

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

Case Number: 21-02372

Subject(s): Adrienne Coleman

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 Commission for adjudication of the alleged violation, the Act further requires the executive inspector general to deliver to the Executive Ethics Commission (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 November 15, 2021, the Office of Executive Inspector General (OEIG) received a complaint alleging that Illinois Mathematics and Science Academy (IMSA) Diversity, Equity and Inclusion (DEI) Director Adrienne Coleman was [redacted]. The complaint alleged that Ms. Coleman conducted workshops and webinars for her personal business, [Company 1], in partnership with former IMSA employee [IMSA Employee 1]. The OEIG had referred two prior complaints related to these matters to IMSA.¹ Upon receiving a **third** related complaint, the OEIG opened the instant investigation.

II. BACKGROUND

IMSA is a residential public high school in Aurora, Illinois, created by the State in 1985 to offer challenging education in math and science for students from around the State. Ms. Coleman began working at IMSA in 2006 as the Coordinator of Leadership Education and Student Activities, and she is currently the Director of Diversity, Equity, and Inclusion. Prior to leaving IMSA in [Redacted], [IMSA Employee 1] was IMSA's [Redacted], and she also served as Ms. Coleman's supervisor.

IMSA's Policy Manual prohibits employees from engaging in outside employment that interferes with their duties at IMSA, and states that "IMSA employees must obtain written approval from his/her supervisor and Human Resources before accepting any outside employment that conflicts, or has the potential to conflict, with this policy."² The Illinois Governmental Ethics Act³ and State Executive Order 15-09⁴ require certain State employees, including some IMSA employees, to file annual Statements of Economic Interests regarding assets and income related to non-State business.

III. INVESTIGATION

A. [Company 1]

According to the Illinois Secretary of State's website, [Company 1] is an [Redacted] company, registered in [Redacted] to an address matching the home address in Ms. Coleman's IMSA personnel file, and it lists her as the company's manager. The company's advertised mission is "to advance DEI (diversity, equity, inclusion) work among clients outside of [Ms. Coleman's] full-time employment."⁵

B. Statements Of Economic Interests And Secondary Employment

¹ OEIG Nos. [Redacted] and [Redacted].

² IMSA Policy Manual, Personnel Policies, Outside Employment (rev. March 15, 2017).

³ 5 ILCS 420/4A-101(f).

⁴ See <https://www.illinois.gov/content/dam/soi/en/web/coronavirus/documents/executiveorder2015-09.pdf> and <https://www2.illinois.gov/eec/ExecutiveOrder/Pages/Home.aspx>.

⁵ See [Redacted].

During its investigation, the OEIG learned that Ms. Coleman is required to complete the Illinois Secretary of State's annual Statement of Economic Interests and the Executive Ethics Commission's annual Supplemental Statement of Economic Interests.⁶ The OEIG obtained each of the Statements of Economic Interests and Supplemental Statements of Economic Interests filed in Ms. Coleman's name since 2018.⁷

The Statement of Economic Interests for calendar years 2018-2020 required responses to the following requests, among others:

1. List the name and instrument of ownership in any entity doing business in the State of Illinois, in which the ownership interest held by the person at the date of filing is in excess of \$5,000 fair market value or from which dividends in excess of \$1,200 were derived during the preceding calendar year.
2. List the name, address and type of practice of any professional organization in which the person making the statement was an officer, director, associate, partner or proprietor, or served in any advisory capacity, from which income in excess of \$1,200 was derived during the preceding calendar year.
3. List the nature of professional services rendered (other than to the State of Illinois) of each entity from which income exceeding \$5,000 was received for professional services rendered during the preceding calendar year by the person making the statement.

The form for calendar year 2021 required responses to the following requests, among others:

1. If you have any single asset that was worth more than \$10,000 as of the end of the preceding calendar year and is held in, or payable to, your name, held jointly by, or payable to, you with your spouse, or held jointly by, or payable to, you with your minor child, list such assets below...If you do not have any such assets, list "none" below.
2. Excluding the position for which you are required to file this form, list the source of any income in excess of \$7,500 required to be reported during the preceding calendar year...If you had no such sources of income or assets, list "none" below.

Among other things, the Supplemental Statement of Economic Interests for calendar years 2018-2021 required a response to the following question:

⁶ State employees submit Statement of Economic Interests forms the year following the calendar year the economic interests occurred. This report's references to the years of certain Statement of Economic Interests forms are referring to the years in which the economic interests are reported to have occurred, not the year in which the forms were filed.

⁷ During her interview with the OEIG, Ms. Coleman confirmed that the Statement of Economic Interests and Supplemental Statement of Economic Interests the OEIG obtained for each calendar year 2018-2021 were the ones she signed and submitted.

During the preceding calendar year, did you hold any non-governmental position(s) with any business entity, non-profit organization, labor group, educational institution, or other entity of any type? If yes, disclose the nature and amount of compensation.

A review of these forms showed that none contained any disclosures of Ms. Coleman's business interest in [Company 1], nor did they contain any information regarding the income Ms. Coleman received from [Company 1].

The OEIG also requested the IMSA personnel file for Ms. Coleman, including any written notifications or approvals of her secondary employment. The personnel file provided by IMSA for Ms. Coleman did not contain any documentation showing that she had reported or received approval for her secondary employment with [Company 1].

C. Interview Of [IMSA Employee 2]

On December 13, 2021, the OEIG interviewed [IMSA Employee 2], [Redacted], a position she has held since [Redacted]. She has also served as [Redacted] since [Redacted]. [IMSA Employee 2] said that after the OEIG referred a complaint to her in February 2021 regarding allegations that [IMSA Employee 1] and Ms. Coleman were [redacted], she spoke with [IMSA Employee 1] and Ms. Coleman about IMSA's secondary employment policies, and both denied [redacted]. [Redacted].⁸ [IMSA Employee 2] explained to the OEIG her understanding of the secondary employment policy, stating that she did not believe that an employee needs to report secondary employment or request approval for it.

D. [Redacted]

[Redacted].

[Redacted].⁹ [Redacted].

[Redacted].¹⁰

[Redacted].

E. Interview Of Adrienne Coleman

On May 13, 2022, the OEIG interviewed Adrienne Coleman. Ms. Coleman said her role at IMSA is advancing equity and excellence at the school based on a three-year plan that she is responsible for implementing with her staff of two employees. She explained that she is involved in IMSA's process to adjudicate bias incidents at the school.

⁸ IMSA provided documents to the OEIG showing [IMSA Employee 2]'s [redacted] analysis and a memorandum of her investigation. Included in the documents was an email from [IMSA Employee 2] to [IMSA Employee 3] dated March 8, 2021, in which she stated, "I see no evidence of violation of the Ethics Act or IMSA's Outside employment policy. Closing this out on my end."

⁹ See [Redacted]. [Redacted].

¹⁰ [Redacted].

Ms. Coleman said she typically works 9:00 am to 5:30 pm at IMSA, for a minimum of 40 hours per week. She added that IMSA allows non-student-facing staff like her to work a hybrid schedule, which for her is Tuesday/Thursday in the office and Monday/Wednesday/Friday at home. Ms. Coleman said that she has an IMSA-provided laptop, external hard drive, and digital note board. She said she does not use these resources for personal business.

Ms. Coleman confirmed that she founded [Company 1] in [Redacted]. She described [Company 1] as a diversity, equity, and inclusion consulting business that works with clients to advance DEI. She explained that the company does not have any employees, but instead hires independent contractors to assist her with [Company 1]’s presentations, trainings, assessments, and workshops. Ms. Coleman said she currently works with four or five independent contractors, including [IMSA Employee 1]. She confirmed that [IMSA Employee 1] was her supervisor at IMSA during the time [IMSA Employee 1] was doing contract work for [Company 1] but added that [IMSA Employee 1] has no ownership or investment interest in the company. Ms. Coleman said she considers [IMSA Employee 1] to be a friend and that [IMSA Employee 1] supported her creation of [Company 1] in [Redacted].

Ms. Coleman said that [Company 1]’s clients include [Entity 1], [Entity 2], [Entity 3] and the [Entity 4], among others. She estimated that in 2021 [Company 1] facilitated 20 to 25 client presentations. She said those included presentations done by either her or [Company 1] independent contractors. Ms. Coleman said her standard billing rate for presentations is \$1,000 per hour, and less for assessments. She said that when independent contractors facilitate the presentations, they receive the full hourly amount billed to the client. When asked about [IMSA Employee 1]’s work for [Company 1] in 2021, Ms. Coleman said that of the four or five webinars that [Company 1] did for [Entity 1], Ms. Coleman conducted the first session and [IMSA Employee 1] conducted the rest (and that most, if not all, would have occurred while [IMSA Employee 1] was an IMSA employee). She said she did not know how much [IMSA Employee 1] earned as contractor for [Company 1] in 2021.¹¹ [Company 1]’s revenue in 2021, Ms. Coleman explained, was about \$47,000, according to her tax documentation, and that after expenses, Ms. Coleman earned approximately \$20,000 in income.

Ms. Coleman confirmed that she has filled out the Illinois Secretary of State’s annual Statement of Economic Interests and the Illinois Executive Ethics Commission’s Supplemental Statement of Economic Interests each year that [Company 1] has been in business. She confirmed that she did not list [Company 1] on any of her Statements of Economic Interests filed for calendar years 2018-2021. Ms. Coleman said that she did not disclose her [Company 1] ownership interest or compensation on the statements because the work was done in [Company 1]’s name, and thus, she did not think she needed to disclose it. She said that she received emails each year from IMSA’s Ethics Officer with the links to fill out the annual statements but added that she never consulted

¹¹ The OEIG reviewed Statements of Economic Interests and Supplemental Statements of Economic Interests filed in [IMSA Employee 1]’s name for the calendar years 2018-2020. Those statements did not contain any reference to [Company 1]. [IMSA Employee 1] declined the OEIG’s request to interview her, and because she is no longer a State employee, the OEIG did not investigate further whether she would have been required to disclose her income from [Company 1] on her Statements of Economic Interests. The OEIG also reviewed [IMSA Employee 1]’s personnel file (provided by IMSA) which did not contain any written approvals of [IMSA Employee 1]’s outside employment with [Company 1].

with anyone on what she should put in the forms. Ms. Coleman said she believed her statements on the forms were correct and true.

Ms. Coleman said she is familiar with IMSA's Outside Employment Policy but did not know that she must obtain written approval for outside employment. She said that she knew she must not use IMSA time or resources to work on outside employment and that she must notify her supervisor. She said that when [IMSA Employee 1] was her supervisor, she knew about Ms. Coleman's work for [Company 1] because [IMSA Employee 1] was an independent contractor for [Company 1]. Ms. Coleman said that she also discussed her outside work for [Company 1] with her current supervisor, the Chief Student Affairs Officer. She added that because [IMSA Employee 1] was [Redacted], Ms. Coleman considered the outside employment to have been disclosed to Human Resources.

IV. ANALYSIS

There is sufficient evidence to conclude that Ms. Coleman did not comply with the Illinois Governmental Ethics Act (the Act) and State Executive Order 15-09 when she failed to disclose on her Statement of Economic Interests and Supplemental Statement of Economic Interests her ownership of [Company 1] and the income she derived from it.

The Act requires certain State employees, including IMSA staff in positions such as Ms. Coleman's, to file annual Statements of Economic Interests with the Secretary of State.¹² The Act specifies that the Statement of Economic Interests ask filers to list assets (including business interests) from the previous calendar year worth more than \$10,000 and non-State income over \$7,500 from the previous calendar year.¹³ Additionally, State Executive Order 15-09 requires filers to complete a Supplemental Statement of Economic Interests with the Executive Ethics Commission that discloses any non-State business position held by the filer in the previous calendar year, including the nature and amount of any compensation.¹⁴

Based on information from the Secretary of State's website and confirmed by Ms. Coleman during her interview with the OEIG, [Company 1] is an active business created in [Redacted] and solely-owned by Ms. Coleman. She stated that in 2021 alone, [Company 1] had a total revenue of \$47,000. She estimated that of the total revenue, she personally earned approximately \$20,000 in income from [Company 1] in 2021. The OEIG obtained copies of the Statement of Economic Interests and Supplemental Statement of Economic Interests filed by Ms. Coleman in which she made economic disclosures covering the years 2018-2021. None of the statements list information regarding her business interest in [Company 1], nor do they give any information on the income she derived from [Company 1].

In addition to the economic interest disclosure requirements under statute and executive order, IMSA's Policy Manual states that outside employment must not interfere with an IMSA

¹² 5 ILCS 420/4A-101(f).

¹³ 5 ILCS 420/4A-103.

¹⁴ See <https://www.illinois.gov/content/dam/soi/en/web/coronavirus/documents/executiveorder2015-09.pdf> and <https://www2.illinois.gov/eec/ExecutiveOrder/Pages/Home.aspx>.

employee's job duties,¹⁵ and employees must obtain written approval from their supervisor and Human Resources before accepting outside employment that could potentially interfere with their work at IMSA.¹⁶ Although Ms. Coleman did not obtain written approval for outside employment from [IMSA Employee 1], her supervisor and [Redacted], Ms. Coleman said she discussed her outside work for [Company 1] with her current supervisor, the Chief Student Affairs Officer, and because [IMSA Employee 1] was [Redacted], Ms. Coleman considered the outside employment to have been disclosed to Human Resources.

Ms. Coleman also claimed in her interview that she did not know she needed to disclose her secondary employment information on the Economic Interest forms because the business was in the name of [Company 1]. However, the questions in the Statement of Economic Interests and Supplemental Statement of Economic Interests clearly request information regarding "ownership interest," "source of any income," "assets," and "any non-governmental positions." Ms. Coleman was required to report the approximately \$20,000 in income she earned from [Company 1] in 2021, as well, as any ownership interest in [Company 1] (which she said had revenue of \$47,000 in 2021) that qualified as an asset. The evidence supports the OEIG's determination that there is reasonable cause to believe that Ms. Coleman failed to properly disclose [Company 1] as an asset and source of non-State income in violation of the Illinois Governmental Ethics Act and the requirements of Executive Order 15-09.

V. [REDACTED] AND RECOMMENDATIONS

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

- **[REDACTED]** – IMSA employee Adrienne Coleman violated the Illinois Governmental Ethics Act and the requirements of Executive Order 15-09 when she failed to disclose on her Statement of Economic Interests and Supplemental Statement of Economic Interests her ownership interest in [Company 1], and the income she received from it.

The OEIG recommends that IMSA take whatever action it deems appropriate regarding Ms. Coleman. IMSA should consider additional guidance for its employees, including Ms. Coleman, regarding the Statement (and Supplemental Statement) of Economic Interests forms.

In addition, the OEIG recommends that IMSA revise its outside employment policy. Currently, the policy requires employees to obtain approval before "accepting outside employment *that conflicts, or has the potential to conflict, with this policy.*" (emphasis added). As written, an employee arguably does not need to get written approval, if the employee believes that there is not a conflict. It is preferable for the policy to simply require the employee to report the proposed outside employment to their supervisor and Human Resources prior to accepting the outside employment. The agency, through its designee, should then make an objective assessment of whether the outside employment conflicts, or has the potential to conflict, with the employee's duties at IMSA, or a risk of abuse of State time or resources, especially for employees working

¹⁵ [Redacted].

¹⁶ IMSA Policy Manual, Personnel Policies, Outside Employment (rev. March 15, 2017).

remotely. Of course, the assessment of this request should be performed by personnel who are free from a conflict themselves. For instance, the assessment should not be conducted by a supervisor or Human Resources Officer who is involved in the employee's outside employment.

Finally, the OEIG recommends that IMSA ensure all employees are notified of any changes made to the outside employment policy. This investigation revealed that IMSA's Ethics Officer did not think the policy required employees to report or obtain approval for secondary employment.

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

Date: September 16, 2022

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

By: **Joseph Loscudo**
Assistant Inspector General

Francesca Lynn
Investigator



630.907.5000 . 1500 SULLIVAN ROAD, AURORA, IL 60506-1000 . IMSA.EDU

October 6, 2022

Ms. Fallon Opperman
Deputy Inspector General and Chief
Office of Executive Inspector General
69 West Washington Street, Suite 3400
Chicago, IL 60602

RE: OEIG Case No. 21-02372 Response

Dear Ms. Opperman,

Based on your report, a formal written warning was provided to Dr. Adrienne Coleman in response to your request that the Illinois Mathematics and Science Academy (IMSA) consider the recommendations of the Office of Executive Inspector General (OEIG). In addition to this formal written warning, IMSA has reviewed and made adjustments to the IMSA Policy GBU: Outside Work requiring all employees to report work outside of IMSA and submit an application for review to determine any ethics violations.

We will provide the IMSA Board of Trustees on November 16, 2022 with a summary of the [REDACTED] and my implementation of the recommendations of the OEIG. Further, we will bring our IMSA Policy GBU: Outside Employment to the meeting in November for review and approval.

This concludes the actions that I have taken regarding Case Number 21-02372. Please contact me if you have any questions.

Sincerely,

Evan Glazer, Ph.D.
President

Illinois Mathematics and Science Academy®

Section G

Personnel Policies

Outside Employment

Outside employment is defined as any additional employment for which an outside source pays compensation while an individual is working for the Academy or additional roles within the Academy beyond the primary position of an employee. This employment includes teaching, consulting, advisory services, and any other form of external employment. Honoraria for lectures or scholarly articles, royalties for books, or patents are not considered compensation from outside employment for purposes of this policy.

IMSA applies this policy consistently and without discrimination to all employees and in compliance with all applicable employment and labor laws and regulations. Academy Employees wishing to seek outside employment must submit an application and receive prior approval from their immediate supervisor and the Office of Human Resources before accepting outside employment. Application(s) for outside employment must be submitted/resubmitted by the employee at the beginning of each fiscal year or throughout the fiscal year when an outside employment opportunity arises. Review and approval of outside employment allow the Academy to ascertain if the said employment creates a conflict of interest or commitment. The intent is to ensure the Academy's best interest is taken into account and all applicable laws, policies, and ethical requirements are considered.

Academy Employees may not at any time engage in any employment that interferes with their effectiveness in performing their regular assigned duties, compromise or embarrass the Academy, adversely affect their employment status or professional standing, or conflict with the mission and work of the Academy ~~their assigned duties.~~

~~Even when otherwise allowed, Academy Employees may not engage in any other employment or in any private business during regular Academy business hours or during time required to fulfill assigned duties, on Academy property, or using Academy equipment or resources.~~

Outside employment activity must not cause or contribute to job-related problems at IMSA. If an employee's outside employment presents a conflict of interest, or if such outside employment has any potential for a negative impact on IMSA, the employee will be asked to terminate the outside employment. The Academy reserves the right to withdraw approval of outside employment and require the employee to discontinue such employment, and the employee may be subject to the standard disciplinary procedures for dealing with the resulting job-related problem(s).

Approved outside/secondary employment must occur outside the employee's regular working hours. Academy-owned equipment, supplies, resources, intellectual property, and space are state-owned resources and are not to be used for outside employment purposes. Sabbatical or sick leave cannot be taken to engage in outside employment opportunities.

~~IMSA employees must obtain written approval from his/her supervisor and Human Resources before accepting any outside employment that conflicts, or has the potential to conflict, with this policy.~~

Failure to comply with this policy may result in disciplinary action up to and including termination of employment.

Adopted: February 19, 1990

Amended: July 18, 2012

Reaffirmed: September 16, 2015

Amended: March 15, 2017

Amended: March 16, 2022

Amended: July 20, 2022

Amended: November 16, 2022

IMSA Outside Employment Request Form

Name: _____

Date: _____

Title: _____

Department: _____

I hereby request approval to engage in outside employment as described below:

Nature of employment:

Time required for employment:

I understand IMSA policy requires prior approval for my engaging in any form of outside employment or business opportunity, for myself or another employer. Additionally I understand that using IMSA equipment or materials for outside employment is strictly prohibited. I understand that in order to engage in outside employment, I must receive approval from my supervisor and Human Resources in advance of performing such outside employment, and that the approval may be withdrawn at any time. I also understand and agree that my outside employment must be suspended if my work status with IMSA is sick leave, FMLA leave, workers compensation leave or restricted duty. I understand that failure to comply with the policy could result in disciplinary action up to and including termination of employment.

Employee Signature _____

Date: _____

DEPARTMENT DIRECTOR ACTION

___ Request Approved

___ Request Denied

Comments or Special Conditions:

Supervisor Signature: _____

Date: _____

HR Representative Signature: _____

Date: _____

Forward completed form to the Human Resource Department.

October 6, 2022

Dr. Adrienne Coleman
Director of Diversity, Equity, and Inclusion/Title IX Coordinator
Illinois Math and Science Academy
1500 Sullivan Road
Aurora, IL 60506

Dear Dr. Coleman,

This notice serves as a formal written warning pursuant to IMSA Policy GBU (Outside Employment) for the following reason:

IMSA received the Final Report from the Office of Executive Inspector General related to OEIG Case No. 21-02372 in connection with the OEIG investigation into failing to properly disclose [REDACTED] as an asset and source of non-State income. This is in violation of the Illinois Governmental Ethics Act and the requirements of Executive Order 15-09. The report summarized the evidence in the case and determined there is “reasonable cause to believe the following:”

- You violated the Illinois Governmental Ethics Act and provisions of Executive Order 15-09 when you failed to disclose on your Statement of Economic Interests and Supplemental Statement of Economic Interests your ownership interest in [REDACTED] and the income you received from it.

As a result of this [REDACTED], I am issuing a formal discipline that requires you to seek my prior approval for outside employment before continuing activities with [REDACTED]. It is my expectation that you comply with this directive and submit the required paperwork for approval before seeking or continuing outside employment. Additionally, I am issuing you a written warning that at all times during your employment with Illinois Math and Science Academy, you are to follow all applicable laws and policies, including the Outside Employment Policy at IMSA. Failure to adhere to the conditions of this warning may lead to more serious disciplinary consequences, up to and including termination of employment.

Respectfully submitted,

Nashwa Mekky
Chief People, Equity and Culture Officer

I have received a copy of this written warning and understand its contents.

Dr. Adrienne Coleman

PUBLICATION OF REDACTED VERSION
OF THE OFFICE OF EXECUTIVE INSPECTOR GENERAL
FOR THE AGENCIES OF THE ILLINOIS GOVERNOR
INVESTIGATIVE REPORT

Case # 21-2372

Subject(s): Adrienne Coleman

RESPONDENT'S SUGGESTIONS FOR REDACTION / PUBLIC RESPONSE

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

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

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

[Redacted Signature]

Respondent's Signature

6/20/23

Date

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

EEC@illinois.gov

Illinois Executive Ethics Commission

401 S. Spring Street, Room 513 Wm. Stratton Building

Springfield, IL 62706

See Attached

Public Response for Adrienne Coleman, Case # 21-2372

This finding by the Office of the Executive Inspector General does not accurately reflect the totality or context of the matter. It was [REDACTED] that I did not reveal my company and the earnings, but it was not my intent or understanding for the question. My interpretation of ownership in an entity doing business in the state of Illinois was that this referred to a state entity, such as a university or another agency that receives funding from the state. Neither of these two examples are applicable to my situation.

In previous years, I shared the organizations that I worked with, and earnings made under my individual name. My intent was and always has been to respond to the questions in an ethical manner. This [REDACTED] is not a reflection of acting unethically, instead it is a representation of an individual not accurately understanding the language and interpretation in the questions. This language has changed from previous years.

I voluntarily communicated to both the former and current [REDACTED] and [REDACTED] [REDACTED], now [REDACTED], [REDACTED], and [REDACTED] of IMSA of my secondary employment. Neither the [REDACTED] nor [REDACTED] of IMSA raised any questions, problems, or concerns to me regarding this information. This is further confirmation of my ethical intent and actions.

Yet, I have been the recipient of false allegations made against me. [REDACTED] [REDACTED]. This was found not to be true [REDACTED]. The false statements and perpetrators of these false statements should be investigated.

I have been a committed and dedicated employee with the State of Illinois for over 20 years, and I have never had a negative mark against me. Without a doubt, it has been extremely traumatizing to go through this investigation process; knowing that my intentions and actions have always been to do what is needed and to follow policies. In fact, I have voluntarily gone above and beyond to do this with leadership. I have done this in the midst of facing blatant racism at my place of employment day in and day out. This is not just an allegation of racism. This conduct was investigated internally by IMSA and [REDACTED] to be true that I have been the recipient of racism at IMSA. Yet, this egregious behavior has never been addressed by either the current [REDACTED] or [REDACTED] of IMSA.