



Illinois Ethics Matters

March 25, 2025

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Honesty, Integrity, Service

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

Office of Executive Inspector General

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Announcements

- The OEIG is pleased to announce the hiring of **Phillip Bullimore** as an Assistant Inspector General, **Deborah Keegan** as the Public Information & Communications Coordinator, and **Tyrone Lomax** as a Project Coordinator.
- The OEIG's Hiring & Employment Monitoring (HEM) Division recently released its annual report for calendar year 2024. It details record-setting statistics for the division, including: the issuance of 86 Advisories to 38 different agencies; the completion of 59 desk audit reviews of hiring sequences; and the handling of 43 new complaint referrals, the highest number referred to HEM to-date. The 2024 HEM Annual Report is available on the OEIG website [here](#).
- Since the beginning of 2025, the Executive Ethics Commission (EEC) has published an additional 39 OEIG investigative reports relating to Paycheck Protection Program (PPP) fraud by State employees. These reports, as well as previously published reports on PPP fraud, are available on the OEIG website [here](#).

Revolving Door Matters

The "revolving door" provisions set forth in Section 5-45 of the Ethics Act are intended to avoid State work situations that could create conflicts of interest or the appearance of impropriety. *In re: Jayaraj*, 21-EEC-005. Thus, any State employee who participated "personally and substantially" in decisions involving an outside entity may be restricted from working there. Also, certain high-level State employees, such as agency directors, may be restricted from working with an entity that was the subject of contracting and/or regulatory decisions by the agency. Recent OEIG investigations illustrate these aspects of the revolving door restrictions.

The EEC recently released a decision involving a former Illinois Department of Financial and Professional Regulation employee involved with regulating the cannabis industry. The employee did not contest, before the EEC, that he was personally and substantially involved with four inspections involving his future employer. The EEC also noted that "the timeline of events has an appearance of impropriety" because one of the inspections occurred when he was negotiating the future employment. The EEC imposed a fine of \$100,000 against the employee.



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The EEC also recently released a settlement involving former Illinois Department of Public Health (IDPH) Director Dr. Ngozi Ezike and the Attorney General. In the settlement, Dr. Ezike admitted to a violation of Section 5-45(h) of the Ethics Act in that she accepted employment from a healthcare entity which had contracts with IDPH with a cumulative value of \$4.2 million and over which she had exercised regulatory and licensing authority in the year before her departure from State employment. Dr. Ezike also agreed to pay a fine of \$150,000.

Both of these cases provide important examples and reminders for employees and Ethics Officers.

Sound Guidance Requires Complete Information

The Ethics Act provides that an Ethics Officer shall “provide guidance to officers and employees in the interpretation and implementation of this Act, which the officer or employee may in good faith rely upon.” In order to provide guidance in the revolving door context, the Ethics Officer should be informed of where an employee wishes to work so the Ethics Officer can fully explore all aspects of the revolving door prohibition, including contracting, regulatory, and licensing actions by the agency. This kind of full review should also involve consultation with subject matter experts who are responsible for this work at the agency.

Regulatory Action

Both cases illustrate the broad scope of regulatory action that can trigger revolving door restrictions. The EEC has defined “regulatory” as “relating to the activity of whether a business is working according to official rules or laws.”

Grants Are Contracts

Another key component in the *Ezike* matter was the consideration of grants as “contracts.” Grants are a common contractual arrangement in which State agencies award funds to other entities for certain purposes. The conclusion that grants are contracts for revolving door purposes is consistent with prior EEC decisions. A more complete authority for the conclusion that grants are contracts can be found at pp. 20-21 of the OEIG final report.

The decision in *Haling v. Bender*, 24-EEC-002, is available on the OEIG website [here](#). All the publicly released records relating to the settlement in *Haling v. Ezike*, 24-EEC-001, including the OEIG investigative report issued on February 21, 2023, are available on the OEIG’s website [here](#).