

PUBLICATION OF REDACTED VERSION
OF THE OEIG FOR THE AGENCIES UNDER THE GOVERNOR
INVESTIGATIVE REPORT

Case Number: 21-02272

Subject(s): Lakeisha Purchase

Below is the redacted version of an investigative summary report issued by the Executive Inspector General for the Agencies of the Illinois Governor. Pursuant to section 20-50 of the State Officials and Employees Ethics Act (Act) (5 ILCS 430/20-50), a summary report of an investigation is required to be issued by an executive inspector general when, and only when, at the conclusion of investigation, the executive inspector general determines reasonable cause exists to believe a violation has occurred. If a complaint is not to be filed with the Executive Ethics Commission (Commission) for adjudication of the alleged violation, the Act further requires the executive inspector general to deliver to the Commission a statement setting forth the basis for the decision not to file a complaint and a copy of the summary report of the investigation and of the response from the ultimate jurisdictional authority or agency head regarding the summary report. 5 ILCS 430/20-50(c-5). The Act requires that some summary reports be made available to the public and authorizes the Commission to make others available. 5 ILCS 430/20-52. Before making them available, however, the Commission is to redact from them information that may reveal the identity of witnesses, complainants, or informants and may redact “any other information it believes should not be made public.” 5 ILCS 430/20-52(b).

Some summary reports delivered to the Commission may contain a mix of information relating to allegations with respect to which the executive inspector general did and did not determine reasonable cause existed to believe a violation occurred. In those situations, the Commission may redact information relating to those allegations with respect to which the existence of reasonable cause was not determined.

The Commission exercises its publication responsibility with great caution and seeks to balance the sometimes-competing interests of transparency and fairness to the accused and others uninvolved. To balance these interests, the Commission has redacted certain information contained in this report and identified where said redactions have taken place and inserted clarifying edits as marked. Publication of a summary report of an investigation, whether redacted or not, is made

with the understanding that the subject or subjects of the investigation may not have had the opportunity to rebut the report's factual allegations or legal conclusions before issuance of the report. Moreover, there has not been, nor will there be, an opportunity for the subject to contest or adjudicate them before the Commission. The subject merely has the opportunity to submit a response for publication with the report.

The Commission received this report and a response from the ultimate jurisdictional authority and/or agency in this matter from the Agencies of the Illinois Governor Office of Executive Inspector General ("OEIG"). The Commission, pursuant to 5 ILCS 430/20-52, redacted the OEIG's final report and responses and mailed copies of the redacted version and responses to the Attorney General, the Executive Inspector General for the Agencies of the Illinois Governor, and each subject.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52. By publishing the below redacted summary report, the Commission neither makes nor adopts any determination of fact or conclusions of law for or against any individual or entity referenced therein.

– THE REDACTED VERSION OF THE EIG'S SUMMARY REPORT
BEGINS ON THE NEXT PAGE –

I. ALLEGATIONS

On October 25, 2021 and January 12, 2023, the OEIG received complaints alleging that in addition to her Illinois Department of Transportation (IDOT) position, Lakeisha Purchase worked as an Alderperson for the City of Springfield, and may be performing her Alderperson duties during her reported State work hours.¹

II. BACKGROUND

Ms. Purchase has been employed at the IDOT since 2011 and works in the Bureau of Small Business Enterprise in Springfield as a Supportive Services Specialist/Technical Manager III.

IDOT employees are responsible for notifying their immediate supervisor of any outside employment through the completion of a Notice of Outside Employment form and are prohibited from conducting outside employment during State work hours.² IDOT defines outside employment as the performance of any service which results in payment of money, goods, or services and/or the exercise of control of an enterprise, either public or private, which results in profits.³

IDOT policy provides that all employees are expected to be at their workstations and ready to work at the appointed starting time until the appointed quitting time.⁴ Rest periods are counted as time worked for pay purposes, may not be used immediately preceding or following the lunch period, and should not be used to adjust starting or quitting times.⁵

The State Officials and Employees Ethics Act (Ethics Act) and IDOT policy prohibit State employees from intentionally performing prohibited political activity, including working on a campaign for any elective office, during any compensated time other than vacation, personal, or compensatory time off.⁶

¹ The second complaint received on January 12, 2023, OEIG [case number 1], was closed down to this case due to the similar subject matter. The complaint was from an anonymous source and discussed other issues that were unrelated to Ms. Purchase's State employment.

² IDOT Personnel Policies Manual, Chapter 15, Conflict of Interest, 15-4 Outside Employment.

³ *Id.*

⁴ IDOT Personnel Policies Manual, Chapter 7, Hours of Work, 7-2 Responsibilities.

⁵ IDOT Personnel Policies Manual, Chapter 7, Hours of Work, 7-5(A)(2) Rest and Lunch Periods. IDOT policy recognizes that employees may have an *occasional need for emergency usage* of wireless communication devices by employees. IDOT Personnel Policies Manual, Chapter 10, Employee Conduct, 10-3(B) Guidelines.

⁶ 5 ILCS 430/5-15 and 1-5; IDOT Personnel Policies Manual, Chapter 16, Political Activities, Contributions and Gift Ban, 16-3, Guidelines.

III. INVESTIGATION

A. Ms. Purchase's Outside Employment

Elected Positions

2017 to September 2021: Ms. Purchase served as a Capital Township Trustee, which is an elected position.⁷

September 2021 to Present: Public records reflect that Ms. Purchase was appointed to a vacant Alderperson position for the City of Springfield and began serving in that position on September 7, 2021. The City of Springfield is governed by an aldermanic form of government that includes 10 Alderpersons and a Mayor, all of which are elected positions.⁸ Ms. Purchase was elected into a new term of the Alderperson position in April 2023.⁹

Additional Outside Jobs

A website associated with Ms. Purchase's aldermanic position reflects that Ms. Purchase is the owner and proprietor of Kashmir DST, LLC (Kashmir), a residential real estate development and management company.¹⁰

The Illinois Secretary of State records for Statements of Economic Interest (SEIs)¹¹ filed in Ms. Purchase's name indicate income, assets, and/or employment from Kashmir for the years of 2020, 2021, and 2022. In addition, her SEIs indicate that she was the owner of Precisions 1-on-1 Properties in 2018 and 2019; was the Sales Director of [Company 1] in 2018; and had assets of and/or earned income from various real estate properties in 2018, 2019, 2020, and 2022.

B. IDOT Records

The OEIG obtained and reviewed Ms. Purchase's IDOT personnel file. The file contained an IDOT Notice of Outside Employment signed in the name of Ms. Purchase for her position as Alderperson that was approved by her supervisor and various other IDOT management staff on

⁷ The Capital Township is included within the borders of the City of Springfield and is governed by an elected Board of Trustees. <https://www.toi.org/township/sangamon-county-capital-township/sangamon-county-capital-township-elected-officials/>.

⁸ <https://www.springfield.il.us/Departments/CityCouncil/CityCouncilHome.aspx#:~:text=City%20of%20Springfield%2C%20Illinois&text=All%2010%20Aldermen%20and%20Alderwomen,City%20Clerk%20and%20City%20Treasurer.>

⁹ <https://results.enr.clarityelections.com/IL/Sangamon/117728/web.307039/#/summary>.

¹⁰ <https://alderwomanlakeishapurchase.com/about-lakeisha-purchase/>. According to the Illinois Secretary of State corporate records, Kashmir is an active limited liability corporation for which Lakeisha Purchase serves as the Manager (<https://apps.ilsos.gov/corporatellc/CorporateLlcController>, last visited 07/14/23).

¹¹ The Illinois Governmental Ethics Act requires certain State employees, including Ms. Purchase, to file annual SEIs regarding assets and income related to non-State business as well as employment by other units of government. See 5 ILCS 420/4A-101(f).

September 21, 2021. The Notice reflected that Ms. Purchase's outside employment as an Alderperson related to a political office or organization and that she agreed to avoid any prohibited political activity as defined in the Ethics Act, including any political activity on State time or property or using State resources. The personnel file did not contain any Notice of Outside Employment forms for Ms. Purchase pertaining to Ms. Purchase's Capital Township Trustee position, or any other businesses.

The OEIG obtained and reviewed Ms. Purchase's State email account from August 2 through November 30, 2021 and located September 19 and 20, 2021 emails between [IDOT Employee 1] and [IDOT Employee 2].¹² In the emails, [IDOT Employee 1] wrote [IDOT Employee 2] that Ms. Purchase asked about voting "present" on a matter before the City Council that involved IDOT funding for a traffic study. [IDOT Employee 2] told [IDOT Employee 1] that Ms. Purchase needed to ensure she was familiar with the IDOT Personnel Policies Manual provisions on conflicts of interest and the appearance of conflicts of interest and that Ms. Purchase could direct any specific inquiries she has to an email address specifically for IDOT ethics matters. This email exchange was forwarded to Ms. Purchase by [IDOT Employee 1] on September 20, 2021.

On March 30, 2022, the OEIG interviewed [IDOT Employee 2]. [IDOT Employee 2] said that in September 2021 when she was serving temporarily as the Acting IDOT Ethics Officer, she learned that Ms. Purchase was appointed as an Alderperson for the City of Springfield and advised [IDOT Employee 1], whom [IDOT Employee 2] directly supervised and was in Ms. Purchase's chain of command, to ensure that Ms. Purchase was not conducting City of Springfield business on State time. She said that [IDOT Employee 1] responded that she ([IDOT Employee 1]) discussed this matter with Ms. Purchase and Ms. Purchase assured that she would not perform any City business during State time and Ms. Purchase said she intended to conduct her constituent services on Fridays, her scheduled days off work at IDOT.¹³

C. Ms. Purchase's IDOT Work Schedule And Time Records

The OEIG obtained Ms. Purchase's IDOT time records from March 1, 2021 through September 15, 2022. IDOT records reflected that on weeks that did not include a State holiday, Ms. Purchase worked a four-day, 37.5 hour, work week with the following hours: 6:30 a.m. to 4:30 p.m. on Mondays, Tuesdays, and Wednesdays; 6:30 a.m. to 4:00 p.m. on Thursdays, and she was off work on Fridays.¹⁴ According to IDOT policy, employees who work a four-day work schedule receive an uncompensated lunch break to be taken at the approximate mid-point of the workday, as well as two compensated 15-minute breaks, one in the first half of the shift and the other during the second half of the shift, and the breaks may not be combined with the lunch period or used to adjust starting or quitting times.¹⁵ Ms. Purchase's IDOT timesheets reflected her starting and ending

¹² This report refers to the positions held by individuals at the time relevant to this investigation.

¹³ According to Illinois Department of Central Management Services records, [IDOT Employee 1] retired from IDOT effective December 31, 2021. The OEIG did not interview [IDOT Employee 1] as part of this investigation.

¹⁴ On weeks that included a State-observed holiday, Ms. Purchase's work schedule was 7:00 a.m. to 3:00 p.m. each day that week with the exception of the observed holiday.

¹⁵ IDOT Personnel Policies, Chapter 7, Hours of Work, 7-5 Rest and Lunch Periods. The IDOT Personnel Policies

times each workday and that she received a 30-minute lunch break, but did not reflect the time she took her lunches or breaks. In a May 25, 2022 interview, Ms. Purchase's supervisor said he believed that if employees took their lunch breaks before 11:00 a.m. or after 2:00 p.m., there was an expectation that the employee will inform and obtain approval from their supervisor.

Ms. Purchase's timesheets also reflected under a "work away" column that she typically worked remotely with the exception of Mondays, when she spent a portion of her day working in the IDOT office and the rest of the day working remotely. Ms. Purchase's supervisor said that since May 2022, Ms. Purchase has worked in the IDOT office on Mondays and Tuesdays and remotely her other working days. He said that from March 2020 until May 2022, Ms. Purchase was required to work in the office on Mondays for at least one-half of the workday and then remotely the rest of the week.

D. Use of Personal Cell Phone During State Hours

The OEIG obtained cellular phone records for two personal cellular phone numbers associated with Ms. Purchase.¹⁶ Phone records reflected that Ms. Purchase was the subscriber for both phone numbers. Records for one number were obtained from March 1, 2021 through August 31, 2022 and the other number from March 1, 2021 until February 25, 2022 when use of this cellular phone number ended. Prior to November 2022, Ms. Purchase had not been assigned a State cell phone.¹⁷ In her OEIG interview, Ms. Purchase said that she did *not* use her personal cell phones to conduct IDOT business, other than that she may have occasionally texted a colleague from her personal phone after seeing a colleague at an event.

As part of the OEIG's review of this 18-month time period of phone records, the OEIG tallied the number of days that calls to and from Ms. Purchase's cell phones totaled over an hour (the amount of time allotted for lunch and two 15-minute breaks) on days Ms. Purchase recorded having worked and during times that she did not use benefit time. Ms. Purchase's IDOT time records reflected that during the 18-month period reviewed, she worked a total of 301 days.¹⁸ The OEIG found that out of those 301 workdays, there were approximately **279** days that showed calls to and from her personal phone numbers that collectively exceeded one hour during Ms. Purchase's

provide that lunch and breaks are according to IDOT policy unless work schedules, collective bargaining agreements or other work rules otherwise dictate. During her OEIG interview, Ms. Purchase said she is in the Teamsters, Local 916. The Teamsters Local #916 Agreement with IDOT, July 1, 2019 to June 30, 2023, does not provide otherwise in regard to lunch and break periods except for emergency situations or a job that is of a nature that an employee's continued presence at his/her workstation is necessary and essential.

¹⁶ During her OEIG interview, Ms. Purchase confirmed that these phone numbers were her personal cell phone numbers, and confirmed that she no longer has one of the numbers.

¹⁷ During her OEIG interview, Ms. Purchase said she was assigned a State cell phone on November 7, 2022. The OEIG reviewed Ms. Purchase's State desk phone records for a one-year period from March 2021 through March 2022 and found approximately 76 total calls, only two of which were longer than one minute. The OEIG also reviewed Ms. Purchase's State email account from August 2 to November 30, 2021, immediately before and after Ms. Purchase began serving as an Alderperson, but did not locate any emails pertaining to her Alderperson appointment and/or duties, related to any other secondary employment, or of a political nature.

¹⁸ The 301 days includes days on which Ms. Purchase used benefit time for part of the day, but only Ms. Purchase's reported State work hours were used to calculate the durations of calls.

reported State work hours.¹⁹ The breakdown of the duration of those 279 days is as follows:

- Days with calls totaling 1 - 3 hours: 100
- Days with calls totaling 3 - 5 hours: 132
- Days with calls totaling 5 - 7 hours: 44
- Days with calls totaling 7 - 8 hours:²⁰ 3
- Total Days** **279**

The duration of the calls totaled over **1,015 hours**.

E. Calls To/From Numbers Associated With Public Officials

In Ms. Purchase’s OEIG interview, she also stated that she did not interact with City of Springfield employees as part of her IDOT duties. Through online research the OEIG identified phone numbers from Ms. Purchase’s phone records that were associated with at least five City of Springfield Alderpersons and four other City of Springfield and/or Capital Township officials.²¹ The OEIG analysis of the phone records showed approximately **163** incoming and outgoing calls, totaling over 39 hours, during Ms. Purchase’s reported State work hours with those phone numbers.²² These calls included 55 with the then-Mayor’s phone,²³ 36 calls with Alderperson A’s phone, and 42 calls with the Capital Township Clerk’s phone. Following are some examples of these calls:

- a 73-minute call from Ms. Purchase’s phone to the phone of the Mayor’s Executive Assistant on August 1, 2022 at 12:01 p.m.;
- a 66-minute call from Ms. Purchase’s phone to Alderperson A’s phone on August 12, 2021 at 6:57 a.m.;
- a 63-minute call from Alderperson B’s phone to Ms. Purchase’s phone on January 26, 2022 at 6:36 a.m.;
- a 52-minute call from Alderperson A’s phone to Ms. Purchase’s phone on August 11, 2021 at 6:58 a.m.; and
- a 35-minute call from Alderperson C’s phone to Ms. Purchase’s phone on July 28, 2022 at 6:46 a.m.

F. Social Media Posts During State Work Hours

¹⁹ This analysis excluded calls that were less than one minute long, calls that went to voicemail, and duplicate calls from cellular tower connections.

²⁰ On a day with calls totaling over eight hours, Ms. Purchase reported working from 6:30 a.m. to 4:30 p.m. and the calls were made to and/or from both of Ms. Purchase’s personal cell phones.

²¹ The OEIG identified these phone numbers using an online search engine, searching a social media platform, and searching a Springfield community organization’s website.

²² The 163 calls to and from phone numbers associated with Ms. Purchase’s secondary employment are phone calls that were also included in the personal phone usage analysis in Section D.

²³ In this Final Report, references to the Mayor of the City of Springfield are to the individual who served as Mayor at the relevant time.

The OEIG identified at least three social media accounts in the name of Lakeisha Purchase, including one with a username that specifically referenced “Ward 5 Alderwoman.”²⁴ The OEIG then reviewed these social media accounts for posts with dates and timestamps during Ms. Purchase’s reported State work hours and located approximately 95 such posts made in the 11-month timeframe of May 18, 2021 through April 7, 2022.²⁵ Of these 95 social media posts, approximately 58 posts were made on the “Ward 5 Alderwoman” social media page, including posts with reminders about City Council meetings, information about community events and available services, and photographs of Ms. Purchase at various community events with descriptions of her work and time spent out within her ward and using the hashtag “#lakeishaonlocation.”

On Ms. Purchase’s social media accounts, the OEIG also identified four posts with timestamps during her reported State work hours that supported a candidate for an elected office. Specifically, the posts supported either Ms. Purchase as a candidate for the Capital Township Trustee position in the consolidated election held in April 2021²⁶ or [Candidate 1], a candidate for the Illinois Secretary of State in the general primary election held in June 2022, as follows:²⁷

- March 3, 2021 at 11:05 a.m.: a post containing a graphic that includes, “Re-elect Lakeisha Purchase Capital Township Trustee” and lists goals Ms. Purchase will continue working toward in her upcoming term, and the text, “Upon re-elected [sic] I will continue to be the voice for the residents of Capital Township. There is work to do and I am prepared to work for you!” and “#ReElect Lakeisha Purchase.”
- March 10, 2021 at 3:18 p.m.: a post containing a graphic that includes, “Re-elect Lakeisha Purchase Capital Township Trustee” and an image of Ms. Purchase standing on a porch and the text, “Serving the people of Capital Township is what gets me up in the morning” and “#ReElect Lakeisha Purchase.”
- August 11, 2021 at 3:46 p.m.: a post titled “#Team[Candidate 1] ♥” with a photograph of Ms. Purchase and the text, “WOMEN FOR [CANDIDATE 1] FOR ILLINOIS SECRETARY OF STATE,” and, “In 2022 we will have a choice to make about the future of Illinois and Jesse White’s legacy. [Candidate 1] is that choice and as Secretary of State she will embody the values of integrity and trust that we need in government,” and “ENDORSED BY LAKEISHA PURCHASE CAPITAL TOWNSHIP TRUSTEE SPRINGFIELD, IL.”

²⁴ During her OEIG interview, Ms. Purchase confirmed that these are her social media accounts. The OEIG also located other social media accounts in the name of Lakeisha Purchase, but the posting on these accounts was minimal.

²⁵ Additionally, the OEIG observed that Ms. Purchase listed her IDOT employment on <https://alderwomanlakeishapurchase.com/about-lakeisha-purchase/> webpage. IDOT policy provides that employees shall not use their official position for personal gain or influence and that a real or apparent conflict of interest may arise from an employee who advertises or endorses any product or service where the advertisement or endorsement includes a reference to IDOT employment. IDOT should review this matter with Ms. Purchase and request that Ms. Purchase remove the reference to her IDOT employment on her Ward 5 Alderwoman webpage, if appropriate. See IDOT Personnel Manual, Employee Conduct 10-3 and Conflict of Interest 15-3.

²⁶ Ms. Purchase also successfully ran for election as an Alderperson in April 2023, and the OEIG observed posts to Ms. Purchase’s social media accounts around the time of that election. See <https://results.enr.clarityelections.com/IL/Sangamon/117728/web.307039/#/summary>.

²⁷ <https://elections.il.gov/electionoperations/ElectionVoteTotals.aspx>.

- November 1, 2021 at 6:33 a.m.: a post titled “Join us TODAY!!!” with a graphic of an invitation that reads, in part, “Please join us for a Meet and Greet with [CANDIDATE 1] FOR ILLINOIS SECRETARY OF STATE,” and the following text, in part,

I would love for you to meet my friend [Candidate 1] who is running for IL Secretary of State....I am proud to stand with [Candidate 1] as her Central IL Coordinator for IL Secretary of State. In 2022 we will have a choice to make about the future of Illinois and Jesse White’s legacy. [Candidate 1] is that choice and as Secretary of State she will embody the values of integrity and trust that we need in government.

I am confident that when you meet [Candidate 1] you will be equally excited about her candidacy.

#Team[Candidate 1]

#[Candidate 1]4SecretaryOfState ♥

G. Ms. Purchase’s Non-State Meetings During State Time

September 28, 2021 Lunch with the Mayor

On March 30, 2022, the OEIG interviewed a State employee, Individual A, who observed Ms. Purchase at a restaurant in downtown Springfield on September 28, 2021 during the workweek. According to Individual A, they observed Ms. Purchase sitting at a table around 11:50 a.m., and then observed the Mayor of Springfield join Ms. Purchase. Individual A said that when Individual A left the restaurant at approximately 1:05 p.m. (one hour and 15 minutes later), Ms. Purchase was still inside the restaurant with the Mayor.

The OEIG reviewed Ms. Purchase’s IDOT timesheet for September 28, 2021, which reflected that she worked remotely from 6:30 a.m. to 4:30 p.m. and received a 30-minute lunch break. There is no record of Ms. Purchase submitting a leave slip to use benefit time on that date.

Capital Township Meetings

Ms. Purchase served as a Capital Township Trustee immediately prior to becoming an Alderperson. According to the Capital Township website, Capital Township meetings are typically held on Mondays or Tuesdays at noon.²⁸ The OEIG obtained the Capital Township Board of Trustees’ meeting minutes from March through December 2021. The meeting minutes reflected that between March 8, 2021 and September 13, 2021, Ms. Purchase attended seven meetings that began at noon on days that she reported working at IDOT and did not use benefit time for the meetings.²⁹ Although the minutes did not document the duration of the meetings, the OEIG obtained recordings and/or call logs from the Capital Township for four of the meetings that reflected the following approximate meeting durations:

²⁸ <https://www.toi.org/township/sangamon-county-capital-township/meeting-schedule/>.

²⁹ The meetings minutes reflect that some of the meetings were conducted by telephone due to the Governor’s Executive Order to Shelter in Place because of the COVID-19 pandemic.

<u>Date of Meeting</u>	<u>Duration of Meeting</u>	<u>Ms. Purchase's Presence at Meeting</u>
Monday, March 8, 2021	64 minutes (time of call)	call in
Monday, May 10, 2021	56 minutes (time of call)	call in
Wednesday, May 19, 2021	51 minutes (time of call)	call in
Monday, June 14, 2021	83 minutes (time of recording)	in person ³⁰

The OEIG also reviewed Ms. Purchase's personal cell phone records and found outgoing calls shortly before noon on March 8, May 10, and May 19, 2021 that were for the approximate durations of the Capital Township meetings. After subtracting Ms. Purchase's allotted 30-minute lunch break for each of these four meetings, the total time that would have exceeded her lunch breaks was approximately two hours and 14 minutes.

On September 8, 2022, the OEIG interviewed [Capital Township Employee 1], who said he has served in that position for over three years. [Capital Township Employee 1] said that he attended the Capital Township Trustee meetings that were held once per month and typically on the second Monday of each month at noon, and on rare occasions, there were two meetings held in one month. He said that when Ms. Purchase served as a Capital Township Trustee, she attended the trustee meetings, and he estimated that there were only two or three meetings that she did not attend. He said that the meetings can last anywhere from five minutes to two hours and that the Trustees are paid \$100 for each meeting they attend.

H. OEIG Interview Of Ms. Purchase

On November 10, 2022, the OEIG interviewed Ms. Purchase. She said that she works for IDOT's Supportive Services Units and her duties included handling billing, outreach, and overseeing consultants who work with small businesses that want to do business with IDOT and are certified within the Disadvantaged Business Enterprise program. Ms. Purchase said she assists the consultants with training, billing, bid estimates, and other technical services.

Ms. Purchase confirmed she was appointed as an Alderperson for the City of Springfield in September 2021 and that she was compensated \$563 every two weeks for this position. Ms. Purchase said that immediately prior to her appointment as an Alderperson, she served as a Capital Township Trustee beginning in 2017 and thought she was paid about \$50 per month for this position. Ms. Purchase also said that she had been an owner of Kashmir, a real estate business that deals in rental properties, since 2012. Ms. Purchase added that for approximately six months prior to the June 2022 primary election, she served as the Central Illinois Coordinator for [Candidate 1]'s campaign for Illinois Secretary of State and that it was an uncompensated position.

Ms. Purchase said she was aware that IDOT policy requires employees to provide notification of secondary employment prior to engaging in secondary employment, which would include her business ventures if they resulted in profits. Ms. Purchase claimed that she submitted

³⁰ According to an online map website, the round-trip drive from Ms. Purchase's home, where her IDOT timesheets reflected she was working at the time of the meeting on June 14, 2021, to the Sangamon County Board Chambers where the Capital Township meetings are held is eight minutes.

a notice to IDOT for her business Kashmir and also submitted a notice in 2017 for her position as a Capital Township Trustee. Ms. Purchase was unable to recall other dates when she submitted the notices and did not think she submitted the forms annually.

Ms. Purchase confirmed that she was aware that IDOT policy prohibits employees from performing secondary employment during State work hours and said she knew that she could not “double dip” and work on her Alderperson duties while on State time. When asked if she received guidance from anyone at IDOT regarding her role as an Alderperson, Ms. Purchase said she had a brief conversation with IDOT’s Ethics Officer about what she could and could not do including a recommendation that she not vote on issues related to IDOT.

1. Ms. Purchase’s Calls During State Work Time

Ms. Purchase said that at IDOT, each workday she received a 30-minute lunch break and two paid 15-minute breaks, one in the morning and one in the afternoon, and confirmed that she is not permitted to use her breaks to extend her lunch period. Ms. Purchase said that she had not been informed of any sort of requirement on when she was required to take her lunch break and said that when she took her lunch and 15-minute breaks depended on her workload that day. She maintained that she would use benefit time for a lunch that exceeded her allotted 30-minute lunch break.

Ms. Purchase confirmed her two personal cell phone numbers discussed above and said that she did *not* use her personal cell phones to conduct IDOT business, other than that she may have occasionally texted a colleague from her personal phone after seeing a colleague at an event. She also said that she did not interact with City of Springfield employees as part of her IDOT duties.

Ms. Purchase said that she used her personal cell phone to conduct her Alderperson duties, but claimed she communicated with the City Council members on the weekends and that it would be rare for her to discuss something related to her Alderperson duties during the workday. When Ms. Purchase was shown a portion of her personal phone records, Ms. Purchase confirmed that she had calls with City of Springfield and Capital Township personnel during her reported State work hours.³¹ She said she could not recall the specifics of all of these calls, but admitted that at least 54 of the 66 calls shown her were unrelated to her IDOT duties. For the 12 calls that Ms. Purchase claimed may have been related to her IDOT duties, Ms. Purchase said that the calls were with Alderperson C, a State employee at an agency other than IDOT, whom she said was a friend, regarding seeking advice about the working conditions at IDOT. She also claimed she was friends with two of the other four Alderpersons with whom she had calls during her IDOT work hours, and said she was unable to recall if any of the calls were related to her duties as an Alderperson.

Ms. Purchase stated that when she served as the Central Illinois Coordinator for [Candidate 1]’s campaign, [Candidate 1]’s campaign staff member [Campaign Employee 1] was her contact person, and claimed that she mostly communicated with [Campaign Employee 1] on weekends via

³¹ During her interview, Ms. Purchase was shown the raw data for her phone records and given the opportunity to review those records in their entirety.

email and with her (Ms. Purchase's) personal cell phone. Ms. Purchase said that approximately once per month on Sunday mornings, she had some direct contact with [Candidate 1] via phone.

In regard to calls during her reported State work hours that collectively exceeded three or more hours in duration, Ms. Purchase agreed that the total call times on these days exceeded her lunch and break times. Ms. Purchase admitted that at least 14 out of a sample of 15 calls shown to her, totaling over 20 hours during her State work hours and ranging from 81 to 93 minutes in duration, were personal calls that she made to or received from friends and family and were unrelated to her State employment.³² Ms. Purchase added that during the time of some of these calls, she was going through a difficult time personally, and these calls may have involved people checking on her. Ms. Purchase acknowledged that it was inappropriate to be on personal calls during her reported State work hours.

2. Ms. Purchase's Social Media Posts during State Work Time

Ms. Purchase confirmed that the three social media accounts discussed above were her accounts, and said that she did the majority of the posting on her social media accounts. However, she said she also had a media consultant who helped her with posts, such as putting in graphics, and that when she served as a Capital Township Trustee, she had another person who assisted her with her duties and occasionally made social media posts for her. Ms. Purchase also claimed that she used a service for posting on social media that allowed her to create the posts in advance during her non-State work hours and schedule the posts to occur at a specified later date and time. Ms. Purchase said her social media posts took time to draft, but claimed that she drafted them during her non-State work hours. She denied making any social media posts during her State work hours and claimed that for the posts that occurred during her State work hours, she would have used the service that scheduled the posts to occur at a later date or that her media consultant or the person who assisted her when she was a Capital Township Trustee would have made the posts.

Ms. Purchase said her practice was to make social media posts before or after her reported IDOT work hours, and she denied working for [Candidate 1]'s campaign during her reported State work hours or performing work for any campaign, including her own campaign, on State time.

3. Ms. Purchase's Non-State Meetings

Ms. Purchase said that she had met with the former City of Springfield Mayor during her State workdays, and admitted that at least some of those meetings were related to her Alderperson duties; she claimed that other meetings with the Mayor were personal in nature. Ms. Purchase said she did not specifically recall a lunch with him on September 28, 2021, but she may have had lunch with him that day. She said she did not recall the purpose of the lunch or how long the lunch was.

Ms. Purchase said that when she served as a Capital Township Trustee, she attended the Capital Township meetings in person, except for a few that she participated in via telephone during

³² Ms. Purchase claimed she did not recognize one of the numbers. Ms. Purchase denied that any of the calls discussed during her OEIG interview were related to her personal business, Kashmir.

the COVID-19 pandemic. She said that the meetings were typically held on the second Monday of each month at noon, but some meetings were held in the evenings. She said that the meetings sometimes only lasted 10 to 15 minutes and that the drive to the Sangamon County building where the Capital Township Board meetings were held was only about six minutes from her IDOT office and about three to four minutes from her house. Ms. Purchase claimed she used benefit time to cover any meetings that occurred during her reported State work hours, and denied conducting any Capital Township business on State time. She also said she only checked in with the Capital Township office on Fridays (her days off work from IDOT), that she had constituents contact the Capital Township office to reach out to her and did not give out her personal phone number for Capital Township business, and that she stayed off social media during her IDOT work hours.

I. Additional Investigation Of Ms. Purchase’s Political Calls During State Work Hours

After Ms. Purchase’s interview, the OEIG requested that Ms. Purchase produce any and all notifications to IDOT of her secondary employment. Ms. Purchase responded to the OEIG’s request, as follows:

I completed an outside employment form and submitted it to the Chief Counsel of IDOT, who would have retained a copy; I however did not retain a copy.

Ms. Purchase also provided the OEIG with phone numbers for [Candidate 1], for whose 2022 Secretary of State campaign she said she served as the Central Illinois Coordinator, and for [Campaign Employee 1], who served as [Candidate 1]’s campaign staff member. The OEIG analyzed Ms. Purchase’s personal cell phone records for calls and texts with these numbers, and located the following calls made between Ms. Purchase’s number and [Campaign Employee 1] and [Candidate 1]’s numbers during Ms. Purchase’s reported State work hours prior to the June 28, 2022 primary election:³³

Connection Date	Connection Time	Duration (Minutes:Seconds)	Originating Number	Receiving Number
08/04/21	11:11 a.m.	9:56	Ms. Purchase	[Campaign Employee 1]
09/23/21	9:26 a.m.	11:03	Ms. Purchase	[Candidate 1]
12/06/21	2:50 p.m.	2:32	[Candidate 1]	Ms. Purchase
01/05/22	12:31 p.m.	23:39	Ms. Purchase	[Campaign Employee 1]
01/13/22	12:58 p.m.	20:05	Ms. Purchase	[Campaign Employee 1]
01/25/22	12:26 p.m.	5:23	Ms. Purchase	[Campaign Employee 1]
02/07/22	8:35 a.m.	27:02	Ms. Purchase	[Campaign

³³ The OEIG excluded calls during Ms. Purchase’s State work hours that were less than one minute in duration. Subsequent to her interview, Ms. Purchase also provided the last name and phone number for her media consultant. The OEIG reviewed her personal cell phone records for calls and texts with this number during Ms. Purchase’s reported State work hours and located one call in one day that was made by Ms. Purchase and totaled approximately 29 minutes.

02/14/22	12:03 p.m.	4:58	Ms. Purchase	Employee 1] [Campaign Employee 1]
02/14/22	2:44 p.m.	2:19	Ms. Purchase	[Campaign Employee 1]
02/25/22	2:37 p.m.	17:54	Ms. Purchase	[Campaign Employee 1]
04/12/22	12:49 p.m.	8:45	Ms. Purchase	[Campaign Employee 1]
04/27/22	3:54 p.m.	6:10	[Campaign Employee 1]	Ms. Purchase
05/05/22	12:26 p.m.	7:15	Ms. Purchase	[Campaign Employee 1]

In addition, the OEIG located three text messages sent on April 27, 2022 from Ms. Purchase’s phone number to [Campaign Employee 1]’s number, during Ms. Purchase’s reported State work hours, at 11:55 a.m., 12:05 p.m., and 3:13 p.m. In the two months after the election there was only one three-second phone call between Ms. Purchase and [Campaign Employee 1]’s numbers (which was not during Ms. Purchase’s State work hours). The records reflected no calls at all between Ms. Purchase and [Candidate 1]’s numbers in the two months after the election.

On April 7, 2023, the OEIG interviewed [Campaign Employee 1] who said that [Candidate 1]’s Secretary of State campaign ran from April 2021 to June 2022. [Campaign Employee 1] said that she served as the Campaign Manager for [Candidate 1]’s campaign from April to August 2021 and then served as the Political Director for the campaign. [Campaign Employee 1] said that she first met Ms. Purchase around the middle of 2021 and believed that Ms. Purchase began serving as the Southern or Central Illinois Coordinator for [Candidate 1]’s campaign, an unpaid position, in the fall of 2021. [Campaign Employee 1] said that during the campaign, she was Ms. Purchase’s main point of contact for campaign matters and talked to Ms. Purchase at least once to a couple of times a week. [Campaign Employee 1] said her communication with Ms. Purchase during that timeframe was mostly in regard to [Candidate 1]’s campaign and that she would not have had any other reason to contact Ms. Purchase except to occasionally ask how she was doing. [Campaign Employee 1] added that the contact to ask how Ms. Purchase was doing did not occur that often because she ([Campaign Employee 1]) was in full campaign mode and that is where her head was at that time (campaign).

The OEIG showed [Campaign Employee 1] the phone records reflecting the dates, times, and durations of the various calls and text messages between her number and Ms. Purchase’s number during Ms. Purchase’s reported State work hours, as described above. [Campaign Employee 1] said she did not recall any of those conversations in the phone calls or whether they were related to [Candidate 1]’s campaign. She said that when she talked with Ms. Purchase just to check in with her outside of the campaign, the calls were brief, probably less than 10 minutes. [Campaign Employee 1] said that it would “definitely” be safe to say that some of the calls with Ms. Purchase that were shown to her were campaign-related and that all of the calls were not personal phone calls where she was checking on Ms. Purchase. She said that although she communicated with Ms. Purchase via phone and text for non-campaign reasons once in a while, it was not that often. In regard to the three text messages with Ms. Purchase on April 27, 2022 during

Ms. Purchase's reported State work hours, [Campaign Employee 1] said she could not recall their content, but noted that the messages occurred during [Candidate 1]'s campaign period, so it was very possible the text messages were regarding the campaign.

[Campaign Employee 1] said that she was unaware of [Candidate 1] communicating or socializing with Ms. Purchase outside of the campaign. She said that it was her understanding that [Candidate 1] and Ms. Purchase's interactions were campaign related.

IV. ANALYSIS

A. Ms. Purchase's Outside Employment

Failure to Notify

IDOT employees are responsible for notifying their immediate supervisor of any outside employment through the completion of a Notice of Outside Employment form.³⁴ IDOT defines outside employment as the performance of any service which results in payment of money, goods, or services and/or the exercise of control of an enterprise, either public or private, which results in profits.³⁵

Ms. Purchase served as a Capital Township Trustee from 2017 to 2021, and as an Alderperson since September 2021 to present, both of which are compensated positions and qualify as outside employment. Ms. Purchase also admitted that she had owned a real estate business, Kashmir, since 2012, and her SEIs filed in 2017 through 2023 with the Illinois Secretary of State reflected that she received income from her business Kashmir. Additionally, Ms. Purchase's SEIs reflected that she received income from Precisions 1-on-1 Properties, a business she owned and/or was a partner in, and [Company 1]. Yet, there is no record in Ms. Purchase's IDOT personnel file nor was she able to produce documentation showing that she ever reported to IDOT on Notice of Outside Employment forms her outside employment as a Capital Township Trustee, her businesses Kashmir or Precisions 1-on-1 Properties, or her work for [Company 1]. Based on the evidence, there is reasonable cause to believe that Ms. Purchase violated IDOT policy by failing to report all of her outside employment to IDOT on Notice of Outside Employment forms, as required.

Conducting Secondary Employment on State Time

IDOT employees are prohibited from conducting outside employment during State work hours.³⁶ Ms. Purchase admitted that she had a conversation with the IDOT Ethics Officer about not doing secondary employment on State time. The IDOT Ethics Officer also said that [IDOT Employee 1] spoke to Ms. Purchase shortly after she became an Alderperson about not performing Alderperson duties on State time and that Ms. Purchase assured [IDOT Employee 1] that she would not do so. Additionally, in September 2021, Ms. Purchase was forwarded [IDOT Employee 2]'s

³⁴ IDOT Personnel Policies Manual, Chapter 15, Conflict of Interest, 15-4 Outside Employment.

³⁵ *Id.*

³⁶ *Id.*

email indicating that Ms. Purchase needed to be familiar with the IDOT Personnel Policies Manual provisions on conflicts of interest and the appearance of conflicts of interest and to direct any specific inquiries she has to a dedicated ethics email address.

Despite all of this, during an 18-month period, Ms. Purchase made and received, at minimum, 163 phone calls during her reported State work hours with City of Springfield Alderpersons and City of Springfield and Capital Township officials.³⁷ When presented with a sampling of 66 of these calls, Ms. Purchase admitted that 54 calls were unrelated to her IDOT duties and that at least some related to her Alderperson and/or Capital Township Trustee positions. The OEIG also identified approximately 58 posts made on Ms. Purchase's "Ward 5 Alderwoman" social media page during her reported State working hours, and Ms. Purchase admitted that she made the majority of posts to her social media pages, although she also claimed that she used a service during her non-State work hours to schedule posts to occur at a later time or that others made any social media posts during her State work hours.

Additionally, on September 28, 2021, shortly after [IDOT Employee 2] had [IDOT Employee 1] instruct Ms. Purchase to not conduct Alderperson business on State time, Ms. Purchase met with the City of Springfield Mayor for a lunch that lasted at least 75 minutes during Ms. Purchase's reported State work hours. Although Ms. Purchase said she did not specifically recall the September 28, 2021 lunch, she admitted that she had met with the Mayor during her State workdays and that some of the meetings were related to her Alderperson duties. While Ms. Purchase claimed she would use benefit time if a lunch exceeded 30 minutes, her IDOT timesheets reflected that she did not use any benefit time for a lunch on September 28, 2021.

Prior to serving as an Alderperson, Ms. Purchase also attended Capital Township Trustee meetings on State time. For example, between March 8 and June 14, 2021, Ms. Purchase spent approximately two hours and 14 minutes of State time as a Capital Township Trustee attending just the four Capital Township meetings for which the OEIG was able to obtain recordings showing their duration. While Ms. Purchase claimed she used benefit time to cover any meetings that occurred during her reported State work hours, there is no record of her submitting benefit time for any of these four meetings. Furthermore, the [Capital Township Employee 1] said that Ms. Purchase regularly attended these monthly meetings.

Based on the evidence, there is reasonable cause to believe that Ms. Purchase violated IDOT policy by performing outside employment, including, at minimum, attending meetings and participating in phone calls related to her Alderwoman and Capital Township Trustee duties, during State time.

B. Ms. Purchase's Non-State Work Calls During State Time

IDOT policy provides that all employees are expected to be at their workstations and ready

³⁷ While there may have been more calls associated with Ms. Purchase's secondary employment, these were the only phone numbers the OEIG could identify through public records as belonging to City of Springfield and Capital Township officials.

to work at the appointed starting time until the appointed quitting time.³⁸ Rest periods are counted as time worked for pay purposes, may not be used immediately preceding or following the lunch period, and should not be used to adjust starting or quitting times.³⁹ Ms. Purchase confirmed that she did *not* use her personal cell phone to conduct IDOT business. Ms. Purchase also admitted that 14 calls out of a sample of 15 calls shown to her during her OEIG interview, ranging from 81 to 93 minutes each and totaling over 20 hours, were personal calls that she had during State time. Ms. Purchase acknowledged that it was inappropriate for her to be on personal calls during her reported State work hours. Thus, the OEIG analyzed all of Ms. Purchases calls reflected in her personal phone records during state time. The amount of personal cell phone usage on State time was excessive.

The OEIG reviewed an 18-month period that contained 301 workdays for Ms. Purchase. Out of those 301 workdays, on 279 days she had calls in excess of an hour, the total time allotted for her lunch and breaks, and many days were well over an hour, including the following:

- Days with calls totaling 1-3 hours: 100
- Days with calls totaling 3 – 5 hours: 132
- Days with calls totaling 5 – 7 hours: 44
- Days with calls totaling 7 – 8 hours: 3

The total hours of time during the workday Ms. Purchase spent on her personal cell phones was over 1,015 hours which is the equivalent to 135 seven and a half-hour workdays.

Based on the evidence, there is reasonable cause to believe that Ms. Purchase violated IDOT policy by abusing State time.

C. Ms. Purchase’s Prohibited Political Activity

The Ethics Act and IDOT policy prohibit State employees from intentionally performing prohibited political activity, including working on a campaign for any elective office, during any compensated time other than vacation, personal, or compensatory time off.⁴⁰

Ms. Purchase was the Central Illinois Coordinator for [Candidate 1]’s political campaign during the time leading up to the June 2022 primary election. Although Ms. Purchase denied conducting any campaign work on State time, the OEIG identified 13 calls made prior to the election between Ms. Purchase and [Candidate 1] and/or [Candidate 1]’s Political Director, [Campaign Employee 1], during Ms. Purchase’s reported State work hours, as well as three text messages sent from Ms. Purchase to [Campaign Employee 1] during Ms. Purchase’s reported work hours. Although some of those calls and texts occurred around the noon hour, six of the calls (totaling approximately 67 minutes) and one of the texts occurred before 11:00 a.m. or after 2:00 p.m., and therefore at minimum they occurred during Ms. Purchase’s compensated State time.

³⁸ IDOT Personnel Policies Manual, Chapter 7, Hours of Work, 7-2 Responsibilities.

³⁹ IDOT Personnel Policies Manual, Chapter 7, Hours of Work, 7-5(A)(2) Rest and Lunch Periods. IDOT policy recognizes that employees may have an *occasional need for emergency usage* of wireless communication devices by employees. IDOT Personnel Policies Manual, Chapter 10, Employee Conduct, 10-3(B) Guidelines.

⁴⁰ 5 ILCS 430/5-15 and 1-5; IDOT Personnel Policies, 16-3.

[Campaign Employee 1] confirmed that she was Ms. Purchase's main point of contact for campaign matters during the campaign, that her communications with Ms. Purchase prior to the election mostly related to [Candidate 1]'s campaign, and that it was her understanding that Ms. Purchase's interactions with [Candidate 1] were also related to the campaign. [Campaign Employee 1]'s statements regarding the campaign purpose of Ms. Purchase's communications are supported by Ms. Purchase's phone records, which reflect no calls with [Candidate 1] or [Campaign Employee 1] during Ms. Purchase's State work hours in the two months after the election.

The OEIG notes that it also identified at least four social media posts that were made during Ms. Purchase's reported State work hours and supported a campaign for elective office. However, the OEIG was unable to obtain evidence contradicting Ms. Purchase's claim that she did not make these posts during state compensated time, rather she used a service to schedule the posts to occur at a later date or other individuals would have made the posts.

Based on the evidence, there is reasonable cause to believe that Ms. Purchase conducted prohibited political activity, at minimum by making and receiving phone calls and sending texts relating to a campaign for elective office during compensated State time.

V. [REDACTED] AND RECOMMENDATIONS

Based on the evidence detailed above, the OEIG has determined **THERE IS REASONABLE CAUSE TO BELIEVE THE FOLLOWING:**

- [REDACTED] – Lakeisha Purchase violated IDOT policy by failing to disclose her outside employment.
- [REDACTED] – Lakeisha Purchase violated IDOT policy by conducting secondary employment on State time by, at minimum, attending meetings and participating in phone calls related to her secondary employment during State time.
- [REDACTED] – Lakeisha Purchase violated IDOT policy by abusing State time by conducting personal phone calls on State time.
- [REDACTED] – Lakeisha Purchase violated the Ethics Act and IDOT policy by engaging in prohibited political activity by, at minimum, having campaign-related phone calls and/or texts on compensated State time.

The OEIG recommends that Ms. Purchase be disciplined up to and including discharge. If Ms. Purchase is not discharged, the OEIG highly recommends that IDOT reconsider allowing Ms. Purchase to work remotely.

Date: January 4, 2024

Office of Executive Inspector General
for the Agencies of the Illinois Governor
607 E. Adams Street, 14th Floor
Springfield, IL 62701

Melissa Rollins
Senior Assistant Inspector General

Christopher Heuerman
Investigator



Illinois Department of Transportation

Office of the Secretary
2300 South Dirksen Parkway / Springfield, Illinois / 62764
Telephone 217/782-6149

January 25, 2024

VIA ELECTRONIC MAIL

Susan M. Haling
Executive Inspector General
Office of the Executive General
69 West Washington Street, Suite 340
[REDACTED]@illinois.gov

RE: OEIG Case No. 21-02272
Referral Response

Dear Executive Inspector General Haling:

This letter is in response to the receipt of the Final Summary Report completed by your office, OEIG Case No. 21-02272, received by IDOT on January 4, 2024.

Based on your investigation, the OEIG stated it has reasonable cause to believe that IDOT employee LaKeisha Purchase failed to disclose outside employment, conducted outside employment on State time, abused state time, and engaged in prohibited political activity on compensated State time.

The recommendation is that Ms. Purchase be disciplined up to and including discharge. Ms. Purchase separated from IDOT employment on July 5, 2023. This report will be placed in Ms. Purchase's personnel file.

Thank you for referring this matter to IDOT for review. If you have any questions, or feel that further investigation is warranted, please feel free to contact me.

Sincerely,

/s/Ellen C. Bruce

Ellen C. Bruce

Deputy Chief Counsel, Ethics
Officer

cc: Omer Osman, Secretary
Terrence Glavin, Deputy Secretary
Michael Prater, Acting Chief Counsel