



Illinois State Toll Highway Authority

Office of the Inspector General

SUMMARY ACTIVITY REPORT

September 1, 2023 through February 29, 2024

Theodor J. Hengesbach Inspector General

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OFFICE OF THE INSPECTOR GENERAL Theodor J. Hengesbach – Inspector General

SUMMARY ACTIVITY REPORT

To: The Office of the Governor The Board of Directors of the Illinois State Toll Highway Authority The State of Illinois General Assembly

From: Theodor J. Hengesbach, Inspector General

Date: March 29, 2024

Re: Office of the Inspector General Summary Activity Report for the Period Spanning September 1, 2023 to February 29, 2024.

INTRODUCTION

We submit this report pursuant to Section 8.5 of the Toll Highway Act (the Act).¹ The Act created the Office of the Inspector General (OIG) to provide independent oversight of the Illinois Tollway. On February 22, 2022, the Illinois Senate confirmed the re-appointment of Theodor J. Hengesbach to a second five-year term.

MISSION/JURISDICTION

The OIG's mission is to foster effectiveness and efficiency in Tollway administration and operations by promoting integrity and accountability of the Tollway board, Tollway employees, and Tollway contractors and vendors. In furtherance of its mission, the OIG strives to detect, deter, and prevent fraud, waste, abuse, corruption, misconduct, and mismanagement.

¹ 605 ILCS 10/8.5(m) provides: The Toll Highway Inspector General shall provide to the Governor, the Board of the Authority and the General Assembly a summary of reports and investigations made under this Section no later than March 31 and September 30 of each year. The summaries shall detail the final disposition of the Inspector General's recommendations. The summaries shall not contain any confidential or identifying information concerning the subjects of the reports and investigations. The summaries shall also include detailed, recommended administrative actions and matters for consideration by the Governor, the Board of the Authority, and the General Assembly.

The OIG derives its authority and direction from the Illinois Toll Highway Act² and the Illinois Administrative Code.³

By statute, the OIG's jurisdiction extends to Tollway officials, Tollway employees, and Tollway contractors and vendors.⁴ As a general rule, the OIG does not become involved in cases involving private disputes, labor-management issues, or litigation. Matters investigated by the OIG may also fall within the jurisdiction of other agencies (e.g., federal, state, or local law enforcement, other inspectors general, etc.). In such cases, the Inspector General is authorized to refer matters or work jointly with these other agencies to investigate allegations of wrongdoing.

The OIG conducts administrative and criminal investigations of alleged violations of law, rule or regulation, and misconduct or mismanagement. In addition, the OIG reviews Tollway policies and procedures, and employment and hiring files, and serves as liaison to law enforcement entities.⁵

STAFF

The OIG is currently staffed by a Deputy Inspector General, a General Manager of Investigations, two Investigator IIs, two Investigator Is, and an Executive Secretary.

The Inspector General, Deputy Inspector General, General Manager of Investigations, two Investigator IIs and two Investigator I's are certified by the national Association of Inspectors General. The Inspector General, General Manager of Investigations, both Investigator IIs, and one Investigator I are Certified Fraud Examiners.

In addition, the Inspector General and the General Manager of Investigations continue as active members of the Board of Directors for the Illinois Chapter of the Association of Inspectors General. The Inspector General currently serves as Vice-President of that Board.

The position of Information Analyst is vacant and is expected to be posted this year.

² 605 ILCS 10/8.5 605 ILCS 10/8.5.

³ ILL. ADMIN. CODE title 2, sec. 3430 (2011).

⁴ See 605 ILCS 10/8.5(d).

⁵ See 605 ILCS 10/8.5(f).

INTAKES

The OIG receives complaints and reports of concerns and allegations of wrongdoing⁶ from the general public, Tollway officials and employees, vendors, bidders, and anonymous sources. These are screened and assessed to determine the most appropriate action, which can include opening a Preliminary Investigation (PI),⁷ an Investigation (IG), a Review (R), or an Investigative Assistance case (IA).⁸ The OIG can also refer matters, as appropriate, to Tollway management, law enforcement or another entity, or decline to open a case.

Factors that impact this decision include: the reliability and accuracy of information based on the OIG's knowledge of the subject matter; the nature of the conduct alleged and the ability to independently verify the allegations; the age of the conduct complained of; the likely impact on Tollway operations; and the availability of investigative resources.

Most often, matters are opened as Preliminary Investigations, which are limited scope inquiries to develop and evaluate available information to determine the most appropriate next action.

The OIG also receives a number of complaints and calls relating to I-PASS concerns or toll violations and fines that we refer to the Tollway Operations Customer Service section.

By law, the identity of any individual providing information or reporting possible or alleged misconduct to the OIG may not be disclosed without consent of that individual or as otherwise required by law.⁹ Furthermore, state and federal Whistleblower laws prohibit retaliation against individuals who provide information to or cooperate with an OIG investigation.

⁶ The OIG can also self-initiate investigations and reviews.

⁷ A Preliminary Investigation is initiated to conduct limited-scope inquiries to determine the next appropriate action. Generally, these inquiries are open for 30 days, although 30-day extensions may be approved by the Inspector General.

⁸ Investigative Assistance matters include tracking of employee arrests and requests for information or subpoenas from law enforcement, regulatory agencies, or other Inspectors General.

⁹ See 605 ILCS 10/8.S(k)(l).

The OIG receives reports of wrongdoing in many ways: in person, by telephone, facsimile, and US and Electronic mail. The Tollway OIG Hotline (866-786-5544) has become one of the two primary means by which the OIG receives such reports. During the past six-month period, there were 70 incoming Hotline calls.

A second primary source of information is the OIG online electronic form that allows individuals to provide information in a secure, confidential manner. This form can be accessed through the OIG webpage; it is encrypted upon submission and delivered directly to a secure OIG email account. During this reporting period, the OIG received 40 online submissions.

From September 1, 2023 through February 29, 2024, the OIG took action in 134 matters:

Preliminary Investigations	22 opened 19 closed 11 converted (2 IGs, 6 Referrals, 3 Reviews)
Investigative Assistance ¹⁰	0 opened 0 closed
Investigations	6 opened 16 closed 4 converted (1 Referral, 3 Reviews)
Reviews	4 opened 3 closed
Referrals	99 matters referred 4 to Law Enforcement
Declined	3 matters

As of February 28, 2024, the following matters were pending¹¹:

Preliminary Investigations	
Investigative Assistance	0
Investigations	8
Reviews	5

¹⁰ On October 1, 2017, responsibility for responding to law enforcement subpoena requests for Tollway records transitioned from the OIG to the Legal Department.

¹¹ These numbers include carry-over from previous reporting period.

REPORTS OF FINDINGS

Summary Reports of Investigation detailing sustained findings and/or recommendations for corrective action are submitted to the Board Chair, the Executive Director and appropriate management officials. Summary reports resulting in discipline of more than 3 days are publicly released in redacted form on the OIG website after the discipline has been finalized.

The OIG also issues Management Advisory Reports to the Board Chair, the Executive Director and appropriate management officials, which describe operational concerns observed by the OIG in the course of its activities.

There were no recommended administrative actions or matters submitted for consideration to the Governor or the General Assembly during this period.

The following are summaries of OIG reports issued between September 1, 2023 and February 29, 2024. Seven Summary Reports of Investigation and two Management Advisory Reports were issued.

SUMMARY REPORTS OF INVESTIGATION

IG-23-007

OIG completed an investigation that established reasonable cause to find that a Tollway Toll Collector serving as a Customer Service Representative fraudulently sought and received a Paycheck Protection Program (PPP) loan for their outside business and engaged in unauthorized outside employment. Documents reflect that this employee received a \$20,000 PPP loan in February 2021 and their application included a 2019 IRS tax form and Schedule C reporting \$125,000 in gross income for "finance and insurance work." During their OIG interview, the employee said that they had worked several non-Tollway jobs during their Tollway tenure, yet never submitted an Outside Employment Form. The employee also admitted that their non-Tollway earnings were actually less than \$500 per year for tax work. In addition, the employee conceded that they used a large amount of the PPP loan proceeds to pay down credit card debt unrelated to the tax work.

Following the interview, OIG informed the Operations Department of the general nature of its preliminary findings of misconduct, and the employee was placed on Suspension Pending Investigation.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee had fraudulently sought and received a

PPP loan and misused the proceeds for ineligible personal expenses. In addition, the employee also repeatedly violated the Tollway's policy on Outside Employment by working several jobs without ever seeking approval to perform non-Tollway work.

Response

The response was expected on November 27, 2023 and received November 28, 2023, and the Tollway reported that on November 16, 2023 it sent the employee a Loudermill letter enumerating several policy violations, and provided seven days to respond. On December 7, 2023, the Tollway reported that because the employee failed to respond, it moved forward with termination effective December 6, 2023.

<u>IG-23-011</u>

OIG has completed an investigation that established reasonable cause to find that a Tollway Toll Collector serving as a Customer Service Representative fraudulently sought and received a Paycheck Protection Program (PPP) loan for their outside business and engaged in unauthorized outside employment. Documents reflect that the employee received a \$12,500 PPP loan in March 2021 and their application included a 2019 IRS tax form and Schedule C reporting \$71,500 in gross income for "special food services work."

During their OIG interview, the employee said that they had worked several non-Tollway jobs during their Tollway tenure, including a barbeque company, yet they never submitted an Outside Employment Form. The employee also admitted that their non-Tollway earnings were actually between \$30,000 and \$35,000 per year, and that they submitted bank records that improperly represented their Tollway salary direct deposits as business income to falsely inflate their 2019 annual revenue in order to increase their PPP loan.

Following their interview, OIG informed the Operations Department of the general nature of its preliminary findings of misconduct, and the employee was placed on Suspension Pending Investigation.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee fraudulently sought and received a PPP loan and misused at least some of the proceeds for ineligible personal expenses. The employee also repeatedly violated the Tollway's policy on Outside Employment by working several jobs without ever seeking approval to perform non-Tollway work.

Response

The response was expected on November 27, 2023 and received November 28, 2023, and the Tollway reported that on November 16, 2023 it sent the employee a Loudermill letter enumerating several policy violations, and provided seven days to respond. On December 7, 2023, the Tollway reported that the employee had not responded, and it went forward with termination effective December 6, 2023.

<u>IG-23-003</u>

OIG completed an investigation that established reasonable cause to find that a Tollway Government Account Representative fraudulently sought and received funds from a Paycheck Protection Program (PPP) loan for their outside business and engaged in unauthorized outside employment. Documents reflect that the employee received a \$4,166 PPP loan in April 2021 and that their application included a 2019 IRS tax form and Schedule C reporting \$20,000 in gross income for an online boutique.

However, during their OIG interview, the employee said their online clothing business began in April 2020, and so could not have had an income in 2019. The employee also admitted that their non-Tollway earnings were actually "maybe \$1,000" before closing the business in late 2020. In addition, the employee acknowledged that they never submitted an Outside Employment Form during their tenure.

Following the interview, OIG informed the Operations Department of the general nature of its preliminary findings of misconduct, and the employee was placed on Suspension Pending Investigation.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee fraudulently sought and received a PPP loan for a business that did not exist prior to February 2020. The employee also violated the Tollway's policy on Outside Employment by operating a business without seeking approval to perform non-Tollway work.

Response

The response was expected and received on December 7, 2023, and the Tollway reported that on November 13, 2023 it issued a Loudermill letter enumerating several policy violations, and provided seven days to respond. The employee provided a response, and the Tollway determined that there remained sufficient grounds to terminate, therefore the Tollway moved forward with termination effective December 6, 2023.

IG-23-004

OIG completed an investigation that established reasonable cause to find that a Tollway Talent Acquisition Specialist engaged in unauthorized outside employment, conducted personal business including outside employment during Tollway work hours, submitted misleading Outside Employment Approval forms, and misused Paycheck Protection Program (PPP) loan proceeds.

Documents reflect that, soon after starting with the Tollway, the employee received a \$14,292 second draw PPP loan in February 2021 for their business based on an application that included a 2019 Schedule C reporting \$91,000 in revenue. During their OIG interview the employee confirmed that since 2001 they have run a company, which was their sole employment from 2017 to December 2020. The employee said they sought employment with the Tollway in 2020 after that business suffered due to the COVID pandemic. They claimed to not perform any non-Tollway work while working for the Tollway, but did acknowledge that in 2021 the business began to pick up. The employee initially told the OIG that they did not think they had to report this work because they were self-employed, and explained that they only disclosed this business in an Outside Employment form in October 2023 after being contacted by the OIG for an interview, and only after their accountant told them that the business made more money than their Tollway earnings.

Following the interview, OIG informed the Administration Department of the general nature of its preliminary findings of misconduct, and the employee was placed on Suspension Pending Investigation.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee continued to operate their business after starting with the Tollway, failed to disclose this business, regularly conducted non-Tollway business during their workday, and, when confronted, failed to provide complete and truthful information to the OIG or their supervisors about this outside employment. In addition, after they started with the Tollway, the employee chose to seek a second PPP loan for that business and then made residential mortgage payments from the business account that went toward principal and escrow, which are impermissible uses of PPP funds.

Response

The response was expected on December 29, 2023 and received December 14, 2023. The Tollway reported that on December 6, 2023, it sent the employee a Loudermill letter enumerating several policy violations, and provided seven days to respond. The employee submitted an email resignation on December 8, 2023, and has been added to the "Do Not Rehire" list in the HR system.

IG-23-005

OIG completed an investigation that has established reasonable cause to find that a Tollway Senior Toll Collector serving as Customer Service Representative fraudulently sought and received funds from a Paycheck Protection Program (PPP) loan for their outside business and engaged in unauthorized outside employment. Documents reflect that the employee received a \$17,312 PPP loan in May 2021 and that their application included a 2019 IRS tax form and Schedule C reporting \$83,105 in gross income for a women's accessories online business, Business A. In their OIG interview the employee told investigators that since 2017 they had run an online clothing/accessories business, Business B, and acknowledged that they authorized a now-deceased person to apply for a PPP loan. The employee said they told that person that their business income was between \$3,000 and \$5,000 and they did not recognize the Schedule C that had been included with the application. The employee said they did not know what Business A was, but admitted that they received the PPP loan proceeds in their bank account and spent those funds. The employee said they used some of the loan proceeds to pay their daughter and goddaughter for helping out with Business B, and admitted spending some of the proceeds on non-business, personal expenses. In addition, the employee admitted that during their Tollway tenure they ran Business B and engaged in other outside employment but never submitted an Outside Employment Authorization form.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee fraudulently sought and received a PPP loan and misused at least some of the proceeds for ineligible personal expenses. The employee also repeatedly violated the Tollway's policy on Outside Employment by operating a business without ever seeking approval to perform non-Tollway work.

Response

The response was expected on February 27, 2024 and received February 29, 2024, and the Tollway reported that the employee had been placed on suspension pending investigation. The employee was served with a Loudermill letter enumerating several policy violations, and provided seven days to respond. The employee provided a response, and the Tollway determined that there remained sufficient grounds to terminate, therefore the Tollway moved forward with termination effective March 25, 2024.

IG-23-006

OIG has completed an investigation that has established reasonable cause to find that a Tollway Accounts Payable Representative fraudulently sought and received funds from a Paycheck Protection Program (PPP) loan for their outside business and engaged in unauthorized outside employment. Documents reflect that the employee sought and received an \$18,540.00 PPP Loan in April 2021 and that their application included a 2020 IRS tax form and Schedule C reporting \$89,000 in gross income.

In their OIG interview, the employee told investigators that since 2017 they have provided event planning and decorating services, and has worked part-time at various businesses up to present, but had not submitted an Outside Employment Authorization form since 2016. The employee admitted to authorizing a friend to submit a PPP application but conceded that the 2020 Schedule C submitted with their application was not accurate because the actual total earnings since 2017 were between \$6,000 and \$7,500. The employee acknowledged receiving the loan proceeds in their bank account, and subsequently spent those funds, but admitted the business expenses only amounted to several hundred dollars.

The employee retired effective January 16, 2024, six days after their OIG interview.

OIG completed its investigation and submitted a Summary Report of Investigation detailing facts that establish that the employee fraudulently sought and received a PPP loan for their business and subsequently spent most of the funds on non-business related expenses. In addition, the employee also violated the Tollway's policy on Outside Employment by operating a business without ever seeking approval to perform non-Tollway work. Since the employee had retired, the OIG recommended that they be placed on the "do not rehire list."

Response

The response was expected on February 27, 2024 and received on March 1, 2024, and the Tollway reported that the employee had retired and had informed their supervisor that it was related to an OIG investigation regarding dual employment and a PPP loan. The Tollway said it agreed with findings and, if the employee had still been with the Tollway, it would have placed them on "Immediate Suspension Pending Investigation." The employee's employment status would then have been evaluated due to the seriousness of the allegations contained in the OIG investigation.

<u>IG-24-001</u>

The OIG completed an investigation that established reasonable cause to find an employee of a Tollway contractor used their position as a Call Taker to engage in criminal activity and violated the vendor's contract with the Tollway. Audio recording and documentary evidence establish that the employee obtained the card information after the patron inadvertently recited the information over the phone to the employee instead of entering it into the automated payment system, and then the Call Taker used the card to make several online purchases totaling less than \$100.

During their OIG interview, the employee admitted to making the unauthorized charges and subsequently resigned. Had the employee not resigned, OIG would have recommended that the Tollway invoke its rights under the contract and have the vendor reassign the employee to non-Tollway work. Because the employee resigned, OIG recommended that the Tollway share these findings with the vendor and prohibit the employee from working on Tollway contracts in the future.

OIG also made several recommendations to provide guidance to call takers on how to handle this situation in the future.

Response

The response was expected on March 15, 2024 and received on March 6, 2024, and the Tollway reported that it agreed with the OIG's findings and had the employee not resigned it would have instructed the vendor to terminate their employment. The Tollway did request that the vendor put the employee on a Do Not Hire list.

In addition, the Tollway agreed with the OIG recommendations and said that it would:

- Instruct its internal managers and the contractor to provide retraining reminding all call takers to stop customers from disclosing personal, private, and/or confidential information, and advise immediately that they will be transferred to a secured automated system.
- Update its automated call center script, so that callers are clearly informed to only provide payment information at the secured automated system.
- Create a Standard Operating Procedure (SOP) to instruct call takers to make a note in their call records and notify a supervisor if a customer inadvertently shares personal, private, and/or confidential information during a call. The SOP will also require the Tollway and its contractor to maintain a copy of any call where this happens for potential investigative and/or training purposes.

MANAGEMENT ADVISORY REPORTS

R-23-004 and R-23-005

OIG completed reviews of two hiring sequences in 2023 and issued one report outlining critical deviations from interview and hiring training provided to Tollway employees by the Department of Administration. In August 2023, OIG initiated inquiries of two recent hiring sequences: R-23-004 – Hiring Sequence 1, and R-23-005 – Hiring Sequence 2.

Two consultants who had been working on Tollway contracts were ultimately hired into these two newly created positions. The selected candidates appear to be qualified for the positions into which they were hired. OIG initially reviewed the hiring-related documentation for these two positions to assess whether these sequences complied with the processes set forth in training provided to Tollway employees.

OIG's preliminary review revealed that both Hiring Sequence 1 and Hiring Sequence 2 diverged from these trainings by having insufficient Relationship Disclosure and Conflict of Interest certifications. Specifically, some of the forms were not timely completed, and there was no clear process for their review.

In addition, the interview stage of Hiring Sequence 1 did not conform to this hiring guidance in two ways. First, the interview pool of candidates was smaller than recommended without a documented explanation. Second, one interviewer had no notes in their interview guide for the selected candidate and notes for only four of ten questions for the other interviewed candidate.

Response

The response was expected and received on February 29, 2024, and the Tollway outlined the following steps it has begun to take to address OIG's concerns, including:

- Requiring that all disclosure forms be signed and returned at least 24 hours prior to first scheduled interview for each panelist. This process will also be applied to interview panelist substitutions required due to concerns presented by the review of the Conflict-of-Interest Certification (COC) form and in the event of unforeseen special circumstances, for example, emergency panelist substitutions made on the day of the scheduled interview.
- Requiring that any COC form presented that may result in a potential conflict of interest will be reviewed and approved by the Chief of Administration or Deputy Chief of HR Services. In their absence, Manager of Talent Acquisition will review and approve COC form.

- Requiring Administration's Talent Acquisition (TA) team to review all interview guides following submission to assure accuracy and completion. TA team members will communicate and emphasize that panelists must input interview notes into interview guides for each candidate interviewed.
- Requiring all future candidate pools to include a minimum of three candidates for interview except in special circumstances, which must be documented in a memo and approved by the Chief of Administration.
- Ensuring that Administration will provide additional guidance in the development of job descriptions.

<u>R-23-006</u>

OIG completed a review of the Administration's use of veterans' preference in various hiring sequences from 2021 through 2023 that found that Administration inconsistently included a veteran status question on employment applications, and did not consider an applicant's veteran status during the hiring process.

Tollway policy requires that "reasonable preference" be given to applicants with U.S. military service. This review showed that Administration's practice, at least since 2020, has not been consistent with Tollway policy and OIG recommended that the Tollway establish standard procedures to effectuate its veterans' preference policy. OIG further recommended that Administration provide written guidance for talent staff members and hiring departments on supplementary application questions to ensure that such questions are meaningfully integrated into the selection process.

Response

The response was expected and received on February 29, 2024, and the Tollway reported that it was taking the following steps to effectuate OIG's recommendations:

- By March 1, 2024 all jobs posted will include a standard application question to allow candidates to disclose their veteran status.
- Any candidate who discloses a veteran status and meets minimum qualifications, will be offered the opportunity to interview for positions they have formally applied. Final selection will not be based solely on candidates' veteran status.

UPDATES ON PRIOR RECOMMENDATIONS

<u>R-22-008</u>

In a previously reported Management Advisory Report, OIG reviewed several Tollway Exempt Hiring sequences from 2022 to examine the process and assess whether the hiring documentation was complete and supported these hiring decisions. Exempt positions are those that, because of the nature of their duties, do not require a competitive hiring process, but all those hired must meet the minimum qualifications for the position. This review identified inconsistencies in position descriptions, application submission requirements, and hiring justification memoranda that made it difficult to objectively determine that all the candidates selected met those minimum qualifications.

OIG recommended that the Tollway develop a more comprehensive Exempt Hire protocol covering such things as developing and approving Exempt position descriptions, ensuring objective assessment of candidate qualifications, and requiring meaningful hiring justification memoranda.

Response

In its initial response, the Tollway agreed with the findings and outlined a series of improvements for selecting and documenting Exempt hires, which it expected to develop and implement by the 4th Quarter of 2023. The Tollway sought an extension on this to consult with Central Management Services and the OIG. Ultimately the Tollway provided a response on March 15, 2024, that included an updated process for Exempt hires and an updated process for Non-Exempt hires. Both documents included an express commitment to ensuring an "ethical hiring and recruiting process where job applicants are assessed without discrimination and bias, embodying integrity, transparency, trust, and merit," that requires periodic review and collaboration among Tollway stakeholders.

The Exempt process document more clearly describes what exempt positions are and provides for a review process to evaluate and document which titles qualify for this designation. OIG looks forward to receiving monthly updates on this Exempt Positions List. The document also sets forth the documentation and approvals required for filling of Exempt Title positions that are posted as well as those that are not posted, such as a newly created category of direct hires and internal promotions. The Non-Exempt process expands on current steps and requires increased collaboration, approval, and documentation.

In its initial response, the Tollway indicated that it would add a quality review process to ensure the Processing Log correctly identifies all titles and candidate/employee names and that all information is listed accurately, and OIG expects this review process will be detailed in future updates.

SUMMARY OF OTHER ACTIVITY

In addition to the activities described above, the Inspector General and OIG staff have engaged in other related projects, including:

- Published four Summary Reports of Investigation on the Inspector General page of the Illinois Tollway website.
- Participated in 12 on-boarding sessions for new employees to introduce and describe the OIG's role, and to emphasize Tollway's expectation of, and commitment to, integrity for all employees, officials, and vendors.
- Four OIG staff members have completed National Safety Council CPR-AED training offered by Tollway Safety and Security department.
- OIG management worked with IT and Procurement to finalize an Invitation for Bid (IFB) for a database and workflow system, with expected bid opening in mid-April.
- Regular engagement with Tollway stakeholders, including the Board Chair, Ethics, Internal Audit, and Executive staff about common issues and ways to enhance Tollway integrity and accountability.
- Collaborated with Ethics, Internal Audit, and Legal on the Conflict Review Committee and Ethics-related initiatives.