year-old child. The OIG investigation revealed that on September 24, 2014, the assistant teacher took a three-year-old child enrolled in the Child Development Laboratory School into the classroom's cubby room to speak with him. When the child reacted to her by resisting, flailing, and screaming, the assistant teacher held the child in a bear hug in order to calm down the child. The bear hug consisted of the assistant teacher wrapping her arms around the child from behind while the child sat in her lap.

The OIG investigation did not reveal that the assistant teacher's actions in performing the bear hug on the child were unjustified or inappropriate. The OIG investigation revealed that the assistant teacher acted appropriately in performing the bear hug on the child for the purpose of calming him down when he was in the process of possibly causing danger to himself or others when he was resisting, flailing, and screaming. The OIG investigation revealed that the assistant teacher's use of the bear hug in this situation was not unjustified or inappropriate because: the assistant teacher utilized the bear hug for a few minutes after the child resisted, flailed, and screamed in order to calm down the child; and the assistant teacher did not use the bear hug to hurt or otherwise punish the child. During her interview with the OIG, the practicum student who reported the incident stated that she did not think that the assistant teacher used more force than was necessary to restrain the child; and numerous interviews of CCC employees assigned to the various Child Development Laboratory Schools revealed that restraining or holding a child is a last-resort method that is used to prevent a child whose behavior may be a danger to the child or others. In such cases, the teacher loosely wraps his/her arms and sometimes his/her legs around the child from behind while talking to the child to attempt to calm the child down. Several of the employees described using or observing this method to calm down a child. Such descriptions are consistent with how the assistant teacher attempted to calm down the child.

The OIG investigation did not reveal that the assistant teacher's actions violated any CCC policies when she performed the bear hug on the child. After reviewing

various CCC policies regarding the Child Development Laboratory Schools as well as Illinois Department of Children and Family Services policies, the OIG found that at the time of the incident, CCC had no clearly delineated policy regarding the appropriateness of restraining a child in the manner performed by the assistant teacher. The OIG investigation revealed that at the time of the incident, CCC lacked clear District-Wide policies and procedures that provided Child Development Laboratory School employees and parents with sufficient guidance and information regarding when and how restraint may be used. However, since the incident occurred, CCC Child Development Laboratory School policies have been updated to address the issue of restraint. Moreover, training is being planned for Child Development Laboratory School teachers regarding when and how to apply restraint to a child.

The OIG investigation did reveal that the director of the Child Development Center, a teacher assigned to Child Development Center, and the assistant teacher failed to document various purported behavioral incidents involving the child in the Child Outcome Planning & Administration (“COPA”) system, in violation of Section 1304.24 of the District-Wide Child Development Laboratory Schools Policies and Procedures Handbook.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary against the assistant teacher and the director for their failure to document various purported behavioral incidents involving the child in the COPA system, in violation of Section 1304.24 of the District-Wide Child Development Laboratory Schools Policies and Procedures Handbook. Additionally, the OIG recommended that the assistant teacher and the director be required to attend training regarding current CCC child development laboratory schools policies and procedures as well as regarding the COPA system. Since the teacher resigned from her position with CCC prior to the completion of the investigation, the OIG recommended that no action be taken regarding her.

The disciplinary processes regarding the assistant teacher and the director are pending.

OIG Case Number 15-0048

The OIG received a complaint that a full-time faculty member assigned to a City College was arrested for the criminal offense of Solicitation of a Sexual Act. The OIG investigation revealed that on August 26, 2014, the faculty member was arrested by the Chicago Police Department for the misdemeanor offense of solicitation of a sexual act, in that he purportedly approached an undercover officer, who was posing as a prostitute, and offered the undercover officer \$25.00 for oral sex. Subsequently, the faculty member appeared in the Circuit Court of Cook County regarding the charge. The faculty member was ordered, with his agreement, to attend the Christian Community Health Center Footprints “Amend” Program, a first-time offender program for those who have been charged with

sexual solicitation. If the faculty member successfully completes the program, the criminal charge would be dismissed on February 17, 2015.

The OIG investigation further revealed that on August 26, 2014, the faculty member did not show-up for his scheduled class due to his arrest for solicitation of a sexual act earlier in the day. On August 27, 2014, the faculty member signed and submitted a Certificate of Attendance for Pay Period 1419, which included August 26, 2014. On this Certificate of Attendance, the faculty member failed to record that he was not present for work on August 26, 2014. Moreover, the faculty member failed to submit an amended Certificate of Attendance until September 23, 2014. On the amended Certificate of Attendance, the faculty member represented that he wished to utilize a personal day for August 26, 2014 due to an “unforeseen personal emergency.” Article 4.11(c) of the Board Policies and Procedures for Management and Government requires that amended Certificates of Attendance be submitted no later than the first payroll period in which the employee actively works following submission of the erroneous certificate.

Due to his actions as described above, the faculty member violated Section IV, Paragraphs 7, 11, and 50 of the CCC District-Wide Employee Manual as well as Article 4.11(c) of the Board Policies and Procedures for Management and Government. Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the faculty member.

The disciplinary process regarding the faculty member is pending.

OIG Case Number 15-0030

The OIG received a complaint that a manager assigned to a CCC enterprise unit resided outside the City of Chicago in violation of the CCC Residency Policy. The OIG investigation revealed that the manager resided in Evergreen Park, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the manager falsified employment records in that he fraudulently affirmed on a CCC residency certification document that he resided in Chicago, Illinois, when in fact he resided in Evergreen Park, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the manager be terminated. The OIG further recommended that the manager be designated ineligible to be re-hired and that his personnel records reflect this designation.

The manager was terminated, and he was subsequently designated ineligible to be re-hired.

OIG Case Number 15-0056

The OIG received a complaint that a director of a CCC enterprise unit resided outside the City of Chicago in violation of the CCC Residency Policy. The OIG investigation revealed that the director resided in Burbank, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the director falsified employment records in that she fraudulently affirmed on a CCC residency certification document that she resided in Chicago, Illinois, when in fact she resided in Burbank, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the director be terminated. The OIG further recommended that the director be designated ineligible to be re-hired and that her personnel records reflect this designation.

The director was terminated, and she was subsequently designated ineligible to be re-hired.

OIG Case Number 13-0131

The OIG received a complaint that a dean at a City College resided outside the City of Chicago. The OIG investigation revealed that the dean resided in Crete, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the dean falsified employment records in that she fraudulently affirmed on a CCC residency certification document that she resided in Chicago, Illinois, when in fact she resided in Crete, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

The dean was terminated from her position with CCC, for reasons unrelated to this investigation, prior to the submission of the Investigative Summary documenting this investigation. As such, the OIG recommended that the dean be designated ineligible to be re-hired and that her personnel records reflect this designation.

The dean was subsequently reinstated and reassigned to her full-time faculty position. This matter is currently under review by the OIG.

Report Submitted Documenting an Investigation that Resulted in a Not Sustained Finding but in Which a Recommendation Was Made

OIG Case Number 15-0087

The OIG received a complaint that a director of security at a City College supervised his brother-in-law, a security officer assigned to the same City College, contrary to the CCC Ethics Policy.

Article 5.2.8 of the CCC Ethics Policy provides the following:

No employee or Board member shall employ or advocate for employment, in any department or any College or program of the District, in which said employee or Board member serves or over which he exercises authority, supervision, or control, any person (i) who is a relative of said...employee...

Article 5.2.2(bb) of the CCC Ethics Policy provides, in pertinent part, the following:

Relative means a person who is related to a Board member, employee, or spouse or any of the following whether by blood or by adoption:...brother...

In the aforementioned definition of relative, brother-in-law is not specifically delineated. However, Article 5.2.2(s) of the CCC Ethics Policy provides that “familial relationship, identical to the definition of Relative, exists when two persons are related by blood, law, or marriage.”

Due to the lack of clarity in the CCC Ethics Policy regarding whether a brother-in-law is a relative, the OIG sought the opinion of the CCC Ethics Officer. Specifically, the OIG asked the CCC Ethics Officer whether a brother-in-law is a “relative” under Article 5.2.2(bb) of the CCC Ethics Policy. In his written opinion, the CCC Ethics Officer essentially stated that under Article 5.2.2(bb) of the CCC Ethics Policy, when read in conjunction with Article 5.2.2(s) of the CCC Ethics Policy, a brother-in-law is a relative.

Although the OIG investigation revealed that the director of security “employs” his brother-in-law by supervising his brother-in-law, due to the lack of clarity in the CCC Ethics Policy regarding whether a brother-in-law is a “relative,” the OIG would not expect the typical employee to know that he was violating the CCC Ethics Policy by supervising his brother-in-law, since brother-in-law is not specifically delineated in the definition of “relative” under Article 5.2.2(bb) of the CCC Ethics Policy.

As such, the OIG did not find that the director of security violated Article 5.2.8(1)(i) of the CCC Ethics Policy. However, to avoid the appearance of impropriety, the OIG recommended that either the director of security or his brother-in-law be transferred to a different City College so that the director of security did not continue to employ and supervise his brother-in-law.

Subsequently, the director of security resigned from his position with CCC to pursue another employment opportunity. As a result, the security officer was not transferred to a different City College.

Due to the ambiguity of the CCC Ethics Policy regarding the definition of “relative”, the OIG recommended that the Board of Trustees adopts the following amendment to Article 5.2.2(bb) of the CCC Ethics Policy:

- Current: “Relative” means a person who is related to a Board member, employee, or spouse or any of the following whether by blood or by adoption: parent, child, brother or sister, aunt or uncle, cousin, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather, stepson or stepdaughter, stepbrother or stepsister, half-brother, half-sister.
- Proposed: “Relative” means a person who is related to a Board member or employee as a spouse, domestic partner, partner in a civil union, parent, child, brother or sister, aunt or uncle, cousin, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather, stepson or stepdaughter, stepbrother or stepsister, half-brother, half-sister and shall include any similar relationship created by blood, legal adoption, marriage, domestic partnership, or partnership in a civil union.

It should be noted that the OIG previously made essentially the same recommendation in an Investigative Summary relative to OIG case number 13-0071, which was submitted on February 1, 2013. OIG case number 13-0071 concerned an issue similar to the one at hand regarding the definition of “relative.” Specifically, the issue was whether an employee violates Article 5.2.8(1)(i) of the CCC Ethics Policy by supervising the cousin of her spouse, i.e., a “cousin-in-law.” However, no action has been taken regarding the OIG’s recommendation to amend the definition of “relative” in the CCC Ethics Policy.

Report Submitted Documenting an Investigation that Resulted in a Not Sustained Finding

While it is atypical for the OIG to issue an Investigative Summary documenting the results of a not sustained investigation, due to the public nature in which the allegations in the investigation discussed below were made, the OIG determined that this Investigative Summary was necessary.

OIG Case Number 14-0201

The OIG received an allegation that a vendor at a City College charged higher prices for items purchased at the bookstore by CCC students who used financial aid funds than for items purchased by students who used cash or a personal credit card. Another allegation brought forth was that the vendor charged various students different prices for identical items, particularly lab/consultation coats. It should be noted that as of May 15, 2014, due to reasons unrelated to the OIG investigation, the vendor was no longer contracted by CCC.

During the course of the investigation, the OIG obtained data from the Department of Finance, Office of Student Financial Services that documented the purchases made from the vendor and charged to students' financial aid accounts. This data did not document each individual item purchased, but it did document aggregate purchases per transaction.

The OIG also obtained data from the vendor, including an electronic spreadsheet of all purchases from the vendor at the City College during the period of August 1, 2012 to January 31, 2014. This spreadsheet included twenty-six fields, including the date and time of the transaction, the unique SKU number of the item purchased, the price of the item, whether the item was purchased with financial aid funds or cash, and student information if an item was purchased with financial aid funds.

During the course of the investigation, the OIG also made visits to classes at the City College in order to meet with students to attempt to obtain receipts and/or other evidence regarding the allegation that the vendor was charging different prices for the same item depending on whether the item was purchased using financial aid funds or personal funds. The classes visited were selected by the OIG with significant input by the City College's administration.

Two students interviewed by the OIG stated that the vendor charged higher prices for items when purchased with financial aid funds as opposed to personal funds. However, no receipts were produced to support these statements.

The OIG reviewed the records of transactions from the vendor at the City College for the period of August 1, 2012 to January 31, 2014. The spreadsheet contained 132,905 transaction lines, including sales, returns and line item voids as well as various transactions regarding gift cards. From the spreadsheet, the OIG identified 57 different SKU numbers for lab coats, consultation jackets, and/or consultation coats. The OIG sorted the SKU numbers into four different descriptions of items sold: lab coats, consultation coats, women's or men's consultation jackets, and women's or men's lab coats/consultation coats. This sorting revealed that within each of the four descriptions, the SKU number changed as the size changed; within each of the four descriptions, the price typically increased when the size increased; and the price charged for each item

listed under the same SKU number was the same regardless of whether the purchaser paid with financial aid funds or personal funds.

The review of these transaction records revealed no evidence that the vendor charged higher prices for items when purchased with financial aid funds as opposed to personal funds. Moreover, the review revealed no evidence that different prices were charged for “identical” items.

During the course of the investigation, one student did provide the OIG with receipts documenting that he was charged different prices (\$23.00 vs. \$36.00) for seemingly identical items - consultation coats purchased on August 23, 2013 and August 27, 2013. However, the items were not in fact “identical.” The consultation coat purchased by the student on August 27, 2013 was imprinted with the required City College patch or insignia, while the consultation coat purchased by the student on August 23, 2013 was not so imprinted. It would no doubt have been more transparent on the vendor’s part to make it clear to students that lab or consultation coats from different vendors and with or without patches were sold at different prices. However, the OIG investigation revealed that the vendor did not charge different prices based on whether the student purchased the item with financial aid funds or with personal funds, and the vendor did not charge different prices for “identical” items.

Based on the results of the investigation, the OIG did not recommend that CCC takes any action against the vendor.