



**OFFICE OF THE INSPECTOR GENERAL**  
*Illinois State Toll Highway Authority*

**NOTICE OF POSTING**

**OIG Case # IG-2016-006**

**Respondents:**

**Jasmine Ragsdell**

**Jacqueline Williams**

**Carlos Garcia**

Pursuant to 605 ILCS 10/8.5 (e)(3), the attached redacted summary report is being posted to the Illinois Toll Highway Authority's public website. As required by law, the Office of the Inspector General for the Illinois Toll Highway Authority sent a copy of this report to each Respondent and gave them fifteen days, until April 20, 2017, to provide suggested redactions or a written response. All three Respondents submitted suggested redactions, but only Williams requested that her response be published.

OIG issued a summary report on December 14, 2016 recommending discipline for all three Respondents for violating Tollway policy by accepting food, drinks and cash gifts from Tollway customers. Specifically, Ragsdell and Williams were seen in surveillance video footage accepting cash gifts from customers. When interviewed, both admitted receiving cash and also admitted accepting food and drinks from customers during their tenure. Garcia was not observed in the video accepting gifts, but when interviewed he admitted accepting money, food and drinks from customers during his Tollway employment.

Each Respondent was placed on Suspension Pending Investigation, and, following review of the OIG report, the Tollway presented them with individual written charges alleging violations of Tollway policy for accepting money, food and drinks from customers that, if substantiated, could result in termination. The Respondents were given seven days to submit responses. Ragsdell and Williams resigned. Garcia provided a response and, following the pre-disciplinary process, he accepted an offer of a Last Chance Agreement that allowed him to return to work with conditions, including: a time-served suspension of more than two months, location reassignment, and an acknowledgement that any future similar violation would result in termination.



# OFFICE OF THE INSPECTOR GENERAL SUMMARY REPORT OF INVESTIGATION

OIG Case # IG-2016-006

December 14, 2016

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

## **I. INTRODUCTION**

OIG initiated an investigation based on information provided by [REDACTED], Chief of Business Systems, respecting unusual activity, captured on security video at the O'Hare Oasis, involving Jasmine Ragsdell, Customer Service Representative (CSR). [REDACTED] suspected Ragsdell might be accepting cash from Tollway customers. The investigation was expanded to include two additional O'Hare CSRs, Jacqueline Williams and Carlos Garcia, observed in the video footage; and [REDACTED] and [REDACTED] who filled in at the O'Hare Oasis. The evidence obtained and developed in this investigation provides reasonable cause to support a finding that Ragsdell, Williams and Garcia violated Tollway policies and procedures by accepting food, drinks and cash gifts from customers. The evidence also provides reasonable cause to support a finding that [REDACTED] and [REDACTED] violated Tollway policies and procedures by accepting food and/or drinks from customers.

In the course of this investigation, OIG also reviewed the underlying transactions performed by the CSRs, which resulted in customer cash gifts. These transactions included dismissing of fines or violations, and appear suspicious, but there is insufficient evidence to conclusively determine that any transaction violated Tollway policies and procedures.

Based on the findings, OIG makes recommendations respecting discipline of the employees involved and provides recommendations for other actions to mitigate risk of improper activity and to reinforce appropriate Tollway standards.

## **II. APPLICABLE RULES**

### **A. 2005 Illinois Tollway Policy and Procedure Manual<sup>1</sup> Chapter I. General Policies and Responsibilities:**

#### **Section A: Fundamental Principles**

Provides in relevant part:

Employees of the Tollway owe a fiduciary duty to the Tollway, and shall act in the Tollway's best interest and not act for their personal benefit or for any other private interest that conflicts

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<sup>1</sup> The 2005 Illinois Tollway Policy and Procedures Manual is referenced throughout this report; based upon the dates of the conduct it is the applicable manual. The new Policy and Procedures Manual did not go into effect until September 2016.

with the public's trust. Integrity is essential, and employees should work towards the public good by adhering to the highest professional and ethical standards.

**B. 2005 Illinois Tollway Policy and Procedure Manual  
Chapter VIII. Employee Demeanor:**

Section A. Employee Conduct

Provides 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. Infractions of the rules of conduct include, but are not limited to the following [pertinent provisions] and may result in disciplinary action, up to and including discharge:

- Failure to follow Tollway policies and procedures.
- Violation of the Tollway Code of Ethics.
- Soliciting or accepting **any** gratuity, gift, present, reward or other thing of value in return for the performance of the employee's official duties, or as a condition for not performing such duties. (emphasis added)
- Use of the employee's official position for personal gain.
- Other conduct unbecoming a Tollway employee.

Section C. Code of Ethics/Conflicts of Interest

Provides in relevant part:

The Tollway requires public trust and confidence in its employees. Integrity is essential. Employees must act according to the highest ethical principles and standards, in accordance with the Tollway's Code of Ethics and all applicable local, state and federal laws imposing standards of ethical behavior. Employees must avoid all situations that could give the appearance of conflict of interest or impropriety. Violations will be grounds for discipline up to and including discharge.

**C. Code of Ethics for the Illinois State Toll Highway Authority  
Section II  
EMPLOYEE CONFLICTS OF INTEREST**

Provides in relevant part:

In General – No employee shall engage in any activity if such activity will...create a Conflict of Interest; result in the employee or relative of the employee receiving an economic benefit through or by virtue of any connection with the Tollway; or interfere with the proper and effective performance of his/her duties and responsibilities to the Tollway.

### **III. BACKGROUND**

#### **A. Subjects/Parties Involved**

1. Jasmine Ragsdell

Jasmine Ragsdell began work at the Tollway on May 12, 2008 as a Customer Service Representative (CSR). During her tenure, Ragsdell has worked at the Central Administration (CA) building in Downers Grove and the Lake Forest Oasis. For the relevant time period of this investigation, Ragsdell was primarily assigned to the O'Hare Oasis.

Ragsdell's disciplinary history includes various written warnings for attendance, use of electronic devices, performance issues, excessive use of the Tollway telephone and a one (1) day suspension for performance issues in May 2013.

2. Jacqueline Williams

Jacqueline (Jackie) Williams began work at the Tollway on November 11, 2011 as a CSR. During her tenure Williams has worked at the CA building in Downers Grove and the Des Plaines and Lake Forest Oases. For the relevant time period of this investigation, Williams was primarily assigned to the O'Hare Oasis.

Williams' disciplinary history includes three written warnings for performance issues, excessive use of the Tollway telephone and job responsibilities.

3. Carlos Garcia

Carlos Garcia began work at the Tollway on July 14, 2004 as a Lane Walker for approximately one year. Garcia became a CSR in 2005 and has worked at the CA building in Downers Grove and the Des Plaines Oasis. During the relevant time period of this investigation, Garcia was primarily assigned to the O'Hare Oasis.

Garcia's disciplinary history includes documented verbal warnings for unacceptable performance, insubordination and neglecting job responsibilities.

4. [REDACTED]

[REDACTED] began work at the Tollway on [REDACTED] 2014 as a CSR. [REDACTED] worked predominately at the CA building in Downers Grove and has filled in at the O'Hare, Lincoln, Hinsdale, DeKalb and Lake Forest Oases.

[REDACTED] disciplinary history includes two documented verbal warnings for performance issues.

5. [REDACTED]

[REDACTED] began work at the Tollway on [REDACTED], 2013 as a CSR. [REDACTED] has worked predominately at the CA building in Downers Grove and has filled in at the O'Hare, Lincoln, Hinsdale, DeKalb, Lake Forest and Des Plaines Oases.

[REDACTED]'s disciplinary history includes a one-day and three-day suspension for excessive tardiness.

#### **IV. SUMMARY OF INVESTIGATION**

##### **A. Documents and Video**

1. Video footage from security cameras at O'Hare Oasis.

The video footage from the Ocularis system captured all of the customer transactions between June 24 and September 9, 2016 at the O'Hare Oasis Customer Service center. OIG viewed this video and identified suspicious transactions on various days in June, July and August where IPass customers provided cash to Ragsdell (7 times), and to Williams (2 times).

2. Investigative Report summarizing CSR transactions June 24 through August 5, 2016 for Ragsdell and Williams.

##### **a. Jasmine Ragsdell**

June 24, 2016

At approximately 16:45<sup>2</sup>, CSR Jasmine Ragsdell handled transactions for two males respecting accounts [REDACTED], and [REDACTED]. A review of the transaction history for those accounts shows that Ragsdell dismissed violations and accepted settlement payments for both accounts.

At 17:51, one of the male individuals placed 2 \$20 bills on the desk in front of Ragsdell. It appears from the video that Ragsdell instructed him to put the money on the underside of her computer, on the left. Ragsdell then covered the money with a note pad. At 17:55, Ragsdell took the money and placed it under the paper at the back of the note pad. She also wrote in the note pad. At 18:19, Ragsdell blocked the camera as she stood up to the left of her computer. She walked away taking the note pad with her, and entered the break room where she put the note pad in her purse, which was in the cabinet.

July 1, 2016

At approximately 07:00, Ragsdell handled a transaction with an African American male wearing a white hat involving account [REDACTED]. A review the transaction history for this account

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<sup>2</sup> The Ocularis system uses a 24-hour clock, so that will be used in this report.

determined the customer made a \$60 cash payment on the account. There were no comments or information reflecting violations paid or dismissed by replenishing the account.

After replenishing his account, the man walked to the side table used for cash toll payments, removed money from his pocket and placed it in a white legal size envelope. He then stood in front of Ragsdell's desk waiting for her to acknowledge him. He handed the envelope to Ragsdell and she placed it to the side of her computer. Ragsdell later looked in the envelope, and appeared to be counting money. She took it to the break room and placed it in her purse.

July 1, 2016

At approximately 10:35, Ragsdell handled a transaction with an African American male involving account [REDACTED]. A review of the transaction history for this account reflects that the customer gave Ragsdell \$40 as a cash payment to bring his account current.

At the conclusion of the transaction, the man placed a \$5 bill on the desk in front of Ragsdell. Ragsdell then motioned as though directing him to place the money at the side of her computer. Ragsdell covered the money with a paper napkin. Later in her shift, Ragsdell removed the napkin and the money and entered the break room.

July 13, 2016

At approximately 10:40, Jackie Williams handled a transaction with an African American male involving two accounts. A review of the transaction history involving account [REDACTED] shows Williams accepted a "Non-Standard Settlement Evaluation" for hardship determination form and then accepted a settlement payment and dismissed the violations. The customer opened a new account, account [REDACTED], and Williams collected payment on other violations.

Ragsdell is observed speaking to the customer and Williams. At approximately 10:53, the customer walked to the cash toll payment counter, and at 10:56, he placed a white envelope on the side of Ragsdell's computer. At 11:33, Ragsdell looked in the envelope at what appears to be US Currency. At 12:11, Ragsdell covered the envelope and took it into the break room.

July 18, 2016

At approximately 11:35, Ragsdell handled a transaction with a Hispanic male. The customer walked into the Oasis and up to Ragsdell then kissed her hand. Two IPass accounts were accessed during this transaction: [REDACTED] and [REDACTED] and a review of the transaction history shows that Ragsdell accepted a payment of \$40 to replenish one of the accounts. There were no violations dismissed that day.

At the conclusion of the transaction, the customer held what appear to be a \$5 bill and two \$1 bills in his hand and Ragsdell motioned to him to place it under her pink drinking cup at the side of her computer. At approximately 12:20, Ragsdell removed the pink drinking cup and the money underneath.

July 18, 2016

At approximately 11:45, Ragsdell handled a lengthy transaction for an African American couple involving account [REDACTED]. A review of the transaction history shows that Ragsdell V-Tolled and dismissed fines, and accepted a payment of \$280 to replenish the account.

At approximately 11:55, the male customer dropped US Currency into the box on the counter containing foil sheets used to wrap transponders. At 12:13, Ragsdell removed the money from the foil box and placed it under her drinking cup. About 15-20 minutes later, Ragsdell removed the money and cup and walked to the back room.

August 5, 2016

At approximately 11:40, Ragsdell assisted a male customer with account [REDACTED]. A review of the transaction history shows there were no violations on the account and the customer made an \$80 replenishment payment.

At the end of the transaction, the customer placed what appear to be two \$5 bills on the counter in front of Ragsdell's telephone. Ragsdell appeared to direct him to place the money on the side of her computer. At approximately 11:45, Ragsdell placed a note pad over the money. At 12:16, Ragsdell put the money in the note pad and took the note pad with money to the back room.

b. Jackie Williams

July 15, 2016

At approximately 12:20, Williams handled a transaction for a male customer with account [REDACTED]. A review of the account history shows he replenished the account with a \$50 cash payment.

At the end of the transaction, the customer placed cash under the candy dish sitting on top of Williams' desk.

At approximately 18:02, Williams pulled the candy dish over the money. At 18:15, Williams put the money inside the front of her sweater.

August 12, 2016

At approximately 09:50, Williams handled a transaction for the same male customer with account [REDACTED]. A review of the account shows he replenished the account with a \$50 cash payment.

The customer placed what looks like a \$5 bill and two \$1 bills on Williams' desk in front of her monitor. At approximately 09:57, Williams took the money and placed it in a cabinet next to her desk.

2. Customer Service Operating Policy and Procedure dated April 10, 2012.

In this document, Business Systems sets forth standard operating procedures and outlines CSR duties and responsibilities when handling IPass customer transactions, such as: dismissing violations; adding/deleting license plates; etc.

3. VPS System Business Rules dated December 22, 2010.<sup>3</sup>

This manual contains rules pertaining to processing violations for IPass customers, which all CSRs must follow, such as: dismissing violations; adding/deleting license plates; etc.

4. Business Systems Notifications

██████████ Senior Manager, provided documents that have been distributed to Business Systems' personnel including the State Gift Ban Act and other notifications highlighting the prohibition against accepting gratuities from Tollway customers.

- a) Email with attachments from ██████████ to all ISTHA regarding new rules for Gift Ban dated December 16, 2015.
- b) Power point attachment from ██████████ on Gift Ban rules directed to all ISTHA in email dated December 16, 2015.
- c) Email from ██████████ to all ISTHA regarding new State of Illinois – Code of Personal Conduct dated July 1, 2016.
- d) State of Illinois – Code of Personal Conduct dated April 2016.
- e) Email dated November 21, 2016 with attachments from ██████████ to all Business Systems employees reminding them of Gift Ban and Code of Personal Conduct.

## B. Interviews

1. Jasmine Ragsdell

On November 15, 2016, OIG Investigators interviewed Jasmine Ragsdell and provided her Administrative Advisements for union employees. Ragsdell read and signed the form. Ragsdell requested a union representative. OIG contacted ██████████, an AFSCME Union Steward, who was present during the interview. Ragsdell also reviewed and signed the Consent to Audio Record form. After the interview concluded, a summary of the interview was prepared.<sup>4</sup>

In summary, Ragsdell stated the following:

Ragsdell admitted accepting money, food and drink from Tollway customers for at least the past six months. She did not believe what she was doing was wrong and believed there was a minimum dollar amount that was acceptable under the Gift Ban rules. Ragsdell stated that Jackie

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<sup>3</sup> VPS is the acronym for Violations Processing System that was used prior to September 2016.

<sup>4</sup> An audio recording was made of the interview. Following OIG recording operations policy, an inadvertent and unrecoverable deletion of the recording occurred. OIG prepared a summary of the unsuccessful recovery efforts.

Williams, Carlos Garcia and other CSRs have also accepted money and gifts from Tollway customers. Ragsdell said that sometime over the summer, [REDACTED] was filling in for Williams at the O'Hare Oasis and a customer dropped a \$20 bill on her keyboard. [REDACTED] called Customer Service Manager (CSM) [REDACTED], and he gave her permission to keep the money.

During the interview, Ragsdell reviewed video footage from June 24, 2016. She identified herself in the video and confirmed she had taken money from the Tollway customer shown on the video. She declined to view additional footage showing six other instances of her accepting cash from customers. Ragsdell agreed that her actions could be interpreted as deceptive and secretive because she tried to hide the money from camera view. Ragsdell said she has not accepted money in exchange for doing a favor for a customer. She said the money was always for her doing a good job, and that she had never been told it was wrong.

## 2. Jackie Williams

On November 15, 2016, OIG Investigators interviewed Jackie Williams and provided her Administrative Advisements for union employees. Williams read and signed the form and declined to have a union representative present for the interview. She also reviewed and signed the Consent to Audio Record form. After the interview concluded, a summary of the interview was prepared.

In summary, Williams stated the following:

Williams admitted accepting money, food and drink from Tollway customers since shortly after she was hired in 2011. She said that when she first began working, she was assigned to the Des Plaines Oasis with Carlos Garcia, and he told a customer, who had offered to get him a drink, to get one for Williams as well. She did not believe what she was doing was wrong and believed there was a minimum dollar amount that was acceptable under the Gift Ban rules. Williams confirmed Ragsdell and Garcia were also accepting gratuities, including cash, from Tollway customers. Williams identified [REDACTED] and [REDACTED] as other CSRs who shared in the food and drink given to them by customers.

Williams reviewed video footage for July 15 and August 12, 2016. She identified herself in the video and confirmed that she accepted cash from Tollway customers on both days. Although she claimed she did not know it was wrong, she could not explain why she never told a supervisor that she had received cash gifts. Williams also agreed that her actions captured on the video could appear to be secretive and deceptive. Williams denied taking money from customers in exchange for doing favors. She said she only accepted gifts for doing a good job. Williams said she was sorry and expressed remorse.

## 3. Carlos Garcia

On November 17, 2016, OIG Investigators interviewed Carlos Garcia and provided him Administrative Advisements for union employees. Garcia read and signed the form and declined to have a union representative present for the interview. He also reviewed and signed the

Consent to Audio Record form. After the interview concluded, a summary of the interview was prepared.

In summary, Garcia stated the following:

Garcia initially claimed to only accept drinks, but eventually admitted to accepting cash, food and drink from Tollway customers for a “very long time”. Garcia believed that he could accept food and drink from customers and a minimum dollar amount was acceptable under Gift Ban rules, but that accepting money from customers was wrong. Garcia eventually admitted that he had also accepted cash from customers, and confirmed that Williams and Ragsdell had also accepted cash payments from Tollway customers. Garcia opined that CSRs have “too much freedom” and acknowledged that he knows taking money or any form of gratuity is wrong. Garcia said the money he accepted was for doing a good job and helping people.

Garcia understands that Business Systems’ protocol for adding license plates to IPass accounts requires CSRs to confirm that the name, address and other identifying information matches. But he admitted to finding a way around this and stated that he had “helped” customers by adding plates to accounts where the information didn’t match. He denied accepting cash in exchange for this. Garcia expressed remorse for his actions, said he was ashamed of what he did and said he would never accept money, food or drink from anyone again.

4. [REDACTED]

On November 30, 2016, OIG Investigators interviewed [REDACTED] and provided her Administrative Advisements for union employees. [REDACTED] read and signed the form. [REDACTED] requested a union representative. OIG contacted [REDACTED], an AFSCME Union Steward, who was present during the interview. [REDACTED] also reviewed and signed the Consent to Audio Record form. After the interview concluded, a summary of the interview was prepared.

In summary, [REDACTED] stated the following:

[REDACTED] admitted accepting food and drink but denied accepting cash from customers. She said she has never seen any other CSRs accepting money from customers; however, all of the CSRs have accepted food and drink. A customer gave [REDACTED] and [REDACTED] a McDonald’s McFlurry last week. [REDACTED] called [REDACTED] for approval and received instructions to throw the drinks in the garbage in front of the security camera. Since the recent email from [REDACTED], they are not allowed to accept anything from customers.<sup>5</sup>

5. [REDACTED]

On November 30, 2016, OIG Investigators interviewed [REDACTED] and provided her Administrative Advisements for union employees. [REDACTED] read and signed the form. [REDACTED] requested a union representative. OIG contacted [REDACTED] union representative who represented [REDACTED] and was present during the interview. [REDACTED] also reviewed and signed the

<sup>5</sup> On November 18, 2016, [REDACTED] sent an email to all CSRs reaffirming prior notifications which informed them of the prohibition against accepting any gifts from customers.

Consent to Audio Record form. After the interview concluded, a summary of the interview was prepared.

In summary, [REDACTED] stated the following:

[REDACTED] admitted taking food and drink from customers. She also admitted accepting \$20 in cash from a customer after obtaining approval from [REDACTED] a Customer Service Manager. She showed the money to the camera acknowledging her acceptance of cash from the customer. [REDACTED] denied accepting any other cash from customers, stating she would call a manager to request approval and would not accept the money if the manager did not answer or give approval. A customer gave [REDACTED] and [REDACTED] a McDonald's McFlurry last week. [REDACTED] called [REDACTED] for approval and received instructions to throw the drinks in the garbage in front of the security camera. She denied seeing any other CSR accept money from customers, specifically Ragsdell, Williams and Garcia. [REDACTED] was aware of the spillage account protocol. She said since the recent email from [REDACTED] they are not allowed to accept anything from customers.

6. [REDACTED]

On November 15, 2016, OIG Investigators interviewed [REDACTED], Customer Service Manager, and provided him Administrative Advisements for non-union employees. [REDACTED] read and signed the form. He also reviewed and signed the Consent to Audio Record form, and declined to have the interview recorded. A summary of the interview was prepared.

In summary, [REDACTED] stated the following:

[REDACTED] confirmed he gave [REDACTED] permission to accept a \$20 gratuity from a customer. He recalled that this occurred in the past two months and it had never happened prior to this time. In looking back on it, he felt he had the authority to make this decision, although he admitted that he probably should have consulted a supervisor.

7. [REDACTED]

On November 16, 2016, OIG Investigators interviewed [REDACTED] Customer Service Manager, and provided him Administrative Advisements for non-union employees. [REDACTED] read and signed the form. He also reviewed and signed the Consent to Audio Record form, and agreed to have the interview recorded. A summary of the interview was prepared.

In summary, [REDACTED] stated the following:

[REDACTED] denied ever giving approval to a CSR to accept any type of gift or gratuity from a customer. [REDACTED] said that a customer offered him a cash gift one time and he refused the money. [REDACTED] said that all CSRs receive training on Business Systems' common practice for handling tips or other money left by customers. Under this practice, the CSR should apply money left by a

customer to the customer's IPass account, if it exists. If there is no IPass account, the CSR should document the occurrence and apply the money to the Tollway spillage account.

## **V. ANALYSIS**

### **A. Acceptance of Cash and/or Other Gifts From Customers**

Tollway policy since at least January 1, 2005 requires tollway employees to act in the Tollway's best interest and not act for their own personal gain. Tollway employees are also required to maintain the highest levels of integrity and ethical standards, avoiding any situation that could be viewed as a conflict of interest or impropriety. Furthermore, Tollway policy expressly prohibits employees from accepting or receiving any form of outside economic benefit, including gifts and gratuities, for performing Tollway work.

Business Systems issues annual reminders to employees prohibiting the acceptance of any form of gifts or gratuities, whether it is cash, food or drink. In addition, Business Systems has a protocol for handling money left behind by customers, either by mistake or as a gift which requires the CSR to apply the money to the customer's IPass account, or if no account exists, to a designated spillage account.

Despite these policies, procedures and reminders, Tollway video footage from the O'Hare Oasis between June 24 and August 5, 2016 documents many examples of CSRs accepting gifts from customers, including seven instances where Ragsdell accepted money from customers, and two instances where Williams accepted money from customers in the course of their Tollway duties. Both employees admit that they accepted money, food and drinks from Tollway customers, but they contend they did not know it was wrong until they met with OIG Investigators. Ragsdell and Williams assert they did not provide any favors or special treatment to any customer and believed they received the money and gifts for doing a good job.

However, the video belies their claim that it was appropriate to accept money. Specifically, the video clearly shows Ragsdell and Williams attempting to conceal the fact that they were accepting money from customers. In some instances, customers put cash on the counter and Ragsdell or Williams motioned or instructed them to put it somewhere to the side of their computer or even in the box of foil sheets. Three customers are observed placing money in envelopes and then placing the envelopes under Ragsdell's computer after she motioned or instructed them to do so. Then Ragsdell carefully checked the inside of the envelopes. Ragsdell can also be seen blocking the camera and palming the money to avoid detection by security cameras. Williams likewise is observed palming money and concealing it by placing it in the front part of her sweater or out of camera view. Both Ragsdell and Williams admit that these actions could appear secretive or deceptive.

Furthermore, Ragsdell and Williams admit that they never sought approval from a supervisor to accept cash gifts from customers, and they never told any supervisor they received money for their work. Both Ragsdell and Williams continued to claim they thought accepting cash gifts was okay until being informed it was not by the OIG investigators, but Williams did eventually state that she was sorry and remorseful.

Garcia is in many of the videos, but none shows him receiving money as a gift. When interviewed, Garcia admitted accepting food and drink during his tenure with the Tollway, but felt these were

appropriate because they fell below the dollar value provided in the State's Gift Ban rules. Garcia also acknowledged that he, Ragsdell and Williams accepted cash from customers, and he acknowledged that he knew it was wrong. In addition, Garcia admitted that he circumvented Tollway policy on V-tolling sometimes to assist customers by adding a license plate to an IPass account where the identifiers such as name or address did not match, although he said he never did so in exchange for money. Garcia said he thought he received cash because he did a good job, and he expressed remorse for his actions.

None of the video reviewed in this matter showed [REDACTED] or [REDACTED] accepting any gifts. When interviewed, [REDACTED] admitted to occasionally accepting food and drinks when assigned to the O'Hare oasis; she also admitted that she accepted a \$20 cash gift from a customer, but only after she sought and received approval from [REDACTED], a manager. [REDACTED] said she showed the money to the camera after she got approval to accept it. During [REDACTED]'s interview, she admitted accepting food and drink when assigned to O'Hare, but she denied ever accepting a cash gift from a customer. Both [REDACTED] and [REDACTED] said they thought it was okay to accept food or drink, and only recently refused to accept them after asking a supervisor and being told not to accept it.

### **B. Suspicious Transactions**

OIG reviewed the underlying transactions where customers gave Ragsdell and Williams cash to determine if they had performed some improper action respecting the customers' accounts. However, while several transactions in the videos involving dismissals of fines and violations appear suspicious, the evidence is insufficient to conclusively establish a violation of procedure or special treatment to the customers who provided cash gifts.

## **VI. RECOMMENDATIONS**

### **A. Acceptance of Cash and/or Other Gifts From Customers**

The evidence obtained and developed in this investigation demonstrates that Ragsdell and Williams violated Tollway policies and procedures by accepting cash gifts, food and drink from customers. Both admit accepting gifts and cash from customers, and video footage supports a finding that Ragsdell and Williams, by their surreptitious and secretive actions, took steps to avoid detection because they knew accepting cash gifts was wrong. Furthermore, in the interview Ragsdell and Williams did not fully accept responsibility for their conduct. OIG finds that the evidence provides reasonable cause to believe that Ragsdell and Williams violated Tollway Policy and Procedure and recommends the Tollway consider all the circumstances and impose discipline up to and including discharge.

The evidence also provides reasonable cause to support a finding that Garcia, the most senior CSR assigned to the O'Hare Oasis, also violated Tollway policies and procedures by accepting cash gifts, food and drink from customers. While there is no video of him accepting gifts or cash from customers, Garcia admitted to doing so and also admitted to violating Tollway policy by adding license plates to accounts where identifiers did not match. In contrast to Ragsdell and Williams, Garcia accepted responsibility for his actions, which he knew were wrong. For these violations, OIG recommends the Tollway consider all the circumstances and impose discipline up to and including discharge.

In addition, [REDACTED] and [REDACTED] admitted that they violated Tollway policies and procedures by accepting food and drink from customers, and [REDACTED] acknowledged that she accepted a cash gift only after receiving approval from a supervisor. The evidence as detailed in this report provides reasonable cause to support a finding that [REDACTED] and [REDACTED] violated Tollway policy. For these violations, OIG recommends the Tollway consider all the circumstances and issue discipline as it deems appropriate for [REDACTED] and [REDACTED].

Finally, although this was not the focus of this investigation, the evidence also provides reasonable cause to support a finding that [REDACTED] failed to provide adequate supervision when he allowed [REDACTED] to accept the cash gift. OIG recommends the Tollway consider taking action it deems appropriate under the circumstances.

OIG recommends the Tollway review Business System's Customer Service Operating Policy and Procedure Manual to ensure that written cash handling policies expressly reflect the prohibition on all gifts and gratuities set forth in the Tollway Policy and Procedure Manual, and make appropriate revisions. OIG further recommends that all Tollway-wide cash handling policies contain consistent language and include language that mirrors the Tollway Policy and Procedure Manual, which prohibits acceptance of any form of gratuity, including cash, tips, gift cards, food and drink. To ensure more effective guidance/training on these policies, OIG recommends that a Frequently Asked Question (FAQ) document be prepared to provide real-life examples for CSRs, and all Tollway employees, respecting gifts and gratuities.

In addition, OIG recommends the Tollway consider installing signage at all customer service locations to clearly inform all customers that Tollway employees are prohibited from accepting any gift or gratuity. Such notification should also be included on the Tollway's webpage.

## **B. Suspicious Transactions**

While the evidence does not conclusively establish any procedure violations respecting the underlying transactions, the information obtained during the course of this investigation identified vulnerabilities in legacy systems used during the time in question, especially respecting the amount of discretion afforded to CSRs and lack of accountability or audit trail. OIG understands the newly implemented Accenture Tolling System (ATS)<sup>6</sup>, is expected to address these risks and prevent the occurrence of suspicious transactions by CSRs. Business Systems Management have assured the Tollway that the current system is set up to prevent dismissals of fines and V-Tolling to accounts without management approval.

OIG commends the Tollway for addressing concerns with the legacy violations and IPass tracking systems and recommends that the Tollway conduct periodic reviews of ATS to determine whether the anticipated safeguards are effective in reducing or eliminating suspicious or questionable CSR transactions, which may violate policy and procedure.

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<sup>6</sup> In September 2016, the Accenture Tolling System (ATS) integrated and replaced the legacy systems that handled IPass and toll violations programs.

## **VII. RULE VIOLATIONS**

As described more fully above, Jasmine Ragsdell, Jacqueline Williams, Carlos Garcia, [REDACTED] and [REDACTED] violated the following provisions of the Tollway Policy and Procedure Manual and the Tollway Code of Ethics when they accepted gratuities, gifts, presents, rewards or other things of value such as cash, and/or drinks or food from customers in the course of their official Tollway duties.

**A. 2005 Illinois Tollway Policy and Procedure Manual  
Chapter I. General Policies and Responsibilities:**

**B. 2005 Illinois Tollway Policy and Procedure Manual  
Chapter VIII. Employee Demeanor:**

**Section A. Employee Conduct**

**Section C. Code of Ethics/Conflicts of Interest**

**C. Code of Ethics for the Illinois State Toll Highway Authority  
Section II  
EMPLOYEE CONFLICTS OF INTEREST**



**OFFICE OF THE INSPECTOR GENERAL**  
*Illinois State Toll Highway Authority*

**RESPONDENT SUGGESTED REDACTION/PUBLIC RESPONSE**

**OIG Case # IG-2016-006**

**Respondent:**

**Jacqueline Williams**

Pursuant to 605 ILCS 10/8.5 (e)(3), the attached Response of Jacqueline Williams is being made public at her request.



**OFFICE OF THE INSPECTOR GENERAL**  
*Illinois State Toll Highway Authority*  
**Theodor J. Hengesbach – Acting Inspector General**

April 5, 2017

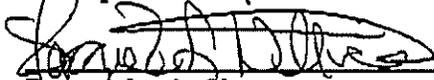
**RESPONDENT'S SUGGESTIONS FOR REDACTION/PUBLIC RESPONSE**

RE: Jacqueline Williams, OIG Case IG-2016-006

Please check the appropriate line and sign and date below. If no line is checked the Office of Inspector General will not make your response public if the redacted report is made public.

Below is my public response. Please make this response public if the summary report is also made public; or

Below are my suggestions for redaction. I do not wish for these suggestions to be made public.

  
\_\_\_\_\_  
Respondent's Signature

4-17-17  
\_\_\_\_\_  
Date

Instructions: Please write or type suggestions for redaction or a public response on the lines below. If you prefer, you may attach separate documents to this form.

First off, I have not had any warnings for performance issues or job responsibilities. Secondly the customer pays only regular money to his account and there was nothing special done for him. It was the same customer each time. He put the marker under the candy dish because he said it was nice of us to provide candy for the customers and told me to buy some candy for the dish. Also, if I had been doing

Return this form and any attachments by **April 20, 2017** to:

Office of the Inspector General  
Illinois State Toll Highway Authority  
2700 Ogden Avenue  
Downers Grove, IL 60515

OR fax documents to fax number 630-795-7661

Continued:

Anything in which I thought was wrong, I would not have been able to in plain sight of the camera. I never tried to hide anything from the camera.

I would like to thank you guys for giving me the strength to do what I could do for myself.

Thanks,

Gregory Hill