

STATE OF OHIO  
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF  
INVESTIGATION



AGENCY: OHIO DEPARTMENT OF ADMINISTRATIVE SERVICES  
FILE ID NO.: 2017-CA00014A  
DATE OF REPORT: DECEMBER 7, 2017

## The Office of the Ohio Inspector General ... The State Watchdog

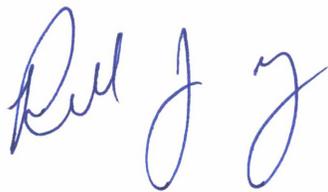
*“Safeguarding integrity in state government”*

The Ohio Office of the Inspector General is authorized by state law to investigate alleged wrongful acts or omissions committed by state officers or state employees involved in the management and operation of state agencies. We at the Inspector General’s Office recognize that the majority of state employees and public officials are hardworking, honest, and trustworthy individuals. However, we also believe that the responsibilities of this Office are critical in ensuring that state government and those doing or seeking to do business with the State of Ohio act with the highest of standards. It is the commitment of the Inspector General’s Office to fulfill its mission of safeguarding integrity in state government. We strive to restore trust in government by conducting impartial investigations in matters referred for investigation and offering objective conclusions based upon those investigations.

Statutory authority for conducting such investigations is defined in *Ohio Revised Code §121.41* through *121.50*. A *Report of Investigation* is issued based on the findings of the Office, and copies are delivered to the Governor of Ohio and the director of the agency subject to the investigation. At the discretion of the Inspector General, copies of the report may also be forwarded to law enforcement agencies or other state agencies responsible for investigating, auditing, reviewing, or evaluating the management and operation of state agencies. The *Report of Investigation* by the Ohio Inspector General is a public record under *Ohio Revised Code §149.43* and related sections of *Chapter 149*. It is available to the public for a fee that does not exceed the cost of reproducing and delivering the report.

The Office of the Inspector General does not serve as an advocate for either the complainant or the agency involved in a particular case. The role of the Office is to ensure that the process of investigating state agencies is conducted completely, fairly, and impartially. The Inspector General’s Office may or may not find wrongdoing associated with a particular investigation. However, the Office always reserves the right to make administrative recommendations for improving the operation of state government or referring a matter to the appropriate agency for review.

The Inspector General’s Office remains dedicated to the principle that no public servant, regardless of rank or position, is above the law, and the strength of our government is built on the solid character of the individuals who hold the public trust.



Randall J. Meyer  
Ohio Inspector General



STATE OF OHIO  
**OFFICE OF THE INSPECTOR GENERAL**

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RANDALL J. MEYER, INSPECTOR GENERAL

**REPORT OF INVESTIGATION**

**FILE ID NUMBER:** 2017-CA00014A

**SUBJECT NAME:** Stuart Davis

**POSITION:** Chief Information Officer

**AGENCY:** Ohio Department of Administrative Services

**BASIS FOR INVESTIGATION:** Inspector General Initiative

**ALLEGATIONS:** Failure to Comply with State Law and/or Regulations;  
Misuse of Position or Office, Other than to Harass or Threaten;  
Conflict of Interest

**INITIATED:** April 13, 2017

**DATE OF REPORT:** December 7, 2017

## **INITIAL ALLEGATION AND COMPLAINT SUMMARY**

The Office of the Ohio Inspector General (OIG) is currently engaged in a series of investigations related to the Ohio Department of Administrative Services (ODAS) Office of Information Technology (OIT). The investigations were initiated from complaints received by the OIG, newspaper articles, and information acquired during related investigations. This investigation stems from a complaint alleging amongst other things, improprieties by the Chief Information Officer Stuart Davis.

Specifically, the complaint alleges that Davis solicited Nola Haug, vice president of CGI Technologies, Inc. (CGI), a vendor with the state of Ohio, to host Davis' speaking session at the 2013 Cincinnati CIO Executive Summit (Summit). The cost of hosting the speaking session at the 2013 Cincinnati CIO Executive Summit was \$37,000.

Prior to the initiation of this investigation, the Office of the Ohio Inspector General reviewed this matter and referred it to the Ohio Ethics Commission for consideration. Over the course of several discussions with the Ohio Ethics Commission it was advised that investigators needed to demonstrate that Davis was "simultaneously engaged in governmental business or activity affecting CGI," when he solicited Haug to host his speaking session at the 2013 Cincinnati CIO Executive Summit. The Ohio Ethics Commission also recommended identifying additional information regarding Davis' role with the Summit's organizer, Evanta, a Gartner Company.

As a result of these discussions with the Ohio Ethics Commission, the Office of the Ohio Inspector General conducted further investigation.

## **BACKGROUND**

The Ohio Department of Administrative Services (ODAS) is responsible for providing support services to state agencies. ODAS is organized into five divisions: Collective Bargaining, Equal Opportunity, General Services, Human Resources, and the Office of Information Technology. The director of ODAS is appointed by the governor and confirmed by the Ohio Senate. ODAS is funded through the general revenue fund and fees charged to agencies for services provided.<sup>1</sup>

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<sup>1</sup> Source: Biennial budget documents.

The ODAS Office of Information Technology (OIT) delivers statewide technology and telecommunication services to state government agencies, boards and commissions, as well as policy and standards development, lifecycle investment planning and security management.

The following OIT sections carry out these responsibilities according to the ODAS mission, vision, goals and principles to provide service, support, and solutions that improve state government.

The State Chief Information Officer's Office provides the management and leadership of the ODAS OIT. The state chief information officer is responsible for the strategic direction and efficient use of information technology across the state and for oversight of state IT activities. As such, this program emphasizes planning, research, communication, and collaboration between government entities for the benefit of the State of Ohio, rather than any one particular interest and is supported by the following program areas:

- OIT Administration
- Business Officer

The Investment and Governance Division (IGD) assists state agencies by providing IT policy and standards, as well as investment planning and management, IT procurement and contract management, and research and project support services. IGD consists of the following program areas:

- Enterprise IT Architecture and Policy
- Enterprise IT Contracting
- Project Success Center
- Strategic Investment Management

The Infrastructure Services Division operates the IT infrastructure for the state, which includes hardware, software, and telecommunication. The division consists of the following program areas:

- Business Support Services

- Data Center Operations
- Enterprise Mainframe Computing and Database Services
- Enterprise Operations
- Enterprise Server Team
- Enterprise Storage Team
- Multi-Agency Radio Communication System
- Unified Network Services

Enterprise Shared Solutions coordinates strategies for delivery of government information and services electronically. This includes oversight of the Ohio portal, which enables constituent access to state information and services via the internet, including Ohio.gov and the Ohio Business Gateway. Enterprise Shared Solutions also partners with the Health and Human Services (HHS) Cabinet and the Governor’s Office of Health Transformation to streamline Health and Human Services. The office consists of the following program areas:

- Enterprise Application Management
- OAKS Service Assurance
- Ohio Benefits
- Ohio Geographically Referenced Information Program

The Office of Information Security and Privacy works with internal and external agency customers to lead the creation, implementation, and management of enterprise efforts for information assurance, security, privacy, and risk management.<sup>2</sup>

*CGI Technologies and Solutions, Inc.*

CGI Technologies and Solutions, Inc. (CGI) is a global information technology consulting, systems integration, outsourcing and solutions company. CGI’s services include:

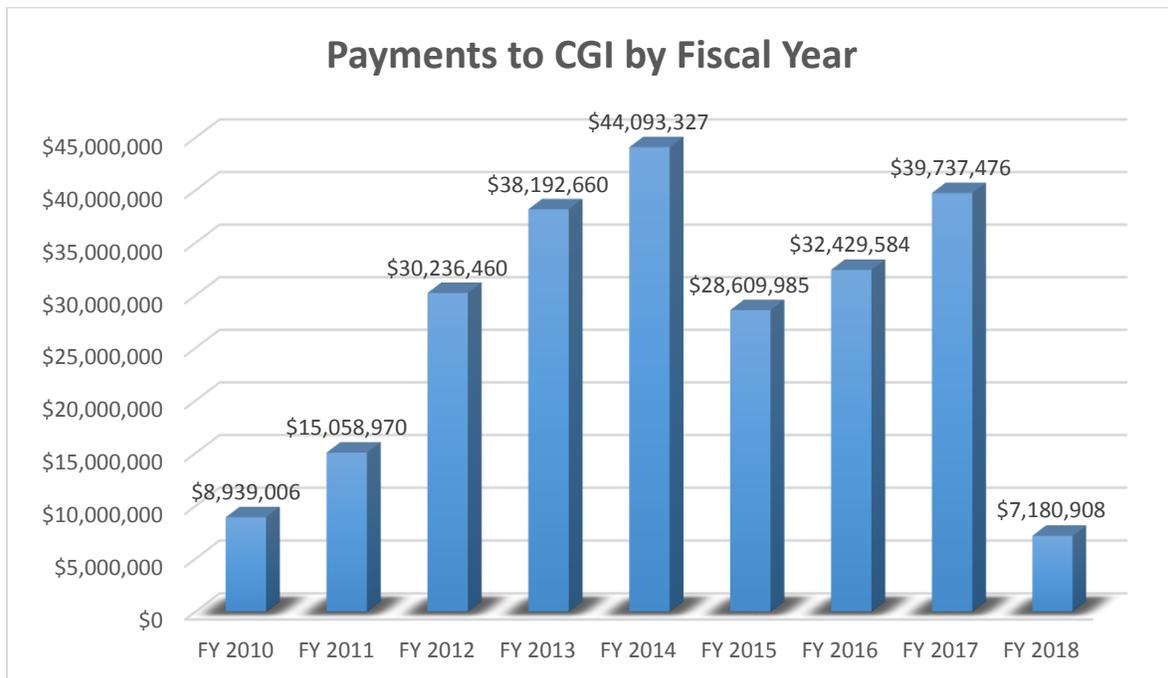
- High-end business and IT consulting with a focus on digital
- Systems integration to connect legacy assets with digital business and operating models

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<sup>2</sup> Source: [www.das.ohio.gov](http://www.das.ohio.gov)

- Transformational outsourcing to improve both how they run and change their organizations
- Intellectual property that acts as a digital business accelerator<sup>3</sup>

CGI has both bid on and been awarded numerous IT contracts with the state of Ohio. For example, from fiscal year 2010 to the present, CGI has received nearly a quarter billion dollars (\$244,478,377)<sup>4</sup> for services provided to the state of Ohio. Approximately 98 percent of these expenditures, totaling \$240,478,377, occurred when Stuart Davis served as CIO of ODAS OIT.



*Evanta and Cincinnati CIO Executive Summit*

Evanta, a Gartner Company, fosters leadership development and collaborative exchange among North America’s top executives. Evanta convenes thousands of top executives each year to create opportunities for leaders of companies to network, share, and learn. Evanta’s tightly

<sup>3</sup> Source: [www.cgi.com](http://www.cgi.com)

<sup>4</sup> Figures derived from the Ohio Administrative Knowledge System (OAKS). FY 2018 figures were from July 1, 2017, to November 27, 2017.

governed network starts with face-to-face gatherings and leadership conferences and extends into professional development programs as well as a mobile social networking platform.<sup>5</sup>

The conferences include regional CIO Executive Summits, such as the Cincinnati CIO Executive Summit. This one-day regional summit is conducted on an annual basis and is open to CIOs by invitation only. The conferences are free to all attendees.

The conferences are planned and controlled by the CIO Executive Summit governing board. Governing board members are leaders in their field who provide strategic direction for the annual summits. The governing board members assist Evanta with the process of identifying relevant topics, speakers, and IT vendor-sponsors for the summits. IT vendors who are interested in sponsoring the summit must be nominated by the CIOs serving on the governing board. Governing board members are not paid. Governing board members attend a networking and planning dinner the evening before the CIO summit and the day-long conference itself.

The role of the chairs of the governing board include inviting speakers, inviting CIOs to attend, inviting other CIOs to join the governing body, nominating key industry partner vendors to participate, and mentoring the content development of the sessions. The chairs act as advisors for the direction of the conference, both the pre-event and the event.

#### *Applicable Laws & Policies*

Ohio Revised Code §102.03(D) states:

No public official or employee shall use or authorize the use of the authority or influence of office or employment to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person's duties.

In Ohio Ethics Commission advisory opinion 2002-02, the commission advised that Ohio Revised Code §102.03(D) and (E) would:

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<sup>5</sup> Source: [www.evanta.com](http://www.evanta.com)

... prohibit a public official or employee from improperly using his position to secure, or improperly soliciting, from a person, the donation of a meal, reception, or open house at a conference of an association of public officials and employees to which he or his public agency belongs, while the official or employee is simultaneously engaged in governmental business or regulatory activity affecting the person.

ODAS policy PUR-001 Ethics states, in part: "... Employees are required to perform their daily activities in a professional and responsible manner to maintain public trust ... Employees must avoid any 'perception of impropriety ...' " Under PUR-001, ODAS has adopted the National Institute of Governmental Purchasing (NIGP) Code of Ethics. The NIGP Code of Ethics states, in part:

... Believes that members of the Institute and its staff should at no time, or under any circumstances, accept directly or indirectly, gifts, gratuities, or other things of value from suppliers, which might influence or appear to influence purchasing decisions ...

... Avoid activities, which would compromise or give the perception of compromising the best interest of the employer ... Never solicit or accept money, loans, credits or prejudicial discounts, gifts, entertainment, favors, or services from your present or potential suppliers which might influence or appear to influence purchasing decisions ... It is the obligation and the responsibility of the buyer, through affiliation with professional organization, to represent that organization in a professional and ethical manner ... A buyer shall not use his position to persuade an individual or firm to provide a benefit to an organization

### **INVESTIGATIVE SUMMARY**

Investigators reviewed records from Evanta regarding the Cincinnati CIO Executive Summit (Summit), which indicated that Stuart Davis served as a governing body co-chair. According to an attorney representing Evanta, the governing body members are "... leaders in their field who provide strategic direction for the annual summits. They assist Evanta with the process of identifying relevant topics, speakers, and vendor-sponsors for the summits."

In an email to a potential Summit sponsor from Aaron Correa, program director for Evanta regarding the Summit, Correa stated, in part:

... Here are some bullet points on the CIO Executive Summit:

- Planned and controlled by the governing body ...
- Sponsoring IT suppliers have to be nominated by CIOs on the governing body ...
- Topics and Speakers are nominated by the CIOs on the governing body ...
- Attending delegates are by-invitation-only and must be CIO or equivalent (or a direct report to the CIO) of companies with annual revenue greater than \$250 million ...

On May 10, 2017, the Office of the Ohio Inspector General obtained a copy of Stuart Davis' state of Ohio email account. Investigators reviewed Davis' account and found that on October 23, 2012, Davis received an email from Correa. In that email Correa stated that he was in the process of scheduling calls with all of the governing body leadership team members to start preliminary discussions for the 2013 Summit. Davis' Outlook calendar revealed that on November 9, 2012, Davis had a conference call with Correa to discuss the preliminary planning of the 2013 Summit.

On December 4, 2012, Correa sent Davis an email that stated, in part:

As a Chair member I wanted to keep you in the loop. Every year, as part of our marketing for the event, we rotate the Chair members to send marketing communications out via proxy email ... The proxy HTML emails are used to communicate and promote the Cincinnati CIO Executive Summit.

For your review I have provided sample HTML emails to give you an idea of some of our marketing campaigns that are sent out on your behalf ...

On February 14, 2013, Correa sent an email to Davis. In that email, Correa stated, in part:

... I had an idea I wanted to float out to you. How would you feel about sending Nola Haug at CGI a note letting her know that you are speaking on the agenda this year, and inviting her to introduce your session ... I know you and Nola go way back ... I am

confident Nola would be honored to introduce you to the stage. I have crafted the below note you could use to invite them to sponsor your session ...

Proposed Note for Nola Haug at CGI ...

I hope you are doing well. I have some great news, the Cincinnati CIO Executive Summit is taking place on June 6<sup>th</sup>, and I have the pleasure of speaking on the agenda. I want to invite you to host my speaking session. It would be great to have you read my bio and introduce me to the stage. I hope you will accept my invitation.

Please connect with Aaron Correa (copied) to discuss the details, as there is a sponsorship affiliated with this session host ...

The Office of the Ohio Inspector General reviewed subpoenaed documents from CGI and found an email sent February 20, 2013, to Nola Haug, vice president of CGI from Stuart Davis' state email account. In that email, Davis stated:

Hey Nola,

Hope this email finds you well. I have a quick request ... I am speaking this year at the Cincinnati CIO Executive Summit. It is June 6<sup>th</sup> and I know you are a past facilitator/presenter. I was hoping you could introduce me and host my session. Let me know if you are willing and available to do so.

Please connect with Aaron Correa to discuss the details. Thanks in advance for considering this request and I look forward to speaking with you soon - srd

On February 26, 2013, Aaron Correa, program director at Evanta sent an email to Haug. Correa stated, in part:

... I enjoyed talking with you today. I am looking forward to working with you and supporting you in hosting Stu's speaking session.

I have attached the sponsorship prospectus for your review. I know it's a large PDF, so go to page 15 and the first blue dot (CIO Executive Summit Tier 1) will give you the price point for the "Session Host" sponsorship. The price is \$37K ...

Haug then forwarded the email to several individuals at CGI, including John Stephan, director, government markets. Less than an hour later, Stephan sent an email to Anthony Pescetti, CGI government relations. In that email, Stephan stated, in part, "... It give you any initial heartburn – a request coming from the state CIO (on gov't email account) for us to sponsor an event?"

On March 28, 2013, Stephan sent an email to Haug. Stephan stated, in part:

... I was thinking about it a little more and had a concern that the host request originated from Stu Davis on his government email. I did some research first and then spoke with Anna (cc'd) because I didn't come up with a black and white answer. Anna is double checking with CGI legal for us to be safe and wanted to make sure I touched base with you ...

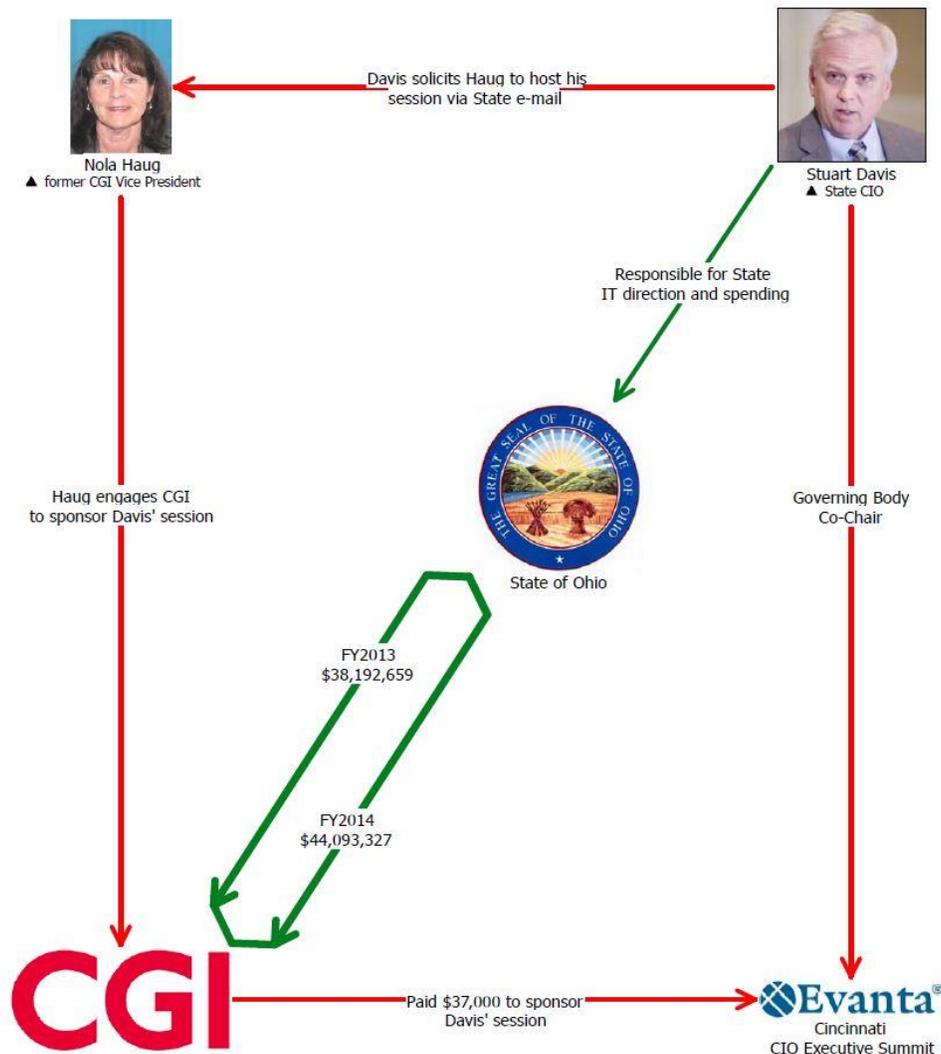
On March 28, 2013, Haug replied to Stephan stating, in part, "... It's considered an honor to be the vendor asked to introduce the CIO. Turning this down would not be the politically correct thing to do."

While investigators reviewed numerous additional emails from CGI in response to the subpoena, the emails were heavily redacted, claiming attorney client privilege.

On April 17, 2013, Evanta issued an invoice #006386 to CGI for the session host sponsorship at the Cincinnati CIO Executive Summit to be held on June 6, 2013. [\(Exhibit 1\)](#) The amount invoiced was \$37,000 and was due May 17, 2013. The invoice stated that this was authorized by Nola Haug.

On May 2, 2013, CGI created a purchase order in the amount of \$37,000 for the Cincinnati CIO Executive Summit – Session Host Sponsorship. [\(Exhibit 2\)](#) On the purchase order, it is noted: "Session Host Sponsorship – Cincinnati CIO Executive Summit – Invoice #006386 – Expedite Payment."

CGI provided the Office of the Ohio Inspector General with payment voucher detail, which showed that on May 13, 2013, CGI paid Evanta \$37,000. The payment subsequently cleared CGI's account on May 20, 2013. [\(Exhibit 3\)](#)



The Office of the Ohio Inspector General requested and reviewed CGI's contract files from ODAS. Investigators reviewed those files and found the following:

- On April 15, 2013, Davis signed, as a reviewer, a memorandum to Ohio Department of Administrative Services Director Robert Blair from Edward Razler, ODAS acquisition analyst. The memorandum stated that the agency (Ohio Department of Job and Family Services) had requested ODAS execute amendment #1 on contract #0A1048, extending

the contract “for two additional state fiscal years ... the maximum duration of this contract will be until June 30, 2015.”

- On June 13, 2013, Stuart Davis signed Director Robert Blair’s name on contract #0A1046 contract amendment number one. This amendment was signed by Haug on June 6, 2013.
- On June 27, 2013, Davis signed, as a reviewer, a memorandum to Director Blair from Razler. The memorandum stated that the agency (Ohio Department of Job and Family Services) requested ODAS to execute amendment #3 on contract #0A1090, allowing for six additional months past the original term of the contract in order to complete all the required tasks. No new tasks were identified. The amendment was signed by Haug on June 26, 2013, and Director Blair on June 27, 2013.

Investigators learned through interviews with several ODAS employees that Director Blair does not sign or review all requests to purchase IT supplies and services. Blair only approves those IT purchases over \$2 million. Davis is responsible for approving all IT purchases from \$500,000 to \$2 million. OIT Enterprise IT Contracting Administrator Eric Glenn is responsible for approving all IT purchases up to \$500,000.

Investigators reviewed all release and permit<sup>6</sup> requests for CGI for the period from January 22, 2013, through July 26, 2013. Investigators identified 13 release and permit requests for CGI totaling \$37,964,526.69 from January 22, 2013, to July 26, 2013, that were either reviewed or approved by Davis.

The Office of the Ohio Inspector General conducted an interview with Nola Haug on September 6, 2017. Haug confirmed that she received the email from Davis on February 20, 2013, asking Haug to introduce and host his speaking session at the Cincinnati CIO Executive Summit. Haug further confirmed that when she received the email from Davis asking her to host his speaking session, CGI was involved in ongoing contracts with the state of Ohio. Haug acknowledged that

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<sup>6</sup> Release and Permit is the waiver that authorizes the agency to seek Controlling Board approval or to make purchases that ODAS cannot make. ODAS’ authority to grant a release and permit is contained in Ohio Revised Code §125.05 and §125.06 and Ohio Administrative Code §123:5-1-03

CGI paid \$37,000 to host Davis' speaking session. Haug stated that she has known Davis for approximately 17 years after meeting him while she was working on OAKS under former Governor Taft.

Haug was asked about the concerns that other employees at CGI had with Davis sending Haug an email from his state email account soliciting her to host his speaking session at the Summit. Haug could not recall any specifics, but told investigators that there must not have been any issues regarding CGI's involvement in the Summit, because had there been, she would not have proceeded with the sponsorship.

Haug was asked about her comment to CGI staff that "... turning this down would not be the politically correct thing to do." Haug stated, "It would be rude. If a state person asks me to do something, if it's not wrong or unethical, I'm going to do it." Haug stated, "... we know anytime the state has an event thing that the vendors have to pay for it ... that's just how it is."

On September 28, 2017, the Office of the Ohio Inspector General conducted an interview with Stuart Davis. In explaining his job duties as CIO, Davis stated that he was "... pretty much accountable and responsible for everything that's IT, even if I own it or not ..." Davis stated, "... if there are issues going on I elevate and escalate to the governor's office and to my director..." Davis noted that, since 2012, a major project of ODAS OIT has been the IT optimization and consolidation. Davis added that in his position, "... it's really defining the strategic direction of IT for the state ... and trying to get the agencies to align to that ... ." Davis confirmed to investigators that he is authorized to approve contracts and contract amendments up to \$2 million.

Davis confirmed with investigators that he has served on the governing board and as co-chair for the Summit. Davis explained that when he started as CIO for ODAS OIT in 2011, he was asked to serve on the governing board of the Summit. Davis said the Summit is an opportunity for CIOs in the private sector to "get together" with CIOs in the public sector and discuss issues that are relevant to both sectors. The governing board defines what the topics are to be addressed at the conference. Davis said there are usually two planning phone calls prior to the actual

conference. Evanta coordinates the phone calls and works with the Summit governing board on selecting speakers and organizing the event. Davis said that telephone calls to governing board members typically occur in January. Davis explained that Evanta calls him and advises him of what other board members have recommended as topics for the sessions, and he opines on those recommendations and provides his own recommendations on topics. Davis stated that Evanta "... just organize the meeting and they host it. That's pretty much it." Davis said as a co-chair, he usually "kicks things off," introducing individuals speaking at the Summit. When asked how the cost of the event is covered since there is no registration fee, Davis said he did not know, stating that Evanta would have to answer the question.

Davis admitted that he has signed and/or approved contracts and contract amendments for CGI. Davis said he has participated in meetings regarding CGI's performance on certain projects, specifically the "CORE" project at the Ohio Bureau of Workers' Compensation. Davis stated that this resulted in a review of all of CGI projects and then regularly scheduled meetings to discuss progress on the CGI projects.

Davis was asked if he recalled the email that he sent to Haug on February 20, 2013, from his state email account, soliciting her to sponsor his speaking session at the 2013 Summit. Davis said, "I wouldn't say I was soliciting her to sponsor. I am asking her to introduce me." When asked if that included a sponsorship, Davis replied, "I don't think so, I think they were sponsors at the time." Davis claimed that prior to him soliciting Haug to host his session, CGI was already committed to sponsor the session. Investigators asked Davis if the State was engaged in contracts with CGI at the time he sent the email to Haug. Davis stated, "I'm sure they were ..."

Although Davis claimed that CGI was already committed to sponsor his speaking session prior to him soliciting Haug to host his session, email communications reviewed by investigators revealed otherwise. The email from Correa to Davis on February 14, 2013, clearly stated that, "I [Correa] have crafted the below note you could use to invite them to sponsor your session ..." and goes on to state that "... there is a sponsorship affiliated with this session host ...". Furthermore, in the email Davis sent to Haug on February 20, 2013, Davis clearly asked Haug to "introduce me and host my session." Davis was aware that Correa and Haug would be in contact

with one another to discuss his session because he stated, "Please connect as well with Aaron Correa to discuss details." Davis was asked if he sought any guidance prior to sending the email to Haug. Davis said, "I did not." Davis stated that Director Blair nor anyone else at ODAS was aware that he had sent the email from his state email account to Haug asking her to host his speaking session.

Davis told investigators that he had stayed at the hotel where the Summit was held, but Evanta did not pay for his room. Davis noted that he paid for his hotel room and was later reimbursed. Investigators informed Davis that they had reviewed his financial disclosure statements (FDS) he filed with the Ohio Ethics Commission. Davis was asked why he sometimes listed Summit-related expenses and reimbursements, and sometimes he did not. Davis said there have been some Summits he did not attend and others where he drove to Cincinnati and back to Columbus within the same day. Davis was shown his 2014 FDS form reporting expenditures made in 2013, where he listed \$0.00 for the Cincinnati CIO Executive Summit held on June 6, 2013. Davis stated that he would have to check his records and verify whether he had spent the night or not. Davis told investigators that he did not believe he had stayed overnight since he did not report it. Investigators informed Davis that state reimbursement records reviewed indicate that he did not seek reimbursement from the state for the 2013 Summit. However, investigators noted to Davis that records reviewed from the Cincinnati Westin Hotel indicate that he did have a room for one night, June 5, 2013. Davis said that he could go back in his records to determine whether he had paid for his room but didn't seek reimbursement. Discover Card records subpoenaed and reviewed by investigators revealed that Davis' Discover Card was charged \$359.83 on June 6, 2013, by the Westin Cincinnati. When asked why he would not request reimbursement for the hotel room, Davis responded that he has not requested reimbursement for a number of his travel expenditures in the past because of the "duration it takes." Davis noted that is why he has not submitted mileage for reimbursement when traveling to the Summit.

Investigators reviewed various records, including but not limited to, email correspondence, calendar entries, release and permit documentation, and vendor payments to determine whether Davis was "simultaneously engaged in governmental business or activity affecting CGI," when he solicited Haug to host his speaking session at the 2013 Cincinnati CIO Executive Summit. As

result of this review, investigators established a timeline of events occurring between late 2012 to mid-2013. This timeline is not intended to be an exhaustive list of Davis' interactions with either CGI personnel or in dealing with CGI-related issues during the late 2012 to mid-2013 timeframe; however, it serves to demonstrate that Davis was engaged with CGI-related issues during a period of time surrounding both the solicitation of and payment for the session hosting, as well as the actual conference. In addition, investigators also noted that Davis' history of involvement with CGI-related issues both predates and extends beyond the timeframe of late 2012 to mid-2013. The link below is directed to an electronic version of the timeline:

[http://watchdog.ohio.gov/Portals/0/pdf/exhibits/17\\_014/TimelineNov2012-July2013.pdf](http://watchdog.ohio.gov/Portals/0/pdf/exhibits/17_014/TimelineNov2012-July2013.pdf)

## **CONCLUSION**

The investigation determined that on February 20, 2013, Ohio Department of Administrative Services OIT CIO Stuart Davis sent an email from his state email account soliciting Nola Haug, vice president of CGI to host Davis' speaking session at the 2013 Cincinnati CIO Executive Summit held on June 6, 2013. Davis served on the governing board and as a co-chair for the Cincinnati CIO Executive Summit since he started as the Ohio Department of Administrative Services OIT CIO in 2011. The summits are planned and controlled by the governing board members who assist Evanta, the Summit's organizer, with the process of identifying relevant topics, speakers, and vendor-sponsors for the event. When Davis solicited Haug to host his speaking session, he was simultaneously engaged in approving contracts and contract amendments for CGI. CGI paid Evanta \$37,000 to host Davis' speaking session.

A review conducted by investigators of CGI contract files revealed that Davis signed as a reviewer on two separate memorandums regarding contract amendments for CGI, one on April 15, 2013, and the other on June 27, 2013. Additionally, Davis signed ODAS Director Robert Blair's name on a contract amendment on June 13, 2013. Investigators also reviewed release and permit requests for CGI and found that Davis reviewed or approved 13 release and permit requests for CGI totaling \$37,964,526.69 from January 22, 2013, to July 26, 2013.

During an interview with Davis on September 28, 2017, Davis admitted to investigators to signing and/or approving contracts and contract amendments for CGI. Davis stated that he

participated in meetings regarding CGI's performance on certain projects, which resulted in a review of all CGI projects and regularly scheduled meetings to discuss progress on CGI projects. Davis claimed during his interview on September 28, 2017, that he was not "soliciting Haug to sponsor" his speaking session, but was merely "asking her to introduce" him at the Summit. However, both Correa's email to Davis, with a proposed note to Haug at CGI, and Davis' follow-up email to Haug included language indicating more was being requested of CGI than a simple introduction.

Correa's email to Davis on February 14, 2013, mentioned, "inviting her [Nola] to introduce your session," and went on to state, "I have crafted the below note you could use to invite them to sponsor your session." The email ended with, "there is a sponsorship affiliated with this session host." Davis' follow-up email to Haug on February 20, 2013, stated, "I was hoping you could introduce me and host my session." When Davis sent this email to Haug he was aware that a sponsorship was affiliated with hosting his speaking session.

In addition, Davis was also aware that Correa and Haug would be in contact with one another to discuss his session because his email stated, "Please connect as well with Aaron Correa to discuss details." Haug's reply to Davis on February 20, 2013, which cc'd Correa, also stated, "I'll reach out to Aaron in a couple days." And finally, Correa's reply to Haug on the same day, which cc'd Davis, stated, "I look forward to chatting with you [Nola] about this." Moreover, during the interview with Nola Haug conducted on September 6, 2017, Haug was asked about her comment to CGI staff that "... turning this down would not be the politically correct thing to do." Haug stated, "It would be rude ... We know anytime the state has an event thing that the vendors have to pay for it ... that's just how it is."

**Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe that a wrongful act or omission occurred in this instance.**

#### **RECOMMENDATION(S)**

The Office of the Ohio Inspector General makes the following recommendations and asks the director of the Ohio Department of Administrative Services to respond within 60 days with a

plan detailing how the recommendations will be implemented. The Ohio Department of Administrative Services should:

1. Review the conduct of ODAS employees to determine if administrative action is warranted.
2. Consider providing ODAS employees with additional ethics training.

### **REFERRALS**

This report of investigation will be provided to the Franklin County Prosecutor's Office, the City of Columbus Prosecuting Attorney's Office and the Ohio Ethics Commission for review and consideration.



STATE OF OHIO  
**OFFICE OF THE INSPECTOR GENERAL**

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RANDALL J. MEYER, INSPECTOR GENERAL

**NAME OF REPORT: Ohio Department of Administrative Services**

**FILE ID #: 2017-CA00014A**

**KEEPER OF RECORDS CERTIFICATION**

**This is a true and correct copy of the report which is required to be prepared by the Office of the Ohio Inspector General pursuant to Section 121.42 of the Ohio Revised Code.**

**Jill Jones**  
**KEEPER OF RECORDS**

**CERTIFIED**  
**December 7, 2017**

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