

CITY COLLEGES[®]
OF CHICAGO

JANUARY 1, 2025 - JUNE 30, 2025

Office of the Inspector General
BI-ANNUAL REPORT



Lamesha Smith
Inspector General
City Colleges of Chicago

CITY COLLEGES[®]
OF CHICAGO

To: Juan Salgado, Chancellor
Katya Nuques, Chair of the Board of Trustees
Rev. Dr. Marshall Elijah Hatch, Sr., Vice-Chair of the Board of Trustees
Princella “Jaribu” Lee, LMSW, Secretary of the Board of Trustees
Darlene Oliver Hightower, J.D., Trustee
Oscar Sanchez, Trustee
Dr. Kafi Moragne-Patterson, Trustee
Widedji Deguenon, Student Trustee

From: Lamesha Smith, Inspector General

Date: August 11, 2025

RE: Office of the Inspector General *Bi-Annual Report* for the period of January 1, 2025 through June 30, 2025

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 January 1, 2025 through June 30, 2025. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of January 1st through June 30th is required no later than September 1st each year.

Article 2.7 et seq. of the Board Bylaws authorizes the Office of the Inspector General 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 Office of the Inspector General 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

The Office of the Inspector General (“OIG”) for the City Colleges of Chicago (“CCC”) has the authority to conduct investigations regarding waste, fraud and misconduct by any officer, employee, member of the Board;¹ any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to CCC; and any program administered or funded by the District² or Colleges.³

The full scope of the powers and duties of the OIG can be found in Article 2.7 of the Bylaws of the Board of Trustees, which can be accessed here: <https://www.ccc.edu/departments/Documents/Board%20Bylaws.pdf>.

Mission of the Office of the Inspector General

The OIG for 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.

¹ Under Article 1.1 of the Bylaws of the Board of Trustees, the Board refers to the Board of Trustees of the Community College District No. 508, County of Cook, State of Illinois.

² Under Article 1.1 of the Bylaws of the Board of Trustees, the District refers to the Community College District No. 508.

³ Under Article 1.1 of the Bylaws of the Board of Trustees, the Colleges refer collectively to the seven separately accredited colleges which make up CCC.

Make a Confidential Complaint

Anyone can make a confidential complaint regarding waste, fraud and misconduct involving CCC programs, Board members, officials, employees, or those doing or seeking to do business with CCC in any manner with which they are comfortable, including the methods listed below:

- **Submitting** a confidential complaint online via the following link, <https://apps.ccc.edu/EmailSupport/ConfidentialComplaintForm.aspx>
- **Sending** an e-mail to InspectorGeneral@ccc.edu
- **Calling** the OIG Fraud Hotline at (312) 553-3399
- **Mailing** a letter to:
The Office of the Inspector General
City Colleges of Chicago
740 North Sedgwick Street
Suite 310
Chicago, Illinois 60654
- **Making** an in-person complaint at 740 North Sedgwick Street, Suite 310

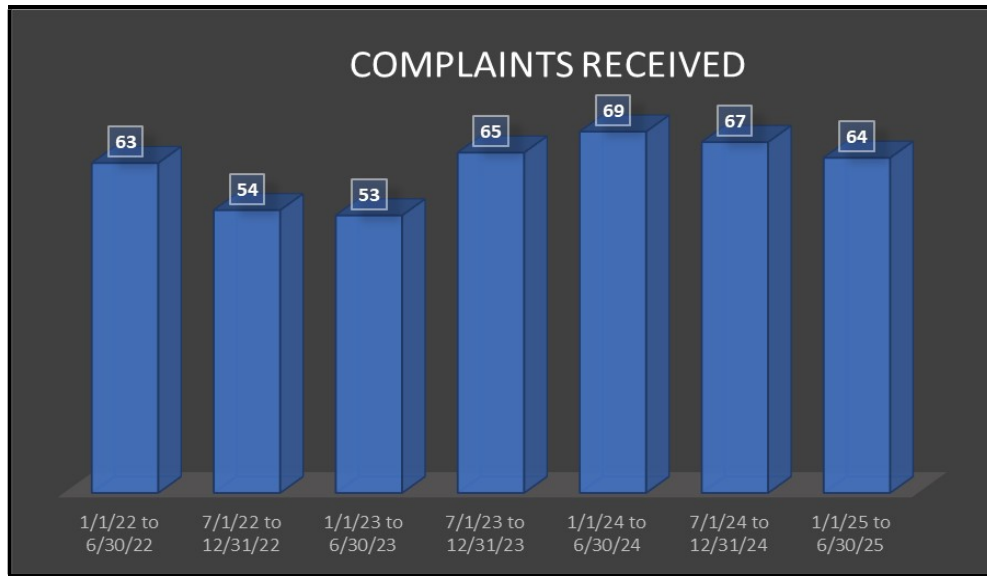
New Development

OIG Presentation with United States Department of Justice – Antitrust Division

In February 2025, the OIG partnered with the United States Department of Justice – Antitrust Division and conducted a presentation to CCC Business and Procurement Services staff members. The presentation provided an overview regarding the CCC OIG and the Procurement Collusion Strike Force, which was formed by the United States Department of Justice several years ago to combat antitrust crimes and related schemes in government procurement, grant, and program funding at all levels of government. The staff members were provided with an overview of antitrust law, as well as information and resources to identify procurement collusion and vendor fraud.

Complaints Received

For the period of January 1, 2025 to June 30, 2025, the OIG received 64 complaints. These 64 complaints included complaints forwarded to the OIG from outside sources as well as investigations initiated based on the OIG’s own initiative. The following table documents the complaints received by the OIG during the current and previous reporting periods.



The 64 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received.

Subject Matter of Complaints Received from January 1, 2025 to June 30, 2025		
Subject Matter (Allegation)	Number	Percentage
Board Mandated Audit	1	1.56%
Conduct Unbecoming of a Public Employee	1	1.56%
Solicitation of Other Employees	1	1.56%
Discrimination	1	1.56%
Violation of CCC Drug-Free Workforce Policy	1	1.56%
Violation of Title IX	1	1.56%
Engaging in Conduct in Violation of the Illinois Compiled Statutes	2	3.13%
Waste	2	3.13%
Unknown	3	4.69%
Violation of CCC Ethics Policy	3	4.69%
Violation of CCC Residency Policy	4	6.25%
Discourteous Treatment	5	7.81%
Preferential Treatment	6	9.38%
Falsification of Attendance Records	10	15.63%
Fraud	11	17.19%
Inattention to Duty	12	18.75%
Total	64	100%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2024, the OIG had 70 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2025 through June 30, 2025, the OIG closed 72 complaints. The following chart categorizes the reasons that the OIG closed the 72 complaints during the period of January 1, 2025 through June 30, 2025.

Complaints Closed Between January 1, 2025 through June 30, 2025		
Reason Closed	Number	Percentage
Completion of Board Mandated Audit	1	1.39%
Sustained	2	2.78%
Subject Inactive	2	2.78%
Duplicate Complaint	4	5.56%
Administratively Closed	9	12.50%
Complaint Included with Another Active Investigation	12	16.67%
Referred / Deferred	16	22.22%
Not Sustained / No Policy Violation	26	36.11%
Total	72	100%

Regarding the complaints closed during the period of January 1, 2025 to June 30, 2025, the table below documents the average number of calendar days between the date that the complaints were received and the date that the complaints were 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 the complaints closed during the previous reporting period (July 1, 2024 to December 31, 2024).⁴

⁴ 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 or the Deputy Inspector General and then 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 Bylaws of the Board of Trustees.

Average Calendar Days to Close				
Reason Closed	7/1/24 to 12/31/24		1/1/25 to 6/30/25	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	3	461	2	478
Completed Board Mandated Audit	-	-	1	143
Not Sustained / No Policy Violation	14	176	26	324
Referred / Deferred	16	19	16	8
Subject Inactive	2	383	2	447
Duplicate Complaint	10	1	4	1
Complaint Included with an Active Investigation	10	2	12	2
Administratively Closed	2	20	9	38
Subject Already Disciplined	1	242	-	-
Totals	58		72	

As of June 30, 2025, the OIG had 57 pending investigations.

OIG Reports Submitted – January 1, 2025 through June 30, 2025

During the reporting period of January 1, 2025 to June 30, 2025, the OIG submitted three reports.⁵ The reports were regarding the following: two reports documenting sustained findings of waste, fraud and/or misconduct as well as one report documenting the annual Board-mandated audit of the District’s compliance with the CCC Residency Policy.

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

OIG Case Number 25-0011

The OIG received a complaint alleging that a coach assigned to a City College applied for an apartment owned by a property management company to be used for students of that City College, and that with the application, the coach presented a letter with an Office of the President letterhead for the City College. The complaint alleged that the letter was fraudulent, because the City College would never enter into the agreement as set forth in the letter. Further, the complaint alleged that while the signatures on the letter appeared to be the signatures of the individuals listed, those signatures must have been taken from another source without the listed individuals’ consent. Based on this complaint, the OIG initiated an investigation.

⁵ Pursuant to Article 2.7.3 of the Bylaws of the Board of Trustees, the Inspector General submits reports to the Chancellor, the Board Chairperson, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

The OIG investigation revealed the following:

- The coach engaged in fraud in violation of Article 5.1 of the Board Policies and Procedures for Management & Government in that the coach placed the signatures of the president of the City College at the time, the dean of student services of the City College, the director – intercollegiate and intramural athletics assigned to the City College at the time, and another coach of the City College, on a letter to prospective landlords apparently from the City College that the coach created, all without their knowledge or consent.
- The coach violated Section IV(15) of the CCC District-Wide Employee Manual by committing forgery, when the coach created and shared a letter apparently from the City College to prospective landlords that included materially false statements and contained unauthorized signatures of employees of the City College, in violation of the Illinois Compiled Statutes, specifically 720 ILCS 5/17-3.
- The coach engaged in fraud in violation of Article 5.1 of the Board Policies and Procedures for Management & Government in that the coach signed as an authorized agent for the City College on a lease for a rental property located in Chicago, Illinois and included the City College as a tenant on that lease without the authority to do so.
- Based on the above findings, coupled with other acts of dishonesty set forth in the OIG investigation, including creating three additional letters that contained materially false information, the coach engaged in conduct unbecoming a public employee, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended the following:

1. The OIG recommended that the coach be terminated. The OIG further recommended that the coach be designated ineligible to be re-hired and that the coach's personnel records reflect this designation.
2. Additionally, the OIG recommended the following:
 - The CCC Athletics Department reviews the training it offers to coaches and staff members, if any, regarding National Junior College Athletic Association Bylaws and permissible student-athlete benefits, and conduct additional training, as necessary.
 - The CCC Athletics Department conducts a review of possible National Junior College Athletic Association rule violations by the coach and report any such violations to the National Junior

College Athletic Association, as appropriate. The OIG made this recommendation in light of admissions by the coach in the coach's OIG interview that:

- The coach has made 10 months' worth of water and sewer payments for the residence at a rental property in Chicago, Illinois where student-athletes of the City College reside.
- The coach paid the City College student-athletes' gas bill at a rental property in Chicago, Illinois.
- The coach collected rent money from one or more student-athletes in connection with at least three rental properties in Chicago, Illinois, and then paid the rent to the landlords of those properties via the coach's personal Zelle account.

Subsequently, in lieu of termination, the coach resigned from CCC employment. The coach was designated ineligible to be re-hired and the coach's personnel records now reflect this designation.

Additionally, regarding OIG recommendation #2 outlined above, the executive vice chancellor – chief student experience officer expressed support for this recommendation. Further, the executive vice chancellor indicated that the District Office team will be directed to carry out these recommendations as part of their preparation for the Fall 2025 term and beyond.

OIG Case Number 24-0019

The OIG initiated a complaint alleging that a full-time faculty member assigned to a City College resided outside of the City of Chicago. The OIG investigation revealed that the full-time faculty member resided in Tinley 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 full-time faculty member falsified an employment record, in that on a CCC Annual Certification of Residency online form, the full-time faculty member fraudulently affirmed that the full-time faculty member resided in Chicago, Illinois, when in fact the full-time faculty member resided in Tinley Park, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the full-time faculty member be terminated. The OIG further recommended that the full-time faculty member be designated ineligible to be re-hired and that the full-time faculty member's personnel records reflect this designation.

Annual Audit of the District's Compliance with the CCC Residency Policy

OIG Case Number 25-0078

On June 26, 2025, the OIG submitted the 2025 Audit of Compliance with the District's Residency Policy.

Article 4.6(a) of the Board Policies and Procedures for Management & Government sets forth the CCC Residency Policy. Article 4.6(a), under the heading *Annual Certification of Residency*, provides that on February 1st of each year every full-time CCC employee will be required to certify their compliance with the residency policy. The employee's certification shall include an oath or affirmation that the employee is not required to be an actual resident because he/she falls within one of the exceptions to the requirement or that the employee is an actual resident of the City of Chicago. Additionally, Article 4.6(a) provides that "the Inspector General shall conduct an annual audit of the District's compliance with this Policy and shall submit a report of audit findings to the Board no later than the first regularly scheduled public meeting of the Board following July 1st of each year."

On Monday, February 3, 2025, all full-time CCC employees were sent an email regarding the need to certify their Chicago residency for 2025 by completing the online *Annual Certification of Residency* form, with directions on how to complete the form online.

On May 27, 2025, the Office of Human Resources provided the Office of the Inspector General ("OIG") with the results of all the responses received. In total, 2,208 (98%) of the 2,254 full-time employees responded to the *Annual Certification of Residency* process.

Of the 46 employees who did not respond, the OIG confirmed that nine (9) changed employment status to terminated during the certification period, one (1) changed employment status from full-time to part-time during the certification period, 10 were on leaves of absence, and two (2) were on sabbatical leaves. Therefore, 24 of the full-time employees who were active and working during the 2025 certification of residency process did not respond. The table below documents the responses received District-Wide, as confirmed by the OIG.

Response	Number	%
No response	24	1.06%
No response – employee status changed to terminated during certification period	9	0.40%
No response – employee status changed from full-time to part-time during certification period	1	0.04%
No response – employee on a leave of absence	10	0.44%
No response – employee on sabbatical	2	0.09%
1. Required to be a resident, with correct address	2,155	95.61%
2. Not required to be a resident, with correct address	4	0.18%
3. Required to be a resident, with incorrect address	11	0.49%
4. Not required to be a resident, with incorrect address	0	0.00%
5. Required to be a resident, but does not currently live within the City of Chicago	38	1.69%
Total	2,254	100%

As part of the audit of compliance with the District’s residency requirement, the OIG analyzed these full-time employee responses. The OIG analysis of these responses revealed the following:

- Regarding the 2,155 employees who responded that they were required to be a resident of the City of Chicago (See Responses 1 and 3 in the table above):
 - As of June 25, 2025, the OIG had active investigations regarding 10 of the 2,155 full-time employees who represented that they were required to be a resident of the City of Chicago.

- Regarding the four (4) employees who responded that they were not required to be a resident of the City of Chicago (See Responses 2 and 4 in the table above):
 - Three (3) of the four (4) employees fell within an exception to the CCC residency requirement.
 - One (1) of the three (3) employees was hired before July 1, 1977.
 - Two (2) of the three (3) employees were exempt from the CCC residency requirement due to side letter agreements.
 - One (1) of the four (4) employees did not fall within an exception to the CCC residency requirement.
 - This employee was a full-time employee for less than one year, and the employee received an approved residency extension. As such, the OIG determined that the employee most likely checked the wrong box on the *Annual Certification of Residency* online form. The employee should have checked the box indicating that they were required to be a resident, but did not currently live within the City of Chicago, which is Response 5.

- Regarding the 38 employees who responded that they were required to be residents, but did not currently reside within the City of Chicago (See Response 5 in the table above):
 - Eleven (11) of the 38 employees were full-time employees for less than six months.
 - Four (4) of the 38 employees received approved residency extensions.
 - Twenty-three (23) of the 38 employees responded that they did not currently reside within the City of Chicago, despite the fact that CCC records indicated a City of Chicago residential address for the employee.
 - The OIG reviewed CCC personnel records and public records regarding these 23 employees.
 - This review revealed that 22 of the 23 employees appeared to reside in the City of Chicago. As such, the OIG determined that the 22 employees most likely checked the wrong box on the *Annual Certification of Residency* online form.
 - The OIG intends to conduct further review regarding one (1) of the 23 employees.
- Regarding the 24 employees who failed to respond, but were active and working employees:
 - CCC records indicated a City of Chicago residential address for 22 of the 24 employees. The OIG reviewed public records regarding these 22 employees. This review revealed that 21 of these 22 employees appeared to reside in the City of Chicago.
 - The OIG intends to conduct further review regarding one (1) of the 22 employees.
 - Two (2) of the 24 employees who failed to respond did not have a City of Chicago residential address on file in CCC records. However, these two employees had been a full-time employee for less than six months.
 - The OIG will inquire with the Office of Human Resources regarding its plan for direct follow ups with employees who failed to respond but were active and working employees during the certification period, as well as its plan for taking appropriate disciplinary action against active and working employees who subsequently fail to comply with the *Annual Certification of Residency* process.

Updates to Investigations Documented in Previous Bi-Annual Reports

Updates regarding recommendations made during the July 1, 2024 to December 31, 2024 reporting period

- *OIG Case Number 23-0084*

The OIG received a complaint alleging that an information technology coordinator assigned to a City College made threats towards a high-level administrator assigned to the City College and towards the administrator's family after the administrator did not recommend the information technology coordinator for a position that the information technology coordinator applied for at another City College. Based on this complaint, the OIG initiated an investigation.

As a result of the OIG investigation, the OIG did not find that the information technology coordinator made specific or direct threats towards the administrator or towards the administrator's family members.

Based on its investigation, the OIG found that the information technology coordinator engaged in conduct unbecoming a public employee, in that the information technology coordinator shared with various City College employees that the administrator had a criminal background, including various misdemeanor and felony charges, either knowing the information was false or with reckless disregard for whether it was false, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the information technology coordinator.

Subsequently, the information technology coordinator was terminated from CCC employment. Additionally, the information technology coordinator was designated ineligible to be re-hired, and the information technology coordinator's personnel records now reflect this designation.

- *OIG Case Number 24-0118*

The OIG received a complaint alleging that an information technology coordinator assigned to a City College recently accepted a job offer and was currently working as an information technology technician with the police department of a local suburb, and rather than resigning from their position with CCC, the information technology coordinator requested and received medical leave from their CCC employment. It was further alleged that the information technology coordinator's medical leave was for two months, which was the amount of time remaining in the information technology coordinator's CCC sick leave bank.

The OIG investigation revealed the following:

- The information technology coordinator requested and accepted a leave of absence on fraudulent grounds, in that the information technology coordinator took a Family and Medical Leave Act leave from CCC during a time frame within May 2024 through July 2024 to work full-time for a local suburb while also requesting and receiving CCC sick time pay, which amounted to approximately \$10,634.70, that the information technology coordinator received from CCC during this leave, in violation of Section IV(10) of the CCC District-Wide Employee Manual.
- The information technology coordinator violated Section IV(42) of the CCC District-Wide Employee Manual by failing to comply with the CCC Outside Employment Policy by working part-time for a local suburb from approximately July 2024 through October 2024, during hours that conflicted with the information technology coordinator's CCC work hours.
- The information technology coordinator violated Section 4.13(1)(e)(ii) of the Board Policies and Procedures for Management and Government and Section IV(13) of the CCC District-Wide Employee Manual by using sick leave in an unauthorized manner for purposes other than allowed under CCC policy, specifically, by using CCC sick leave to work part-time for a local suburb during the information technology coordinator's CCC work hours. On numerous days during a time frame within July 2024 through September 2024, the information technology coordinator requested and received a total of 56.25 hours of sick leave in an unauthorized manner, which amounted to approximately \$1,829.10 in sick time pay that the information technology coordinator received from CCC.
- The information technology coordinator falsified employment records in violation of Section IV(11) of the CCC District-Wide Employee Manual, by falsely stating on two leave request forms that the information technology coordinator's condition made it impossible for the information technology coordinator to perform the functions of the information technology coordinator's job, and by requesting sick time in CCCWorks for an unauthorized purpose, when the information technology coordinator was not actually sick.
- Based on the above findings, the information technology coordinator engaged in conduct unbecoming a public employee, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended the following:

1. In light of the information technology coordinator's resignation from CCC after the OIG sent the information technology coordinator a letter

- requesting the information technology coordinator's presence for an interview, the OIG recommended that the information technology coordinator be designated ineligible to be re-hired and that the information technology coordinator's personnel records reflect this designation.
2. The OIG also recommended that CCC uses all reasonable and fiscally responsible remedies to recoup approximately \$12,463.80 in sick leave pay that the information technology coordinator received from CCC in violation of CCC policies.

As was documented in the *Bi-Annual Report* for the period of July 1, 2024 through December 31, 2024, as a result of the OIG recommendation, the information technology coordinator was designated as ineligible to be re-hired. Additionally, the CCC Office of the General Counsel intended to submit a request to the now former information technology coordinator to repay to CCC the funds received in violation of CCC policies.

Subsequently, the CCC Office of the General Counsel sent a letter to the now former information technology coordinator requesting repayment to CCC of the \$12,463.80 in funds received in violation of CCC policies. The CCC Office of the General Counsel informed the OIG that the now former information technology coordinator had not responded to the letter.