IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

In re: DEBRA MOORE) OEIG Case #12-02052

OEIG FINAL REPORT (REDACTED)

Below is a final summary report from an Executive Inspector General. The General Assembly has directed the Executive Ethics Commission (Commission) to redact information from this report that may reveal the identity of witnesses, complainants or informants and "any other information it believes should not be made public." 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes-competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report's factual allegations or legal conclusions before the Commission.

The Commission received a final report from the Governor's Office of Executive Inspector General ("OEIG") and a response from the agency in this matter. The Commission, pursuant to 5 ILCS 430/20-52, redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor's Executive Inspector General and to Debra Moore at her last known address.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52.

I. INTRODUCTION

In October 2012, the OEIG received a complaint alleging that then Illinois Department of Human Services (DHS) caseworker Debra Moore set up false DHS food benefits cases in exchange for money and used her mother's address as the mailing address for those cases.

The OEIG investigation revealed that Ms. Moore worked on DHS benefits cases that included false information and listed her parent's Chicago address as the mailing address. Upon learning that the OEIG was investigating these benefits cases, Ms. Moore immediately retired from State of Illinois employment. The overpayment of DHS benefits made on these cases amounted to approximately $100,000. The OEIG referred Ms. Moore's misconduct to the Office of the Attorney General (OAG) and to the U.S. Department of Agriculture (USDA) for further investigation. On July 15, 2015, Ms. Moore was charged in the Circuit Court of Cook County, Illinois with theft of government property over $100,000.

[This paragraph concerns the actions of a person who received discipline of less than three days' suspension and the Commission exercises its authority to redact it pursuant to 5 ILCS 430/20-52.]

II. BACKGROUND

Qualifying Illinois residents may apply for and receive food benefits through the Supplemental Nutrition Assistance Program (SNAP) at local DHS Family Community Resource Centers (FCRCs). Benefits recipients receive the awarded value of their SNAP benefits through a DHS-issued Illinois Link card that they can use to buy food.

Former DHS caseworker Debra Moore, who worked for DHS since 1986, was assigned to the South Suburban FCRC in 2002. Ms. Moore requested and was granted a hardship transfer to the Woodlawn FCRC, effective June 1, 2011, to be closer to her parents' home.[1] At the Woodlawn FCRC, Ms. Moore was assigned to conduct intake work, including setting up new benefit cases. Ms. Moore resigned from State of Illinois employment effective July 15, 2013.

III. INVESTIGATION

A. [Redacted]

[The next two paragraphs concern the actions of a person who received discipline of less than three days' suspension and the Commission exercises its authority to redact them pursuant to 5 ILCS 430/20-52.][2] [3]

B. Benefits Case Files Using Ms. Moore's Parents' Address

As part of its investigation, the OEIG found that from March 2012 to March 2013, at least 15 different beneficiaries had DHS benefit cases[4] listing the address of [redacted] S. Drexel Ave, Chicago, Illinois ("Drexel address"). DHS' Bureau of Collections reviewed these cases and estimated that at least $100,056 of benefits had been improperly paid out in these cases for various reasons. The OEIG learned that during this time period, Ms. Moore's parents resided at the [redacted] S. Drexel Ave, Chicago, Illinois ("Drexel address").[5]

1. Investigation of the Drexel Address

OEIG investigators visited the Drexel address and discovered that it was a two-unit building. The OEIG spoke with Ms. Moore's brother, [redacted], who stated that he

---

[1] According to [redacted], Ms. Moore requested the transfer to be closer to her parents.
[2] [Redacted]
[3] [Redacted]
[4] Some beneficiaries had more than one DHS benefits case and so the number of cases associated with the Drexel address during that time period was 27 in total.
[5] Ms. Moore's mother resided at the Drexel address; however, she passed away on September 27, 2013. *See* State of Illinois, Medical Certificate of Death for [redacted] (Nov. 25, 2013). Ms. Moore's father, Mr. [redacted], passed away on June 7, 2013. *See* Cook County Bureau of Vital Records, Certificate of Death for [redacted] (July 24, 2013). At the time of his death, he was staying at a nursing center in Chicago.

has resided at the Drexel address for the last five years and moved there to care for his parents while they were alive. [The brother] informed the OEIG that he lives on the first floor, his cousins, [redacted] and [redacted], live on the second floor, and that no one has ever lived in the basement.

[The brother] stated that over the last five years, he was the only person residing on the first floor with his parents and that currently only three people resided at the Drexel address. The OEIG, however, observed the mailboxes at the Drexel address, which contained a handwritten list of eleven names as residing on the first floor unit, and nine additional individuals as residing on the second floor. Many of these names appear to match the names listed in the DHS system as receiving DHS benefits, including: [redacted], [redacted], [redacted], and [redacted] on the first floor, and [redacted] and [redacted] on the second floor. The OEIG asked [the brother] to identify many of the individuals listed on the mailbox. He identified some as relatives but said he was unfamiliar with at least five other names listed on the mailboxes.

2. DHS Benefits Case Records

DHS electronic case records show that in 11 cases, Ms. Moore either created benefits cases or recertified benefits for cases that used the Drexel address. Specifically, the electronic case records reflect that after Ms. Moore transferred to the Woodlawn FCRC, she approved benefits for at least seven cases that listed the Drexel address and that for at least four of those benefits cases, Ms. Moore was the caseworker who changed the address of record to the Drexel address. At the OEIG's request, DHS analyzed the cases that Ms. Moore worked on and which listed the Drexel address and calculated the amount of benefits that had been improperly issued in those cases ("overpayment" amounts). DHS provided the OEIG with the factors it considered when determining the benefits were improper.

The following table identifies the actions taken by Ms. Moore on cases using the Drexel address, and the reason that DHS determined benefits were improperly issued.

Actions Taken by Debra Moore on DHS Cases Involving an Improper Payment of Benefits

Case Number	Date/s of Activity	Action by Moore	Client Name & Relationship to Moore[6]	Overpayment Amount	DHS Basis for Improper Benefits
93-212-L37683	9/21/2011 10/23/2012 4/8/2013	Recertification of benefits Address changed to Drexel address basement Recertification of benefits	[redacted], relationship unknown	$20,100	Client resides out of state
8-212-L69869	2/15/2012	Recertification of benefits	[redacted], relationship unknown	$40,257	Client resides out of state

[6]The relationship of some of these individuals was substantiated during the OEIG's interview of Ms. Moore's brother.

Case Number	Date/s of Activity	Action by Moore	Client Name & Relationship to Moore[6]	Overpayment Amount	DHS Basis for Improper Benefits
8-212-R19486	2/22/2012 6/7/2012 1/24/2013	Case opened Recertification of benefits Recertification of benefits	[redacted], father	$13,767	False SSN; did not qualify for benefits under real SSN; benefits usage continued after deceased
8-212-M05256	2/21/2012 10/23/2012	Case opened Address changed to Drexel address basement	[redacted], relationship unknown	$7,325	Client did not qualify for benefits due to unreported income
94-212-040052	3/7/2012	Recertification of benefits	[redacted], niece	$5,055	Client did not qualify for benefits due to unreported income
8-212-S77712	5/30/2012 8/3/2012 5/20/2013	Case opened Address changed to Drexel address basement Recertification of benefits	[redacted], former daughter-in-law, ex-wife of [redacted]	$5,018	Client name does not match SSN
8-212-R49724	12/7/2012	Recertification of benefits & address changed to Drexel address	[redacted], son	$8,534	Client resides out of state

The table shows that Ms. Moore took action on all of the above listed cases, most of which involved her relatives.[7] Some of these benefits cases involved relatives falsely listing the Drexel address even though they actually resided out of state. For example, in DHS Case Number 8-212-R49724, Ms. Moore awarded benefits to her own son, even though he was not an Illinois resident and, based on information received from DHS has lived in California since March 2011. SNAP benefits continued to be awarded to this individual from March 2011 through December 2013, for a total of approximately $8,534.

For DHS Case Number 8-212-R19486, SNAP benefits were being issued to Ms. Moore's parents. According to DHS, a false social security number was used for this benefits case, and a total of $13,767 in SNAP benefits had been used. Notably, approximately $1,755 of those benefits were used after both parents had passed away prior to October 2013.

[7] The OEIG ultimately did not interview Ms. Moore about the actions she took on these cases or any other matters, because she moved outside of the State of Illinois after resigning from DHS and because the OEIG did not want to interfere with law enforcement authorities who were reviewing the matter, as a result of the OEIG's referral of the matter.

IV. ANALYSIS

The public's trust in State agents necessarily requires State employees to be held to high standards. State employees are bound by various duties and must abide by rules of conduct found in their agency policies and procedures, the Ethics Act, and other laws.

A. Ms. Moore Violated DHS Policy By Improperly Creating Or Awarding DHS SNAP Benefits

According to DHS policy, an employee shall not participate in or condone fraud, dishonesty, or misrepresentation in the performance of duties.[8] DHS policy also provides that "[e]mployees who . . . fail to report fraud or perform other unlawful actions, may be guilty of administrative malfeasance."[9]

The table set forth in Section III reflects fraudulent benefits cases which:

- Ms. Moore either set up, made changes to, or somehow worked on;
- listed the Drexel address as the address where benefits were issued; and
- DHS determined had an overpayment of benefits.

Ms. Moore would have been aware that these beneficiaries were not residing at the Drexel address. According to Ms. Moore's brother, who has resided at the Drexel address for the last five years, most of the individuals listed on the benefits cases never resided at the Drexel address during that time period. Ms. Moore knew or should have known that those individuals did not reside at her parent's address, particularly in light of the fact that she transferred to the Woodlawn FCRC to be closer to her parents. Furthermore, one of these beneficiaries was Ms. Moore's son, who did not reside at the Drexel address, but has lived in California during the entire time period in question. Yet, in December 2012, Ms. Moore recertified benefits for him and changed his address in the DHS system to reflect the Drexel address. In addition, Ms. Moore changed the addresses of at least three benefits cases to the "basement" apartment, even though no one had ever lived in the basement of the Drexel address.

Thus, there is sufficient evidence that Ms. Moore participated in or condoned fraud, dishonesty or misrepresentations in the opening or awarding benefits for these benefit cases in violation of DHS policy; therefore, the allegation is **FOUNDED**.

B. Ms. Moore Improperly Worked On Cases For Family Members

The DHS Employee Handbook restricts DHS employees from processing the benefits of their own relatives. It states:

> An employee may not authorize assistance, benefits, or services to relatives, household members or persons for whom they have custodial responsibility. Further, an employee

[8] DHS Employee Handbook, Section V – Employee Personal Conduct (April 1, 2009).
[9] *Id.*

may not be directly involved in deciding or redetermining eligibility for DHS services for relatives or household members, or for whom they have custodial responsibility.[10]

Although DHS policy prohibits DHS employees from handling benefits cases for their family members, DHS case records reflect that Ms. Moore was directly involved in awarding SNAP benefits to various family members, including her parents, her son, and niece, listed in the table set forth in Section III. Specifically, Ms. Moore recertified benefits for the following relatives:

- [redacted], her father;
- [redacted], her niece; and
- [redacted]; her son.

Therefore, the allegation that Ms. Moore violated DHS policy when she initiated or recertified benefits for family members is **FOUNDED**.

C. [Redacted]

[The next three paragraphs concern the actions of a person who received discipline of less than three days' suspension and the Commission exercises its authority to redact them pursuant to 5 ILCS 430/20-52.][11] [12]

V. FINDINGS AND RECOMMENDATIONS

Based on its investigation, the OEIG issues these findings:

- **FOUNDED** – Debra Moore violated DHS policy when she falsified DHS SNAP information or awarded SNAP benefits on the DHS benefits cases described herein.
- **FOUNDED** – Debra Moore violated DHS policy when she worked on benefits cases for her family members as described herein.
- **[Redacted]**

Based upon its investigation and its findings that Ms. Debra Moore violated DHS policy, the OEIG recommends that DHS place a copy of this report in Ms. Moore's employment file and indicate in Ms. Moore's centralized personnel record that Ms. Moore should not be rehired for State employment. As noted above, the OEIG has referred this matter to appropriate law enforcement agencies. If Ms. Moore is convicted of any charges, DHS should also consider any implication the conviction has on Ms. Moore's pension benefits.

[Paragraph redacted.]

---

[10] DHS Employee Handbook at V-10 (Apr. 1, 2009).
[11] [Redacted]
[12] [Redacted]

No further investigative action is needed and this case is considered closed.

Date: **July 21, 2015**

Office of Executive Inspector General for the Agencies of the Illinois Governor
69 W. Washington Street, Ste. 3400
Chicago, IL 60602

Spiridoula Mavrothalasitis
Assistant Inspector General

Jeffrey Leh
Investigator

Bruce Rauner, *Governor*

Illinois Department of Human Services

James T. Dimas, *Secretary-designate*

August 6, 2015

Via e-mail to Fallon Opperman, Deputy Inspector General and Chief of Chicago Division, on behalf of:
Maggie Hickey
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 Report for Complaint 12-02052

Dear Executive Inspector General Hickey:

This letter responds to the Final Report for Complaint Number 12-02052 (attached). The Report identified founded allegations of misconduct by a Department of Human Services (DHS) employee and failure to properly report wrongdoing. The Report recommended several actions. In general, these are all being accepted. I have one suggestion for your office, however.

Specifically, a copy of the Final Report has been placed in Ms. Moore's personnel file. An indication has been made that she should not be rehired.

Finally, the Report recommended that DHS consider the impact of any conviction on Ms. Moore's pension benefits. As you know, pension benefits are administered by the State Retirement Systems of Illinois (SRS), however. It would seem more appropriate to direct to SRS any notice from law enforcement officials regarding her conviction.

If you have any questions, please feel free to contact Robert J. Grindle, DHS' Ethics Officer.

Regards,

James T. Dimas
Secretary-designate