

# 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 change 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 receipted                  | 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 | ✔ Yes     | Yes, this is allowed  |
| Local Business / Corporation (not doing City business) wants to make a \$900 contribution                     | ✔ 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  | ✔ Yes     | Must be registered and disclosed.                             |
| Anonymous or Straw Donors   | ❌ No      | Prohibited; must refund or donate within 10 days              |
| Cash Contributions  | ✔ 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