



OFFICE OF THE INSPECTOR GENERAL
Illinois State Toll Highway Authority

NOTICE OF POSTING
OIG Case # IG-23-011
Respondent: Herbert Taylor II

Pursuant to 605 ILCS 10/8.5 (e)(3), the attached redacted summary report is being posted to the Illinois Toll Highway Authority's (Tollway) public website. As required by law, the Tollway Office of the Inspector General (OIG) sent a copy of this report to the Respondent's last known address on file with the Tollway, and gave him until February 15, 2024 to provide suggested redactions or a written response. The Tollway correspondence was returned undeliverable.

The OIG issued this Summary Report of Investigation (SRI) following an investigation that established reasonable cause to find that Tollway Toll Collector Herbert Taylor III (Taylor) fraudulently sought and received a Paycheck Protection Program (PPP) loan for his outside business and engaged in unauthorized outside employment. Taylor's conduct violated multiple Tollway rules of employee conduct, the Tollway's outside employment policy, Federal rules governing forgiveness of PPP loans, and Federal law.

The OIG recommended that the Tollway impose discipline as appropriate under the circumstances. The Tollway agreed with OIG's findings and initiated the termination process. OIG subsequently received notification that Taylor's employment had been terminated effective December 6, 2023.



**OFFICE OF THE INSPECTOR GENERAL
SUMMARY REPORT OF INVESTIGATION
OIG Case # IG-23-011
October 30, 2023**

This report provides a summary of evidence set out in the attached investigative materials, and the Office of the Inspector General's (OIG's) analysis of that evidence. An index of these investigative materials is attached.

I. INTRODUCTION

OIG has completed an investigation that has established reasonable cause to find that Illinois State Toll Highway Authority (Tollway) Toll Collector Herbert Taylor III (Taylor) fraudulently sought and received a Paycheck Protection Program (PPP) loan for his outside business and engaged in unauthorized outside employment. Taylor's conduct violated multiple Tollway rules of employee conduct, the Tollway's outside employment policy, Federal rules governing forgiveness of PPP loans, and Federal law.

These actions bring discredit on the Tollway, erode public confidence in government institutions, and clearly fall well below the standards of conduct that the public should expect from Tollway employees like Taylor, and OIG recommends that the Tollway issue discipline, commensurate with the gravity of his violations, and any other relevant considerations, up to and including termination.

II. BACKGROUND

A. Paycheck Protection Program

The Coronavirus Aid, Relief, and Economic Security (CARES) Act established the PPP loan program in March 2020 to support small businesses, individuals, and other eligible entities adversely impacted by the COVID-19 pandemic.¹ The program, which provided \$813.7 billion over two rounds of funding for forgivable loans to eligible entities, was intended to ensure workers remained employed during the unprecedented pandemic. Between March 2020 and May 2021, the federal government processed 11.8 million PPP loans, totaling \$799.8 billion. Small Business Administration (SBA) guidance reflected that self-employed individuals could collect up to 2.5 months of net profits, up to \$100,000 in net profits, through the program.² Qualified businesses

¹ See United States Small Business Administration Inspector General, "SBA's Handling of Potentially Fraudulent Paycheck Protection Program Loans," May 26, 2022, available at <https://www.oversight.gov/sites/default/files/oig-reports/SBA/SBA-OIG-Report-22-13.pdf> (last accessed September 15, 2023).

² United States Small Business Administration, "PAYCHECK PROTECTION PROGRAM HOW TO CALCULATE MAXIMUM LOAN AMOUNTS FOR FIRST DRAW PPP LOANS AND WHAT DOCUMENTATION TO

(those in existence prior to February 15, 2020) were eligible to apply for first draw PPP loans from March 2020, through August 8, 2020. Second draw PPP loans were issued from December 2020, through May 31, 2021. The maximum PPP loan for self-employed individuals for each draw was \$20,833.33. To qualify for that amount, an applicant would have to self-report at least \$100,000 in annual net profit.

Recent federal investigations and reviews have shown that the PPP was rife with fraud. “[SBA] OIG and other law enforcement agencies identified systemic patterns of potential fraud, including false attestations on loan documents, inflation of payroll, falsified tax documentation, identity theft, and misuse of proceeds.”³ SBA OIG’s analysis of loan data as of August 2020, identified more than 70,000 PPP loans, totaling over \$4.6 billion, as potentially fraudulent. This data only captured loans issued during the first round of PPP funding.

Over the past year, many OIG offices in Illinois have reported on PPP loan fraud by government employees, including the OIGs at the Chicago Housing Authority, the Clerk of the Circuit Court of Cook County, the Chicago Park District, the Chicago Public Schools, and the Office of Executive Inspector General for the Agencies of the Illinois Governor.

Considering these facts, OIG undertook a review of Tollway employees who received forgivable PPP loans. OIG compared publicly available PPP loan data to outside employment disclosures made by Tollway employees. OIG identified that Taylor received a forgivable PPP loan in 2021 for self-employment of operating a barbeque business. He did not have outside employment approval forms on file with the Tollway.

B. Parties Involved

1. Herbert Taylor III

Tollway records reflect Taylor began Tollway employment on September 13, 2013, as a Seasonal Toll Collector. Taylor was hired a second time on June 24, 2015, as a part time Toll Collector. Although his title is the same, since late 2020 he has served as a Customer Service Representative.⁴

Tollway records list two home addresses for Taylor: the MAR system reflects his home address as [REDACTED], while his personnel file reflects [REDACTED]. During his OIG interview, Taylor confirmed he lives at the [REDACTED].

Taylor earns approximately \$59,100 annually from his Tollway work.⁵

PROVIDE – BY BUSINESS TYPE,” as of January 17, 2021, available at [PPP: How to Calculate Maximum Loan Amounts for First Draw Loans \(sba.gov\)](https://www.sba.gov/loans/first-draw) (last accessed September 15, 2023).

³ United States Small Business Administration Inspector General, “SBA’s Handling of Potentially Fraudulent Paycheck Protection Program Loans.”

⁴ The Tollway moved to electronic toll collections during the COVID-19 pandemic. At that time, it also moved former toll collectors into customer service representative roles, but toll collectors kept the “Toll Collector” title.

⁵ This salary is based off the Salary database search of the Illinois State Comptroller’s website for Taylor’s 2022 salary. Salary Data - The Illinois Office of Comptroller (illinoiscomptroller.gov).

III. APPLICABLE RULES, REGULATIONS, LAW

A. Illinois Tollway Policy and Procedure Manual Chapter 7. Employee Conduct and Discipline: Section A: “Employee Conduct” (in relevant part):

To ensure orderly operations and provide the best possible work environment, the Tollway expects employees to follow rules of conduct that will protect the interests and safety of both the employees and the organization. Violations of the rules of conduct may result in disciplinary action, up to and including discharge. The rules of conduct include, but are not limited to, the following:

- Failure to follow Tollway or Departmental policies or procedures[.]
- Violation of the Tollway Code of Ethics or other official laws.
- Other conduct unbecoming a Tollway employee.

B. Illinois Tollway Policy and Procedure Manual Chapter 7. Employee Demeanor: Section H: “Outside Employment” (in relevant part):

Any employee who seeks to engage in outside employment after they are employed with the Tollway must notify and receive the written approval of their Department Chief before accepting such employment. Outside employment consists of any type of activity for which the individual actually or anticipates receiving compensation (i.e., salary, commission, hourly pay, etc.) which may be in the form of cash or check, and may or may not include or be subject to the withholding of taxes. The Department Chief's written approval must be forwarded to the Chief of Administration.

At the time of hire, new employees will be asked if they currently are engaged in employment secondary to their position at the Tollway. Appropriate forms disclosing secondary employment must be completed during new employee processing. On an annual basis, employees will be required to acknowledge on-going secondary employment.

* * *

Violation of these standards may be cause for discipline up to and including discharge.

D. Federal Criminal Statutes

Several federal statutes prohibit false and fraudulent activity, including:

- **18 U.S. Code § 1014 – Crimes and Criminal Procedure – Loans and credit applications generally[.]**

Prohibits knowingly making a false statement or report on a loan application for the purpose of influencing in any way the action of the Small Business Administration and/or an institution insured by the Federal Deposit Insurance Corporation.

- **18 U.S. Code § 1344 – Bank Fraud**

Prohibits knowingly executing a scheme to defraud a financial institution or obtain moneys or funds of the financial institution by means of false or fraudulent pretenses or representations

- **18 U.S. Code § 1343 – Wire Fraud**

Prohibits using wire transmissions to devise a scheme to defraud or obtain money by means of false or fraudulent pretenses or representations.

- **31 U.S. Code § 3729 – False Claims**

Prohibits knowingly false or fraudulent claims for payment from the United States Government.

IV. SUMMARY OF INVESTIGATION

A. Documents

1. [REDACTED] ⁶ Paycheck Protection Program (PPP) Loan
 - a. [REDACTED] application # [REDACTED]

Taylor's March 1, 2021 PPP loan application reflects a business address of [REDACTED]. The application requested a loan of \$12,500 and listed the primary contact and owners as Herbert Taylor III. The application states that Taylor maintains 100 percent ownership of his business.

On the loan application, Taylor reported that the loan would be used for "Payroll Costs." Documents submitted by Taylor to support his loan request included a 2019 1040 IRS Tax form and Schedules 1 (Additional Income and Adjustments to Income) and C (Profit or Loss from Business (Sole Proprietorship)) for Taylor and his business. Taylor reported in the Schedule C that

⁶ [REDACTED] has both online and in person banking options. They have two locations, one in New Jersey and one in New York.

his business made \$71,500 in gross income from special food services work in 2019, with a net profit of \$60,250.

Taylor ultimately received a \$12,500 PPP loan on March 1, 2021.

b. Loan Detail Report

██████████ loan detail report shows a loan number ██████████ dated March 1, 2021, for business named Herbert Taylor III. The loan funding details show bank routing and account number information for Herbert Taylor III, that matched information Taylor provided to the OIG during his interview.

c. Proof of Revenue

To show proof of business revenue for the PPP loan, Taylor submitted his ██████████ statement for the period October 17, 2019, to November 18, 2019, for bank account ending in ██████████. It showed six deposits and credits equaling ██████████, including five direct deposits, totaling ██████████, from “State of Ill.”

d. Paycheck Protection Program Loan Forgiveness Application SBA Form 3508S

On June 2, 2021, Taylor submitted SBA Form 3508S seeking forgiveness of his \$12,500 PPP loan. He certified that his business complied with all PPP rules for forgiveness, including rules related to eligible uses for PPP funds and calculation of loan forgiveness amounts. He also certified that the information provided in the loan forgiveness application was true and that he was not knowingly making a false statement to obtain forgiveness. The form stated:

By Signing Below, You Make the Following Representations and Certifications on Behalf of the Borrower:

The Authorized Representative of the Borrower certifies to all of the below by **initialing** next to each one.

The Borrower has complied with all requirements in the Paycheck Protection Program Rules (Sections 7(a)(36), (7)(a)(37), and 7A of the Small Business Act, the PPP interim final rules, and guidance issued by SBA through the date of this application), including the rules related to:

- eligible uses of PPP loan proceeds;
 - the amount of PPP loan proceeds that must be used for payroll costs;
 - the calculation and documentation of the Borrower’s revenue reduction (if applicable);
- and
- the calculation of the Borrower’s Requested Loan Forgiveness Amount.

Information regarding these requirements may be found in the Form 3508S Instructions and the Paycheck Protection Program Rules.

The information provided in this application is true and correct in all material respects. I understand that knowingly making a false statement to obtain forgiveness of an SBA-guaranteed loan is punishable under the law, including 18 U.S.C. 1001 and 3571 by imprisonment of not more than five years and/or a fine of up to \$250,000; under 15 U.S.C. 645 by imprisonment of not more than two years and/or a fine of not more than \$5,000; and, if submitted to a Federally insured institution, under 18 U.S.C. 1014 by imprisonment of not more than thirty years and/or a fine of not more than \$1,000,000.

Following submission of this forgiveness application, the Borrower must retain all records necessary to prove compliance with Paycheck Protection Program Rules for four years for employment records and for three years for all other records. SBA may request additional information for the purposes of evaluating the Borrower's eligibility for the PPP loan and for loan forgiveness, and the Borrower's failure to provide information requested by SBA may result in a determination that the Borrower was ineligible for the PPP loan or in a denial of the Borrower's loan forgiveness application.

The Borrower's eligibility for loan forgiveness will be evaluated in accordance with the Paycheck Protection Program Rules. SBA may direct a lender to disapprove the Borrower's loan forgiveness application if SBA determines that the Borrower was ineligible for the PPP loan.

e. PPP Loan Payoff

The SBA forgave Taylors's PPP on June 29, 2021.

2. Tollway Personnel Forms

In the course of his Tollway tenure, Taylor has executed several forms acknowledging receipt and understanding of Tollway policies, including:

a. Personnel Policies and Procedures Manual Acknowledgment, Disclaimer, and Receipt form (February 1, 2016)

Taylor signed, acknowledging the following (in relevant part):

I, Herbert E. Taylor III, acknowledge that I have received copy of the Personnel Policies and Procedures Manual (revised January 1, 2005) for the Illinois State Toll Highway Authority.

I acknowledge that it is my responsibility to read and understand the contents of this manual.

- b. Personnel Policies and Procedures Manual Acknowledgement, Disclaimer and Receipt form (October 7, 2016)

Taylor signed, acknowledging the following (in relevant part):

I, Herbert E. Taylor III, acknowledge that I have received copy of the Personnel Policies and Procedures Manual (revised September 2016) for the Illinois State Toll Highway Authority.

I acknowledge that it is my responsibility to read and understand the contents of this manual.

3. Tollway Ethics and Outside Employment Training and Reminders

- a. November 10, 2021 email

On November 10, 2021, the Tollway Ethics Office emailed all Tollway employees about outside employment ethics guidelines. It wrote, in relevant part (emphasis in original):

Illinois Tollway Outside Employment Policy

With the approaching holiday season, many employees may be looking for ways to earn something extra to make the holidays special. Remember, however, the Tollway Policy and Procedures Manual policy on outside employment states that any employee who seeks to engage in outside employment after they are employed with the Tollway **must notify and receive the written approval** of their Department Chief before accepting such employment.

It's critical to remember that the employee's responsibility is to complete and return the attached Outside Employment Approval Form and follow the provided guidelines at any time you seek employment in addition to your Tollway employment.

Click on the link below to download the form. Complete and send the form to your Department Chief for approval. <https://crossroads/sites/-executive/EthicsFOIA/Ethics/Ethics%20Communications%20201>.

Outside employment consists of any type of activity for which the individual actually or anticipates receiving compensation (i.e., salary, commission, hourly pay, etc.) which may be in the form of cash or check, and may or may not be subject to the withholding of taxes.

b. 2023 Tollway Employee, Official, & Contractor Ethics Training

According to the weekly reports of Tollway annual training completed by employees, Taylor completed his 2023 Tollway Ethics training on June 15, 2023.

Slide 14 of the 2023 Tollway Ethics training states (in relevant part):

OUTSIDE EMPLOYMENT

Employees may have outside employment so long as it is not in conflict with the employee's Tollway responsibilities and will not interfere with the employee's job performance or work schedule at the Tollway and includes, in relevant part:

- o notifying their Department Chief and the Ethics Officer via the Outside Employment Approval Request Form initiated through each Department's Executive Secretary;

* * *

- o the Outside Employment Approval Request Form is located online on Crossroads, <https://crossroads/sites/executive/EthicsFOIA/Shared%20Documents/Outside%20Employment%20Form-fillable.pdf>

* * *

- o not conducting any business or performing any outside duties, including solicitation relating to outside employment, on Tollway premises or during the employee's normal work schedule.

c. Important Ethics Information: Outside Employment Policy
Reminder email

On January 17, 2023, the Tollway Ethics Office emailed ethics information related to outside employment to all Tollway employees⁷. The email stated, in relevant part:

Under the Tollway Policy and Procedures manual, any Tollway employee who seeks to engage in outside employment after they are employed with the Tollway must notify and receive written approval of their Department Chief before accepting such employment.

At the time of hire, new Tollway employees will be asked if they currently are engaged in employment secondary to their position at the Tollway and if they do

⁷ Email was sent to ALL ISTHA emails which consisted of 442 Tollway ALL0365 mail only accounts including Taylor.

have outside employment, they will need to fill out and sign the Outside Employment Approval Request form.

* * *

On an annual basis, Tollway employees will be required to acknowledge on-going secondary employment. This can be done using the Outside Employment Approval Request form.

Outside employment must not adversely affect an employee's job performance or the employee's work schedule at the Tollway.

Outside employment consists of any type of activity for which the individual actually or anticipates receiving compensation (i.e., salary, commission, hourly pay, etc.) which may be in the form of cash or check, and may or may not be subject to the withholding of taxes.

d. Important Ethics Information: Outside Employment Policy
Reminder email

On June 14, 2023, the Tollway Ethics Office emailed ethics information related to outside employment to all Tollway employees⁸. The email stated, in relevant part (emphasis added):

Under the Tollway Policy and Procedures manual, any Tollway employee who seeks to engage in outside employment after they are employed with the Tollway must notify and receive written approval of their Department Chief before accepting such employment.

At the time of hire, new Tollway employees will be asked if they currently are engaged in employment secondary to their position at the Tollway and if they do have outside employment, they will need to fill out and sign the Outside Employment Approval Request form.

* * *

On an annual basis, Tollway employees will be required to acknowledge on-going secondary employment. This can be done using the Outside Employment Approval Request form.

Outside employment must not adversely affect an employee's job performance or the employee's work schedule at the Tollway.

Outside employment consists of any type of activity for which the individual actually or anticipates receiving compensation (i.e., salary, commission, hourly pay, etc.) which may be in the form of cash or check, and may or may not be subject

⁸ Email was sent to ALL ISTHA emails which consisted of 441 ALL0365 mail only accounts including Taylor

to the withholding of taxes. **Running your own business is considered outside employment for the purposes of the disclosure requirement.**

B. Interviews

1. Herbert Taylor III

On October 11, 2023, OIG interviewed Toll Collector Herbert Taylor III (Taylor). Taylor was provided both orally and in writing, a consent to record form to which he consented and signed. Taylor was also provided, both orally and in writing, with Administrative Advisements for Union Employees, which he read, acknowledged, and signed acknowledging he wanted to proceed without union representation. In summary, Taylor stated the following:

Taylor's current address is [REDACTED]. He has worked as a Toll Collector for the Tollway for eight years. His Tollway work hours are from 8:00 a.m. to 4:00 p.m., Monday through Friday. When he started as a seasonal Toll Collector, his hours would vary due to him being on-call. In January 2016, he was moved from seasonal Toll Collector to a part-time Toll Collector. Then, in March 2020, due to the COVID-19 pandemic, he moved into a full-time customer service representative role but kept the Toll Collector title. He currently works remotely; his duties include answering telephone calls, taking customer payments, adding credit cards to accounts, and helping customers with invoices.

a. Outside Employment

Taylor confirmed he had employment other than his Tollway employment and provided the following information:

- [REDACTED]: Taylor tends bar and works security at the door on weekends. He has worked there for four years and had an ownership stake in the club from 2017 through 2021. In 2021, he sold his portion of the bar to his sister. Taylor said the Secretary of State Corporation File Detail Report for [REDACTED] information listing him as both the [REDACTED] and [REDACTED] of [REDACTED], was inaccurate. He confirmed he had held those titles in the past but did not now. Taylor's father left the bar to him and his sister. [REDACTED] hours are Thursday 6:00 p.m. to 12:00 a.m., Friday 6:00 p.m. to 2:00 a.m., Saturday 6:00 p.m. to 3:00 a.m., and Sunday 4:00 p.m. to 12:00 a.m. Taylor works at the bar Saturdays 6:00 p.m. to 3:00 a.m. and Sundays 6:00 p.m. to 12:00 a.m. His hours do not change weekly, and he set his own schedule. Taylor's sister pays him \$150 a shift plus tips "under the table." (Recording 12:12).⁹
- [REDACTED]: A pop-up barbeque company Taylor owns and operates. He started the business approximately four to five years ago. He runs the restaurant from his residence at [REDACTED]. He works there on the weekends. He starts making food as 5:30 a.m. and usually finishes at 5:30 p.m. He typically makes between \$1,500 and \$1,600 a weekend, and approximately \$30,000 to \$35,000 annually. It is an all-

⁹ This reflects the timestamp of the statement on the interview recording.

cash business. He has one full-time employee and one person who helps occasionally. He does the purchasing for the business.

- [REDACTED]: He worked there from November 2019 to February 2020, shopping and delivering items for customers. He made \$1,500-\$2,000. He did not have a set schedule while working there, he just worked there when he wanted to. He worked for [REDACTED] on “red x” days, which meant he was not working at the Tollway and could not be called into work. He also completed some [REDACTED] work after his Tollway shifts.

Taylor never performed any outside employment while on the clock at the Tollway. People from his outside employment knew not to bother him before 4:00 p.m. and he never took food orders while working for the Tollway.

b. Outside Employment Form

Taylor admitted that he never reported his outside employment to the Tollway. He claimed he did not know he needed to report the outside employment. “We had to report it? I didn’t think we had to report it or nothing like that.” (Recording 43:07). Taylor was shown copies of his signed acknowledgements and reminder emails related to secondary employment, and acknowledged signing the documents and receiving the emails, but said he did not take the time to read them carefully. He said he remembered completing the ethics training. He understands now that he must report outside employment.

c. Taylor’s PPP Loan

Taylor confirmed he received a \$12,500 PPP loan for [REDACTED] and admitted that the most money he made at [REDACTED] was \$30,000-35,000 a year. Taylor reviewed his PPP loan application, and acknowledged he completed an online application claiming \$5,020 in monthly payroll for a sole proprietor company for which he was the 100 percent owner. He said he learned about PPP loans from social media, posters, and people at tax services and initially attempted to obtain a loan from [REDACTED] but said that loan request was denied. He then submitted three loan applications and [REDACTED] was the only approved application. He also received a non-PPP loan for [REDACTED]

Taylor reviewed the Schedule C tax form he submitted as support for his PPP loan and confirmed that he completed the form. Taylor could not initially explain why he had previously told the OIG that his business made between \$30,000 to 35,000 in gross income but the PPP application showed \$71,500 in income. Eventually, Taylor admitted to inflating his business income on the application in order to obtain a larger PPP loan, and admitted that he knew when he completed the Schedule C that \$71,5000 was not the accurate amount of business income from 2019. Taylor further confirmed he submitted his personal [REDACTED] account statement showing his Tollway salary direct deposits in an effort to improperly inflate his business revenue to receive the PPP loan for his personal business.¹⁰

¹⁰ The statement reflects [REDACTED] in credits and deposits; [REDACTED] of those deposits are State of Illinois direct deposits.

At the end of the interview, Taylor again confirmed he knew the PPP loan was fraudulent because he inflated his business income.

V. ANALYSIS

OIG's investigation has established that Taylor submitted fraudulent documents to obtain a PPP loan for his outside business and engaged in unauthorized outside employment. Taylor's conduct violated Tollway rules of employee conduct, the Tollway's outside employment policy, Federal rules governing forgiveness of PPP loans, and Federal law.

A. PPP Loan

Taylor engaged in conduct unbecoming a Tollway employee by fraudulently completing a PPP loan application and inflating reported income that he did not receive. Taylor admitted he completed and submitted a PPP loan application containing false information by claiming \$71,500 in 2019 income when he actually received \$30,000 to \$35,000. In fact, Taylor provided a bank statement showing his Tollway direct deposits in order to inflate his business income so he could obtain a higher loan. His actions related to the PPP loan likely violated multiple federal laws. Providing false information to a financial institution to obtain a Small Business Administration loan violates multiple federal laws, including 18 U.S.C. 1014 (prohibits knowingly making a false statement or report on a loan application for the purpose of influencing in any way the action of the Small Business Administration and/or an institution insured by the Federal Deposit Insurance Corporation) and 18 U.S.C. 1344 (prohibits knowingly executing a scheme to defraud a financial institution or obtain moneys or funds of the financial institution by means of false or fraudulent pretenses or representations). He likely also committed wire fraud in the submission of his loan application, in violation of 18 U.S.C. 1343 (prohibits using wire transmissions to devise a scheme to defraud or obtain money by means of false or fraudulent pretenses or representations).

B. Outside Employment and Disclosure

In addition, Taylor engaged in unauthorized outside employment. The Tollway's Outside Employment policy defines outside employment as "any type of activity for which the individual actually or anticipates receiving compensation (i.e., salary, commission, hourly pay, etc.) which may be in the form of cash or check, and may or may not be subject to the withhold of taxes." The policy requires new employees, at the time of hire, to disclose "employment secondary to the position at the Tollway." Disclosure forms must be completed at the time of new employee processing and should be updated annually. Employees who wish to begin outside employment after starting with the Tollway must notify and receive written approval prior to accepting the employment. Outside employment cannot conflict with the Tollway Code of Ethics. Violation of the Tollway's Outside Employment policy is subject to discipline up to and including discharge.

At various times during his Tollway tenure, Taylor worked for two companies – [REDACTED] and [REDACTED] – in addition to his self-employment. However, he acknowledged that he never reported any of these positions to the Tollway. Taylor claimed he did not know he needed to report these outside jobs. But Tollway records reflect that Taylor received multiple emails and completed ethics

training informing employees to report outside employment, including self-employment. Taylor acknowledged receiving the emails and ethics training but claimed he did not read them carefully.

VI. RECOMMENDATION

Taylor's conduct shows a disregard for Tollway rules and policies. Most troubling, Taylor exhibited contempt for federal law and those not so fortunate as him to have a full-time paycheck with benefits, when he knowingly provided false income information to fraudulently obtain a PPP loan. As a government employee, Taylor has a duty to engage in ethical conduct and follow the law. Taylor's conduct not only reflects poorly on his character, but also brings discredit on the Tollway because it erodes public confidence in government institutions. In addition, Taylor repeatedly engaged in outside employment without disclosing or obtaining proper approval.

These actions violate Tollway policy and clearly fall well below the standards of conduct that the public should expect from Tollway employees like Taylor. OIG recommends that the Tollway impose discipline, commensurate with the gravity of his violations, and any other relevant considerations, up to and including termination.