

# AURORA ETHICS OMNIBUS ORDINANCE

**STRENGTHENING TRANSPARENCY, ACCOUNTABILITY, AND INTEGRITY**

**JANUARY 6, 2026**



# KEY REFORMS (OVERVIEW)

More thorough  
disclosures of Economic  
Interests & Campaign  
Finances

Campaign Contribution  
Limits & Regulations

Regulation of Lobbyists

# KEY IMPACTED PARTIES

Those that currently do business with the city

Those who want to do business with the city

Lobbyists

## CAMPAIGN CONTRIBUTIONS (SECS. 15-320 TO 15-322)

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-  Stricter local limits on top of state law
-  \$1500 cap from entities doing or seeking City business and from lobbyists/clients/vendors
-  Treats affiliates and reimbursements as one donor
-  No anonymous or pass-through donations
-  Penalties and disqualification of doing business with the city for violation

## **WHO'S COVERED AND WHEN?**

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**“Covered person”** definition tied to state law and **when a person becomes a candidate** (circulating petitions, or upon receipt of first campaign or PAC contribution.)

**Initial disclosure due within 15 days** of becoming “covered.”

## WHAT'S NEW VS. 2019

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Area	2019 Approach	Proposed Update
Financial disclosures	Narrower content; older cadence	Broader content (outside employment, real estate, entity ownership, city-funded org leadership, gifts/loan forgiveness >\$150) with annual e-filing by Jan 31 + penalties and public online access
Campaign finance	Higher Flexibility	\$1500 annual cap for entities doing/seeking business; no anonymous/pass-through donations; aggregates affiliates; 4-year "no business" ban for violations
Lobbyists	Limited specificity	Ban on direct/in-kind contributions by lobbyists/5%+ owners; violation triggers 4-year ban on City business

## CITY OF AURORA ETHICS ORDINANCE VS. STATE OF ILLINOIS

Category	City of Aurora – Proposed Ordinance (2025)	State of Illinois – Campaign Disclosure Act (2025)
Contribution Limits	\$1500 per contributor; \$150 cash cap; aggregated entities limited.	\$7,300 individual; \$14,600 corporations; \$72,800 PACs.
Contractor & Lobbyist Restrictions	No >\$500 from entities doing business with City; lobbyist contributions restricted.	Bans contributions from contractors with >\$50,000 contracts; no solicitation on state property.
Cash & Anonymous Donations	This has been removed from City ordinance	Anonymous donations prohibited; aggregate under \$150 as non-itemized.
Economic Interest Disclosures	Expanded to include spouse/children holdings; annual e-filing by Jan 31; public portal.	Filed annually; discloses income sources, ownerships, creditors.
Candidate Definition / Filing	Starts when petitions circulate; file within 15 days.	Threshold: \$5,000 receipts/expenditures; D-1 within 10 days.
Reporting Frequency	Annual e-filing; updates within 15 days of changes.	Quarterly D-2 reports; A-1 and B-1 for large contributions/expenditures.
Public Access / Transparency	Online public portal for filings; penalties for false/late reports.	State website lists filings; fines for late or incomplete reports.
Use of Property & Seal	No chance to current City ordinance.	No fundraising on state property; "paid for by" disclosure required.
Enforcement & Penalties	Ethics Commission enforcement; public posting of violations; fines.	Civil penalties up to 150% of excess; fines for late filings.
Purpose & Intent	Enhance transparency, close loopholes, safeguard resources.	Ensure campaign finance disclosure and public trust.

## ETHICS ORDINANCE COMPARISON: AURORA, CHICAGO, EVANSTON, OAK PARK

Category	Aurora (Proposed 2025)	Chicago	Evanston	Oak Park
Oversight Body	DuPage Board of Ethics (due to IGA)	Board of Ethics	Board of Ethics	Village Ethics Committee
Who is Covered	Officials, employees, lobbyists	All employees, vendors, lobbyists	Officials, appointees, employees	Officers, senior staff, select employees
Gift Limit	\$75 for food/refreshments per day; \$100 aggregate annual limit from one prohibited source (unless SOEEA raises it).	\$50 per source per year (cap); no gift may exceed \$50 unless explicitly excepted.	\$100 limit per gift from prohibited source.	\$50 limit per gift from prohibited source.
Real Estate Disclosure	Within 1.5 miles of city (planning jurisdiction)	State form only	Within city limits	All property in Oak Park (except home)
Business Disclosure	>\$2,500 income or ownership	All doing business with city	Any business with City >1%	>5% ownership or >\$500 income
Campaign Limits	\$1,500 per person per candidate per election cycle, including affiliated entities (parent companies, subsidiaries, or reimbursed employees). Cash contributions must be itemized if over \$150.	\$1,500 per person to any City official or candidate per election cycle (much stricter than the State's \$7,300 limit). PACs limited to \$3,000, and lobbyists may not contribute at all.	Follows State of Illinois Election Code; no local monetary limits, but prohibits fundraising or solicitation on City property or during compensated time.	No local campaign finance limits; relies entirely on state campaign finance law (10 ILCS 5/9-8.5).
Public Access	Online searchable portal maintained by City Clerk	Board of Ethics database	City Clerk public access	Village Clerk records (partial public)

# ETHICS ORDINANCE COMPARISON: AURORA, CHICAGO, EVANSTON, OAK PARK CONT'D

Element	Aurora (Proposed 2025)	Chicago	Evanston	Oak Park
Overall Limit per Donor	\$1500 per person per candidate if doing business with the city; \$150+ itemized/reported	\$1,500 per person; \$3,000 PAC; lobbyist ban	Follows state law; no local monetary limits	No local limits; state law applies
Lobbyist Restrictions	No donations to Elected from lobbyists or vendors	Lobbyists banned from contributing to any City official	Must comply with state registration; no contributions tied to city duties	No explicit lobbyist rules
Prohibited Sources	Anyone seeking/doing business with City limited to \$1,500	Vendors, contractors, lobbyists capped at \$1,500	Broadly defined; no contribution caps	Covered under general ethics provisions only
Solicitation Rules	No solicitation or fundraising on City property or paid time	Same; also bans use of official titles for fundraising	Same as Aurora; no campaign activity on City property	Defaults to state restrictions
Anonymous/Cash Contributions	Same as state law	Anonymous banned; cash >\$25 received	Same as state law	Same as state law
Enforcement & Penalties	Ethics Commission/Board of Ethics enforces; fines and public posting	Board of Ethics; fines up to \$5,000	Board of Ethics; reprimand or removal	Village Board; referrals to State Board of Elections
Public Transparency	Local disclosure portal; frequent updates	Board of Ethics public database	City Clerk maintains public filings	Village Clerk public records for 5 years

## DISCLOSURE OF ECONOMIC INTERESTS (SEC. 2-185)

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- Broader disclosures
  - **Outside employment** and whether that employer receives City funds/contracts
  - **Real estate in Aurora/1.5-mile area** (incl. household & Immediate Family)
  - **Entity ownership / >\$2,500 income** from entities in or doing business with the City
  - **City-funded organizations** where you or spouse serve as officer/board/trustee
  - **Annual e-filing due Jan 31; initial filing within 15 days** when newly covered; **public portal posting; penalties** for late/false filings
- Public Online Transparency
- Penalties for late, incomplete, or false reporting



## STATE DISCLOSURES

#	State Disclosure Question	Purpose / What It Covers
1	Sources of Income	List each entity from which you derived income over \$1,200 during the previous year.
2	Ownership Interests	List any entity where you or your spouse/dependents own more than \$5,000 or over 10% interest.
3	Creditors / Debts	List creditors owed over \$5,000, excluding your primary home mortgage.
4	Real Property	List real property other than your residence in which you hold an ownership interest.
5	Professional or Business Relationships	List entities regulated by or doing business with your unit of government from which you earned over \$1,200.
6	Gifts / Honoraria	List any gifts or loans over \$500 received from non-relatives during the previous year.

# REGULATION OF LOBBYISTS (SEC. 15-321)

Lobbyists and entities with ownership interests >5% prohibited from direct or in-kind contributions to City officers, candidates, or committees

Four-year ban on doing business with the City for violations

## EXAMPLES

Contributor Type	Allowed?	Limit / Condition
Individual Resident or Voter who does not have or is perusing a city contract wants to make a \$1000 donation	<input checked="" type="checkbox"/> Yes	Yes, this is allowed
Local Business / Corporation (not doing City business) wants to make a \$900 contribution	<input checked="" type="checkbox"/> Yes	Yes, this is allowed
Entity Doing Business with City	 Limited	Max \$1,500 total per year; includes contracts >\$5,000
Entity Seeking to Do Business with City	 Limited	Max \$1,500 within 6 months before/after application
Lobbyist / Entity Owned >5% by Lobbyist	 No	Completely prohibited from contributing
Employee / Partner of City Contractor	 Limited	Counted with company if reimbursed; \$1,500 limit applies
PAC or Political Committee wants to donate \$300	<input checked="" type="checkbox"/> Yes	Must be registered and disclosed.
Anonymous or Straw Donors	 No	Prohibited; must refund or donate within 10 days
Cash Contributions	<input checked="" type="checkbox"/> Yes	Allowed; >\$150 must be itemized and disclosed per state law

# ANTICIPATED IMPACTS

- Enhances transparency and accountability
- Increases disclosures and decreases quarterly to annually
- Provides residents with accessible online disclosure data
- Establishes enforceable, fair contribution rules
- Safeguards taxpayer-funded resources from political misuse

# DESIRED ACTION

- **Request:** That the City of the Whole Committee recommend approval of the proposed ordinance to the City Council