



**OEIG Investigation No.: 23-00159**  
**Subject(s) Name(s): Robin Watkins**

### **Investigative Summary Report Publication**

The Executive Ethics Commission ("Commission") is responsible for publishing the attached redacted Executive Inspector General for the Agencies of the Illinois Governor investigative summary report pursuant to the State Officials and Employees Ethics Act. 5 ILCS 430/20-52. An Executive Inspector General issues an investigative summary report at the conclusion of an investigation if they determine that reasonable cause exists to believe a violation has occurred. 5 ILCS 430/20-50. The Commission did not write the report, conduct the investigation leading to the report, or impose any discipline upon the subject of the report.

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The Ethics Act requires the Commission to publish an investigative summary report and ultimate jurisdictional authority's response if the report's subject was terminated or suspended for three days or more. 5 ILCS 430/20-52(a). Otherwise, the Commission may, but does not have to, publish the report and response. The ultimate jurisdictional authority varies from report to report and is typically the constitutional officer overseeing the subject's work location.

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The Ethics Act also requires the Commission to redact, or remove, some information from investigative summary reports before publishing them. 5 ILCS 430/20-52(b). The Commission must redact information that may reveal the identity of witnesses, complainants, or informants or where the Commission determines that redaction is appropriate to protect the identity of a person. The Ethics Act permits the Commission, in its discretion, to redact other information it does not believe should be made public.

Before the Commission publishes a redacted report, it sends the report with the proposed redactions to the subject(s), the Executive Inspector General, and the Office of the Attorney General to review the proposed redactions, offer suggested redactions, and/or provide a response to be published with the report. 5 ILCS 430/20-52(b). The subject has an opportunity to provide a response to the report. If the report is published, the subject's response may be published as well. If the Executive Inspector General finds reasonable cause to believe that the subject(s) violated the Ethics Act's prohibition against sexual harassment, the Commission also sends the report with proposed redactions to the complainant for review and an opportunity to provide a response. 5 ILCS 430/20-63(b)(7).

### **Investigative Summary Report Publication Considerations**

The Commission exercises its investigative summary report publication responsibilities only after thoughtful consideration. While the Ethics Act allows a subject to submit a response to be published with the report, it does not allow a subject to request a hearing before the Commission regarding the contents of a report. By publishing the following redacted report, the Commission neither makes nor adopts any arguments, allegations, determinations of fact, or conclusions of law relating to the subject or any other individual or entity referenced therein.

If you have questions about the content of the report, please contact the Executive Inspector General for the Agencies of the Illinois Governor. For enquiries about the Commission's publication process, please email [eec@Illinois.gov](mailto:eec@Illinois.gov) or visit [eec.illinois.gov](http://eec.illinois.gov) for additional information.

Office of Executive Inspector General for the  
Agencies of the Illinois Governor

Investigation Case No. 23-00159



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[Redacted].

## **I. INTRODUCTION**

Based on finding evidence of a State employee fraudulently obtaining a federal Paycheck Protection Program (PPP) loan, the OEIG conducted a larger review to determine whether State employees properly obtained PPP loans and provided notice of secondary employment. Due to the large volume of PPP loans obtained by State employees, the OEIG narrowed its review based on certain factors, including those State employees who received approximately \$20,000 or more in PPP loan funds.<sup>1</sup>

The OEIG self-initiated this investigation regarding a PPP loan obtained by Robin Watkins in the amount of \$20,832 while she was employed at the Illinois Department of Human Services (DHS). Based on its investigation, the OEIG determined there is reasonable cause to believe that Ms. Watkins obtained a federal PPP loan based on falsified information, in violation of DHS and State of Illinois policies on employee conduct, and that Ms. Watkins failed to report secondary employment in violation of DHS policy.

## **II. BACKGROUND**

Ms. Watkins began working at DHS in August 2020 and is currently a Mental Health Technician I.

The PPP was created by the Coronavirus Aid, Relief, and Economic Security (CARES) Act and administered by the Small Business Administration (SBA) to provide relief to small businesses affected by the COVID-19 pandemic. PPP loans were made to eligible businesses, which included sole proprietorships, independent contractors, and self-employed individuals, for qualifying payroll costs and business operating expenses such as insurance, rent, and utilities.<sup>2</sup> To apply for the loan, a sole proprietor, independent contractor, or self-employed individual needed to submit certain tax filings or other payroll documentation to an SBA-approved lender, establishing their eligibility and demonstrating the qualifying payroll amount, which as of March 2021 could be based on “gross income” reported on an IRS Form 1040, Schedule C.<sup>3</sup> PPP loans were eligible for forgiveness by the SBA if used on qualifying expenses and if at least 60% was used for payroll costs.<sup>4</sup>

## **III. INVESTIGATION**

### **A. PPP Records For Ms. Watkins**

The OEIG located public records showing that Ms. Watkins was approved for a \$20,832 PPP loan in approximately April 2021, for a “sole proprietorship.” The OEIG subpoenaed loan documents from the identified lender, which included, among other things: a Borrower Application

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<sup>1</sup> From the OEIG’s review, in order to be eligible for at least \$20,000 in loan proceeds, the small business typically had approximately \$100,000 or more in yearly net profit or gross income. The OEIG will be referring to the Ultimate Jurisdictional Authority those State employees who obtained PPP loans in smaller amounts or were not investigated for other logistical reasons.

<sup>2</sup> 15 U.S.C. § 636(a)(36); SBA Interim Final Rule, 85 FR 20811 (Apr. 15, 2020).

<sup>3</sup> See SBA Interim Final Rule, 86 FR 13149 (Mar. 8, 2021) (expanded definition of “payroll costs” for sole proprietors).

<sup>4</sup> See *id.*; 15 U.S.C. § 636(m).

Form for Schedule C Filers Using Gross Income; a 2020 IRS Form 1040, Schedule C, Profit or Loss From Business (Sole Proprietorship); a copy of Ms. Watkins's Illinois Driver's License; bank account information for Ms. Watkins; an SBA "Note" for the loan; a PPP Loan Forgiveness Application; and a Notice of PPP Forgiveness. Among the documents was a "DocuSign" record in Ms. Watkins's name, attached to an Electronic Record and Signature Disclosure from an entity referred to in this report as "Lender Service Provider A."

The Borrower Application Form was dated April 18, 2021 and appeared to be signed electronically in Ms. Watkins's name. It reflected the Business Legal Name "Robin Watkins," a business address, phone number, and social security number matching those in her DHS personnel file, a year of establishment of 2016, and an "NAICS Code" corresponding to the category Book Publishers.<sup>5</sup> The "sole proprietor" box on the form was checked, and Ms. Watkins was identified as the owner and only employee. The application listed gross income as \$115,000 from line 7 of a 2020 IRS Form 1040, Schedule C, and that amount was used to calculate the requested loan amount of \$20,832 (intended to cover a period of up to 2.5 months).<sup>6</sup> Under "Purpose of the loan," boxes were checked for "Payroll Costs," "Rent/Mortgage Interest," "Utilities," "Covered Supplier Costs," and "Other." The form contained several certifications reflecting the initials "RW," including that the applicant "was in operation on February 15, 2020" and was an "eligible self-employed individual, independent contractor, or sole proprietorship..."; that the funds would be used as authorized by PPP rules; that information provided in the application and supporting documentation was "true and accurate in all material respects;" and an acknowledgement the lender would "confirm the eligible loan amount using required documents submitted."

The 2020 IRS Schedule C listed Ms. Watkins's name and the same social security number, Book Publishers as the principal business or profession, and reported \$115,000 in gross receipts or sales, from which the gross income on line 7 was derived. Under the "Expenses" section, the following were listed: \$3,000 for advertising; \$2,000 for contract labor; \$2,000 for office expenses; \$2,000 for supplies; \$2,000 for deductible meals; and \$2,000 for utilities.

The SBA Note for \$20,832 was dated April 29, 2021 and "DocuSigned" in Ms. Watkins's name. The Loan Forgiveness Application was dated August 19, 2021 and also DocuSigned in Ms. Watkins's name, reflecting information about the business that matched the Borrower Application, including the Business Legal Name, address, NAICS Code, and social security number. It requested forgiveness of the full loan amount, indicated the money was spent on Payroll Costs, and included certifications with the initials "RW" stating the borrower had complied with rules related to eligible uses of PPP loan proceeds and that the information provided was true and correct. An SBA notice, included with the lender documents, stated the loan had been forgiven in full on September 21, 2021 (the principal of \$20,832 along with \$82.17 in interest).

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<sup>5</sup> The form's instructions stated the NAICS [North American Industry Classification System] Code should match the business activity code on applicable IRS tax filings.

<sup>6</sup> The application contained two additional fields to calculate the requested amount. First, the gross income was to be divided by 12 (up to a maximum amount of \$8,333.33); that field here reflected the maximum of \$8,333.33. Second, the resulting number was to be multiplied by 2.5; which is what resulted in the loan request amount, here \$20,832 (amounts of outstanding "EIDL" loans might also be added, but were not in this instance).

## **B. DHS Secondary Employment Documentation And Internet Research On Ms. Watkins**

The OEIG reviewed the DHS personnel file for Ms. Watkins and at the time of review located two DHS Report of Secondary Employment forms, dated August 18, 2020 and March 16, 2021. Both were signed in Ms. Watkins's name under the section that stated: "This section to be completed by all new hires and all current employees reporting no secondary employment, including self-employment. / I am employed only in my current position as identified above...and will, as an IDHS employee, report accepting any secondary employment."

The OEIG conducted internet research on Ms. Watkins and located a social media page in her name, which identified her as "Author R. Michelle." One social media post from August 2022 included an advertisement for a book expo taking place in Chicago, Illinois that month, featuring Ms. Watkins among authors from the Urban Fiction and Romance genre. A subsequent post stated Ms. Watkins would be present at a book festival in Jackson, Mississippi, in March 2023. A search of an online retailer revealed 29 distinct titles available by the author "R. Michelle." Many were priced between \$0.99 to \$3.99 in an e-reader format (or noted as available with an e-reader subscription service), and some were available in paperback and priced between \$2.97 to \$6.65.

## **C. Robin Watkins's OEIG Interview**

On March 3, 2023, the OEIG interviewed Ms. Watkins, who confirmed that in addition to her DHS employment, she earns income from royalties she receives from her published books.<sup>7</sup> Ms. Watkins explained that she used to be a full-time author and started writing in 2015, and has a business called R. Michelle Presents, which she said she operates out of her home. Ms. Watkins said she does not have set hours and no longer writes full-time, but does so when the inspiration strikes, mainly in the morning hours before her afternoon DHS shift. Ms. Watkins denied doing work for her business on State time, stating that if she writes during her DHS shift, it is only on lunch and break times, and that she talks to her publisher outside of scheduled work hours. Ms. Watkins said she also attends book events, typically once a year, though she said she planned to do more of those in 2023. Ms. Watkins said she had not registered a business entity with the State of Illinois, but that she did obtain an EIN from the IRS around 2017 for R. Michelle Presents.<sup>8</sup>

Ms. Watkins said that other than a Report of Secondary Employment form she completed when she started at DHS in August 2020, she did not recall submitting a new form for 2021, 2022, or 2023, adding that she was on a leave of absence from October 2021 until March 2022. Ms. Watkins confirmed she had not disclosed secondary employment and said she did not believe any DHS supervisors are aware she is a published author. When asked about her understanding of secondary employment, Ms. Watkins said the only definition that occurred to her was a second

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<sup>7</sup> Ms. Watkins said that prior to working for DHS in 2020, she held two part-time positions, and initially stated one of those positions ended in March 2021; however, at other points during the OEIG interview, she stated the same position ended because of the COVID-19 pandemic and that since starting at DHS in August 2020, her only other income was from book royalties. Review of Ms. Watkins's personnel file further revealed a CMS100 employment application reflecting the position ended in March 2020 due to COVID-19.

<sup>8</sup> Ms. Watkins clarified she did not have employees other than herself. According to the IRS website, an Employment Identification Number (EIN) is used to identify a business entity. See <https://www.irs.gov/businesses/small-businesses-self-employed/employer-id-numbers> (accessed May 30, 2023).

full-time job. Ms. Watkins added that most of what she has published was written in 2020, and that while she has written some additional content since then, she has not released new material since April 2021. Ms. Watkins further claimed that she inquired about reporting self-employment when she was first hired, but that she could not remember who she spoke to about it, and that she did not receive a direct answer.

When asked about her business income, Ms. Watkins explained that most of her books are sold in eBook format through an online retailer, and the amount earned varies based on the number of pages read. Ms. Watkins said she has a publisher, who receives 50% of the profits, and that the online retailer pays the publisher, who in turns pays her. Ms. Watkins said the book royalties are deposited into her personal bank account, and that the online retailer payments are associated with her EIN number. Ms. Watkins said she also sells paperback copies through the online retailer, but that is infrequent, and that she typically brings about 40 paperbacks to sell directly at book events. Ms. Watkins said her business expenses include advertising on two social media platforms, supplies like pens and notebooks, typesetting to change certain font or design aspects, and some travel-related expenses. Ms. Watkins said she maintains records, including her publishing contract, royalty statements from her publisher, advertisement and promotional costs, and costs of supplies. Ms. Watkins claimed that she reports her income on her income tax returns. When asked to estimate her gross income over the past several years, Ms. Watkins initially stated her business grossed approximately \$9,000 in 2022, \$17,000 in 2021, and had probably never exceeded \$17,000; later in the interview, she clarified the maximum annual gross income was approximately \$21,000, stating she had forgotten to add royalties from another publisher. Ms. Watkins said she could not recall her gross profits from 2019 or 2020, but that in 2019 it likely ranged between \$2,000 to \$3,000.

Ms. Watkins admitted that she sought and received a PPP loan in 2021 in the amount of \$20,832. Ms. Watkins said she heard about PPP loans generally on a social media platform, and an online search led her to Lender Service Provider A's website, to apply online. Ms. Watkins said that prior to applying for the PPP loan, she applied for a \$10,000 SBA EIDL (COVID-19 Economic Injury Disaster Loan) Loan for her business, which was denied. Ms. Watkins added that when previously filling out the EIDL application, she put actual numbers from tax documents reflecting her annual income.

Ms. Watkins said she applied for the PPP loan by filling out an online application and submitting documents showing she had an EIN number, a bank account in her name prior to 2020, and her driver's license. Ms. Watkins said the bank account was not the same one she used for her book royalties, because she received communication requesting proof of an account established prior to a certain year, so she instead used a long-standing account she co-owned with a family member. Ms. Watkins said that a few weeks after she filled out the online application, the full PPP loan amount was deposited into her account, and that she used the money to pay rent and property taxes on her home, to get caught up on utilities, to purchase a desktop computer, notebooks, and pens, and to pay for typesetting costs. Ms. Watkins said she did not have any of the funds left. Ms. Watkins confirmed that the PPP loan had been forgiven and that she filled out an application for that as well.

During her OEIG interview, Ms. Watkins was shown the Borrower Application in her name, which she confirmed reflected her home address, phone number, and personal email address, and she said she recalled filling that out along with some of the other information. Ms. Watkins said she also recalled initialing the individual certifications and checking the Payroll Costs, Rent, and Utilities boxes for the purposes of the loan. However, Ms. Watkins expressed surprise about the gross income amount of \$115,000, stating she has never made that amount from her business. Ms. Watkins said she also thought she would have used her business name, R. Michelle Presents, in the space for “Business Legal Name,” and her EIN instead of her social security number, as she said she had done for her EIDL loan application, and that she did not remember inputting the “NAICS Code.” Ms. Watkins further denied the electronic signature on the application was hers, explaining that in her DocuSign signature, she forms the R in her first name like a triangle, and that she believes she “halted” before signing the Borrower Application. Later, towards the end of the interview, Ms. Watkins clarified that she sometimes also signs documents using the Adobe Fill and Sign function, but she continued to deny she had signed the Borrower Application.

When shown the 2020 Schedule C submitted in her name, Ms. Watkins said neither the gross income nor most of the expenses on it were accurate, and she claimed that she did not create the Schedule C, had not seen it before, and it was not filed with her income tax return. Ms. Watkins said she did not know if her income tax returns had ever included a Schedule C, adding that R. Michelle Presents is a book publishing company but that she receives royalty statements from her publishers. Ms. Watkins said she had a Certified Public Accountant who prepared her income tax returns, and that he was supposed to be sending her tax documents from the last two years. However, Ms. Watkins said she knew with certainty the gross income on the Schedule C was not correct, because she did not pay taxes on such a high amount.

When asked about what income information she did supply in her PPP loan application, Ms. Watkins initially stated that while she did not recognize the \$115,000, she would have to look in her emails to see if she had a copy of what she had actually submitted. Ms. Watkins subsequently admitted that she included all her income on the application, not just the business income from R. Michelle Presents, though she said those amounts would still not add up to \$115,000. Ms. Watkins said the combined total would maybe be half that amount. (Ms. Watkins also said the part-time positions she held in 2020, prior to joining DHS, paid between \$11-\$15 per hour). Later, towards the end of the interview, Ms. Watkins claimed she recalled putting approximately \$35,000 in income on the application.

Ms. Watkins said she did not know why anyone would fill out or alter the PPP application in her name with inaccurate information, and then have the funds deposited into her bank account. Ms. Watkins said she did not pay fees associated with applying for the PPP loan, and no one assisted her or was present while she completed it online. When asked if she found the loan amount she received surprising, Ms. Watkins answered in the affirmative, but said she assumed the bank “had fixed” anything she put in her application. When asked if she had given permission to anyone to complete the Borrower Application or Schedule C on her behalf, Ms. Watkins said she had not explicitly done so.

Ms. Watkins confirmed that she Docusigned the SBA Note for the loan and completed and Docusigned the Loan Forgiveness Application, and she acknowledged both documents contained her own name and not her business name. Ms. Watkins confirmed she received a notice that the entire amount of the PPP loan had been forgiven, and she said that as a result, she had never made any payments on the loan.

#### IV. ANALYSIS

The DHS Rules of Employee Conduct state that an employee's "conduct while off-duty may subject the Employee to discipline up to and including discharge" when the conduct raises "reasonable doubt concerning the Employee's suitability for continued state employment."<sup>9</sup> In addition, the State of Illinois Code of Personal Conduct provides that "A State Employee will conduct himself or herself...with integrity and in a manner that reflects favorably upon the State."<sup>10</sup>

Ms. Watkins acknowledged that she received a PPP loan of \$20,832 in 2021, which she said she sought for her business as a book author, called R. Michelle Presents. Ms. Watkins further acknowledged that she spent the funds and accepted forgiveness of the loan in full. The information in Ms. Watkins's loan documentation, however, was false. The loan application represented that Ms. Watkins was a sole proprietor whose 2020 IRS Form 1040, Schedule C reported gross income of \$115,000, and a Schedule C in Ms. Watkins's name was submitted with the application, reflecting that amount. But, in her interview, Ms. Watkins admitted that number was inaccurate and far exceeded the amount of gross income her business made in any year. Ms. Watkins said she earned income on book royalties, primarily through online eBook sales, but the most annual gross income her business ever made was \$21,000 in 2021. Ms. Watkins also said the Schedule C was fabricated and was never included in her actual income tax return.

Ms. Watkins attempted to deny responsibility for the falsified information, stating she did not recall entering \$115,000 on the application or signing it, that she did not submit the 2020 Schedule C, and that she did not know why or by whom her application might have been altered. Ms. Watkins ultimately claimed that instead of \$115,000, she entered approximately \$35,000 of income on her PPP loan application. However, even accepting those statements at face value, they cannot be reconciled with fundamental aspects of the application on its face, or with Ms. Watkins's other admissions, as described further below. Thus, her explanations do not absolve her of responsibility for the deliberate steps she took to obtain the funds, based on information she knew (or should have known) was inaccurate.

First, the title of the application stated it was for "Schedule C Filers Using Gross Income," with a field explicitly calling for gross income from line 7 of a Schedule C. That number was required to calculate the requested PPP loan amount. Ms. Watkins acknowledged that she personally initiated and completed portions of the application, and initialed certifications she was providing true and accurate information. But Ms. Watkins admitted that not only did she fail to rely on her own Schedule C in submitting the application, she also did not know if she had ever filed one, since someone else took care of her taxes and she did not have copies. Instead, Ms.

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<sup>9</sup> DHS Administrative Directive 01.02.03.040.

<sup>10</sup> Illinois Code of Personal Conduct, Conduct Unbecoming of a State Employee (2017 & March 17, 2021).

Watkins claimed she provided a personal bank statement unrelated to her business, documentation she had an EIN, and a copy of her driver's license in support of the application; however, none of those would have established the Schedule C information required. It is not clear how Ms. Watkins could have reasonably believed she was entitled to a PPP loan in any amount, using that type of application. By contrast, Ms. Watkins acknowledged that in previously applying for a separate COVID-related EIDL loan, she did rely on income listed in her actual tax documents (and she also said that loan was denied).

In addition, though Ms. Watkins claimed not to have supplied the \$115,000 gross income figure on the PPP loan application or the Schedule C, she also said she filled out the application without assistance and did not authorize anyone else to complete those documents on her behalf. The same gross income appeared on both the loan application and the Schedule C and was used to calculate the requested loan amount; thus, it appears unlikely to have been the result of an accident or typographical error. And Ms. Watkins was unable to consistently explain what number she did use or intended to use in applying for the loan. Initially, she said she could not recall; later in her OEIG interview, she said she used not only business income but her entire combined income for the year. Ms. Watkins said that amount might have been half the \$115,000 figure; then, toward the end of the interview, she said she recalled inputting a lower amount of approximately \$35,000 on the loan application (which was still higher than the maximum amount she said her business had ever made and did not correlate to her DHS income). At a minimum, Ms. Watkins's statements establish she never intended to submit an accurate PPP loan application and falsified her gross income to some extent.

Further, if Ms. Watkins had in fact supplied the gross income amount of \$35,000, as she eventually claimed, her maximum loan amount would have been far below what she actually received, which would have necessarily become apparent before she submitted the loan application. In addition to requiring gross income from line 7 of a Schedule C, the application contained two additional fields to calculate the "Loan Request Amount," the first instructing the applicant to divide the gross income by 12, and the second to multiply the resulting number by 2.5.<sup>11</sup> Had Ms. Watkins started with a gross income of \$35,000, her requested loan would therefore have been \$7,292 instead of the \$20,832 recorded in the application. However, Ms. Watkins admitted she received the loan funds of \$20,832, which she said were deposited into her bank account not long after she submitted the loan application. At that point, if Ms. Watkins had provided the numbers she claimed, she should have known she had received nearly three times the loan amount she requested. But Ms. Watkins admitted that she accepted and spent all the funds, never sought to make repayments, and a few months later, proceeded to submit a loan forgiveness application for the entire loan amount.

Ms. Watkins's admissions establish that she submitted loan documentation with false information, and thereafter accepted over \$20,000 to which she knew, or should have known, she was not entitled. Further, after receiving the funds, Ms. Watkins sought and received loan forgiveness of the full amount.

In addition, the DHS secondary employment policy requires employees to complete a new Report of Secondary Employment form annually, confirming "any secondary employment,

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<sup>11</sup> A cap on income, as well as EIDL amounts, could also be part of the calculations, but are not relevant here.

including self-employment, or whether no secondary employment exists.” It further states that “[f]ailure to have an accurate and current form submitted may result in disciplinary action, up to and including discharge.”<sup>12</sup> Ms. Watkins admitted that she did not report secondary employment to DHS, and none was disclosed on the forms signed in her name from August 2020 and March 2021. Ms. Watkins claimed that most of the work she has published was written prior to 2021; however, she admitted she has continued to write and engage in activities related to her business, up to and including promoting her books and attending book fairs. Although Ms. Watkins indicated it was not made clear to her that self-employment needed to be reported, and stated that her business did not overlap with her DHS hours, she nevertheless failed to follow the policy’s reporting requirements. Those are made plain on the face of the forms she signed, which call for the disclosure of any secondary employment, including self-employment.

Based on the evidence, there is reasonable cause to believe that Ms. Watkins violated DHS and State of Illinois policies on employee conduct and secondary employment.

## **V. [REDACTED] AND RECOMMENDATIONS**

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

- [REDACTED] – Ms. Watkins obtained a federal PPP loan based on falsified information in violation of DHS and State of Illinois policies on employee conduct.
- [REDACTED] – Ms. Watkins failed to report secondary employment in violation of DHS policy.

Regardless of the ease of procuring these PPP funds, this was not free money for the taking. The PPP was a public program set up to provide qualifying small businesses with public funds to assist during the pandemic, provided they met the established criteria. These loans, as with any other, required truthful information as a basis for approval. State employees are expected, at minimum, to maintain the public’s trust and confidence. Misappropriating such funds is far from being ethical, professional, acting with integrity, or conducting oneself in a manner that reflects favorably upon the State. Accordingly, the OEIG recommends that DHS terminate Ms. Watkins.

No further investigative action is necessary, and this matter is considered closed.

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<sup>12</sup> DHS Administrative Directive 01.02.03.120, Subject: “Secondary Employment” (eff. 8/02/99, last rev. 6/09/16). The policy states that if secondary employment is reported, the form will be placed in the employee’s official personnel file. *Id.*

Date: June 13, 2023

Office of Executive Inspector General  
for the Agencies of the Illinois Governor  
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By: Janelle Skaloud  
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**JB Pritzker, Governor**



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**Grace B. Hou, Secretary**

**Office of the General Counsel**  
69 West Washington • 9<sup>th</sup> Floor • Chicago, Illinois 60602

June 15, 2023

***Via e-mail to Senior Paralegal Sherry Bult (at [REDACTED]@illinois.gov), on behalf of:***

Susan M. Haling  
Executive Inspector General  
Office of the Executive Inspector General for the Agencies of the Illinois Governor  
69 West Washington Street, Suite 3400  
Chicago, Illinois 60602

RE: Response to the Final Reports for Complaints Transmitted on June 13, 2023

Dear Executive Inspector General Haling:

This letter responds to the set of 24 Final Reports for the complaints transmitted to the Department of Human Services (DHS) on June 13, 2023. The complaints are being reviewed. Your office will receive an update as these matters move along. If you have any questions, please feel free to contact Robert J. Grindle, DHS' Ethics Officer.

Regards,

/s/ Grace B. Hou by /s/ Robert J. Grindle

Grace B. Hou  
Secretary

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JB Pritzker, Governor



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Grace B. Hou, Secretary

**Office of the General Counsel**  
69 West Washington • 9<sup>th</sup> Floor • Chicago, Illinois 60602

September 20, 2023

***Via e-mail to Senior Paralegal Sherry Bult (at [REDACTED]@illinois.gov) on behalf of:***

Susan M. Haling  
Executive Inspector General  
Office of the Executive Inspector General for the Agencies of the Illinois Governor  
69 West Washington Street, Suite 3400  
Chicago, Illinois 60602

RE: Updated Response to the Final Report for Complaint 23-00159

Dear Executive Inspector General Haling:

This letter updates a previous response for the Final Report for Complaint Number 23-00159. That Final Report details two [REDACTED] allegations, regarding the federal Paycheck Protection Program (PPP) and secondary employment. It makes one recommendation. The recommendation is being followed. The Department of Human Services (DHS) began the disciplinary process, but the employee resigned from State employment before that process could be completed.

With the employee's separation complete, DHS considers this matter closed. If you have any questions, please feel free to contact Robert J. Grindle, DHS' Ethics Officer.

Regards,

/s/ Grace B. Hou by /s/ Robert J. Grindle

Grace B. Hou  
Secretary