



Illinois State Toll Highway Authority

**Office of the Inspector General**

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**SUMMARY ACTIVITY REPORT**

September 1, 2025 through February 28, 2026

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Theodor J. Hengesbach  
Inspector General

Hotline: 866.786.5544  
Fax: 630.795.7661  
<https://www.illinoistollway.com/OIG>



**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 *JJH*

**Date:** March 31, 2026

**Re:** Office of the Inspector General Summary Activity Report for the Period  
Spanning September 1, 2025 to February 28, 2026.

**INTRODUCTION**

We submit this report pursuant to Section 8.5 of the Toll Highway Act (the Act).<sup>1</sup> The Act created the Office of the Inspector General (OIG) to provide independent oversight of the Illinois Tollway. On July 11, 2025, Governor JB Pritzker appointed Theodor J. Hengesbach to a third five-year term, and that appointment is pending Senate approval.

**MISSION/JURISDICTION**

The OIG's mission is to foster effective and efficient 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 provides independent oversight to detect, deter, and prevent fraud, waste, abuse, corruption, misconduct, and mismanagement.

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<sup>1</sup> 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 Act<sup>2</sup> and the Illinois Administrative Code.<sup>3</sup>

By statute, the OIG's jurisdiction extends to Tollway officials, Tollway employees, and Tollway contractors and vendors.<sup>4</sup> 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, employment and hiring files, and serves as liaison to law enforcement entities.<sup>5</sup>

## STAFF

The OIG hired a new Investigator I who started in January 2026, and the current staffing includes: 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 one Investigator I are certified by the Association of Inspectors General. The Inspector General, General Manager of Investigations, and both Investigator IIs are Certified Fraud Examiners.

In addition, the Inspector General and the General Manager of Investigations continue to serve 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.

One budgeted position for an Information Analyst is expected to be filled by the third quarter of 2026.

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<sup>2</sup> 605 ILCS 10/8.5 605 ILCS 10/8.5.

<sup>3</sup> ILL. ADMIN. CODE title 2, sec. 3430 (2011).

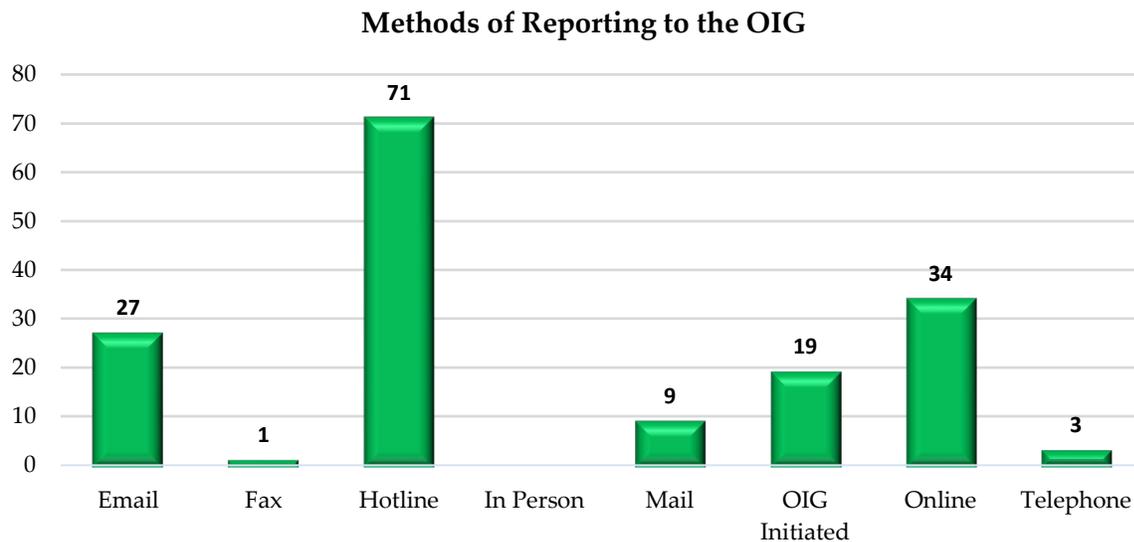
<sup>4</sup> See 605 ILCS 10/8.5(d).

<sup>5</sup> See 605 ILCS 10/8.5(f).

## INTAKES

The OIG receives complaints and reports of concerns and allegations of wrongdoing from the general public, Tollway officials and employees, vendors, bidders, and anonymous sources.

Complaints and reports of alleged wrongdoing are made to the OIG in many ways, such as in person, by telephone, facsimile, online, and US and Electronic mail. The OIG can also self-initiate investigations and reviews.



As shown above, the Tollway OIG Hotline (866-786-5544) remains the most frequently used method to report concerns to the OIG. There were 71 incoming Hotline calls during this reporting period.

The second most commonly used method is OIG's online electronic form, which 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 34 online submissions.

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.<sup>6</sup> Furthermore, state and federal Whistleblower laws prohibit retaliation against individuals who provide information to or cooperate with the OIG.

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<sup>6</sup> See 605 ILCS 10/8.S(k)(l).

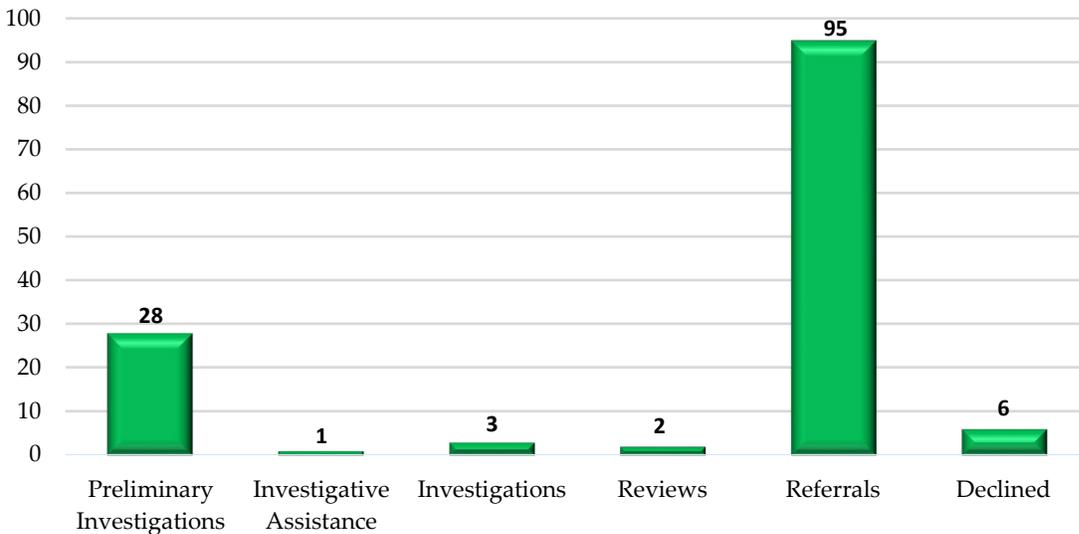
All matters are evaluated to determine the most appropriate action, which can include opening a Preliminary Investigation (PI),<sup>7</sup> an Investigation (IG), a Review (R), or an Investigative Assistance case (IA).<sup>8</sup> The OIG can also refer matters, as appropriate, to Tollway management, law enforcement or another entity, or decline to open a case.

Some factors that impact this decision may 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 about concerns with I-PASS accounts or toll violations and fines that are referred to the Tollway Operations Customer Service section.

### Matters Initiated, Referred, and Declined



<sup>7</sup> 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.

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

From September 1, 2025, through February 28, 2026, the OIG took action in 135 matters:

Preliminary Investigations	28 opened 29 closed 11 converted (3 IGs, 7 Referrals, 1 Review)
Investigative Assistance	1 opened 0 closed
Investigations	3 opened 3 closed 1 converted (1 Referral)
Reviews	2 opened 2 closed
Referrals	95 matters referred 69 to Toll Ops - Customer Service 11 to various Tollway departments 0 to other State Agencies 15 to Law Enforcement
Declined	6 matters

As of February 28, 2026, the following matters were pending:<sup>9</sup>

Preliminary Investigations	6
Investigative Assistance	1
Investigations	5
Reviews	8

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<sup>9</sup> These numbers include carry-over from the previous reporting period.

## REPORTS AND RECOMMENDATIONS

Summary Reports of Investigation detailing sustained findings and/or recommendations for corrective action are submitted to the Board Chair, the Executive Director, the Board of Directors, and appropriate department managers. 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, the Board of Directors, and appropriate department managers, 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 reports with recommendations issued during this period, and responses to those recommendations.

### SUMMARY REPORTS OF INVESTIGATION

#### **IG-25-008**

OIG completed an investigation that established reasonable cause to find that a Tollway Dispatch Telecommunicator improperly posted information about Tollway incidents onto a non-Tollway social media site with more than 64,000 members, which they learned and posted while working at the Tollway.

When questioned, the employee initially denied and eventually acknowledged that they belong to and had posted to a non-Tollway social media site. The employee further admitted that their posts were based on information they learned while working at the Tollway and acknowledged that they did not have authorization to post such information.

OIG recommended that the Tollway impose discipline commensurate with the circumstances. OIG also recommended that the Tollway provide better guidance to Dispatch employees regarding the use of personal mobile devices during working hours and guidance on posting on social media platforms.

## Response

The response was expected and received on February 27, 2026.

In response, the Tollway agreed with the findings and recommendations. The Tollway found that the posts included real-time information related to roadway events captured on Tollway cameras, such as accidents and injuries, and at times appeared to be cavalier about these incidents as evidenced by the employee's joking or casual tone in some of the messages.

The Tollway confirmed that the employee was not authorized to share such information, and that their actions violated Tollway's Media and Social Media Policy, which prohibits employees from sharing work-related items on social media platforms or speaking on behalf of the Tollway in a public or non-public setting. Consequently, the Tollway imposed a Written Warning, noting that the employee also failed to provide the OIG with complete information before admitting their actions.

In addition, the Tollway reported that department leadership will evaluate ways to develop and administer Dispatch-specific protocols regarding employee engagement with social media and/or other platforms during work hours.

## MANAGEMENT ADVISORY REPORTS

### R-25-001

OIG completed a review of the Tollway's outside employment reporting process. Tollway policy requires employees to disclose and seek approval for all outside employment in order to identify any potential conflicts of interest or commitment that could adversely impact an employee's ability to perform their Tollway job or undermine public trust. In response to prior OIG recommendations the Tollway created an electronic acknowledgment and disclosure form in NeoGov and requires employees to annually acknowledge this policy and affirm whether or not they have outside employment.

OIG's review showed that for 2024, more than 200 employees had not completed the NeoGov form more than 2 months after the November 30, 2024 deadline, and full compliance was not ultimately achieved until the third quarter of 2025. Noting that the annual process for 2025 was scheduled to begin in November, OIG made several recommendations to improve awareness and expedite completion of the NeoGov Outside Employment task.

OIG recommended that the Tollway continue to share important information with its employees, especially those located at maintenance sites. Managers and supervisors should make time for all employees to complete the NeoGov Outside Employment task.

Finally, OIG recommended that the Tollway Administration department work with department heads to develop a corrective action escalation plan to address employees who do not complete the process by the designated deadline.

### Response

The response was expected on November 7, 2025, and received November 6, 2025.

In its response, the Tollway recognized that in 2024 compliance with the outside employment acknowledgment and disclosure task took longer than it should have. The Tollway agreed with the OIG recommendations, confirmed its commitment to educating employees on the importance of timely reporting outside employment, and pledged to ensure that maintenance site employees are provided adequate time and resources to complete the process. Additionally, the Tollway said that Administration would work with department heads to craft and communicate the appropriate corrective action measures for any employees who fail to meet the deadline. The Ethics Office reported that by the end of January 2026, all active employees had completed the 2025 Outside Employment acknowledgment and disclosure process.

## R-25-003

OIG completed a review of the Tollway's handling and oversight of corrective action issued to an employee for violating the Tollway's Anti-Sexual Harassment policy. In late November, 2024, the Tollway issued a memorandum to an employee who was found to have used an "extremely vulgar and sexually explicit term to describe the scent of [their] water bottle," outlining corrective action. In addition to a 30-day suspension, the Tollway said that it would "equip [Employee] with additional resources to assist [them] in appropriate workplace communication." The additional resources included requiring the employee to complete Anti-Sexual Harassment training and several Employee Assistance Program (EAP) courses within 10 days of returning to work.

OIG interviewed several Tollway stakeholders involved in this matter, and found that this corrective action plan was developed by the Administration department in consultation with the employing department and EEO, and was generally to be overseen by Administration. When asked for confirmation that the additional requirements had been met, Tollway Administration provided documentation that the EAP courses had been timely completed. However, Administration told OIG that it had no information regarding the additional Anti-Sexual Harassment training that was to have been provided, because EEO was responsible for such training.

After several OIG inquiries, OIG learned that EEO had decided that, instead of the in-person Anti-Sexual Harassment training initially contemplated, the employee should re-take the annual online Anti-Sexual Harassment training required for all state employees. Administration was not aware of this change. Eventually, the employee did complete that training, but not until more than one month after returning from suspension and after OIG's inquiries.

OIG recommended improved coordination between Administration and EEO to ensure that intended corrective action is accurately tracked and completed.

### Response

The response was expected and received on November 26, 2025.

In its response the Tollway acknowledged that there was a gap in the communication regarding the employee's completion of Anti-Sexual Harassment training.

The Tollway said that Administration and the EEO office have a "strong collaborative relationship," and that this instance was an anomaly.

## MANAGEMENT REFERRALS

### RF-25-201

OIG referred information about prior employment history that was not sought or considered during the hiring of an Equipment Operator Laborer (EOL) in 2021. Public records confirm that in 2016 the employee had resigned as a police officer after an investigation resulted in sustained findings that they had engaged in an “unjustified verbal or physical altercation” with a suspect in 2012.

Tollway records reflect that the employee was hired as part of a large group of 25 EOLs in 2021. Available materials from this hiring sequence include the employee’s employment application and resume. While the employee’s application only listed their position as a mechanic/equipment operator from February 2019 to date of application, the resume included their previous employment as a police officer from 1995 until retirement in May 2016. Based on these documents, it appears the employee had a gap in their employment from May 2016 to February 2019.

In addition, the employee’s personnel file includes copies of three forms that were apparently emailed to the most recent employer seeking verification of the employee’s employment. These forms include a section completed by the candidate to identify their former position, dates of employment, and supervisor and supervisor’s contact. There is a blank section for the employer to confirm dates of employment, and respond to the following: why did employee leave?, would you rehire?, general rating (excellent, good, fair poor), and additional comments. The Tollway apparently received no response to these requests.

Administration advised OIG that, according to protocol in place at that time, no further efforts were made to confirm this basic information before the candidate’s hire was ultimately approved. As noted above, the forms used at that time required the employee to fill out the former employer contact information – and it appears that the Tollway did nothing to confirm that the information was correct or that the form was actually received by the former employer.

OIG’s preliminary inquiry found gaps in the hiring process and identified areas for improvement, especially when evaluating candidates for public-facing positions like EOLs. OIG recommended that the Tollway consider adding language to the position description noting the need to interact with the public. In addition, OIG recommended that the Tollway include supplemental questions in the application asking all candidates to explain if they were terminated or left any position in lieu of termination, and to explain any gap in employment of over a year. Understanding that Administration now uses a third-party vendor to conduct employment verification for

prospective hires, OIG recommended that this new process includes some inquiry about prior terminations or discipline.

### Response

The response was expected and received on November 17, 2025.

In its response, the Tollway acknowledged that the materials submitted by the employee revealed a three-year gap in employment from 2016 to 2019 that should have prompted further inquiry. The Tollway also reported that the employment verification process used at that time did not reveal information about the employee's resignation from a prior job following findings of misconduct. The Administration Department confirmed that it now uses a third-party vendor for candidate employment verification to ensure compliance and consistency.

The Tollway agreed with OIG's recommendations and said it would take the following steps as permitted by law and collective bargaining agreements:

- Add language to the EOL job description to describe the position as a public facing role.
- Add questions to the EOL job application to inquire about a candidate's previous terminations, whether they left in lieu of termination, and their explanation of any employment gaps of one year or more.
- Require the third-party employment verification vendor to include some inquiry about past terminations and discipline.

### **RF-25-208**

An OIG investigation confirmed that, in 2020, the Tollway authorized five vendors that were performing construction work on the Tollway to provide additional asphalt repair services on several sections, but failed to obtain approval from the State Procurement Officer (SPO) for these change events, as required by the Procurement Code. As a consequence, the Tollway could not pay the vendors under the contracts, and had to execute atypical legal settlements with those vendors. Several factors appear to have contributed to this failure, including: (a) unprecedented operational challenges caused by the COVID-19 pandemic, (b) suboptimal communications between the Tollway and the SPO, and (c) the Tollway's incomplete integration of State procurement laws and regulations with Tollway processes.

The Tollway categorizes change events as either Extra Work Orders - which add work not included in the contract, and Change Orders - which impact quantities for items included in the original contract or previously added by an Extra Work Order. Before work can begin, the Tollway issues an Authorization to Proceed (ATP). In response to

the 2020 events and a 2022 Internal Audit report, the Tollway took steps to improve its contract modification process and better incorporate the SPO into the change event process. Now the Tollway invites the SPO to ATP approval discussion meetings and an SPO review step has been added to the ATP approval process.

However, the 2025 edition of the Construction Manager's Manual included ATP and change event process flow charts that had not been revised since 2020. These charts accurately showed SPO involvement earlier in the process but did not reflect what steps should be taken if the SPO ultimately rejects a change event.

OIG recommended that the Tollway regularly review its construction change event processes to ensure they continue to meet Tollway needs and comply with State law. OIG further recommended that the Tollway proactively engage with state procurement officials to maintain alignment on Procurement Code requirements.

### Response

The response was expected and received on December 4, 2025.

In response, the Tollway described its efforts since 2020 to strengthen the change event process to ensure legal compliance and transparency, while remaining responsive to safety, schedule, and public operational needs.

The Tollway confirmed that for changes exceeding \$100,000, SPO action is now required prior to ATP approval. In addition, the SPO has been invited to all Tollway Contract Cost Change Controls Committee ("C5") meetings to review ATPs regardless of dollar value.

The Tollway also reported that if work has started on a change event and the SPO/CPO ultimately concludes that the work is not "germane to the original contract," as required under the Procurement Code, the Tollway will use its Emergency Procurement authority to procure the required work immediately if conditions warrant, and will post an emergency statement on BidBuy within 10 days from the start of work, as required by law.

The Tollway agreed that the 2025 CM Manual incorrectly included some flowcharts that date from 2020, and said that the 2026 CM Manual will reference the updated flowcharts found in the current web-based program management ("WBPM") system to eliminate any ambiguity between printed material and electronic workflow.

Finally, the Tollway said that Engineering and Procurement maintain regular engagement with state procurement personnel, including weekly meetings and trainings, to ensure alignment with the Procurement Code and JCAR Administrative

Rules. This engagement also fosters ongoing continuous improvement across all of Tollway's procurement-related processes.

#### **RF-25-217**

OIG initiated a preliminary investigation after receiving an anonymous complaint that a Tollway employee improperly used Family Medical Leave Act (FMLA) leave to extend their regular time off.

OIG's preliminary investigation confirmed the employee has approved FMLA, dating back to January 2023. Tollway records also reflect that in 2024 and 2025 the employee consistently used FMLA leave before and after scheduled time off, which could suggest a pattern of misuse. OIG referred the information to Tollway Administration.

#### **Response**

The response was expected on January 5, 2026, and received on January 20, 2026.

Administration reported that the Tollway's FMLA Coordinator reviewed the employee's leave activity and found there had not been any recent misuse. Administration also said that it requested a recertification be completed for this employee to ensure the level of FMLA approved leave was still warranted.

Administration said it will continue to work with the department to monitor the employee's leave use and will take appropriate action as warranted.

#### **RF-25-214**

OIG referred information learned following a preliminary investigation of an anonymous complaint that certain employees assigned to a maintenance garage site allegedly misused Tollway equipment and conducted unauthorized work at a satellite location referenced as a "dump site." The complainant included photographs depicting statues, tables, and chairs at the site purportedly constructed from discarded wood and other materials. Google Maps shows that while this site appears to be Tollway property near an exit ramp, there does not appear to be any permanent structures or signage identifying this as Tollway property or a restricted area.

Work assignment records confirm that Tollway employees do visit the site and engage in some apparently authorized activities, including cutting trees. And geo-location data reflects that employees have been at this site on days when they were not assigned there. Inconsistent record keeping made it difficult for OIG to determine which employee drove which vehicle during the period examined, or whether their presence at the dump site was inconsistent with their work duties. In addition, OIG could not

locate any policy or directive concerning the use of disposed or discarded items, such as wood, at Tollway sites.

OIG referred the information to the Engineering Department to determine if further action is necessary. OIG recommended that the Tollway take steps to restrict any unauthorized activities and secure the site to ensure people are not injured.

### Response

The response was expected and received on January 12, 2026.

In response, Engineering confirmed that its review found that the M site Section Manager and Section Supervisor did not clearly communicate the intent/purpose of the site to the staff, and failed to establish goals/expectations for how and when the site would be used. Engineering further reported that the area will be cleared under supervision, and the site will be properly secured and monitored like other Tollway satellite locations.

### **RF-26-0031**

OIG referred data gathered from complaints it received during the 2025 calendar year relating to patron experiences with customer service. In early 2025, there was an increase in patrons expressing similar concerns to the OIG about their experiences with Tollway customer service. OIG began tracking information about the call process and call taker interactions.

Specifically, during the first two quarters of 2025, OIG received 122 complaints about the call takers or the customer service call process, including: 20 instances of hold times exceeding 20 minutes, 14 times when call takers hung up on patrons, 21 times where calls were not answered, and 34 times patrons described call takers as not helpful or said they refused to help.

However, in the last two quarters of 2025, OIG received only 47 complaints related to customer service call takers or the customer service call process, reflecting a marked decrease. The data reflects notable declines in all areas with an 85 percent decrease in complaints about hold times over 20 minutes, and an 86 percent decrease in calls not being answered. Overall, complaints to OIG about patrons' customer service call experiences decreased by 61.5 percent.

OIG commended the Tollway for its progress in improving the telephone customer service experience for its patrons, and recommended that the Tollway continue to coordinate with the third-party vendor to maintain sufficient call taker staffing and training. OIG reiterated its offer to participate in call taker onboarding and training.

## Response

The response was expected and received on February 12, 2026.

In response, the Tollway reported that the decline in customer service complaints in 2025 aligns with the Tollway's initiatives, such as increased staffing implemented by the vendor, enhanced training, and expanded customer self-service capabilities. The Tollway implemented and refined multiple Interactive Voice Response enhancements, digital self-service tools, and chat-based support options that allowed customers to resolve common issues online without requiring live agent assistance. These efforts reduced pressure on the call center, improved response times for customers who require agent support, and contributed to sustained service level improvements.

The Tollway said it would continue to closely monitor the vendor's performance ensure compliance with the Tollway's customer service standards.

## UPDATES ON PRIOR MATTERS

### R-23-002

The Summary Activity Report issued in March 2025 included information about OIG recommendations resulting from a review that showed inconsistencies in the process and documentation used by the Tollway when hiring and retaining 75-Day Employees.

OIG recommended that the Tollway consider using Personal Services Contracts (PSC) for such situations, like other state agencies, in order to memorialize expectations and conditions of the position. OIG also recommended that the Tollway standardize the selection and use of 75-Day Employees into a written procedure to address several specific areas.

In its initial response, Tollway Administration agreed with the recommendations and reported that it would clarify and improve the process for hiring retired employees. In a recent update, Administration provided a copy of a standard operating procedure for “Temporary Re-Employment of Retirees – 75-Day Employees” dated February 3, 2026. While Administration said it would not use Personal Services Contracts, the standard operating procedure establishes formal guidelines for re-employment of retired employees starting in 2026.

Specifically, the new process requires Department Chiefs to submit a return to work form for any retiree they would like to bring back. This form is reviewed by Administration and shared with the Ethics Officer for Revolving Door considerations. In addition, returning employees must undergo background and drug screening and they sign an acknowledgement that enumerates the duties they will perform as a 75-day employee.

## SUMMARY OF OTHER ACTIVITY

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

- Provided orientation for new Board Director.
- OIG staff participated in 12 on-boarding sessions for new Tollway employees to introduce and describe OIG's role and to emphasize the Tollway's expectation of, and commitment to integrity for all employees, officials, and vendors.
- OIG staff participated in the Tollway's "Contracting with Government" event. Spoke to potential vendors about OIG's role and commitment to transparent and fair procurement practices.
- Inspector General attended the 24th Annual Society of Corporate Compliance & Ethics Institute.
- OIG staff attended the Association of Certified Fraud Examiners' Investigating on the Internet Virtual Conference.
- OIG staff attended the Association of Inspectors General Florida Chapter and Illinois Chapter Virtual Training sessions.
- Implemented database for OIG case management in December.
- Regular engagement with Tollway stakeholders, including the Board Chair, Executive, Ethics, and Internal Audit staff to promote integrity and ethics initiatives.