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**CHICAGO HOUSING AUTHORITY  
OFFICE OF THE  
INSPECTOR GENERAL**

**ANNUAL REPORT**





CHICAGO HOUSING AUTHORITY  
OFFICE OF THE INSPECTOR GENERAL  
INSPECTOR GENERAL KATHRYN B. RICHARDS  
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February 1, 2023

To Chairperson Hurlock, Vice-Chairman Brewer, and Distinguished Members of the Finance and Audit Committee:

Enclosed for your review is the 2022 Annual Report on the activities of the Chicago Housing Authority Office of the Inspector General (OIG). During 2022, the OIG processed 729 complaints, initiated 28 investigations, and provided investigative support to outside government agencies and CHA departments on 25 matters. OIG investigations resulted in 4 criminal convictions, 7 individuals indicted, \$224,817 in restitution, and 39 cases sustained for administrative violations.

**This was a record-breaking year for OIG Investigations.** In 2022, the OIG fielded more complaints than in each of the prior five years. At the same time, the OIG sustained more administrative cases than ever before, providing actionable findings to CHA management regarding CHA program participants, employees, and contractors. OIG criminal investigations were particularly active, through partnerships with the U.S. Attorney's Office and the Illinois Attorney General's Office, which resulted in more indictments than in the prior five years, and the highest total restitution obtained in in the last five years.

Other OIG accomplishments and developments include the following:

- **OIG New Hires** - In early 2022, the OIG welcomed three new team members. The OIG has been fully staffed with 14 individuals for much of the year, an increase of 3 FTEs as compared to 2020. These new team members made a significant impact in the efficiency and effectiveness of OIG operations.
- **PPP Loan Fraud Analytics and Investigations** - OIG analytics and investigations resulted in sustained findings against 23 CHA employees (17 active and 6 recently resigned) as a result of having received Paycheck Protection Program loans for lost business income. OIG analytics further identified 8,800 individual occupants of CHA subsidized properties who obtained more than \$190 million in forgivable loans based on questionable claims of lost income. In most cases, individuals claimed to have had business income of more than \$100,000 in 2019 to obtain the PPP funds. The OIG provided this data to CHA management for appropriate action.
  - The CHA OIG was one of the first local IG offices to make findings based on potential PPP loan fraud. After several inquiries, CHA OIG provided other local IG offices technical support and insights on the PPP data and investigative process.

- **44% Reduction in Case Backlog** – OIG pending investigations fell from 113 in 2021 to 63 at the close of 2022. Investigators prioritized the closing of older administrative cases, resulting in the closure of 66 cases, an 89% increase over last year. Enhancements to the OIG's complaint assessment and referral process allowed for more appropriate referrals of matters that may otherwise have been opened as investigations. Improved referrals also added value to other CHA departments in at least 29 matters, for which the OIG provided detailed information and public records.
- **Case Management Technology** – Throughout 2022, the OIG engaged in a public procurement for proposals for an upgraded case management database, which is anticipated to further improve case management, tracking, and operational analytics. The new database is anticipated to be implemented by late 2023.
- **Procurement Fraud Monitoring** – In 2022, the OIG launched a procurement fraud monitoring initiative, using data analytics to identify red flags in CHA's procurement and bidding process, in order to root out and prevent collusion, bid-rigging, and price fixing. We are hopeful that the OIG's efforts in this area will ensure CHA is at the leading edge of procurement fraud prevention in Chicago and beyond.
- **Successful 2022 Peer Review** – In September 2022, representatives from the Association of Inspectors General conducted a Peer Review of OIG investigations and audit activities and unanimously concluded that OIG's work met all applicable professional standards.
- **Training and Outreach** – The OIG provided training to over 650 CHA employees and contractors on the role of the OIG and the duty to report misconduct. These trainings were very well-received. The OIG will continue the training initiative for CHA new hires and other contractor staff.
- **Audits and Analytics** – OIG staff provided insights and recommendations for improvement in various areas of CHA operations, through one audit, three advisories, and one management memo.

It is an honor to work alongside OIG employees, who are dedicated to promoting integrity and trustworthiness in CHA operations. I am grateful to the Board and CHA management for their shared commitment to this mission. Together, we continue to hold the CHA to the highest standards of transparency, integrity, and trust.

Respectfully submitted,



Kathryn B. Richards  
Inspector General

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## I. MISSION OF THE OIG

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The OIG is an independent oversight agency whose mission is to promote economy, efficiency, and integrity in the administration of programs and operations of the Chicago Housing Authority (CHA). The OIG's authority is derived from the OIG Charter as approved by the CHA Board of Commissioners.

The OIG achieves its mission through:

- Criminal Investigations
- Administrative Investigations
- Investigative Support to Partner Agencies
- Performance Audits
- Program Reviews
- Analytics
- Advisories
- Training
- Communications and Outreach

The OIG partners with law enforcement agencies to pursue criminal prosecutions where appropriate. In administrative matters, the OIG issues reports of findings and recommendations to ensure that CHA officers, the Board of Commissioners, employees, and vendors are held accountable for running an efficient, cost-effective operation. Through audits, reviews, and analytics, the OIG seeks to prevent, detect, expose, and eliminate waste, inefficiency, misconduct, fraud, and abuse in CHA's programs and operations. Finally, through training, communications, and outreach, the OIG seeks to raise awareness of common indicators of fraud or other misconduct, and to provide multiple avenues for reporting such concerns and issues to ensure the CHA remains responsive and accountable to its stakeholders.

Ultimately, the OIG seeks to ensure the CHA is best equipped to serve its overarching mission to "leverage the power of affordable, decent, safe, and stable housing to help communities thrive and low-income families increase their potential for long-term economic success and a sustained high quality of life."

## II. OIG INDEPENDENCE AND REPORTING

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As provided by the OIG Charter enacted by the CHA Board of Commissioners, the OIG reports to directly to the CHA Board of Commissioners Finance and Audit Committee, and is "independent from the Authority's executive management, specifically, the Chief Executive Officer and other appointed officers." The Inspector General is appointed to a four-year term and may only be removed for cause by a majority vote of the Board.

OIG activities are reported to the Board's Finance and Audit Committee, and the OIG is required to publish quarterly and annual reports detailing sustained findings and activities. The OIG is authorized by the Board to issue administrative subpoenas in support of its investigations. All CHA officers, employees, and contractors have a duty to report to the OIG any fraud, mismanagement, waste of funds or resources, abuse of authority, misconduct, conflicts of interest, ethical violations or other improper act involving Authority business or the Authority's assets, and a duty to cooperate with all OIG inquiries.

## III. INVESTIGATION AND AUDIT STANDARDS

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The OIG conducts investigations in accordance with the Association of Inspectors General (AIG) Principles and Standards for Office of Inspectors General (the "Green Book"), using generally accepted principles, quality standards, and best practices applicable to federal, state, and local offices of inspectors general. These include both general and qualitative standards as outlined in the Green Book. Additionally, the OIG always exercises due professional care and independent, impartial judgment in conducting investigations and in the issuance of reports and recommendations.

The OIG conducts audits in accordance with the Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States (the "Yellow Book") and the Green Book. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for findings and conclusions based on the audit objectives. Adherence to these standards ensures that audits and program reviews are conducted with the requisite independence, planning, organizing, staff qualifications, direction and control, coordination, reporting, confidentiality and quality assurance.



#### **IV. 2022 PEER REVIEW BY THE ASSOCIATION OF INSPECTORS GENERAL**

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To ensure compliance with the OIG's Green Book and Yellow Book standards, OIG operations undergo an independent peer review conducted by members of the national Association of Inspectors General (AIG) every three years.

In September 2022, the OIG completed its third AIG Peer Review. As in the two prior reviews, the Peer Review Team unanimously concluded that OIG's work for the years 2019-2021 met the applicable professional standards.

These findings were based on the direct observations of the peer reviewers; interviews with external stakeholders; interviews with OIG staff; case file reviews; review of OIG administrative and operating materials; and the professional judgment and experience of the peer reviewers.

#### **V. SIGNIFICANT ACCOMPLISHMENTS AND ACTIVITIES IN 2022**

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- **Criminal Investigations – 7 Individuals Indicted, \$224,817 in Restitution**
  - People v. Spruill, (Cook Cty. Cir. Ct.) Indictment
  - People v. Brown, (Cook Cty. Cir. Ct.) Indictment
  - People v. Rios & People v. Rodriguez, (Cook Cty. Cir. Ct.) Indictments
  - U.S. v. Green, (N.D. Ill.) Indictment and Guilty Plea
  - People v. Townsend, (Cook Cty. Cir. Ct.) Indictment
  - U.S. v. Jones, (N.D. Ill.) Indictment and Guilty Plea
  
- **Administrative Investigations – 39 Reports of Sustained Findings**
  - In 2022 OIG sustained 39 administrative investigations, which identified program violations and misconduct and recommended corrective action regarding the following subjects:
    - HCV and Public Housing Participants
    - CHA Contractors and Contractor Employees
    - 24 CHA Employees
  
- **Performance Audits and Advisories - 1 Published Audit, 3 Advisories, 1 Management Memo**
  - Audit of HCV Demonstration Programs and Special Initiatives Admissions
  - OIG Advisory #23: Paycheck Protection Program Loan Certifications by CHA Participants Claiming Lost Business Income
  - OIG Advisory #24: Public Housing Waitlist Status and Application Date Issues
  - OIG Advisory #25: HCV Suspensions of Building Code Scofflaws
  - OIG Management Memo: Potential Lack of Clarity in CHA By-Laws

## VI. OIG COMMUNICATION, OUTREACH, AND TRAINING EFFORTS

In 2022, as service of its mission to prevent fraud, waste, and abuse, the OIG significantly increased its communication and outreach efforts, while also providing training to all CHA employees and HCV contractors on the role of the OIG and the duty to report misconduct. These efforts are guided by the principle that an organization benefits from multiple avenues for stakeholders to provide complaints and concerns without fear of reprisal. The OIG continually strives to increase awareness of the OIG as a confidential, trusted resource for CHA stakeholders to seek resolution to their concerns. OIG Communication, Outreach, and Training accomplishments in 2022:

- Conducted in-person and remote training for over 400 CHA employees and 250 HCV contractors.
- Published 3 issues of *Integrity Watch*, the OIG email newsletter, highlighting recent OIG investigations
- Sent informational OIG fliers to all 50 Chicago Aldermanic Ward Offices, 32 Chicago-based non-profit housing and legal services agencies, 30 CHA Senior Sites, and 30 CHA Mixed Income Property Offices
- Conducted site visits to CHA public housing developments to provide fliers and information regarding OIG to residents and property managers
- Held informational meetings with four stakeholder agencies
- Promoted OIG activities on Twitter, LinkedIn, and Facebook
- Published OIG reports in the Association of Inspectors General Illinois Chapter newsletter



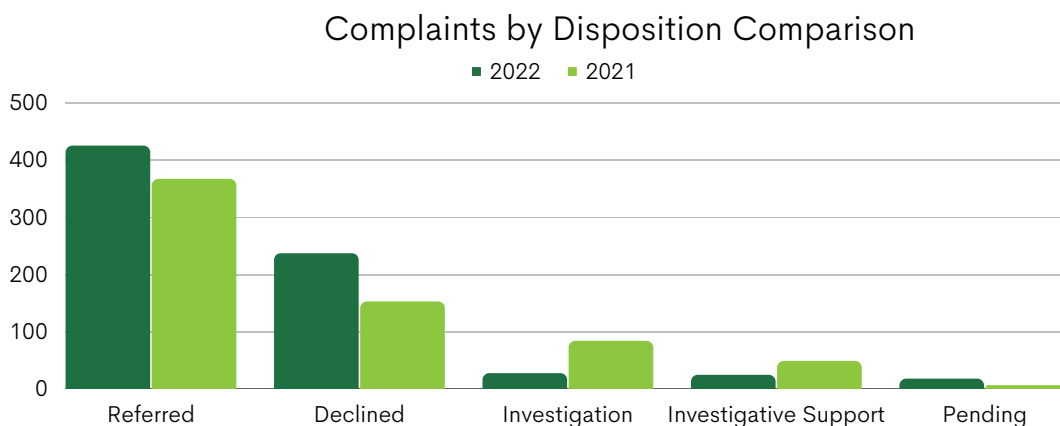
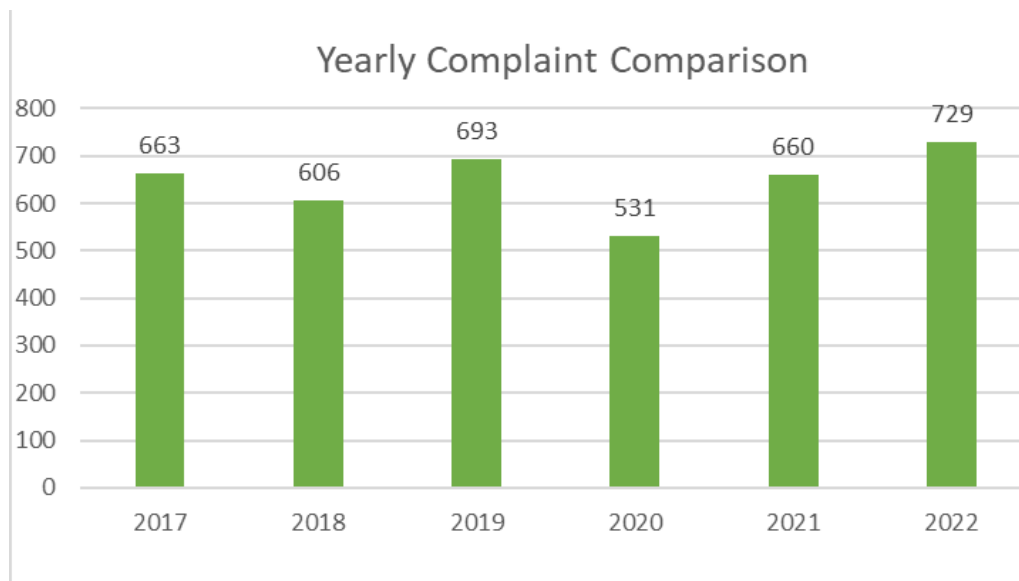


## VII. STATISTICAL INFORMATION REGARDING COMPLAINTS RECEIVED IN 2022

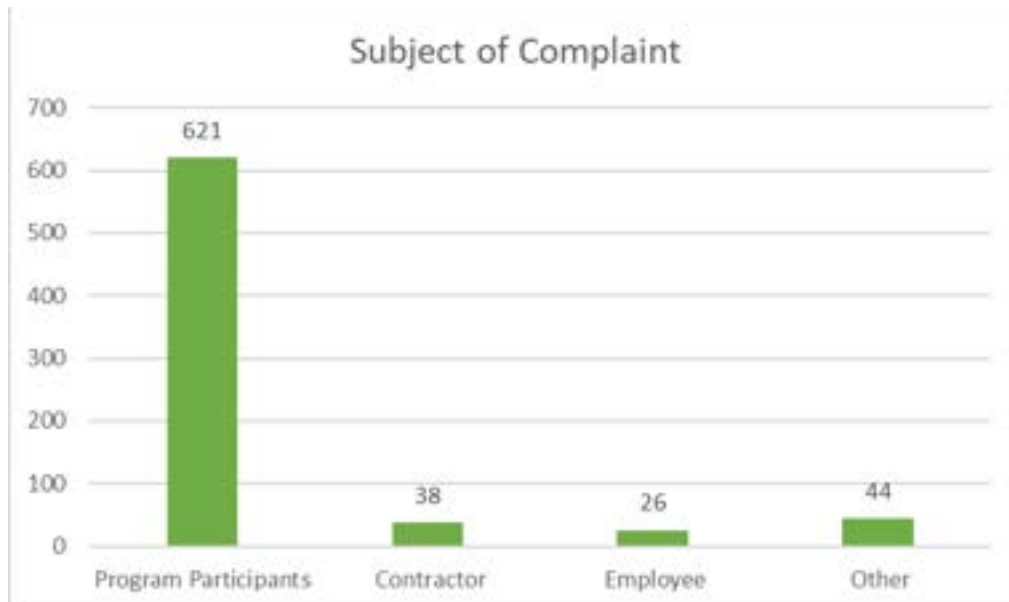
The OIG accepts complaints through its online web portal, by email, telephone hotline, employee complaint drop boxes, and in-person reports. Complainants may choose to remain anonymous. The OIG initiates investigations, reviews, and audits in response to complaints or concerns it receives or upon the OIG's initiative. Following a preliminary review and assessment of the complaint, OIG staff determine whether to open an investigation or other matter. Matters may be declined for a variety of reasons including but not limited to: insufficient information, lack of jurisdiction, or no violation presented.

The OIG received 729 complaints in 2022, the most complaints received in the past 6 years. Of those complaints, the OIG opened 28 for investigation, referred 425 complaints to various relevant CHA departments and outside agencies; provided investigative support to internal and external stakeholders in response to 25 complaints, and declined 237 complaints. At the close of 2022, 18 complaints remained pending for preliminary investigation.

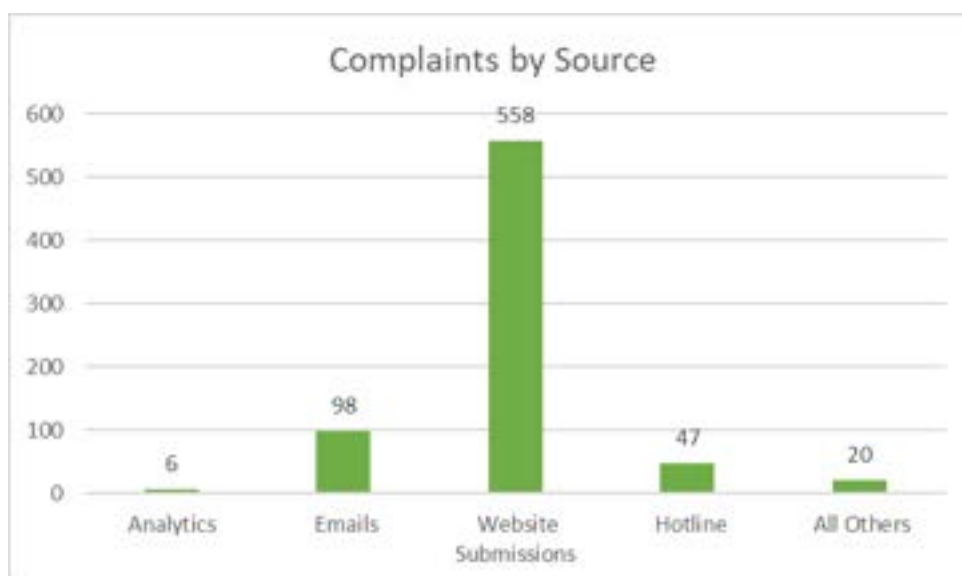
Below are a series of tables showing statistical information on the OIG complaints for 2022.



Consistent with prior years, 85% of all complaints received by the OIG involved program participants and potential fraud or alleged violations of the CHA's public housing or HCV program policies. Allegations against CHA contractors and their employees constituted 5% of all complaints, while allegations against CHA employees represented just 4% of all complaints. The remaining 6% of complaints involved individuals or entities outside the OIG's jurisdiction or unknown individuals.

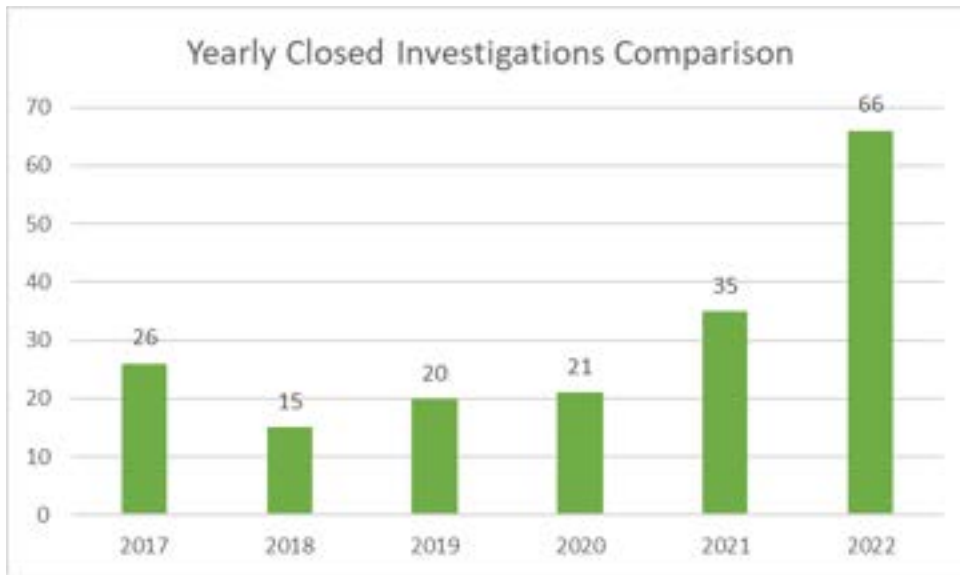


Most complaints received by the OIG, 77%, were submitted through the OIG's anonymous web portal for complaints, located on the OIG's webpage.

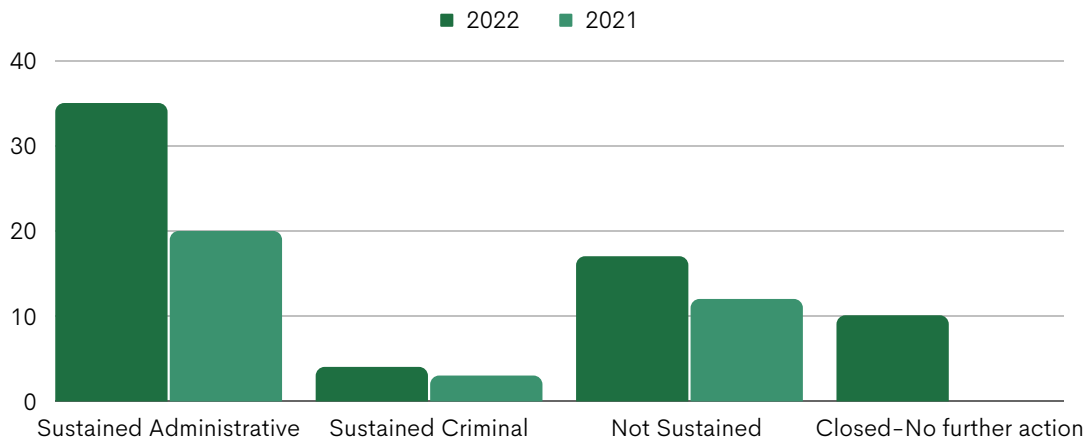


## VIII. STATISTICAL INFORMATION REGARDING INVESTIGATIONS

In 2022, the OIG closed 66 investigations, representing a record number of closed cases in the past 6 years, and an 89% increase over 2021. Of those closed cases, 39 were closed sustained for misconduct or other violations, representing 4 criminal convictions and 35 administrative sustained findings. A total of 17 investigations were closed as not sustained, and 10 were closed with no further action warranted. See the chart below detailing closed criminal and administrative cases.

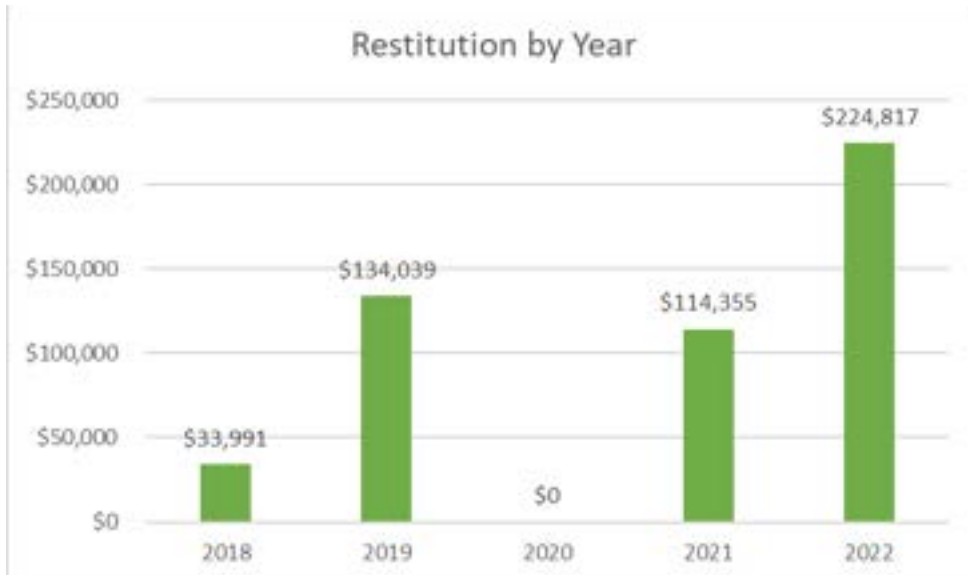


### Disposition of Closed Investigations



## Investigations Resulting in Restitution

The OIG consistently seeks restitution from individuals found to have defrauded the CHA's housing programs. In 2022, OIG criminal investigations resulted in two significant court orders for restitution, in the amounts of \$40,000 and \$184,817, respectively, for a total of \$224,817 in funds recovered for the CHA. This is the highest amount of recovery achieved in the last five years.



## Pending Criminal and Administrative Investigations

At the close of 2022, the OIG had a total of 63 pending investigations. This is a significant reduction as compared to 2021, when OIG had 113 pending investigations. Of those investigations pending at the close of 2022, 39 were administrative and 24 criminal.

## Investigations Not Concluded Within Six Months

As of December 31, 2022, 53 of the OIG's 63 pending investigations (84%) had been open for at least 6 months. At the close of 2021, 56 investigations had been open 6 months or more, representing 50% of all OIG cases. The following table shows the reasons why these matters remained open.

Reasons	Number of Investigations
Complex investigations, generally involve difficult issues of multiple subjects and/or under review by prosecuting agency	17
Indicted cases, but no criminal disposition	10
On-hold or delayed due to other ongoing time-sensitive investigations	26
<b>Total</b>	<b>53</b>

## **IX. INVESTIGATIONS - CLOSED CASE SUMMARIES**

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### **A. CRIMINAL CASES**

In 2022, OIG investigations resulted in 7 individual indictments for fraud related to CHA programs, including two HCV landlords, a mixed-income property manager, an insurance broker servicing CHA contractors, and three HCV participants. OIG investigations further resulted in four final criminal convictions and sentencing, including two HCV participants, one Public Housing leaseholder, and one former CHA contractor. In two of these cases, defendants were ordered to pay restitution, resulting in a total of \$224,817 payable to the CHA. The other two individuals were sentenced to incarceration.

These cases are detailed below, along with a table of all pending criminal cases stemming from OIG investigations.

### **CRIMINAL INDICTMENTS**

#### **Indictment of Nekeia Spruill, Former Mixed-Income Property Manager People v. Spruill, 22-CR-0228801 (Cook Cty. Cir. Ct.) OIG #2020-02-00030**

On February 16, 2022, the Grand Jury sitting in the Circuit Court of Cook County returned a nine-count indictment charging Nekeia Spruill, a former property manager for Leasing & Management Inc. (L & M) with theft, forgery, and wire fraud in connection with her management of two CHA mixed-income properties. Since 2011, L & M has managed Keystone Place Apartments (Keystone) and Dorchester Housing + Art Collaborative (Dorchester), both CHA mixed-income properties. Spruill was employed by L & M to manage these properties from December 2016 to October 2019.

The investigation revealed that, from February 2017 through October 2019, Spruill fraudulently deposited money orders totaling over \$83,000 into her personal bank accounts. The money orders were rent payments L & M received from tenants of Keystone and Dorchester, and which Spruill had altered to identify herself as the payee. The payments were from tenants that included CHA public housing residents, CHA Housing Choice Voucher (HCV) participants, and market rate renters. Spruill took various steps to conceal her theft from both L & M and the CHA. L & M has worked closely with the OIG to support the investigation and ensure no tenants were negatively affected.

The CHA OIG worked jointly on the investigation with the Chicago Police Department Financial Crimes Unit. Prosecution of the matter is being handled by the Illinois Attorney General's Office. The OIG's investigation remains open pending the outcome of the criminal court proceedings.

**Indictment of Catherine Brown, HCV Program Fraud**  
**People v. Brown, 22-CR-0281301 (Cook Cty. Cir. Ct.) OIG #2017-04-00014**

On March 2, 2022, the Grand Jury sitting in the Circuit Court of Cook County returned a four-count indictment charging former HCV participant Catherine Brown with Theft of Governmental Property Exceeding \$100,000 (Class X felony) and three counts of Forgery (Class 3 felony). The indictment stems from an investigation initiated by the CHA OIG, which found that, from September 2000 to May 2018, Brown fraudulently obtained housing benefits totaling over \$193,000. Brown has also used the name Catherine D' Tycoon. Brown is a locally known pastor and community activist, who unsuccessfully ran for mayor in the 2019 Chicago mayoral election.

The indictment contends that, from October 2006 through July 2017, Brown fraudulently received housing benefits totaling over \$136,000 by residing with her CHA voucher in a property she jointly owned with her parents. During this time, Brown was a signatory on both the P.O. Box and the bank account where Housing Assistance Payments intended for Brown's landlord were sent. Brown also failed to report her husband as a household member or his income to the CHA.

In addition, prior to her ownership of the property, Brown failed to report that she was renting her HCV unit from her parents, a violation of CHA's family obligations. This caused the CHA to incur an additional loss of approximately \$57,000 from September 2000 to September 2006.

The OIG initiated the investigation based on OIG analysis of HCV landlords whose last name matched the HCV participant and that had provided a Post Office (P.O.) Box as their vendor address. The CHA terminated Brown's voucher in May 2018.

Prosecution of the matter is being handled by the Illinois Attorney General's Office. The OIG's investigation remains open pending the outcome of the criminal court proceedings.

**Indictments of Carla Rios and Sylvia Rodriguez, HCV Program Fraud**  
**People v. Rios, 22-CR-0694301 & People v. Rodriguez, 22-CR-0694401 (Cook Cty. Cir. Ct.) OIG #2019-07-00005**

On June 15, 2022, the Grand Jury sitting in the Circuit Court of Cook County returned a four-count indictment charging former HCV participant Carla Rios with State Benefits Fraud (Class 3 felony) and three counts of Forgery (Class 3 felony). The Grand Jury also returned a two-count indictment charging Rios's sister, Silvia Rodriguez, with Theft of Government Property (Class 1 felony) and Forgery (Class 3 felony). Rodriguez was the owner of the HCV property where Rios purportedly resided with her voucher.

The indictments stem from an OIG investigation, which found that, from September 2015 to March 2021, Rios fraudulently obtained housing benefits totaling over \$60,000 from the CHA. The payments related to these housing benefits were sent by the CHA, via direct deposit, to an account held by her sister, Rodriguez.

The OIG investigation revealed that Rios failed to report to the CHA various sources of income and residential properties she jointly owned with her husband. Rios resided in one of these properties during the time she was supposed to be residing in the HCV unit. The investigation further revealed that Rodriguez received the monthly payments from the CHA despite knowing Rios did not live in the HCV unit, and in fact, resided there herself. Rodriguez also submitted numerous fraudulent documents to the CHA alleging she was not the sister of Rios, a violation of CHA policy. The CHA terminated Rios's voucher in March 2021.

Prosecution of the matter is being handled by the Illinois Attorney General's Office, Public Integrity Bureau. The OIG's investigation remains open pending the outcome of the criminal court proceedings.

**Criminal Charge and Guilty Plea of Maurice Green, Pillar Insurance Services, LLC  
U.S. v. Green, 22-CR-391 (N.D. Ill.) OIG #2018-12-00002**

On August 11, 2022, Maurice Green, owner of Pillar Insurance Services, LLC, was charged by information in the U.S District Court for the Northern District of Illinois, with one count of wire fraud, in violation of 18 U.S.C. 1343, for his scheme to sell fraudulent surety bonds to CHA construction contractors. The contractors believed they were purchasing legitimate surety bonds, which were required for their work on CHA contracts.

On November 28, 2022, Green, pleaded guilty to one count of wire fraud. As Green acknowledged in the plea agreement, from approximately October 2015 through December 2018, he and his company Pillar Insurance sold fictitious surety bonds and insurance policies purporting to be from legitimate insurance companies, when in fact those insurance companies had not issued the policies, and Pillar had not been authorized to sell them.

Green collected approximately \$270,776 in fees from CHA contractors for the fictitious bonds and policies, which had a combined purported coverage value of \$6,764,078. The CHA required certain contractors performing work for the Authority to obtain surety bonds, which would insure against those contractors' failure to perform on the contract or to pay any subcontractors. As described in the single count charged, Green defrauded a CHA construction contractor, which believed it was purchasing a legitimate surety bond. Green acknowledged that a majority of the fraudulent surety bonds and policies that he sold to his customers were provided to the CHA as part of his customers' contracting process with the CHA. He further acknowledged that, as a result of having purchased one

of the fraudulent surety bonds, one of those customers was obligated to pay \$30,000, the amount that would have been covered by the bond, had it been legitimate.

Green's sentencing is scheduled for March 17, 2023. The parties agreed that the applicable advisory sentencing guidelines range is 27 to 33 months' imprisonment, in addition to any supervised release, fine, and restitution the Court may impose. The Court must order restitution to the victims of the offense in an amount determined by the Court. To the extent CHA reimbursed some of the contractors for their insurance costs, per the terms of their contract, CHA may be entitled to restitution in addition to the construction contractors who purchased the fraudulent bonds. The CHA OIG is working with the U.S. Attorney's Office to provide information regarding the loss amounts.

The CHA OIG initiated this investigation and worked in partnership with the U.S. Department of Housing and Urban Development OIG and the FBI. Prosecution of the matter is being handled by the U.S. Attorney's Office for the Northern District of Illinois. The OIG's investigation will remain open pending the outcome of Green's sentencing.

**Indictment of Lanell Townsend, former HCV Landlord**  
**People v. Townsend, 22-CR-0017401 (Cook Cty. Cir. Ct.) OIG #2017-06-00003**

On December 21, 2022, the Grand Jury sitting in the Circuit Court of Cook County returned a three-count indictment charging former Housing Choice Voucher (HCV) landlord, Lanell Townsend with Theft by Deception Exceeding \$100,000 (Class 1 Felony), Forgery (Class 3 Felony), and Wire Fraud (Class 3 Felony). The indictment stems from a CHA OIG investigation worked in conjunction with the U.S. Department of Housing and Urban Development (HUD) OIG. Three weeks later, on January 12, 2023, (outside the 2022 reporting period), Townsend pleaded guilty to one count of theft by deception greater than \$100,000.00. He was sentenced to 12 months' probation and ordered to pay restitution to the CHA in the amount of \$106,634.00, including \$20,000, which he tendered in court the day of the plea.

The investigation revealed that from approximately February 2010 to January 2020, Townsend fraudulently received Housing Assistance Payments (HAP) as an HCV landlord by residing with the HCV participant and their daughter in two subsidized properties that he owned. From February 2010 through May 2015, Townsend received payments from the CHA as a landlord for a property he owned in Chicago, IL, while failing to disclose he resided with the HCV participant, and was the father of a minor occupant on the voucher.



From May 2016 to January 2020, Townsend received payments from the Housing Authority of Cook County (HACC) as a landlord for a property he owned in Sauk Village, IL, while failing to disclose he resided with the HCV participant, and was the father of a minor occupant on the voucher. Despite HACC administering the voucher, the CHA was still responsible for the HAP. In total, Townsend fraudulently received HAP totaling over \$106,000.00.

Prosecution of the matter was handled by the Illinois Attorney General's Office, Special Prosecutions Bureau.

**Indictment and Guilty Plea of Brenda Jones, HCV Participant**  
**U.S. v. Jones, 22-CR-612 (N.D. Ill.) OIG #2018-07-00007**

On December 27, 2022, Brenda Jones, an HCV participant, pleaded guilty in the U.S District Court for the Northern District of Illinois to one count of theft of government funds in violation of 18 USC § 641, for her scheme to defraud the CHA and the Social Security Administration (SSA).

As Jones acknowledged in her plea agreement, she used two Social Security Numbers (SSNs) to enable her to conceal her work activity, income, and assets from the CHA. While working using the second SSN, Jones used the first SSN in connection with her CHA applications and related benefits. Based on the false and misleading information provided by Jones, the CHA made Housing Assistance Payments to Jones's landlords.

From approximately October 2004 to December 2017, Jones caused the CHA to issue an overpayment of HCV benefits in the amount of \$29,644.00. In addition, from approximately May 2003 to December 2017, Jones caused the SSA to issue her approximately \$70,839.90 in Supplemental Security Income benefits, which she was not entitled to receive.

As part of the plea agreement, Jones agreed to pay restitution in the above amounts to the CHA and SSA, respectively. The plea agreement was entered pursuant to an Information filed on November 16, 2022. Jones's sentencing date is currently not set, pending receipt of the pre-sentence investigation and sentencing memoranda.

The CHA OIG worked the investigation in partnership with the SSA OIG. Prosecution of the matter is being handled by the U.S. Attorney's Office for the Northern District of Illinois. The OIG's investigation will remain open pending the outcome of Jones's sentencing. Following the filing of Jones's guilty plea, the OIG referred the matter to the HCV department for administrative termination of benefits. HCV immediately began the process for termination of benefits.

## **CRIMINAL CONVICTIONS**

### **Guilty Plea & Sentencing of Agwu Mong, Public Housing Fraud** **People v. Mong, 19 CR 1092601, (Cook Cty. Cir. Ct.), OIG # 2016-02-00046**

On May 31, 2022, Agwu Mong, a former CHA public housing participant, pleaded guilty to one count of Felony Theft and one count of Forgery in the Circuit Court of Cook County, relative to a scheme to defraud the CHA. The Honorable Judge Maria Kuriakos Ciesil sentenced Mong to serve two years of probation and to pay restitution to the CHA in the amount of \$40,000.

Mong was a CHA leaseholder at the CHA's Altgeld Gardens / Phillip Murray development from January 2010 until he was evicted in September 2016. The CHA OIG's investigation revealed that during the time Mong was a CHA leaseholder, he concealed the fact that he was also the owner of a multi-unit, residential property located in the Austin neighborhood of Chicago, for which he was receiving rental income. In addition, Mong did not actually reside in his CHA unit at Altgeld Gardens and instead used it as a source of income by renting it to multiple sub-lesers.

Mong had been charged on August 6, 2019, with Felony Theft and multiple counts of Forgery. The matter was prosecuted by the Cook County State's Attorney's Office, Public Corruption / Financial Crimes Unit. Senior Investigator Justin King handled the case for the CHA's OIG.

Mong was evicted from the CHA public housing unit in September 2016 but has been a CHA HCV landlord for multiple properties at various times under the vendor names Agwu Mong and Mong Properties Inc. At the time of his guilty plea, Mong was receiving one Housing Assistance Payment (HAP) for one apartment in a property he owns. The OIG referred this additional finding to the HCV department for appropriate administrative action.

The OIG is working with the CHA's Office of General Counsel to ensure Mong's Order of Restitution is enforced through a filing with the Circuit Court for civil enforcement in accordance with 730 ILCS 5/5-5-6(m). The CHA OIG has closed this matter as sustained.

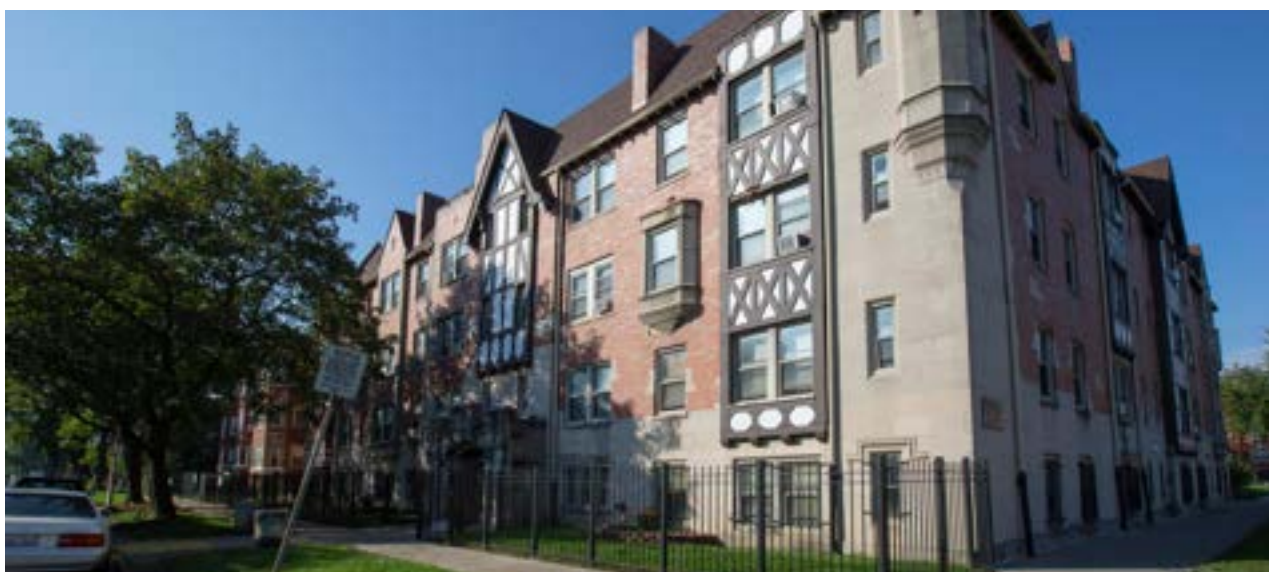
**Guilty Plea and Sentencing of Major Barrow, CHA Contractor Fraud**  
**U.S. v. Barrow, 19-CR-00650 (N.D. of Ill.), OIG # 2014-07-00043**

On June 8, 2022, Major Barrow, president and owner of Barrow Construction, was sentenced before the Honorable Judge Edmund Chang in the U.S. District Court, Northern District of Illinois, following his guilty plea in March 2022 for the crime of wire fraud committed as part of a scheme to defraud the CHA. Barrow was ordered to pay restitution to the CHA in the amount of \$184,817.00. The Court declined to impose incarceration or probation in accordance with the U.S. Attorney's Office recommendation for a non-custodial sentence due to Barrow's declining health.

Barrow's company, Barrow Construction, was a business located in Oak Lawn, IL, that provided maintenance and renovation services. Barrow Construction entered into multiple subcontract agreements to provide maintenance and renovation services to private property management (PPM) companies at CHA sites. Barrow's contracts for work at CHA properties totaled approximately \$345,532 in CHA funds, including wages purportedly paid to Barrow Construction employees.

The OIG's investigation found that Barrow Construction submitted multiple false representations regarding its labor practices. In documents submitted to the CHA, Barrow Construction falsely represented that it paid prevailing wages as set forth in Davis-Bacon regulations. Additionally, Barrow knowingly prepared weekly certified payroll reporting forms that contained materially false statements regarding the dates of work performed by the employees; the wages paid to the employees; the financial instruments used to pay the employees; and the withholding of relevant taxes from the employees' wages.

Barrow had been charged on August 15, 2019, with two counts of wire fraud for transmitting fraudulent certified payroll reports to the CHA and the PPMs by means of wire communication through interstate commerce. The OIG has closed this matter as sustained.



**Guilty Plea and Sentencing of Evelyn Massey, HCV Program Fraud**  
**People v. Massey, 21 CR 58201 (Cook Cty. Cir. Ct.) OIG # 2017-06-00022**

On August 31, 2022, Evelyn Massey, an HCV participant, was sentenced to two years' incarceration in the Illinois Department of Corrections, following her plea of guilty to wire fraud. On the day she had been scheduled for trial in June 2022, Massey pleaded guilty in the Circuit Court of Cook County to one count of wire fraud relative to a scheme to defraud the CHA of more than \$188,000 rental subsidy to live in a house she owned.

An OIG investigation revealed that from November 2000 through February 2018, Massey fraudulently received housing benefits totaling over \$188,000 by concealing her ownership in the property that she resided in with her CHA voucher. Massey became a CHA HCV participant in 1994. She rented a house owned by her father, which, at the time, was permitted under the program. Massey's father died in October 2000, and the home was ultimately deeded to her. Instead of notifying the CHA, Massey repeatedly submitted documents continuing to identify her father as the owner of the property and failed to disclose her ownership of the property, despite being the recorded owner and receiving a loan secured by a mortgage on the property. Massey further submitted documents directing the housing assistance payments be deposited to a bank account she controlled.

Massey had been charged on January 20, 2021, with one count of Class X Felony Theft, three counts of Class 1 Felony Theft, one count of Wire Fraud (Class 4 Felony) and three counts of Forgery (Class 3 Felony). Prosecution of the matter was handled by the Illinois Attorney General's Office, Public Integrity Bureau. The HCV department stopped payment of Massey's voucher in 2018, but termination of the voucher was held pending the outcome of the criminal case. Following an administrative hearing, in which Massey did not participate, CHA formally terminated Massey's voucher in October 2022. The CHA OIG's investigation is now closed.



**Guilty Plea and Sentencing of Silk Lumpkins, HCV Program Fraud**  
**People v. Lumpkins, 21-CR-0069001 (Cook Cty. Cir. Ct.) OIG #2019-09-00060**

On December 7, 2022, Silk Lumpkins, a former HCV participant, pleaded guilty to violating the terms of her probation and was immediately remanded to the custody of the Illinois Department of Corrections for a sentence of three years for her crime of defrauding the CHA.

Lumpkins had previously pleaded guilty, in July 2022, to one amended count of State Benefits Fraud, a Class 3 Felony, and admitted to defrauding the CHA of more than \$100,000 in HCV housing benefits. The Honorable Judge Arthur Wesley Willis of the Circuit Court of Cook County had sentenced Lumpkins to 30 months' standard probation and restitution payable to the CHA in the amount of \$105,762.00, including \$20,000 payable on the date of the plea. Per the restitution order, Lumpkins was to make monthly payments of \$2,859.00 for the 30 months of probation.

When Lumpkins appeared in court to enter her guilty plea in July 2022, however, she personally tendered to the court a forged cashier's check payable to the CHA. In fact, and as she later admitted, she had purchased a \$20 cashier's check and altered it to appear to be a check for \$20,000. When the CHA deposited the cashier's check to its bank account, the bank returned it as unpaid.

Upon learning of the forged restitution payment, the Illinois Attorney General's Office moved to vacate the plea and sentence and also filed a petition for violation of probation. On December 7, 2022, prior to her hearing, Lumpkins admitted to forging the cashier's check in violation of her probation. Lumpkins' probation was terminated unsatisfactorily, and she was sentenced to three years in the Illinois Department of Corrections related to the original State Benefits Fraud count. Lumpkins was immediately taken into custody. The CHA OIG's underlying investigation revealed that from November 2015 through March 2020, Lumpkins fraudulently received housing benefits totaling approximately \$110,000 by concealing the following income and assets:

- Income from employment with several major companies, through the use of an alias (Pauline Williams) and a second social security number.
- Ownership of a residential home in Crystal Lake, IL. As part of her 2013 Marital Settlement Agreement, Lumpkins received sole possession of the residential property, and was not responsible for paying the mortgage, taxes, or insurance on the property.
- Monthly rent payments she had received since 2015 from tenants that rented the Crystal Lake property.
- Monthly child support payments.
- The income of her current husband, who was also an unauthorized household member.
- In addition, Lumpkins failed to disclose on her March 2015 CHA application a federal felony conviction for a bank robbery she committed in May 2010.

## PENDING CRIMINAL MATTERS

At the end of 2022, 11 OIG criminal investigations remained pending in court. The chart below outlines the current status of those cases.

Case Name	Indictment	Summary of Charges	Scheme	Updates
U.S. v. Jones, 22-CR-00391 (U.S. District Ct.)	12/27/2022	Theft of government funds	HCV Fraud	Awaiting sentencing date
People v. Townsend, 23-CR-0017401 (Cook Cty. Cir. Ct.)	12/21/2022	Class 1 felony theft, forgery, and wire fraud	HCV Fraud	Guilty plea and sentence entered January 12, 2023
U.S. v. Green, 22-CR-391 (U.S. District Ct.)	8/11/2022	Wire fraud	Sale of Fraudulent Surety Bonds to CHA Contractors	Sentencing set for March 17, 2023
People v. Rodriguez, 22-CR-0694401 (Cook Cty Cir Ct)	6/15/2022	Class 1 felony theft, forgery	HCV Fraud	Status hearing set for February 21, 2023
People v. Rios, 22-CR-0694301 (Cook Cty Cir Ct)	6/15/2022	State benefits fraud, multiple forgery counts	HCV Fraud	Status hearing set for February 21, 2023
People v. Brown, 22-CR-0281301 (Cook Cty Cir Ct)	3/2/2022	Class X felony theft and forgery	HCV Fraud	Status hearing set for January 17, 2023
People v. Spruill, 22-CR-0228801 (Cook Cty Cir Ct)	2/16/2022	Class 1 felony theft, class 2 felony theft, wire fraud, forgery	Property manager theft of rental receipts	Status hearing set for March 14, 2023
People v. Carney, 21-CR-1492801 (Cook Cty Cir Ct)	12/21/2021	Felony theft, wire fraud, and forgery	HCV Fraud	Status hearing set for January 19, 2023
U.S. v. Coleman, 20-CR-00099 (U.S. District Ct)	2/14/2020	Felony wire fraud	Contractor MBE Fraud	Guilty Plea entered January 2022. Sentencing March 8, 2023
U.S. v. Kowalski, 19-CR-00226-01 (U.S. District Ct)	3/10/2019	Conspiracy to commit embezzlement, bankruptcy, tax fraud	HCV Owner Fraud	Jury Trial set for February 13, 2023
People v. Hawthorne, 16-CR-1222901 (Cook Cty Cir Ct)	8/8/2016	Felony theft, forgery, continuing financial crimes enterprise	HCV Fraud	Sentencing delayed pending restitution payment. Status March 15, 2023

## **B. ADMINISTRATIVE INVESTIGATIONS - SUSTAINED CASE SUMMARIES**

The OIG sustained 35 administrative investigations for various policy violations in 2022. Representative matters are detailed below.

### **Housing Choice Voucher Program Violations**

#### **City of Chicago Employee Income Reporting\_OIG #2021-08-00051 & 2021-08-00060 (HCV Participants)**

On February 25, 2022, the OIG notified CHA management of two additional HCV participants identified through a data analysis of CHA participants employed by the City of Chicago for whom there appear to be discrepancies in the income recorded in Yardi and the actual income earned. On December 10, 2021, the OIG issued Advisory #21 regarding City of Chicago employee income reporting and provided information regarding 7 CHA participants who were employed by the City of Chicago but had not accurately disclosed their income to the CHA. The two additional HCV participants were identified through the same OIG analysis. The OIG's review found indications that these two individuals reported their City income but that both had gaps in service due to seasonal employment or a leave of absence, and as a result, their full income was not accurately recorded in Yardi.

The OIG recommended that the HCV Department review these individuals' records to ensure the housing assistance payments (HAP) are correctly calculated and actions taken during recertification complied with HCV rules and policies.

In response, HCV reviewed both matters and determined that the individuals had received overpayments in HAP in the amounts of \$9,062.00 and \$19,696.00 respectively. HCV issued both notices of intent to terminate the vouchers, with an opportunity to respond and enter a repayment plan. One participant requested a repayment plan and the other failed to respond, resulting in termination of the voucher.

#### **Property Owner Receiving Rental Subsidy, HCV Fraud, OIG # 2017-06-00021**

An OIG investigation found that a former HCV participant and their son committed a decades-long fraud against the CHA's HCV program, in which they obtained approximately \$200,000 in benefits to which they were not entitled. Specifically, the participant concealed the fact that they owned the property where they were receiving an HCV rental subsidy to reside, while their son falsely claimed to own the property and the bank accounts to which the HAP payments were directed. In fact, the HCV participant was the sole signatory to the bank accounts where they received the CHA rental payments. Although the matter was declined for criminal prosecution, and the HAP payments had since stopped the OIG recommended the HCV department review the matter for appropriate administrative action, including the suspension of the participant's son as an HCV landlord and any other available remedies.

In response, the HCV department stated that it would add the participant's son and purported landlord to the Do Not Lease List and would add the amount owed to HUD's Debts Owed system for the former participant.

**Unauthorized Occupant of HCV Unit, OIG #2021-10-00034, HCV Participant**

An OIG investigation found that an HCV participant may have an unauthorized occupant at their unit, because public websites show a \$17,083 Paycheck Protection Program (PPP) loan issued to another individual at the subsidized address. The investigation stemmed from an anonymous complaint that the participant had undisclosed business income. While the OIG found no evidence of businesses in the participant's name, the participant's address was used to obtain the substantial PPP loan.

The OIG recommended the HCV department review the matter for appropriate administrative action. In response, HCV stated its Enforcement Team would attempt to confirm whether the PPP loan recipient is an unauthorized occupant. HCV sent the participant a request for documentation regarding the individual's residence.

**Failure to Reside in Subsidized Unit, Failure to Disclose Marriage, OIG #2019-09-00011, HCV Participant**

An OIG investigation found that an HCV participant committed fraud against the CHA's HCV program by failing to reside in their HCV unit for well over six years and failing to provide truthful information to CHA, including the fact that they had married. The participant began receiving HCV subsidy in 2009, but between 2011 through 2022, the participant in fact lived in market-rate apartments with their spouse in South Holland, Illinois, Decatur, Georgia, and Romeoville, Illinois. The OIG obtained multiple leases signed by the participant and their spouse, for a market-rate apartment in Romeoville. The participant also appears to have unreported income, having received a \$20,833 PPP loan as a sole proprietor of a beauty salon in 2021.

The OIG recommended the HCV department review the matter for appropriate administrative action, including termination of the participant's voucher. In response, the HCV department stated it would work expeditiously to issue an ITT to the participant.

**Abandonment of HCV Unit, Failure to Disclose Homeownership, OIG #2021-10-00035, HCV Participant**

An OIG investigation found that an HCV participant failed to notify the CHA that they had been residing in a house they own in Flowood, Mississippi since October 2019, and had allowed unauthorized individuals to reside in the subsidized unit. The participant did not report their ownership of a home in Flowood along with another property, and further failed to report purported business income, which was the basis for two Paycheck Protection Program loans. The HCV department responded that it would initiate the process to terminate benefits.



**Abandonment of HCV Unit, Participant Living in a House Jointly Owned with their Spouse, OIG #2021-07-00058, HCV Participant**

An OIG investigation found that an HCV participant was not living in their HCV subsidized unit and instead was living in a house they own with their spouse in Hazel Crest, IL. The participant also failed to report apparent business income, which would have served as the basis for a PPP loan received at the Hazel Crest address. The OIG recommended the HCV department review the matter for appropriate administrative action.

In response, HCV stated that it would initiate the process for termination of benefits.

**Underreported Income and Unauthorized Occupant, OIG #2020-01-00007, HCV Participant**

An OIG investigation found that an HCV participant underreported income earned from the U.S. Postal Service between 2017 and November 2021. Additionally, the participant previously had at least one unauthorized occupant in their unit and failed to report the individual's income. The OIG recommended the HCV department review the matter for appropriate administrative action.

The HCV department responded that it would pursue administrative enforcement and issued requests for relevant income documentation.

**Public Housing - Sustained Administrative Investigations**

**Subleasing and Abandonment of Unit (Public Housing Participant) OIG # 2020-02-00031**

On January 28, 2022, the OIG notified CHA management of an investigation, which found that a current resident of Bridgeport Homes had sublet their prior public housing unit in Altgeld Gardens for more than three years, from October 2016 until May 2020. For two of those years, the resident had been renting a market-rate apartment in Oak Park, Illinois. In 2020, the resident requested a move and relocated to a unit in Bridgeport Homes. The OIG recommended that the Property and Asset Management (PAM) Office refer the resident for eviction.

PAM responded that it referred the matter to the CHA's Office of General Counsel for review and further action as appropriate, and later issued the resident a 30-day notice of lease termination.

### **Unauthorized Occupant of Public Housing, OIG # 2020-03-00035**

An OIG investigation found that a resident of Wentworth Gardens appeared to have an adult son living as an unauthorized occupant in their public housing unit. The OIG's investigation was based on an allegation that the son was an unauthorized occupant at a rental unit where his wife and children were receiving an HCV rental subsidy. In response, the son provided documentation to show he resided with his parent, a public housing resident. The OIG recommended that the Property and Asset Management (PAM) Office refer the information to the Private Property Management (PPM) firm for appropriate enforcement action in accordance with the Admissions and Continued Occupancy Policy.

In response, PAM instructed the property manager to follow up with the resident to remind them of the policies regarding visitors and unauthorized guests.

### **Unauthorized Occupant of Public Housing Unit, Failure to Disclose Marriage, OIG #2020-01-00020, Public Housing Resident**

An OIG investigation found that a resident of a CHA scattered site public housing unit failed to disclose her marriage in 2016, failed to disclose her husband has been living with her, and may also have had unreported business income.

The OIG recommended that the PAM department review for appropriate administrative action and enforcement of the lease provisions. After the OIG issued its report, the resident voluntarily vacated the unit.

## **Public Housing Local Advisory Council - Sustained Administrative Investigation**

### **LAC Mismanagement, Conflicts of Interest, and Mishandling of Funds Cabrini Green Local Advisory Council v. The CHA et al., OIG # 2016-12-00051**

As previously reported in the second quarter report of 2021, the U.S. District Court approved a settlement order on April 21, 2021, between the CHA, City of Chicago, and Cabrini Green Local Advisory Council (LAC), requiring the then-board members of the Cabrini Green LAC Community Development Corporation (CDC) to resign and the establishment of a "caretaker board" tasked with identifying new CDC board membership and hiring professional staff. The Cabrini Green LAC CDC is projected to receive over \$7 million in revenue from the redevelopment of Cabrini Green pursuant to the Consent Decree.

The settlement was the result of an OIG investigation of the Cabrini Green LAC CDC Board, which found that, despite receiving over \$1.5 million between 2015 and 2019, the CDC provided little or no benefits to the displaced and current residents of Cabrini Green. The CDC frequently violated policies regarding conflicts of interest and allowed CDC Board members, their friends, and family to receive CDC funding. As found by the Court, the Board used \$25,106 in petty cash with no recorded purpose and misspent CDC funds on payments to the father of the sons of the CDC's then-President Carol Steele, and to cover funeral expenses of Steele's brother. The CDC failed to observe IRS regulations for tax-exempt organizations, potentially risking its eligibility for government tax credits. Expenditures and actions taken by the Board were often not documented or recorded in Board minutes. Board President Carol Steele, who served as both the LAC President and CDC President since September 1, 2016, controlled all aspects of the CDC decision making process and had appointed all CDC Board members since 2009.

On March 31, 2022, the District Court entered an additional order prohibiting the removed CDC officers, Carol Steele, JoAnn Hollie, Lynell Dillon, Lena Wells, and Vincent Davis, "from occupying any corporate officer or director role in CDC or any other LAC operating entity that takes its place pursuant to the Consent Decree...and from being involved in any [Cabrini LAC] operating entity's responsibilities as set out in Section III.A.1 of the Consent Decree."

The latest order was the result of the Court's finding that, even after it had entered an interim-relief order requiring strict recordkeeping and disclosures of expenditures, "Carole Steele signed a \$7,200 check to her son, Travaughn Steele, as purported 'severance pay' on around July 20, 2021" and did not disclose the expenditure as required. "On top of that," the Court wrote, "Steele and then-Board members JoAnn Hollie, Lynell Dillon, Lena Wells, and Vincent Davis also paid themselves . . . each a purported 'stipend' of \$2,000," also undisclosed and in knowing, direct violation of the CDC Articles of Incorporation & By-Laws. The former directors and Travaughn Steele agreed to pay back the funds, but the Court determined that further sanction was warranted and barred them from any future role "in an officer or director position of CDC (or any successor corporation under the Consent Decree."



## CHA Employees - Sustained Administrative Investigations

### CHA Employee PPP Loan Fraud Investigations

In June 2022, the OIG concluded an investigative initiative, which found that 15 CHA employees each committed federal program fraud when they submitted falsified Small Business Administration (SBA) Paycheck Protection Program (PPP) applications to receive SBA covid relief funds to which they were not entitled. Two additional CHA employees who also obtained PPP loans were found to have violated other CHA personnel rules and policies. The OIG's investigation focused on all active CHA employees who were identified as having obtained a PPP loan as a sole proprietor or self-employed but had not previously obtained authorization for secondary employment or disclosed business income on their annual Statement of Financial Interests.

The OIG's investigation stemmed from an analysis, which matched publicly available SBA PPP loan data to CHA HR data and identifying those records which matched on both full name and home address. As of March 2022, 17 active CHA employees appeared as having received PPP loans as sole proprietors.

The PPP program provided forgivable loans of up to 2.5 times the monthly average business income (net or gross) up to \$100,000. Individuals who had net profit of zero or less, were not eligible for a PPP loan. The maximum amount a self-employed individual could receive was \$20,833.33, if they had \$100,000 or more of business income. OIG's analysis identified the following:

Nearly all of the loans were for more than \$20,000.00, indicating the employee reported an annual business income of approximately \$100,000. Almost all employees listed their businesses as existing for more than two years. The employees identified a wide range of businesses to include janitorial services; taxi service; catering; beauty salon; and new multi-family housing construction.

The 17 employees served in 4 CHA departments in various titles, with three holding mid-level supervisory responsibilities:

- Resident Services (two supervisors of resident programs, a program specialist, Section 3 coordinator, and two Central Advisory Council administrative employees)
- Property and Asset Management (front desk monitors and front desk supervisor, emergency dispatcher, facility/event staff, project manager),
- Human Resources (project manager),
- Office of General Counsel (one administrative employee).

The CHA OIG interviewed all 17 employees in one week in April 2022. All but one of the employees admitted to knowingly applying for and taking the loans.

- One employee asserted a family member used the employee's name to obtain a loan for a legitimate business without the employee's knowledge, but the employee reportedly knew the family member was working under the employee's social security number.
- One employee appeared to have had a very active, licensed catering business that the employee claimed had earned over \$100,000 in one year, but did not disclose the income or obtain approval for secondary employment. The same employee used their CHA email address to apply for a PPP loan for another individual and provided false statements in their OIG interview.
- One employee was also a CHA public housing tenant who had been delinquent on rental payments since 2019 and had failed to arrange a payment plan with property management.
- One employee appeared to have had a very active, licensed catering business that the employee claimed had earned over \$100,000 in one year, but did not disclose the income or obtain approval for secondary employment. The same employee used their CHA email address to apply for a PPP loan for another individual and provided false statements in their OIG interview.
- One employee was also a CHA public housing tenant who had been delinquent on rental payments since 2019 and had failed to arrange a payment plan with property management.
- Multiple employees claimed they had planned to start a business with the money, but these statements directly contradicted the signed attestations on the PPP loan applications.
- Several employees stated they had small, unreported side businesses, but had no evidence of having made \$100,000 in a calendar year.

Based on the evidence, OIG issued its summary reports of investigation to CHA management in June 2022, recommending that management discharge 16 employees and mark them ineligible for rehire; in one instance the OIG recommended CHA impose discipline up to and including termination.

One month later, CHA management responded that it concurred with the OIG's findings, and terminated the employment of 16 employees. The 17th employee had already left CHA employment prior to CHA management receiving the OIG report. CHA management declined to categorize the terminated staff as ineligible for rehire.

CEO Tracey Scott addressed all CHA employees in a live TEAMS meeting to address the terminations and the importance of integrity in CHA operations. CEO Scott announced that all CHA employees would be required to complete annual ethics training by the close of the third quarter of 2022, department heads had been instructed to discuss the CHA Ethics Policy at their upcoming team meetings, and the OIG would be providing training to all CHA departments on the role of the OIG before the end of the year. The OIG successfully trained all CHA departments as of November 2022.

**CHA Employee PPP Loan Fraud and False Statements, OIG ##2022-09-00049, 00050, 00051, 00052, 00053, 00054**

In November 2022, the OIG sustained an additional six investigations of CHA employees found to have fraudulently obtained SBA PPP loans by submitting falsified applications. These investigations were prompted by an anonymous complaint received after the conclusion of OIG's earlier investigations of CHA employees who engaged in PPP loan fraud. The first set of investigations resulted in sustained findings against 17 employees. Of the six additional employees, five resigned after having scheduled an interview with the OIG or having sat for an interview.

The OIG provided CHA management information regarding the five former employees (four in the Property and Asset Management department and one in Resident Services) for inclusion in the employees' personnel files should they seek re-employment with the CHA. The OIG recommended that CHA discharge the sixth employee and designate the employee as ineligible for rehire based on findings that the employee committed federal program fraud by submitting a falsified PPP application and later provided false statements to OIG investigators.

In response, CHA management discharged the one remaining employee.

**Preferential Treatment, Failure to Cooperate with the OIG, OIG #2021-02-000001, CHA Employee and Contractor**

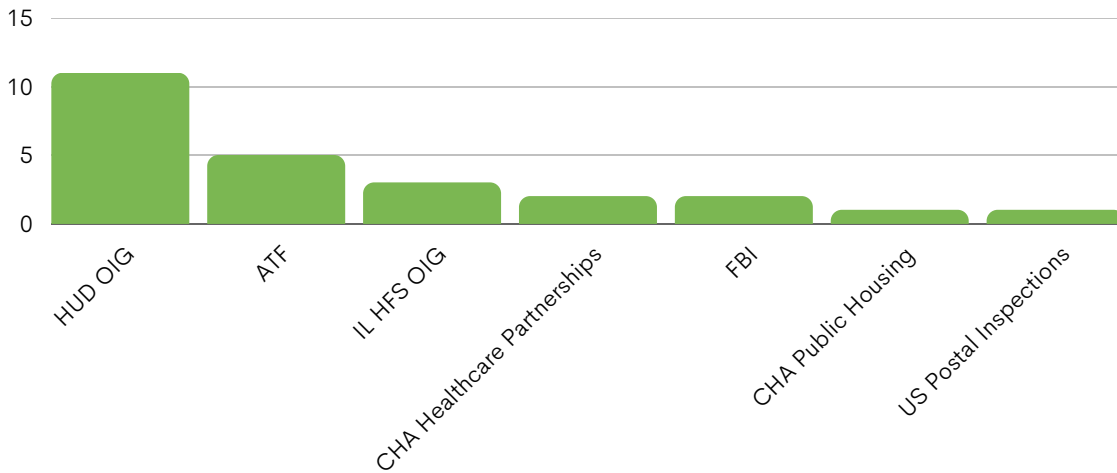
An OIG investigation found that a management-level employee in the PAM department violated CHA policies and provided preferential treatment to a CHA construction contractor that had been participating in the former JOC Program and contracted to renovate several public housing units. The manager caused the CHA to issue manual checks payable to the Contractor for the full contract amounts prior to completion of the work and was prepared to personally deliver the checks, despite the Contractor's history of poor performance. The manager provided the Contractor extraordinary preferential treatment, which created, at a minimum, the appearance of impropriety.

Additionally, the owner of the CHA contractor, in direct violation of the contract with CHA, refused to cooperate with the OIG's investigation, failing to produce records or appear for an interview.

The OIG recommended PAM impose discipline against the employee commensurate with their violations, work history, past disciplinary history, and any other relevant factors. The OIG further recommended that the CHA Department of Procurement and Contracts initiate debarment proceedings against the construction company and the individual owner. In response, CHA management discharged the employee. CHA's Department of Procurement and Contracts and Office of General Counsel are reviewing the matter for potential debarment.

## X. INVESTIGATIVE SUPPORT MATTERS

The OIG regularly receives requests from various external and internal partners for investigative support on matters within the OIG's jurisdiction. These requests often take the form of discrete requests for information, due diligence, or data analysis. In 2022, the OIG provided investigative support in response to 25 complaints from various agencies including, HUD OIG, ATF, FBI, U.S. Postal Inspector General, and the Illinois Department of Healthcare and Family Services OIG.



## XI. MANAGEMENT ADVISORIES & MEMOS

The OIG issued three management advisories and one management memo in 2022. OIG management advisories and memos notify the CHA of various management and operational issues identified by the OIG through analytics, audits, or investigations. The OIG provides advisories to describe opportunities to strengthen program administration, improve program controls, or eliminate waste or inefficiencies.

Advisory #	Description/Summary
23	PPP Loan Certifications by CHA Participants
24	Public Housing Waitlist Status and Application Date Issues
25	HCV Suspensions of Building Code Scofflaws

## **OIG Advisory #23 – Paycheck Protection Program Loan Certifications by CHA Participants Claiming Lost Business Income**

On February 24, 2022, the OIG advised CHA management of a significant indicator of potential fraud among CHA program participants who have received over \$135 million in forgivable loans through the U.S. Small Business Association (SBA) Paycheck Protection Program (PPP). Through data analytics, the OIG identified CHA program participants who have received pandemic relief PPP loans based on assertions that they lost substantial income as sole proprietors, independent contractors, or self-employed persons. OIG's analysis identified the following:

- 6,280 individual borrowers (heads of households and family members) associated with 5,361 CHA households (i.e., tenant IDs) received a combined total of \$135,268,790 in forgivable PPP loans.
- Of those, 3,053 CHA participants received loans of \$20,830 or more, indicating they reported annual business income of at least \$99,984 (capped at \$100,000).
- Another 2,520 individual borrowers whose addresses match CHA participant addresses but are not authorized occupants at the respective addresses. These individuals received a total of \$55,028,184 in forgivable loans.
- Combined, the two categories represent 10,170 loans equaling \$190,296,975 for 8,800 documented and potential occupants of CHA subsidized properties.

Given the widely reported, high level of fraud on the PPP loan program, particularly by those claiming to be sole proprietors or self-employed, the OIG views a vast number of these loans as suspect and potentially fraudulent, raising concerns about the credibility or truthfulness of these individuals' various submissions to the CHA, or conversely, that program participants failed to report legitimate business income to the CHA.

**Recommendation:** The OIG provided a datafile listing the program participants and other individuals identified as having received PPP loans at a CHA subsidized address. The OIG recommended that HCV and PAM use this information as the basis for further inquiry during individual eligibility reexaminations going forward and consider other proactive compliance and enforcement initiatives.



**Response:** As of September 2022, CHA management reported to the OIG that “both the HCV and PAM divisions will review PPP loans as Participants complete recertification. While the process will be protracted, CHA will not ignore fraud cases. During the recertification process a determination will be made whether the Participant should be terminated from the subsidy program.” Additionally, management reported that those households identified as receiving PPP loans will be required to provide an annual recertification rather than wait another two or three years. Management provided the following timeline:

As of August 29, 2022	HCV	PH & RAD
Documents Outstanding Notices Sent	<b>5,648 Households</b>	
- Participant Submitted Documents	2,849 households	
- No Documents Submitted	2,799 households	
<b>Recertification – Annual or Interim</b>		
- To be completed in 2022	1,314 households	<b>297</b>
- To be completed in 2023	2,933 households	<b>909</b>
- Scheduled in 2024 – to be rescheduled	1,440 households	
<b>Unauthorized Use of a CHA Address</b>	1,989 households	<b>9</b>
- Out of total number		

HCV program management also noted that it had initiated enforcement proceedings prior to the OIG advisory. As of September 1, 2022, HCV had issued notices of Intent to Terminate to 69 participants. Termination was executed after 85% (30) of the 34 hearings were held. Three lawsuits are pending as a result of terminations due to PPP loans.

PPP Loan Enforcement (as of 09/01/22)	#'s
<b>Total Intent to Terminate (ITT) Notices</b>	<b>69</b>
Termination: Hearing Not Requested	15
Hearing Requested	54
Pending: 30 days to request hearing	0
<b>Hearing: Status # of cases</b>	<b>54</b>
- Intent to Terminate Rescinded	1
- Hearing Not Scheduled	14
- Hearing Date after 8/29	5
- <b>Hearing Held:</b>	<b>34</b>
○ Hearing Conducted with No Decision	1
○ Hearing Decision: Re-instate Conditions	1
○ Hearing Decision: Re-instate	2
○ Hearing Decision: Termination	30
<b>Voucher Relinquished (Not part of PPP loan project)</b>	<b>1</b>

\* Intent to Terminate Notice proceeds a hearing.

## **OIG Advisory #24: Public Housing Waitlist Status and Application Date Issues**

The OIG issued an advisory to the Property and Asset Management (PAM) Department regarding a concern with the process by which Public Housing applicants are returned to the waitlist should they not be selected for a unit after screening. Specifically, the OIG found that a significant number of applicants had remained in an "Issued/Offer" status in the Yardi database for more than 120 days. An applicant in Issued/Offer status is not eligible for future units, leaving the individual in limbo. Moreover, the OIG found that when many of these individuals were finally returned to the waitlist, CHA erroneously changed the application date, causing the applicant to lose their place in line. The OIG found 62 applicants whose waitlist application dates had been changed to reflect the date they were returned to the waitlist once they were unsuccessfully screened.

The OIG's analysis was prompted by two separate complaints from Public Housing waitlist applicants stating they had been accepted for housing opportunities but had not received any further updates. PAM department personnel confirmed that any unsuccessful applicants in the Issued/Offer status should be returned to On List status for future selection and housing considerations after 120 days. Additionally, only certain situations should cause a waitlist applicant's original application date to be updated – an example being an applicant who refuses an available unit, but opts to reapply at a later date.

**Recommendation:** The OIG recommended that CHA develop and implement additional processes to ensure eligible applicants are returned to On List status within the stated 120-day goal. Second, OIG recommended that CHA review the process employees were using to return applicants to On List status, and provide any corrective training as appropriate. Finally, OIG recommended that CHA review applicants currently in On List status to make any corrections necessary to restore appropriate waitlist seniorities.

**Response:** CHA management reviewed the issue and identified 44 applicants with application dates erroneously modified since 2021 when CHA first implemented the use of Yardi's Issue/Offer status. CHA determined that Yardi's coding script incorrectly altered the application dates of certain applicants returned to the waitlist from Issue/Offer status. CHA responded that it would reinstate the original application dates of applicants erroneously modified. CHA will work with Yardi to update the Issue/Offer script. Until the issue is resolved, Issue/Offer exception reports will be assessed on a recurring basis and applicant records will be updated accordingly.

Regarding the duration of applicants' Issue/Offer status, CHA responded that, on various occasions (i.e., 2019 leasing initiative, 2020 COVID pandemic, 2021 leasing initiative, etc.) the PAM department made a business decision to allow applicants to remain in a "reserve" queue for housing opportunities longer than 120 days and be re-screened after an initial denial. As a general matter, applicants are placed in Issue/Offer status after they are approved for housing and PAM conducts a Move-In-Review Audit of Property Management's outreach and screening process. Because background checks are valid for 120 days, any applicants not housed within 120 days of a Move-In-Review are typically returned to the waitlist.

## OIG Advisory #25 HCV Suspensions of Building Code Scofflaws

The OIG issued an advisory regarding a data analytics project, which identified seven residential building owners and affiliated companies receiving HCV Housing Assistance Payments (HAP) appearing on the City of Chicago "Building Code Scofflaw List" in violation of the CHA's HCV Administrative Plan. CHA's HCV Administrative Plan and Program Procedure Guide specifically provide that building owners may be placed on the CHA's "Do Not Lease List" if they appear on the City's Building Code Scofflaw List. The Chicago Building Code Scofflaw Ordinance prohibits the owners of buildings that are identified as "priority buildings with serious and chronic code violations" from being awarded City contracts, receiving financial assistance from the City, or having certain applications accepted or processed by the City. Since September 2021, the City has published lists of buildings and their owners that are deemed to be Building Code Scofflaws. Buildings on the list are also subject to follow-up inspections by the Department of Buildings at least every 12 months.

As of April 1, 2022, the CHA had 11 HCV owners appearing on the City's Scofflaw List. Three owners had been suspended as of April 2022 but still had active HCV tenants because the tenants' leases were not yet expired. Seven of these owners had not been suspended and had active HAP contracts representing a combined total of 672 units.

Four of the seven active HCV owners were identified by the OIG based on the property address appearing on the Scofflaw List, but which appear in Yardi as associated with CHA vendors other than the legal owners on the Scofflaw List. In at least one instance, the CHA vendor appeared to be a management agent, rather than the legal owner. Individuals and corporations often form unique business entities or limited liability companies (LLCs) for each apartment building or rental property they own, or maintain separate ownership and management aspects of their business, meaning that the same individuals may be responsible for multiple HCV properties through separate legal business entities. The CHA's HCV Procedure Guide did not address the question of common agents and ownership between different business entities, or management agents for those owners appearing on the Scofflaw List.

**Recommendation:** The OIG recommended that HCV consider clarifying its relevant policies and procedures regarding who may be considered responsible parties subject to suspension for reasons such as appearance on the building code Scofflaw List, including indicators of common ownership and the obligations of management agents working on behalf of a property owner.

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1 [https://codelibrary.amlegal.com/codes/chicago/latest/chicago\\_il/0-0-0-2601403](https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2601403)

2 <https://data.cityofchicago.org/Buildings/Building-Code-Scofflaw-List-Map/hgat-td99>;  
<https://opendatanetwork.herokuapp.com/dataset/data.cityofchicago.org/crg5-4zyp>

The OIG further recommended that, when reviewing the City's Scofflaw List for HCV properties, HCV employees search by property address as well as owner name, and review for shared agents, managers, and owners of companies that participate in the HCV program, to ensure the parties responsible for delinquent properties are held accountable as appropriate.

**Response:** In response, the HCV department stated it will provide further guidance to its contractors/staff regarding the relevant policies and procedures and instruct them to search by each address and owner's name listed on the City's Scofflaw List and Troubled Buildings list. The HCV department stated that it would further consider amendments to its policies regarding the suspensions of property management firms and all the entities associated with an owner-entity appearing on the Scofflaw List. Of the entities identify by the OIG, HCV had updated and clarified records pertaining to four owner entities.

### **OIG Management Memo regarding Potential Lack of Clarity in CHA By-Laws**

In December 2022, the OIG issued a management letter to the Board of Commissioners and CEO, following the OIG's receipt of a complaint regarding the method by which CHA management implemented a change to the employee vacation policy. While the OIG's investigation identified no evidence of misconduct or violations of the Illinois Wage Payment and Collection Act, the investigation revealed an existing lack of clarity and consensus regarding the intent of CHA Board By-Laws with respect to the scope of authority delegated to the CEO and the appropriate level of Board access to information regarding CHA operations.

The OIG recommended the Board consider revising its By-Laws to avoid any such concerns in the future. The OIG further recommended that the Board and CEO ensure they have a clear, shared understanding of their working relationship, and continually review the By-Laws and resulting operations to ensure CHA leadership is working together, efficiently and productively, to further the mission of the CHA.



## XII. AUDITS AND REVIEWS

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The OIG closed one audit in 2022. The audit is summarized below. Additionally, in October 2022, the OIG finalized its 2023 Audit Plan described below.

### **Demonstration Programs and Special Initiatives Admissions Audit**

The CHA OIG conducted an audit of CHA Demonstration Programs and Special Initiatives ("demonstration programs") to determine whether CHA's Resident Services Division (RS) and CHA contractor Nan McKay & Associates (NMA) admitted participants to the Housing Choice Voucher (HCV) Program in accordance with CHA policy and program criteria and to assess current internal controls in the admission process for CHA's demonstration programs.

As of September 9, 2021, CHA's nine demonstration programs had issued 1,825 (94%) of the 1,943 housing subsidy vouchers set aside for individuals such as veterans, survivors of human trafficking, and people with disabilities. Such individuals receive a voucher through a referral process rather than the traditional waitlist process. The CHA's Board of Commissioners approves all CHA Demonstration Programs and the respective program criteria by board vote.

**Findings:** The OIG found that CHA demonstration program admissions are fully supported by agency referral letters that appropriately document participant eligibility. The OIG tested 10% of all demonstration program participants identified by RS and NMA to ensure appropriate documentation of the participant's eligibility in the form of referral letters from partner community organizations or other government agencies. Of the 185 participants tested for referral letters, 100% of the letters were identified, and no exceptions were noted. The OIG's review found that each referral letter appropriately lists the name of the demonstration program and the referring agency.

During this audit, the OIG identified discrepancies between the RS/NMA spreadsheet and the Yardi report of information recorded in the participants' HUD Form 50058 lines 2q and 2r as of September 9, 2021. First, the Excel spreadsheet of demonstration program participants RS/NMA provided the OIG was incomplete. The OIG found 32 or 2% (32 out of 1,454) of active demonstration program participants did not appear on the RS/NMA Excel spreadsheet. Second, the OIG identified inconsistent data entry practices for demonstration program information recorded in Yardi. As of September 2021, CHA was recording demonstration program participation in both HUD-50058 lines 2q and 2r, using multiple different acronyms for the same programs, and in approximately 26% of cases, did not record demonstration program participation on the most recent 50058.

**Recommendations:** The OIG recommended that the RS and HCV Divisions review data entry and program tracking practices for the demonstration programs. Specifically, the OIG recommended that RS and HCV review all current demonstration program participants to ensure the manual tracking spreadsheet is complete; ensure the use of consistent acronyms for each demonstration program going forward, and periodically conduct a review and reconciliation of all current demonstration program participants to ensure the relevant demonstration program is recorded consistently, in each participant’s current 50058–line 2q or 2r, to improve data analysis and reporting capabilities.

**Response:** CHA management concurred with all findings and pledged to adopt all OIG recommendations, including better record keeping to ensure the identified risks and issues were addressed.

**2023 OIG AUDIT PLAN**

The following is a list of audits that were in progress at the close of 2022 and audits that are projected to be completed in 2023. More information about these audit topics can be found in the OIG Audit Plan for 2023, published on the OIG webpage at <https://www.thecha.org/about/office-inspector-general>.

The OIG audit plan is subject to change based upon OIG observations, requests by CHA management, and any other emergent issue that requires the OIG to respond in a timely review.

Audits in Progress	Follow up Audits	2023 Audits
CHA Public Housing Unit Vacancy Rates	Public Housing Equipment, Appliances and Materials Inventory	CHA Contractor System Access Controls
HCV Abatement Process	PPM Tenant Accounts Receivable	Manually Prepared Accounts Payable Checks
Mixed-Finance/Mixed Income Public Housing Rent Collection		Private Property Management Company Expenditures
Department of Procurement and Compliance-PRTF		CHA Receipt and Use of Emergency Pandemic Relief Funding
		Commercial Property Rental Income

### XIII. ANALYTICS

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The OIG routinely engages in various data analytic projects designed to identify red flags or indicators for fraud, program violations, or other misconduct. In 2022, the OIG completed multiple data analytics projects, some of which resulted in complaints for investigation (as noted in the statistical data provided above), and others which resulted in management Advisories #23, #24, and #25, also described above. As a new major initiative, OIG analytics staff launched an ongoing effort focused on procurement integrity.

#### **Procurement Fraud Monitoring Analytics**

In April 2022, the OIG launched a Procurement Fraud Monitoring Initiative to use data analytics to proactively monitor CHA procurement data for evidence of fraud such as bid-rigging or collusion among CHA vendors.

The OIG leveraged partnerships with the U.S. Department of Justice's Procurement Collusion Strike Force and international experts in the field of procurement analytics. Researchers at the Danish Competition and Consumer Authority provided pro bono assistance by subjecting anonymized CHA procurement data to a red-flagging dashboard, using a variety of statistical and machine learning-based calculations. This effort identified some potential red-flags for further OIG inquiry, as well as further insights for future management recommendations and OIG analyses going forward. The OIG looks forward to working collaboratively with CHA's Department of Procurement and Contracts to ensure integrity in the procurement process.



## XIV. OIG STAFF AND CREDENTIALS

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The work of the OIG is performed by investigators, auditors, and analysts with deep institutional knowledge as well as subject matter expertise in areas of criminal and administrative investigations, government auditing principles, and analytics.

OIG staff hold memberships and relevant professional certifications from the Association of Inspectors General, Association of Certified Fraud Examiners, Association of Local Government Auditors, and the Institute of Internal Auditors, among others.

INSPECTOR GENERAL – KATHRYN RICHARDS was appointed as Inspector General for the Chicago Housing Authority by the CHA Board of Commissioners in April 2021. Richards is a Certified Inspector General and a licensed attorney. Prior to CHA, Richards spent 10 years with the City of Chicago OIG, including five years as the Chief Assistant Inspector General. In that role, she provided strategic guidance and legal counsel on all OIG activities, including investigations, audits, and reviews. Richards is also the Board President of the Illinois Chapter of the Association of Inspectors General, which provides training in professional best practices for all Illinois IG agencies. She previously served as a staff attorney with the Seventh Circuit U.S. Court of Appeals. Richards holds a B.A. in Political Science from New York University and a J.D. from DePaul University College of Law, where she graduated *summa cum laude* with a certificate in public interest law.

DEPUTY INSPECTOR GENERAL – MICHAEL KOSANOVICH joined the OIG in February 2017 after 24 years with the FBI, where he provided executive management oversight to the Chicago Division's White Collar Crime program, leading Financial Crime and Public Corruption investigations. Prior to his arrival to CHA, Michael spent three years as the Global Security Director with General Electric. Michael earned a Bachelor's degree in Criminal Justice from the University of Maryland and completed FBI Executive Management Training at Northwestern University's Kellogg School of Management. He is a Certified Inspector General.

SENIOR INVESTIGATOR – JUSTIN KING joined the OIG in August 2013 after working for CHA's Legal Department as a Housing Compliance Project Coordinator, helping initiate and investigate Criminal Activity Eviction cases. Justin holds a Bachelor's degree in Criminal Justice and is a Certified Fraud Examiner and a Certified Inspector General Investigator.

SENIOR INVESTIGATOR – EDWARD MALONEY joined the OIG in December 2020 after 30 years of service as an Assistant States Attorney for Cook County. Ed prosecuted cases of identity theft, financial institution fraud, felony theft and forgery. He also conducted training sessions for the Chicago Police Department and United States Postal Inspectors on evidence needed for successful prosecutions of financial crime cases. Ed received his law degree from The University of Illinois at Chicago College of Law.



INVESTIGATOR – ANTHONY Q. SARTIN joined the OIG in January 2021 after retiring from the federal government with over 30 years of law enforcement experience. He spent seven years as a Customs Inspector with the U.S. Customs Service (now Customs & Border Protection). He then worked as a Special Agent with the Federal Aviation Administration Civil Aviation Security Division. Finally, he ended his federal career as a Senior Special Agent after 22 years with the U.S. Department of Transportation OIG. Anthony has an extensive background in fraud investigations including Disadvantaged Business Enterprises, contract fraud, money laundering, and numerous false statements/certifications cases. Anthony graduated from Tennessee State University with a degree in Accounting & Business Law and is a Certified Inspector General Investigator.

INVESTIGATOR – THERESA BERNAL joined the OIG in April 2022. Theresa previously served as a Probation Officer for Cook County Adult Probation and also worked as a LEADS Unit Supervisor with the Cook County State's Attorney Office for four years. She previously worked in the legal field for over 15 years. Theresa holds a Bachelor's degree in Criminal Justice from Roosevelt University.

STAFF INVESTIGATOR – ANGELINA ALLABACK joined the OIG in April 2022. Before working for the OIG, Angelina worked as an Investigator for the Defense Counterintelligence and Security Agency. She holds a dual degree in English and History from Saint Olaf College in Minnesota and is currently working toward her Master's degree in Investigation at the University of New Haven.

AUDIT MANAGER – BEATRIZ MARTINEZ joined the OIG in August 2013 after working for CHA's HCV Department as a Quality Control Financial Analyst and the Comptroller Division as an HCV Accounting Supervisor. Beatriz has over 30 years of accounting experience and over 15 years of experience as an auditor. Prior to CHA, Beatriz worked as an Internal Auditor for the Office of the Special Deputy Receiver and worked pro-bono at Latinos Progresando. Beatriz also provides income tax assistance to low-income residents. Beatriz earned a Bachelor's degree in Accounting from Robert Morris University. Beatriz is a Certified Fraud Examiner, a Certified Inspector General Auditor, and a Certified Public Accountant.

SENIOR AUDITOR – ELLAYE ACCOH has worked at the OIG since 1998. Ellaye has over 25 years of experience in the fields of audit and investigation. Ellaye earned a Bachelor's degree in Finance and a Master's degree in Accounting. Ellaye is a Certified Fraud Examiner, a Certified Inspector General Auditor, and a Certified Government Auditing Professional.

PERFORMANCE ANALYST – BRUCE MERRELL joined the OIG in August 2019 after working for 15 years as an Engagement Manager for RSM US LLP, where he supervised numerous attestation examinations. For the last three years, Bruce was assigned to the CHA’s internal audit department and supported various data analytics projects. Bruce also previously served as a data center and application development manager for Avon Products, Inc., where he was responsible for the design, development, implementation, and support for enterprise-wise, multi-national applications. Bruce is a Certified Fraud Examiner, Certified Information Systems Auditor, a Certified Information Security Manager, and Certified in the Governance of Enterprise IT.

STAFF AUDITOR – JADA TINNIN joined CHA OIG in April 2022. Prior to CHA, Jada worked as an Auditor for the U.S. Department of Education, OIG. She also served in the AmeriCorps Program with the Legal Council for Health Justice. Jada earned a Bachelor’s degree in Business Administration, with a major in Global Management from Bucknell University.

OPERATIONS ANALYST – SHANIQUIA (NICOLE) ANDERSON joined the OIG in October 2019 after working as a QA Analyst and Grant Writer. Nicole holds a Bachelor’s degree in English and Communications and a Master’s degree in Public Administration from the University of Illinois Urbana-Champaign.

INFORMATION ANALYST- MAXWELL BROWN joined the OIG in January 2022. Max previously served as a consultant with the Greater Chicago Food Depository, where he worked on issues of food access and equity in Illinois. He received his Master's of Public Policy from the Harris School of Public Policy at the University of Chicago with a certificate in Municipal Finance, and a B.S. in Environmental Health from Colorado State University.

EXECUTIVE ASSISTANT- KIANA GATES joined the OIG in August 2021. Kiana has worked in administration for over 15 years and has gained an enormous amount of experience that has enabled her to work in various administrative roles in both non-profit and private sectors. Kiana received her Bachelor’s degree in Mass Communications from Southern University and A&M College.





The Office of the Inspector General (OIG) is an independent body within the Chicago Housing Authority (CHA). Its purpose is to investigate and audit matters concerning fraud, theft, waste, abuse, and misconduct within or affecting CHA. The OIG promotes economy, efficiency, and integrity in the administration of programs and operations of CHA. The OIG ensures that violations are investigated and prosecuted, as they relate to CHA residents and employees, contractors, subcontractors, or any entity receiving funds from CHA.

For more information regarding this report, please contact  
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