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January 8, 2026

Transmittal Via Email Only

Honorable Kari K. Steele
 and Honorable Members of the Metropolitan Water
 Reclamation District of Greater Chicago Board of Commissioners
 100 East Erie Street
 Chicago, Illinois 60601

Re: Interim Inspector General Quarterly Report (4th Qtr. 2025)

Dear President Steele and Honorable Members of the Board of Commissioners:

On April 3, 2025, the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago (MWRD or District) enacted the Office of the Interim Inspector General Ordinance, O25-010 (April 3, 2025) in accordance with the MWRD Act, 70 ILCS 2605/4. On May 17, 2025, the MWRD Office of Interim Inspector General (Interim IG Office) initiated operations.¹ The purpose of the Office of the Interim IG is to detect, deter and prevent corruption, fraud, waste, mismanagement, unlawful political discrimination, misconduct or other criminal activity in relation to MWRD operations and to assure that no interference or influence external to the Office of the Interim IG adversely affects the independence and objectivity of the office. This report is being submitted in accordance with the Interim IG Ordinance to apprise you of the activities of the office during the period of October 1, 2025 through December 31, 2025.²

¹ On September 4, 2025, the Interim IG Ordinance was amended (O25-011) by the Board of Commissioners to (a) clarify the distribution of confidential summary reports and the maintenance of confidential information, (b) create penalties for violation of the ordinance provisions related to the failure to cooperate and the improper disclosure of confidential information, and (c) expand the scope of authorized public statements by the Interim IG in relation to investigations involving District waste and mismanagement. Metropolitan Water Reclamation District of Greater Chicago, Board of Commissioners Meeting Agenda, Item 2 (File # O25-011) (Sept. 4, 2025), mwrlegistar.com.

² In accordance with Article VII of the Interim IG Ordinance, this office reports on a quarterly basis (a) the number of complaints received along with the number and type of investigations initiated, concluded and pending, (b) any recommendations made by the Interim IG during the reporting period and whether such recommendations were adopted by the MWRD and (c) any concluded investigations that require a response from the District. Interim IG Ordinance, O25-011, art. VII, para. A-C. Finally, quarterly reports also reflect miscellaneous activities of the Interim IG Office that may be of interest to MWRD officials, employees, contractors and members of the public.

Office of the Interim IG Case Activity

The office received a total of 13 complaints during this reporting period. This number includes those matters resulting from my own initiative (Interim IG Ordinance, art. IV, para. 2).³ Nine of these matters are proceeding as an IG Inquiry at this time while a total of 12 IG Inquiries remain pending. Two IG Investigations have been initiated during this reporting period. These investigations relate to alleged conduct involving conflicts of interest and hiring irregularities and harassment. Two investigations have been completed this reporting period as set forth below while four Interim IG investigations are currently pending. There are no Office of the Interim IG investigations that remain pending beyond 180 days of its opening.⁴

Office of the Interim IG Concluded Investigations

During the 4th Quarter of 2025, the Office of the Interim IG issued two summary reports. The following provides a general description of each matter. Specific identifying information is being withheld in accordance with the Office of the Interim IG Ordinance where appropriate.

Case No. OIG 25-004: This investigation was initiated after receiving an anonymous complaint stating that a District “boss” and an “employee” were engaged in a personal romantic relationship. This investigation was undertaken to ascertain whether such a relationship between a supervisor and subordinate existed and, if so, whether the fiduciary duty and/or conflicts of interest provisions of the Ethics Ordinance have been implicated. Specifically, the Ethics Ordinance provides:

Art. II, sec. B. Fiduciary Duty:

Commissioners, Officers and Employees shall at all times in their performance of their public duties owe a fiduciary duty to the District. The fiduciary duty owed by Commissioners, Officers and Employees shall include, but is not limited to, the following duties:

1. Commissioners, Officers and Employees shall act impartially in the performance of their duties, so that no private organization or individual is given preferential treatment.

³ Upon the receipt of a complaint, the Interim IG Office will undertake an analysis of each complaint as part of the intake process and determine whether a formal investigation should be initiated or whether the matter should proceed as an “IG Inquiry.” This level of review involves a determination of the existence of corroborating evidence before proceeding with a formal investigation. When an IG Inquiry reveals the existence of corroborating evidence, the matter will be upgraded to a formal investigation. Should additional information be developed negating the viability of the complaint, the matter will be closed without further inquiry.

⁴ See Interim IG Ordinance, art. VIII, para. D.

2. Commissioners, Officers and Employees have a special relationship of trust with the public and therefore must avoid conduct that gives the appearance of impropriety and/or that they are violating their fiduciary duties to the District. Whether particular circumstances create an appearance of impropriety or can be considered a violation of fiduciary duties to the District shall be determined from the perspective of a reasonable person with knowledge of the relevant facts....

Art. II, sec. C. 1. Conflicts of Interest, states:

- a) No Commissioner, Officer or Employee shall make, or participate in making, any District governmental decision with respect to any matter in which the Commissioner, Officer or Employee or their Relative, has any economic interest distinguishable from that of the general public....⁵

Interview of TPO II⁶

TPO II began his employment with the MWRD in 2016 and was elevated to TPO II in 2019. The TPO II reports directly to the sole District TPO III at the facility. The TPO II explained that the facility currently has both District TPO I's and District TPO II's. As a TPO II, he "supervises" a District TPO I on the day shift. The TPO II further explained that he initially began supervising District TPO I's when he was assigned the day shift as a TPO II in 2021-2022. Currently, TPO II supervises District Employee A, a District TPO I.

TPO II explained that he and TPO I (not District Employee A) began a consensual romantic relationship in late 2024 or the beginning of 2025. TPO I worked the day shift as a vacation relief TPO I which meant that she would fill in for District Employee A in his absence. In such circumstances, TPO II stated that he would direct TPO I's work and that she would receive assignments from him while working together. TPO II estimated that TPO I worked as the TPO I under his direction during the day shift between 10-50 times, although 50 is likely high. TPO II stated that he never served as TPO I's "supervisor" and has never scheduled her time nor corrected her work. TPO II stated that he had never commented favorably about her work to another person and never conducted a performance review of her work. Moreover, according to TPO II, TPO I never sought his professional support for any reason within the District.

TPO II currently resides with TPO I who he describes as his "girlfriend." TPO II did not believe that his relationship with TPO I could be a work issue or a potential conflict of interest and

⁵ On April 7, 2022, The District amended the Ethics Ordinance, art. II, sec. C. 6. (Supervision and Employment of Relatives). "Commissioners, Officers and Employees shall not directly supervise or evaluate a Relative's job performance. This prohibition shall not apply to supervisory relationships in effect prior to the passage of this amended ethics ordinance." This section of the Ethics Ordinance does not extend to romantic relationships that may exist among unmarried District employees.

⁶ "TPO II" is alleged in the complaint to be the "boss" while "TPO I" is alleged to be the subordinate employee.

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indicated that he never discussed his personal relationship with his chain-of-command. TPO II stated that TPO I recently transferred from the facility.

Interview of TPO I

TPO I began her employment with the MWRD in 2023. In October 2024, TPO I's duties expanded and included serving as a vacation relief TPO I. TPO I also reports to TPO III at the facility. TPO I stated that she began a consensual romantic relationship in January 2025 with TPO II. TPO I stated that she currently resides with TPO II.

TPO I stated that she worked with TPO II on occasion as a vacation relief TPO I. She did not believe that he ever directed or corrected her work and she could not say whether or not TPO II ever trained her. On occasion, TPO I would seek assistance from TPO II in the same manner she would of other employees and stated that TPO II is not her supervisor.

Initially, TPO I stated that she has never discussed her relationship with any other person at the District. When specifically asked whether she spoke to TPO III about her relationship with TPO II, TPO I stated that there was a possibility that she mentioned it to TPO III in an indirect way though she could not be sure. TPO I has no memory of the circumstances in which she may have mentioned her relationship with TPO II to TPO III.

When asked whether having a consensual relationship with TPO II could be an issue or create the potential for a conflict of interest within the District, TPO I stated "no" and further explained that she reviewed the MWRD Ethics Commission web page and reviewed the conflicts of interest guidelines and did not believe there was a conflict and specifically noted that she was not related to TPO II.

Interview of TPO III

TPO III began her employment with the District in 2007 and became a TPO III in 2020 and is currently the only assigned TPO III at the facility where she is responsible for overseeing all the District TPOs covering three shifts at the facility and reports to the area Senior Engineer.

TPO III explained that she would be considered the supervisor of the District TPOs at the facility and is responsible for their scheduling and performance reviews, although she explained that District TPO II's will also conduct a performance review of their assigned District TPO I. In this regard, TPO II supervises his assigned District TPO I (District Employee A). TPO III confirmed that, until recently, TPO I was assigned vacation relief during the day shift. In this position, TPO I would fill-in for absent District TPO I's including filling in for District Employee A. TPO III checked the work schedule extending back to January 2025 and estimated TPO I filled in for District Employee A on approximately 10 occasions when TPO I worked directly with TPO II. During those occasions, TPO III would expect that TPO II would oversee and direct TPO I's work although there were other individuals at the facility available to assist TPO I if she required direction or assistance.

In early June 2025, TPO III heard “rumors” that TPO I and TPO II were in a consensual romantic relationship. TPO III felt that she needed to know if this was the case and discussed it with another District TPO II who stated he would ask TPO II directly. TPO III felt that it was better to have District TPO II approach TPO II due to the personal nature of the issue and the close relationship District TPO II has with TPO II. District TPO II reported back to TPO III that TPO II denied any such relationship with TPO I. TPO III stated that she felt that she “had nothing to worry about” after learning there was no relationship between TPO I and TPO II. TPO III reported these circumstances to her supervisor although TPO III stated there was nothing to do at that juncture after they learned that no relationship existed.

TPO III was asked how she would have handled the issue if she did become aware of such a relationship. TPO III stated that she is sensitive to this issue and would have informed her supervisor and Human Resources and seek further guidance. TPO III never observed any behavior between TPO I and TPO II that would suggest a relationship and never saw any friction or other behavior between them that caused a problem in the workplace. TPO III also offered that no other individuals in the facility are in a consensual romantic relationship with a co-worker. TPO III was asked if TPO I ever mentioned her relationship with TPO II and TPO III denied that TPO I ever informed her even indirectly.

Findings and Conclusion

The preponderance of evidence developed in this investigation fails to support the allegation that TPO II and/or TPO I violated their fiduciary duties to the District or otherwise engaged in activity constituting a conflict of interest. While the evidence establishes that TPO I was assigned under TPO II to provide shift relief on approximately 10 occasions in the absence of District Employee A, there is no evidence that TPO II acted, in any way, in violation of his fiduciary duty to the District or otherwise engaged in biased activity constituting a conflict of interest. Similarly, there is no evidence that TPO I sought to influence the impartiality of TPO II or otherwise seek to benefit from her personal relationship with TPO II. Accordingly, the allegations raised against TPO I and TPO II are not sustained.

However, while there is currently no imminent risk of an ethics concern because TPO I was reassigned from the facility pending the conclusion of a temporary disability leave, one must recognize that further oversight by TPO II of TPO I carries the risk of creating, at a minimum, the appearance of impropriety which *will* implicate the Ethics Ordinance. In other words, a reasonable person would, quite appropriately, view such proximity between TPO I and TPO II as giving the appearance of impropriety which is prohibited by the Ethics Ordinance (art. II, sec. B. 2.).

Additionally, any supervisor-subordinate type relationship must be considered in light of the legal and policy framework that exist to guard against sexual harassment, discrimination and retaliation. That is, it is appropriate to assess these circumstances not only from the perspective of preventing favoritism, preferential treatment and conflicts of interest, a critical assessment of these circumstances should also involve preventing harassment and discrimination in the workplace. *See*

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District Administrative Procedures Manual, 10.5.0 (March 23, 2018); *see also* Title VII of the Civil Rights Act of 1964, 42 USC sec. 2000e *et seq.*⁷ This District policy specifically states that:

A supervisor is defined as any District employee who has the authority to undertake or recommend a tangible employment action decision, write the performance review or direct a daily work activity of at least one other employee, regardless of whether the supervisor is in the employee's own chain-of-command. A supervisor is also defined as any employee who has real or perceived authority over another employee or one who is temporarily authorized to direct the daily work activities of another employee, regardless of whether the person acting as a "supervisor" receives acting pay. (10.5.0, Responsibilities, B. Managers and Supervisors).

TPO III recognized the potential legal issues when she learned of "rumors" circulating in the workplace that TPO I and TPO II were in a romantic relationship. TPO III sought to determine whether this was the case by requesting another District TPO II to inquire with TPO II directly. In this regard, TPO III clearly understood the potential ramifications of permitting this workplace circumstance to continue without scrutiny. The District TPO II reported back to TPO III that no such relationship existed. TPO III then notified her supervisor, and the issue was closed.

Recommendations

This case demonstrates the need for a District-wide policy to address circumstances of this nature. Workplace issues related to bias and preferential treatment combined with those associated with preventing harassment, discrimination and retaliation should form the basis for exploring the implementation of guidelines to address personal relationships in the workplace. Guidelines addressing acceptable behavior that include disclosure requirements of personal romantic relationships and managing the workplace risks related to them should be considered. I also recommend that these guidelines address personal relationships involving contractors and their employees working in District facilities.⁸

Finally, this case also highlights the vulnerability contained in the Ethics Ordinance wherein it seemingly *permits* commissioners, officers and employees to directly supervise or evaluate a relative's job performance if the supervisor-subordinate relationship existed prior to April 7, 2022. Ethics Ordinance, art. II, sec. C. 6 (Supervision and Employment of Relatives). This provision should also be amended to eliminate the existing vulnerabilities associated with the supervision and performance review of relatives in the District.

⁷ A supervisor's involvement in creating a "hostile work environment" has been the focus of significant Title VII litigation. *See Gates v. Bd. of Education of the City of Chicago*, 916 F.3d 631 (7th Cir. 2019) and *Vance v. Ball State University*, 570 U.S. 421 (2013).

⁸ The Society for Human Resources Management (SHRM) offers valuable research and policy considerations in this area.

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In accordance with the Interim IG Ordinance, the Executive Director shall respond to these recommendations for corrective action within 45 days of the issuance of the initial findings (December 19, 2025) or seek an extension. Interim IG Ordinance, art. V, para. E.

Case No. OIG 25-026: This investigation was self-initiated in accordance with the Interim IG Ordinance (art. IV. sec. A. 2.) to ascertain whether prohibited political activity⁹ was occurring within the District in relation to a political fundraiser held on Sunday September 28, 2025 called “Women for [Commissioner]” that took place in connection with the Commissioner’s campaign for election.

An initial search of the District’s electronic mail system was undertaken using the following search terms: “Women for [Commissioner],” “[Commissioner’s first name] for [Office]” and “[Commissioner’s full name] for [Office]” extending back 6 months. These searches revealed an email address, [Name]@mwr.org, which initiated emails on Monday September 29, 2025 of a political nature. The District email address has been assigned to a District employee serving as a Commissioner’s Assistant.

A second search was conducted focusing on the same District email address using the following search terms and within the last 6 months:

Campaign
[Office]
Vote
[Name] (contact person on political flyer announcing the September 28th event.
[] District
[] District
Democratic
Voter
Friends for [Commissioner]
Donate.

The second search identified an email initiated by the Commissioner’s Assistant on August 15, 2025 referencing political activity. Each of the emails identified above were issued during regular business hours of the MWRD.

Interview of Commissioner’s Assistant

The Commissioner’s Assistant began her employment with the District in March 2025 as a part-time Commissioner’s Assistant working 3 days per week, normally Monday, Wednesday and Friday. When asked if she works in the 100 East Erie Street building on a regular basis, the Commissioner’s Assistant stated that she had worked Monday, Wednesday and Friday at the District’s main office, but that schedule has not always been in place. Currently she only works

⁹ The term “Prohibited Political Activity” is defined by the Ethics Ordinance, art. I. sec. C. 27 (a-p).

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Wednesdays in the main office. When asked if she swipes in when she enters the main office, the Commissioner's Assistant stated that she only learned recently that she was required to swipe her credentials or provide her ID number upon entry. Prior to learning about this requirement, the Commissioner's Assistant stated that she would not swipe or check-in upon building entry.

The Commissioner's Assistant was asked to outline her understanding of the term "prohibited political activity" in the context of the Ethics Ordinance. The Commissioner's Assistant offered a general understanding involving the prohibition of performing volunteer political work while clocked in to the MWRD at the same time. The Commissioner's Assistant stated that she has participated in employee Ethics Training. The Commissioner's Assistant stated that in addition to working for the Commissioner, she also volunteers with the Commissioner's political campaign seeking election.

The Commissioner's Assistant was presented a print-out of a flyer titled "Women for [Commissioner]" inviting individuals for a "Conversation with [Commissioner], Candidate for [Office]..." that took place on Sunday September 28, 2025 at a cost of \$50 to \$1,000 in contribution. The Commissioner's Assistant stated that she routinely attends events like this and could not recall whether she attended this particular event and also could not recall whether she provided any volunteer support in relation to this campaign event.

The Commissioner's Assistant was presented an email issued on Monday September 29, 2025 at 3:25 p.m. from [Name]@mwr.org addressed to the Commissioner's private email address with the subject line "Draft Thank you Letter." The Commissioner's Assistant acknowledged she sent the email to the Commissioner's private email although she could not specifically recall why she sent the email to the Commissioner or why she used the specific personal email of the Commissioner to send it to her. The Commissioner's Assistant denied drafting the narrative language contained in the draft thank you letter and stated that someone with the campaign whom, she could not recall, provided her with the narrative when the Commissioner's Assistant attended the event on September 28, 2025. The Commissioner's Assistant stated that she typed the narrative the previous day and then emailed it to its intended recipients using her personal computer although she could not recall the details of when and where this occurred. The Commissioner's Assistant denied using her work computer or work email address to send the narrative to the attendees of the event, as opposed to the Commissioner. The subject email contained the following language issued at 3:25 p.m. by the Commissioner's Assistant to the Commissioner:

Subject: Draft Thank you Letter
Sent: Mon, 29 September 2025 – 15:25

Dear Sisters and Supporters,

I want to take a moment to express my deepest gratitude to each of you who came out in support of *[Commissioner] 4 Women*. Your presence, your dedication, and your unwavering belief in me and in our shared fight for a stronger future mean more than I can ever put into words.

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This movement is about more than one campaign – it is about women standing together, lifting each other up, and demanding the representation and respect our communities deserve. Knowing that you are willing to walk this journey with me gives me strength and reaffirms why this fight is worth every step.

Thank you for putting your boots on the ground and walking alongside me. Your commitment shows the power of women united, and it inspires me every day. Together, we will carry this fight all the way to Washington, D.C. – because when women lead, our communities win.

With heartfelt gratitude,
[Commissioner]

The Commissioner's Assistant was then presented an email issued on Monday September 29, 2025 at 3:32 p.m. from [Name]@MWRD.org to the Commissioner's private email with the subject line "Thank You for Joining Us at Women for [Commissioner]." The Commissioner's Assistant acknowledged that she issued this email 7 minutes after the first email although she could not recall the specific circumstances surrounding the second email or the minor edits that were made to the narrative in the second email. The Commissioner's Assistant stated that she made the changes on her own and denied speaking with the Commissioner or anyone else in connection with the email or the edits that were made to the narrative. The Commissioner's Assistant was asked why she sent this email and narrative to the Commissioner and she stated that it was probably to keep her informed. The Commissioner's Assistant was asked why she used her work email to send these emails and she stated that she did not know, "maybe it was a mistake." The Commissioner's Assistant acknowledged the political nature of the emails and the ethical prohibitions associated with using government property in connection with political activity. The following amended language was sent by the Commissioner's Assistant to the Commissioner at 3:32 p.m.

Subject: Thank You for Joining Us at Women for [Commissioner]
Sent: Mon, 29 September 2025 – 15:32

Dear Sisters and Supporters,

I want to express my deepest gratitude to each of you who showed up for the *Women for [Commissioner]* event. Your presence, your dedication, and your unwavering belief in me and in our shared fight for a stronger future mean more than words can capture.

This movement is about more than one campaign, it is about women standing together, lifting each other up, and demanding the representation and respect our communities deserve. Knowing that you are willing to walk this journey with me gives me strength and reaffirms why this fight is worth every step.

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Thank you for putting your boots on the ground and walking alongside me. Your commitment shows the power of women united, and it inspires me every day. Together, we will carry this fight all the way to Washington, D.C., because when women lead, our communities win.

With gratitude,
[Commissioner]

The Commissioner's Assistant was also presented an email issued on Friday August 15, 2025 at 3:35 p.m. from [Name]@MWRD.org to a private email account with the subject line "Bud Billiken Volunteer Confirmation." This email is a continuation of an August 7, 2025 exchange relating to supporting the Commissioner at the Bud Billiken Parade that took place on Saturday August 9, 2025. The August 15, 2025 email states:

Hello [Name],

It's [Commissioner's Assistant]. I'm also helping with the [Commissioner] for [Office] Congress campaign. We have 3 events this weekend – gathering signatures, marching with her team, and sharing her mission with the community:

Fri 8/15 – Music in the Park, 6 - 10 PM (Hazel Crest)
Sat 8/16 – Ribs & Blues Festival, 11AM – 6 PM (Park Forest)
Sat 8/16 – Lost in Music House Festival, 11 AM – 9 PM (Richton Park)

Can we count on you to attend one or all of the events?

The Commissioner's Assistant acknowledged sending this email and stated that the email represents her volunteer work on behalf of the Commissioner's campaign. The Commissioner's Assistant stated that she "sees how this could be viewed as a problem." The Commissioner's Assistant stated that she could not specifically recall whether she sent this email from her personal computer or whether she used her work computer or recall where she was when she sent it. Finally, the Commissioner's Assistant could not recall if she was clocked in to the MWRD when this and the preceding two emails were sent.

Interview of Commissioner

The Commissioner confirmed that the Commissioner's Assistant serves as a volunteer for her campaign but stated that the Commissioner's Assistant no longer works for her in the MWRD because the number of hours available for her to work have been exhausted. The Commissioner opined that the Commissioner's Assistant could be asked to return to work in her office if the opportunity arises although nothing has been set for this to occur.

The Commissioner confirmed that she held a fundraiser, "Women for [Commissioner]," on Sunday September 28, 2025. In connection with the first email sent by the Commissioner's

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Assistant on Monday September 29, 2025 at 3:25 p.m., the Commissioner stated that she had no recollection of receiving this email or discussing its contents with the Commissioner's Assistant. The Commissioner also explained that her private email account only retains emails for 30 days, therefore, the Commissioner would be unable to search if the email was actually received by her. The Commissioner volunteered that she "was very surprised that the Commissioner's Assistant would do that because "they should know better" referring to her staff in general. The Commissioner further clarified that "they know not to volunteer during the day and not to use [District] property" for such purposes and that this is an example of what should never occur.

In connection with the second email issued by the Commissioner's Assistant to the Commissioner at 3:32 p.m., the Commissioner stated that she also had no memory of speaking to the Commissioner's Assistant about this email either before or after this email was sent nor did she have any recollection of ever receiving this email. The Commissioner again stated that this email should not have been drafted or sent using District time or the District's resources. The Commissioner stated that her staff have been trained and that they are very much aware of the prohibitions associated with political activity on District time using District resources though recognized that additional training and mentoring should be available to the Commissioner's Assistant if she returns to the District.

Time and Attendance and Training Records

District time records reveal that the Commissioner's Assistant worked 9:15 a.m. - 5:00 p.m. (clock override entry) on August 15, 2025 and September 29, 2025, the days on which the subject emails were issued. District records maintained in the Genetec System and in the Online Reporting System failed to record the Commissioner's Assistant entering or exiting 100 East Erie Street on the subject dates. District training records reveal that the Commissioner's Assistant completed mandatory ethics training on September 10, 2025.

Findings and Conclusion - Commissioner's Assistant

The preponderance of evidence developed in this investigation supports the conclusion that the Commissioner's Assistant knowingly used District resources, electronic mail, during paid work time to engage in prohibited political activity as defined by the Ethics Ordinance. Moreover, the Commissioner's Assistant also prepared/amended political campaign material (September 29, 2025) and sought assistance of a third party to engage in political work on behalf of the campaign (August 15, 2025) all done during District compensated time while using District IT resources.¹⁰ The definitions section of the Ethics Ordinance defines Prohibited Political Activity, and includes the following provisions:

Ethics Ord., art. I, sec. C. 27:

¹⁰ The evidence fails to support the conclusion that the involved conduct occurred while the Commissioner's Assistant was on District premises.

- k) Distributing, preparing for distribution, or mailing campaign literature, campaign signs or other campaign material on behalf of any Candidate for elective office or for or against any referendum question;
- m) Managing or working on a Campaign for Elective Office or for or against any referendum question; and
- p) Any conduct in violation of 70 ILCS 2605/4.22-28.¹¹

In connection with Prohibited Political Activity, the Ordinance states:

Ethics Ord., art. II., sec. C. 4. A:

No Commissioner, Officer or Employee shall intentionally perform any Prohibited Political Activity during Compensated Time as defined herein. No Commissioner, Officer or Employee shall intentionally use any property or resources of the District in connection with any Prohibited Political Activity.

Finally, the conduct of the Commissioner's Assistant also stands in violation of the provisions of the MWRD Administrative Procedures Manual, 4.11.0, Acceptable Use of Information Technology Resources (June 6, 2025) when the Commissioner's Assistant used District technology resources in a manner that is unlawful and against District policy.

Findings and Conclusion - Commissioner

The Ethics Ordinance states, in relevant part, that “[n]o Commissioner...shall intentionally require any other...Employee to perform any prohibited political activity....” Ethics Ord., art. II., sec. C. 4. B.

The preponderance of the evidence fails to support a violation of law or policy involving the Commissioner in relation to the September 29th emails. The Commissioner's Assistant has stated that the drafting of the messages that were issued on September 29, 2025 occurred without the Commissioner's knowledge. Moreover, the Commissioner has denied speaking with the Commissioner's Assistant about her September 29th emails and has no recollection of receiving the September 29th emails. Accordingly, this matter is not sustained as to the Commissioner.

Recommendations

The Commissioner's Assistant is not currently employed by the District although the possibility remains that she will return to service. Should the Commissioner's Assistant seek re-

¹¹ 70 ILCS 2605/4.25 (b) states, in part, “During an employee's compensated time, other than vacation, personal, holiday, or compensatory time off, an employee shall not take any part in the management or affairs of any political party or in any political campaign....” The District has also incorporated this code provision in the Administrative Procedures Manual, 10.36.0 (August 15, 2011) regulating political activities.

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employment, I recommend that she is subject to the disciplinary procedures set forth in the District's Employee Handbook, Section VII, A. 2 (k-j) addressing Major Cause infractions. Based on all of the foregoing, I recommend that the Commissioner's Assistant be admonished through a written warning as to the importance of ensuring compliance with her ethical and employment obligations to the District. In this case, her obligation to refrain from engaging in political activity during compensated time while using IT resources of the District.

Finally, in accordance with the Interim IG Ordinance, the Executive Director shall respond to this recommendation for the imposition of disciplinary action within 45 days of the issuance of the initial findings (December 14, 2025) or seek an extension. Interim IG Ordinance, art. V, para. E.

Miscellaneous Activity Involving the Interim IG Office

On December 4, 2025, the Board of Commissioners extended the term of the Interim IG to June 30, 2026. MWRD, Board of Commissioners Meeting Agenda, Item 2 (File No. 25-091) and Item 24 (File No. 29-013) (December 4, 2025), m wrd.legistar.com. On December 18, 2025, the Board of Commissioners enacted an ordinance establishing the qualifications and duties for the appointment of an MWRD Inspector General and tasked the Chicago Bar Association with the responsibility to convene a search committee with the goal of recommending qualified candidates to the MWRD Selection Committee for consideration. MWRD, Board of Commissioners Meeting Agenda, Item 11 (File No. O25-013) (December 18, 2025), m wrd.legistar.com.

Finally, as the initial term of the Office of the Interim IG concludes, I wanted to take this opportunity to advise that in addition to investigative duties and developing OIG protocols, the office has developed a webpage that includes detailed guidance on issues related to the OIG function and includes the policies of the office relating to the investigation process. Additionally, the office has developed an internal case management system and confidential web-based intake process that is supported by the Interim IG tipline (312.751.4444). OIG flyers have been distributed throughout the District encouraging contacts with the office and flyers entitled *Your Rights and Duties Under the Interim Inspector General Ordinance* have also been distributed throughout the facilities of the District. The Interim IG has also presented at all new employee orientations. These efforts are designed to encourage District employees, officials and the public to communicate their issues and concerns directly with the Interim IG.

Conclusion

Thank you for your time and consideration with these issues. Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Honorable Kari K. Steele and Honorable Members of the Metropolitan
Water Reclamation District of Greater Chicago Board of Commissioners
January 8, 2026
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Very truly yours,



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cc: John P. Murray, Executive Director
Susan T. Morakalis, General Counsel
John T. Joiner, Administrative Aid to the President