

The Discriminatory Enforcement of Illinois' Crime-Free and Nuisance Property Ordinances

March 2025



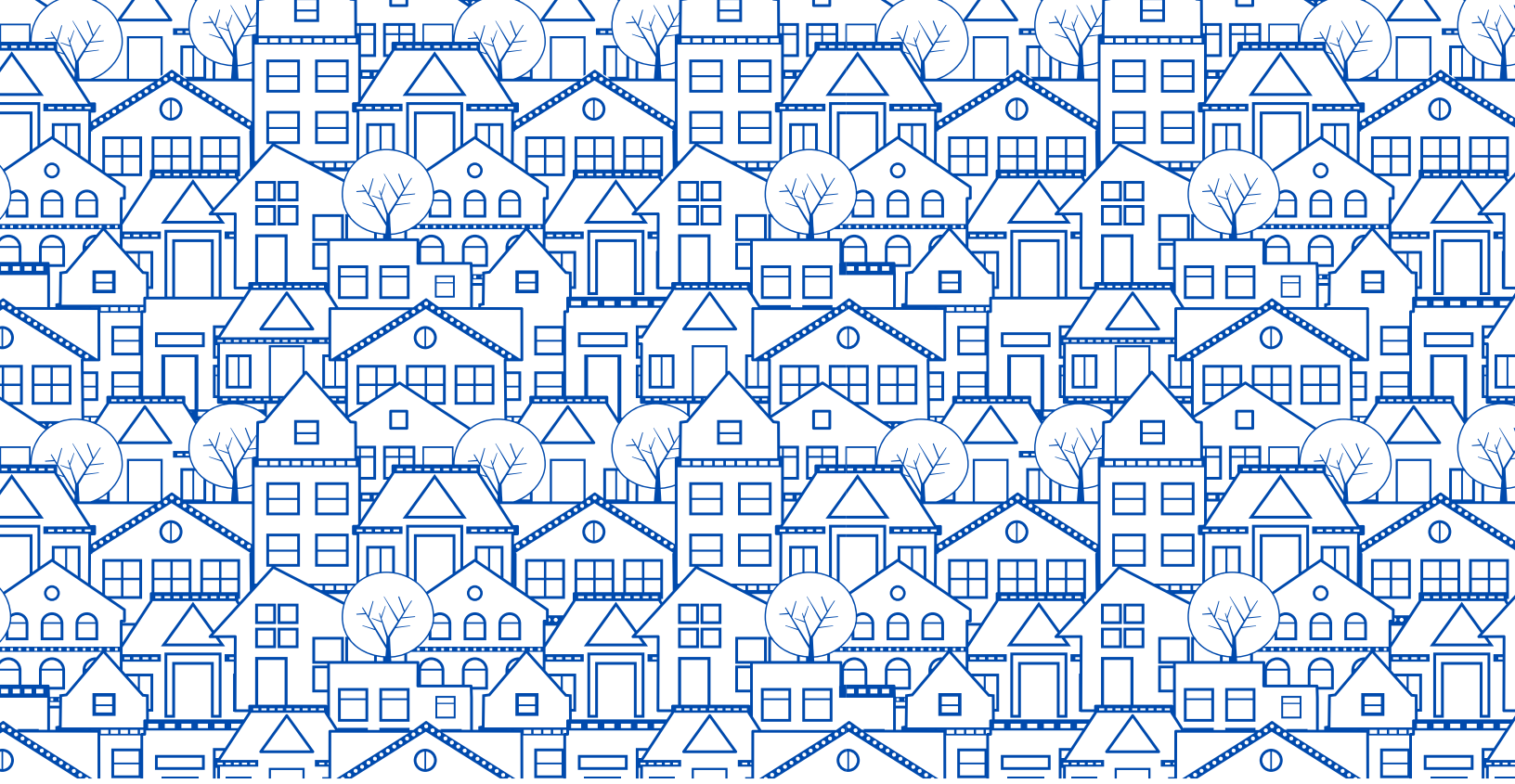


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Introduction



Community Safety Through Stable Homes Coalition : The authors of this report are members of Community Safety Through Stable Homes Coalition (“the Coalition”), a group of grassroots, fair housing advocacy, victim service provider, and legal aid organizations from across the state that seeks to end the harmful enforcement of these ordinances.

So-called "Crime-Free Housing Nuisance Ordinances" (CFNOs) forces landlords to evict tenants -and even entire families- simply for making 911 and other emergency service calls. These ordinances use fines and other pressure tactics to push property owners into evicting tenants based on minor nuisance complaints or allegations of criminal activity, usually without giving residents the legal protections they are owed, such as due process or a fair hearing in court.

While municipalities claim these ordinances fight crime and keep communities safe, in practice, they do the opposite. CFNOs discourage vulnerable community members from seeking help from emergency services, push families into unstable housing situations, and exclude people of color from housing opportunities.

For more than a decade, advocates in Illinois have worked to limit the harm of these ordinances. Advocates have worked to enact statewide protections for groups most at risk from enforcement, advocating at the local level to stop new CFNOs, and challenged these ordinances in court. Despite these efforts, CFNOs have proliferated across the state.

Although CFNOs purport to create safe, healthy, stable neighborhoods by eliminating the very worst crimes and nuisances from rental properties, in reality, they are used to punish tenants for allegations of minor offenses, effectively denying people their due process rights and the ability to defend themselves. They¹ intimidate people who need to call for emergency services for themselves and/or others.

Through a FOIA investigation, our coalition analyzed CFNO enforcement records, training materials, and existing ordinances across Illinois, and we found:

- Many ordinances violate existing state and federal civil rights laws.
- Enforcement of these ordinances are not effective at lowering crime rates
- CFNOs make communities less safe by penalizing crime victims, creating fear around calling 911, and further destabilizing families in crisis.

This affirms what our coalition, the Biden Administration’s Department of Justice, property owners, private property advocacy organizations, and tenants harmed by CFNOs already knew.

¹ See Max Griswold et. al. *An Evaluation of Crime Free Housing*, The Rand Corporation (2023)

Introduction



Using our analysis of CFNO enforcement data, this report demonstrates:

1. CFNOs do not work as intended, and actually have unintended consequences that are harmful to people of color and marginalized communities.
2. Municipalities violate existing state and federal protections in their enforcement of these ordinances.
3. Illinois has tried to regulate these ordinances, but stronger statewide legislation is needed due to the ongoing impact.

The Coalition’s investigation also explores the ways CFNO enforcement patterns disproportionately harm renters of color. CFNOs are often passed and enforced in municipalities with actual or perceived changes in racial demographics. Many of the municipalities we examined have had significant decreases in the proportion of white residents over the past two decades. For example, as indicated in the chart below: Palatine (-14% decrease), Rolling Meadows (-14% decrease), Elgin (-17% decrease), Aurora (-18% decrease), Addison (-19% decrease), Belleville (-24% decrease), and Park Forest (-34% decrease).² Since people of color are much more likely to rent their homes rather than own them, **when CFNOs are enforced, they disproportionately target non-white communities and maintain racial segregation.**

The Changing Racial Demographics of Illinois Municipalities with High Enforcement of CFNOs



² U.S. Census Bureau, Accessed 2025

Introduction



This report highlights multiple municipalities that are enforcing CFNOs in a way that violates existing state law. In 2015, Public Act 099-0441 was enacted to protect survivors of domestic and sexual violence, as well as people with disabilities against CFNO enforcement. Despite this carve-out and years of advocacy, the Coalition has identified numerous municipalities across the state that continue to enforce CFNOs against these vulnerable groups.

The report also features many municipalities with ordinances that legal experts in our coalition believe are not in compliance with existing state and federal civil rights laws. For example:

- The Illinois Human Rights Act (IHRA) protects Illinois residents from being discriminated against because of their race, sex, order of protection status, nationality, immigration status, disability, and arrest record (including juvenile court records).
- Protections are also afforded to tenants by the federal Fair Housing Act which prohibits housing discrimination because of their race, religion, national origin, sex and gender identity, disability, and family status.³
- Section 603 of the Violence Against Women Act (VAWA) prohibits enforcement of CFNOs against people who contact law enforcement and people who “are a victim or otherwise not at fault” in alleged criminal activity.⁴

Unfortunately, the Coalition’s investigation found that **municipalities continue to actively disregard broad-based civil rights protections - even after years of outreach and training.**

Despite explicit statewide protections, federal laws, and attempts to bring municipalities into compliance, these ordinances continue to defy existing protections. While advocacy and litigation against municipalities have curbed some of the worst CFNO violations of civil rights laws, this resource-intensive process cannot keep up with the pace of discriminatory enforcement taking place across Illinois. Likewise, while state and federal guidance offers advocates persuasive material to convince⁵ municipalities to change their practices, without vigorous enforcement these guidelines largely go unheeded.

The only real solution to upending the harm caused by these ordinances is for the Illinois General Assembly to use explicit constitutional authority to ban municipalities from enforcing ordinances that punish people from calling the police and that unfairly mandate evictions based on contact with law enforcement.

³ Fair Housing Act, 42 U.S.C. §3601 et seq

⁴ 34 U.S.C. § 12495 (Section 603 applies to municipalities that receive Community Development Block Grant (CDBG) funding)

⁵ Diamond Jones v. Village of Richton Park, No. 23-cv-15802 (N.D. Ill.); HOPE Fair Housing Center v. City of Peoria, No. 1:17-cv-1360 (C.D. Ill.)

Introduction



DISCLAIMER: This data comes from publicly available training materials, documents, and police reports acquired online or through Freedom of Information Act requests. The enforcement notices we received via FOIA include responsive materials from over 15 communities, primarily from 2021 to late 2024. The Coalition chose to primarily focus on 7 municipalities from regions of the state with a reputation of crime-free programs with high enforcement. The Coalition remains concerned with the enforcement of Chicago’s crime-free program but did not gather sufficient data to include an analysis in our report. Public records from previous FOIA requests or other public records in the possession of Coalition members are also included. While this investigation aimed to collect all available information related to crime free enforcement in the municipalities analyzed, it is not a complete record of an estimated 145 or more crime free and nuisance ordinances and programs across Illinois.

CFNOs Do Not Work as Intended

Basing CFNO Enforcement Solely on Arrests Harms Communities of Color

It is well documented that people of color are overrepresented in the criminal legal system and are significantly more likely to face eviction. As a result, the disparities in these systems are likewise reflected in CFNO enforcement.

Many crime-free programs from around the state enforce their ordinances and mandate evictions based on arrests alone, without additional corroboration or convictions. By brandishing an entire family as criminal before anyone has gone through our criminal legal system, CFNOs compound the over-policing of people of color and risk evicting people who have not been involved in any harmful activity. Even if the allegations or charges against a person are dropped, they still have an eviction record and cannot return home. Recognizing that an arrest alone should not be the reason to deny someone housing, in 2021, the Illinois General Assembly added arrest status as a protected class under the IHRA through SB 1480.

⁶ Jenna Prochaska, *Breaking Free from “Crime Free” State-Level Responses to Harmful Housing Ordinances*, Lewis & Clark Law Review Vol. 27 No. 1, 275-276 (2023) (citing the disproportionate arrests and incarcerations rates of Black and Hispanic/ Latino Americans which cannot be explained by a difference in the criminality between racial groups).

CFNOs Do Not Work as Intended



Example: Palatine’s ordinance is frequently triggered by an arrest on or near the property. But while their enforcement documents indicate the arrest, there is no corroborating evidence of wrongdoing or a probationary period to see whether the incident resulted in a conviction. Out of the 51 enforcement incidents from November 2022 to August 2024, not a single one was triggered by anything more substantial than an arrest. Belleville, too, uses arrests to trigger enforcement of their ordinance - often the very day that an individual is arrested at or near the property.

Other municipalities enforce their CFNOs based on an arrest anywhere within the municipality. For example, Orland Park sends enforcement notices within a day or two of the alleged incident anywhere within the Village, leaving no time for further investigation or corroboration.

DeKalb’s ordinance explicitly does not require a conviction to trigger CFNO enforcement. The CFNO requires a landlord to pursue an eviction or risk fines if their tenant is arrested or if the authorities merely suspect criminal activity. Despite a warning from area-civil rights, fair housing, and realty groups that this provision violates the IHRA protection based on arrest records, DeKalb amended its ordinance with this provision in 2022 and continues to enforce this provision.

CFNO Enforcement Triggers Evictions With Minimal Safeguards or Procedures

CFNO enforcement often results in a lease termination or an eviction without the adequate due process that would allow for the tenant to contest the CFNO enforcement. When a landlord files an eviction, tenants have the right to a set of due process rights and protections, including regulated notices and civil court proceedings. The gravity of losing your home prompts the due process protections of the 14th amendment of the US Constitution, which guarantees adequate procedures and an opportunity to be heard. Due process protections for eviction proceedings are crucial not only because people may lose their homes, but also because an eviction filing can have long-term consequences. Once filed, an eviction record can follow a person for life, making it harder to secure housing in the future.

From: [REDACTED]
Sent: Monday, [REDACTED] 2023 4:58 PM
To: [REDACTED]
Subject: Nuisance Property
Attachments: [REDACTED] Redacted.pdf, Nuisance Property [REDACTED]

Good afternoon,

On [REDACTED] 2023, a tenant who resides at [REDACTED] reported her parking pass was stolen from her vehicle. The parking pass was found in [REDACTED] vehicle. [REDACTED] advised that he found the parking pass on the ground and decided to keep the parking pass instead of turning it in to management. He was arrested for theft.

I have sent you the nuisance property paperwork along with the police report for your review.

I can be reached by phone if you have any questions.

Once your office decides how it will proceed on this nuisance property complaint, please email me back the response form.

Enjoy your evening,

[REDACTED]
Director of the Crime Free Housing Bureau
City of DeKalb
[REDACTED]

*DeKalb Enforcement Notice Based on
Arrest for Theft*

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See Health Affs., *Eviction and Health: A Vicious Cycle Exacerbated by a Pandemic*, at supp. Exhibit 1 (Apr. 2021) (documenting other harms associated with evictions like long last health consequences, lower life expectancy, and the increase of economic instability)

CFNOs Do Not Work as Intended



Unlike evictions between a landlord and tenant, **a CFNO's triggering event and subsequent enforcement cause formal or informal evictions without adequate procedure and sometimes without any due process at all.** Some CFNOs have no formal or informal hearing process. Others have a process that only notifies the landlord. As a result, the tenant only knows that their lease termination is because of the municipality's CFNO if their landlord chooses to tell them.

Example: Aurora has a formal administrative hearings process but not a requirement to send the enforcement notice, or “administrative citation,” to the tenant. Aurora reported 24 enforcement incidents from January 2021 to September 2024, but in only 2 instances did a tenant appear at the administrative hearing. The small number of tenants participating may be the result of the city's failure to notify tenants about the hearing itself.

Other municipalities fail to include administrative processes at all. Before Diamond Jones filed a federal lawsuit, Richton Park had no appeal procedure and did not notify the tenant when there was an enforcement action against them.⁸ Ms. Jones experienced this firsthand when she found out from her landlord that the city believed she was in violation of their crime-free ordinance because she called the police for help and to report a crime. When she tried to contact the Village and explain the misunderstanding, there was no process to contest the action against her.

Example: Rolling Meadows offers no formal or informal hearing process for tenants targeted by the crime-free program in their ordinance. Without any administrative check or procedure, enforcement records show Rolling Meadows enforcement has become more aggressive. Up until the spring of 2023, enforcement actions include either a recommendation to begin eviction proceedings or a mandate. By May of 2023, however, every enforcement action mandated the landlord to evict their tenants, including crime victims.

Palatine has also enforced their CFNO with little to no consistent due process. In 2017, Gail Diop was notified by her landlord that she and her family needed to move because the police had arrested her son. Ms. Diop knew that her son's friend, not her son, was arrested; she went to the police station to clarify the misunderstanding. Even after providing a notarized statement that her son had not been arrested, her landlord issued her a 10-day notice to leave the apartment because the municipality accused her son's friend of being a resident in her apartment. After one last appeal to the police department in the Spring of 2018, the coordinator for Palatine's Crime-Free Program mandated Ms. Diop's landlord evict her. Shortly afterwards, she filed a lawsuit and Palatine amended its Crime-Free ordinance that limited the scope of nuisance violations in order to moot the case and settle with Ms. Diop without eliminating their program. Recent enforcement records show that Palatine continues to enforce its ordinance vigorously as described elsewhere in this report

⁸ *Lawsuit Challenges Richton Park's "Crime-Free" Housing Ordinance*, Chicago Lawyers' Committee for Civil Rights (Nov. 9, 2023) <https://www.clccrul.org/press/lawsuit-challenges-richton-parks-crime-free-housing-ordinancenbsp>

CFNOs Do Not Work as Intended



The failure to provide a consistent procedure or any process at all means that a tenant's ability to avoid an eviction being filed against them has no procedural safeguards. **Without any checks or balances, CFNOs are enforced in inaccurate, unjust, or illegal ways.**

CFNO Enforcement for Small or Minor Offenses

Many incidents unrelated to health and safety trigger CFNO enforcement and put tenants at risk of losing their homes. For example, in Addison, one citation was issued for a complaint to police about a backyard party that included “DJ, tenants, and children playing.” Another citation issued in Addison was triggered by a gathering with food and music that did not acquire a city permit.

In 2019, Belleville required the eviction of an entire family because the landlord rented to the family before acquiring an occupancy permit. In February 2024, enforcement notices were issued in Dekalb for a “disorderly house” and a “false report to 911” after a child began playing with a phone and called 911.

While a local government can justifiably regulate these activities, evicting entire families for these allegations does not address the root of the issue. Instead, forcing tenants from homes can exacerbate existing issues and add to community instability.

Many CFNOs require landlords to include a mandatory lease addendum in all rental properties.

Mandatory lease addendums required by CFNOs often include overly broad and irrelevant provisions. For example, the lease addendum in Collinsville that was on the city’s website until January 2025 includes a checklist requiring tenants to disclose and explain personal questions including whether they have ever been arrested, in a gang, a petitioner in bankruptcy court, involved in any criminal activity, or moved because of problems with a landlord or another tenant.

A back-up officer was requested and Sergeant [REDACTED] arrived on scene.

I observed a large outdoor tent party with live music- DJ and a lot of chatter, laughter, and dancing. Children were observed running around and screaming as they played.

Sgt. [REDACTED] and I arrived at the party and were approached by a male subject who identified himself as the resident and in charge of said party. The subject provided me with an Illinois identification card identifying him as [REDACTED]. [REDACTED] was advised that the music and noise were raucous and he [REDACTED]. I advised [REDACTED] that due to him being previously warned, a citation would be issued at this time.

An emergency call was dispatched and I advised [REDACTED] that I would leave and return with the citation. Sgt. [REDACTED] repeated to him the same.

After clearing the emergency call, I returned to the scene and provided [REDACTED] with a Village of Addison adjudication citation ([REDACTED]) for Noise Violation.

[REDACTED] was upset that a citation was issued even though he complied by turning the music down [REDACTED] was advised that he was previously warned and was told he would be cited today.

An e-mail was sent to Ofc. [REDACTED] with this incident.

Addison Police Report of a Backyard Party that Resulted in a CFNO Enforcement Notice

REPORTING OFFICER NARRATIVE		
alb Police Department		OCA [REDACTED]
Victim	Offense UNFOUNDED 911 CALL	Date / Time Reported [REDACTED] 2024 [REDACTED]
THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY		

On [REDACTED] 24, I, Ofc. [REDACTED] responded to a report of an unfounded 911 call at [REDACTED]. The following is a summary of events and not verbatim. I did not review my BWC.

Police received a 911 hang up that was tracked to [REDACTED]. Since [REDACTED] 23, there have been 13 calls for service generated at this address for 911-hang ups. Several of those calls involve multiple hang ups on the same date. On some of the calls, officers made contact with [REDACTED]. On those occasions, [REDACTED] told officers that a child was playing with the phone. Officers told [REDACTED] to prevent the children from calling 911 without cause.

The issue was not solved by [REDACTED] and the unfounded calls continued. I told [REDACTED] that the calls were a misuse of police resources. I issued [REDACTED] with a mail-in citation for disorderly house. I informed her of the mandatory city hearing date. She signed the citation and was given a copy.

DeKalb Police Report for Excessive 911 Calls that Resulted in a CFNO Enforcement Notice

CFNOs Do Not Work as Intended



The Park Forest lease addendum allows the municipality to enforce its crime-free ordinance for “any criminal activity of behavior in the village limits of Park Forest.” In some cases, children were arrested off of the property but within the city limits and the entire household was evicted. In four enforcement incidents from 2021-2023, DUI citations somewhere within the municipality triggered enforcement.

Have you or anyone, regardless of age, who will be residing with you ever:

	YES	NO
Been arrested, cited, prosecuted, plead guilty to or been convicted of any crime?	()	()
Been placed on probation, parole, or effected by the Megan Laws?	()	()
Been in a gang, or currently a member of a gang?	()	()
Been involved in or currently involved in any illegal activities?	()	()
Been evicted or had a forcible detainer filed against you?	()	()
Been a petitioner in a case at bankruptcy court?	()	()
Had a warrant or do you currently have a warrant for your arrest?	()	()
Moved to avoid eviction or because of problems with a tenant or landlord?	()	()

Excerpt from Collinsville Crime-Free Lease Addendum

Alarming and Extreme CFNO Training Materials

Training materials used to enforce CFNOs expose the discriminatory intent and flawed reasoning behind these programs. Documents obtained from multiple Illinois municipalities reveal offensive content portraying renters, particularly those in subsidized housing, as inherently suspicious or criminal. Training slides from Hazel Crest, Skokie, and Elgin describe renters as "predators" and "criminals like weeds," reinforcing dangerous stereotypes that justify surveillance and eviction policies tied to the biases of the criminal legal system.

For example, Village of Niles’ training materials advise landlords to be cautious in screening Housing Choice Voucher holders (referring to “Section 8 applicants” in a disparaging tone), implying that discrimination should be done subtly to avoid lawsuits. These problematic narratives promote racialized fear and encourage the disproportionate targeting of renters of color under the guise of public safety.

2. Tenant or any member of Tenant’s household shall not:
 - A. Engage in or anyway be involved in any criminal activity or behavior in the village limits of Park Forest.
 - B. Engage in any act intended to facilitate or that does facilitate criminal activity in the Village limits of Park Forest.

Excerpt from Park Forest Crime-Free Lease Addendum

Unintended Harms Violate Existing Illinois and Federal Law

CFNO Enforcement Endangers Survivors of Domestic and Gender-based Violence

Many municipalities amended their ordinances to include protections for domestic and sexual violence survivors in accordance with PA 99-441. However, **even in municipalities that have codified these protections, domestic and sexual violence continues to trigger CFNO enforcement, prompting citations and evictions that include surviving spouses and children.** For example, Rolling Meadows codified state-wide protections for survivors into their crime-free ordinance on August 4, 2022. However, of the 14 enforcement incidents in Rolling Meadows

Unintended Harms Violate Existing Illinois and Federal Law



in 2023, 8 actions were triggered by a domestic violence incident or order of protection violation. These actions resulted in a notice to begin enforcement proceedings even when they were triggered by a call from the tenant victim to report a non-tenant abuser.

Setting the above municipalities aside, many jurisdictions have not amended their laws to add PA 99-441's protections at all, refusing to even comply with these limited protections. The continued enforcement of these ordinances against survivors, without even a nominal change to their local law, means that more is needed to stop CFNO enforcement against victims. For example, Belleville, which enforces one of the most aggressive crime-free ordinances in Illinois, has never incorporated the statewide protections of PA 99-441 into their CFNO. As a result, the city repeatedly mandated evictions for domestic violence incidents. Between October 2021 and October 2024, nearly half of the over 200 enforcement actions in Belleville were triggered by domestic violence-related calls, often resulting in the eviction of entire households, including survivors.

These practices disregard state protections, federal law, and exacerbate the vulnerabilities of those experiencing violence.

The Illinois Human Rights Act (IHRA) protects against discrimination regardless of whether or not someone has received an order of protection. However, in some municipalities, survivors of domestic or sexual violence are only provided protections in PA 99-441 on the condition that they acquire an order of protection, in violation of the IHRA. Requiring a survivor to obtain a protective order, rather than centering their safety, increases the risk of violence escalating. Survivors should not be held responsible for the actions of their abusers or required to take legal action against them.

Crime Free Multi-Housing Program CONFIRMATION OF ARREST NOTICE

Report Number: [REDACTED]

A report has been filed with the Rolling Meadows Police Department. The following information is provided concerning this report:

Date of Report: [REDACTED] 23 Time of Report: 02:07 AM Type of Report: Arrest
Location: [REDACTED] Type of Charges: Violation of an Order of Protection

Brief description of factual circumstances surrounding incident/arrest:
On the above date and time, Police were contacted by Victim [REDACTED] of [REDACTED]. [REDACTED] stated that she was awakened by an unknown noise and discovered her ex-spouse, Arrestee [REDACTED], in her bedroom. It was learned that [REDACTED] forced entry into the apartment through a screen window. When the police were called, [REDACTED] reportedly forced open another bedroom door, causing damage. [REDACTED] was taken into custody for violating an existing Order of Protection.

Arrested: Yes
Charges: See above
Arrestee: [REDACTED] DOB: [REDACTED]
Address: [REDACTED] Rolling Meadows, IL 60008

Remedy:
Based on the severity of this crime and the application of the Crime Free Lease Addendum, you are instructed to begin abatement proceedings on this resident. Please send me a copy of the Notarized 10-Day Notice (735 ILCS 5/9-20) served to your tenant. Copies of police reports are available through the Freedom of Information Act.

Today's Date: [REDACTED] 2023
Information Released to: [REDACTED]
Released by: Office [REDACTED] #260 (Crime Free Multi-Housing Coordinator)
Address: [REDACTED] Phone: 847-870-9060

Enforcement notice for Gender-Based Violence Incident under Rolling Meadow Crime-Free Multi-Housing Program

In other municipalities, a protective order will not stop the police from enforcing a CFNO against a tenant. In North Chicago, a tenant was attacked by her abuser and called the police. Her abuser was arrested and the tenant received an Order of Protection that same day. Despite being the victim of a violent attack, the North Chicago police contacted the building owner and instructed him that he was required to evict his tenant.

Report Number	Report Date	Case Type
[REDACTED]	[REDACTED] 2023 [REDACTED] PM	DOMESTIC BATTERY
Address [REDACTED] [REDACTED]		
Pursuant to Crime Free Housing ordinance 154.50, any violation of the provision shall be a material and irreparable violation of the Rental Agreement and good cause for immediate termination of tenancy and recovery of the leased premises, (Rental Unit). Action must be taken to remove all occupants from the property permanently.		
See the attached Rental Incident Form or further details.		
Please contact me if there are any questions.		
Sincerely,		
Ofc. [REDACTED] Belleville Police Department 618-355-9782 [REDACTED]@bellevillepolice.org		

Enforcement notice for Gender-Based Violence Incident under Belleville Crime-Free Program

Unintended Harms Violate Existing Illinois and Federal Law



Harming Renters Who Call Emergency Services & Preventing Calls to the Police

CFNOs decrease public safety by enforcing ordinance violations and evictions against tenants who call the police or emergency medical services. They punish victims of crime who seek help. Twenty-nine municipalities in Illinois have specific provisions in their CFNO that punish tenants for ‘excessive calls’ to emergency services. The First Amendment guarantees the right to freedom of speech and to petition the government for redress of grievances, which includes reporting criminal activity and filing a complaint with law enforcement. Restrictions on this activity, such as requiring the eviction of renters who call the police, run afoul of these protections. Likewise, Section 603 of VAWA protects tenants and landlords from being penalized when seeking the assistance of emergency services on behalf of themselves or another person in need of assistance.

Despite these protections, CFNOs continue to evict or threaten tenants whose calls for help are deemed a nuisance. Multiple municipalities we examined still have “excessive” or “unreasonable” calls for service as a prohibited nuisance offense in their ordinance. Other municipalities without explicit call-based provisions continue to enforce against calls for services, often on an ad-hoc basis. Penalizing tenants for calling for help creates an environment of fear around calling the police and other emergency services, deterring survivors of violent crimes and people with disabilities from seeking support and making communities less safe.

In 2023 alone, Palatine reported 17 enforcement incidents under their crime-free program. Of these 17 enforcement incidents, 7 were triggered by “an unreasonably high number of calls for emergency services.” After Ms. Diop testified at the Housing Committee of the Illinois House of Representatives, Palatine amended its ordinance to change the program's name from the “Criminal Nuisance Abatement and Crime-Free Multi-Housing Program” to the “Rental Housing Tenant Protection Program” in December, 2024. Palatine’s amendment also codified the protections in PA 99-441 and increased the number of minors that raised the amount of nuisance violations needed to trigger enforcement from 2 to 4 incidents within a 6 month period. Yet, Palatine failed to repeal the offending provision in their ordinance required by Section 603 of VAWA: an enforcement trigger for “excessive calls for service.” Such contradictions undermine state-wide protections and discourage survivors and others in crisis from seeking help, leaving them to choose between personal safety and stable housing.

Date: [REDACTED] 2024

Village Ordinance Notice

Nuisance Property

This notice is in relation to your property located at: (55 S [REDACTED])
and the Village Of Palatine Code of Ordinance 10-16

Your property has been deemed:

At risk of becoming a nuisance property

A nuisance property

The status of your violation was determined by the following actions:

Action	Report #	Date
Violation of 10-16 (i)(1) - ...2 or more instances of nuisance activity in a 6 month period.	[REDACTED]	[REDACTED]
Violation 10-16(h) ...an unreasonably high number of calls for police service	[REDACTED]	[REDACTED]

The following action is required:
You must respond to this notice within 10 business days to propose a course of action to abate the nuisance activities. The course of action shall be in writing and addressed to the Crime Free Multi-Housing Unit. The information can be emailed to [REDACTED]

Officer: [REDACTED]
Palatine Police Department
Crime Free Multi-Housing Unit
595 N Hicks Road
Palatine, IL 60067

Enforcement for an Unreasonably High Number of Calls to Emergency Services under Palatine’s Crime-Free Program

Unintended Harms Violate Existing Illinois and Federal Law



In 2022, Richton Park enforced its CFNO against a mother named Diamond Jones. When a shooting occurred while Ms. Jones was at work, her mother, who was watching Ms. Jones’ two kids, called the Richton Park Police Department to report the incident. The family then received threats for cooperating with law enforcement and called the police again to notify them. Two days later, shots were fired into Ms. Jones’ house while her mother and children were inside. When the family called the police a third time, the Village enforced its crime-free ordinance against Ms. Jones and her family for “causing an unreasonably high number of calls for police service,” which Ms. Jones only learned about when her landlord gave her a 10-day notice. Ms. Jones filed a federal civil rights lawsuit and the Village immediately removed the call based enforcement language. The lawsuit later settled for \$250,000, but crime victims like Ms. Jones are still threatened by call-based provisions that trigger CFNO enforcement throughout the state.⁹

From the Fall 2021 to Fall 2024, Elgin issued 7 warning letters to landlords, telling them to abate a nuisance at a rental property. However, of these 7 warnings, at least 4 were triggered by calls for service, and at least 1 was triggered by a domestic violence incident. Aurora had 24 enforcement incidents from January 2021 to September 2024, one of which was solely triggered by calls for service. In Elgin and Aurora, even if there is no call-based provision within the ordinance itself, sporadic enforcement triggered by 911 calls can affect tenants' willingness to call emergency services and discourage renters from seeking critical assistance out of fear of eviction or other penalties.

CFNOs that Discriminate Against People with Disabilities

Just as call- based enforcement punishes crime victims and deter calls to the police, CFNOs triggered by calls for medical assistance disproportionately affect people with disabilities, who are more likely to use public emergency services. Additionally, enforcement against tenants living with substance use disorder or experiencing mental health crises unfairly harms tenants because of their disability.

Disability is a protected class under federal and state law. Yet, municipalities continue to enforce CFNOs against tenants because of their disability. For one, call-based provisions in CFNO ordinances where enforcements are triggered by “unreasonable” or “excessive” calls for service disproportionately impact people with physical or mental disabilities. People living with disabilities are far more likely to call emergency services than people without disabilities, and as many as 1 in 10 police-citizen encounters in Illinois in general involve a person with a mental health disability.¹⁰ **Penalizing renters with disabilities for a high number of calls for emergency services either makes people scared to call emergency services and miss out on the care they need or punishes people for getting help.**

⁹ *Settlement Reached in Lawsuit Challenging Richton Park's "Crime-Free" Housing Ordinance*, Chicago Lawyers' Committee for Civil Rights (Jan. 17, 2025) <https://www.clccrul.org/press/settlement-reached-in-lawsuit-challenging-richton-parks-crime-free-housing-ordinance>

¹⁰ Alysson Gatons, *Responding to Individuals Experiencing Mental Health Crises: Police Involved Programs*, Illinois Criminal Justice Information Authority (2018)

Unintended Harms Violate Existing Illinois and Federal Law



In West Chicago, CFNO enforcement was triggered when a mother called 911 because her son was threatening to harm himself. Rather than deescalating, the police arrested the mother's two children. Despite the fact that neither son was charged with any crime, the city ordered their landlord to "abate the nuisance activity," which led to the family's displacement.

Likewise, the police often enforce CFNOs based on behaviors arising solely from someone's disability. In 2017, the Orland Park police department sent enforcement notices to a tenant known to suffer from alcoholism whose substance use disorder resulted in incidents that "would be considered nuisance calls," including a call for an ambulance. Despite noting that the tenant "had been doing much better," Orland Park still threatened her with eviction under their crime-free ordinance.

Incidents reported by Illinois Public Media in 2019 showed that police in Granite City mandated evictions for tenants who were resuscitated by 911 responders from opioid-induced overdose. Despite laws preventing criminal charges in these contexts, 28 of 300 CFNO enforcement letters over 5 years related to such incidents.¹¹ In a 2023 incident, Elgin classified a 911 call requesting assistance for a substance induced overdose as a nuisance and sent a warning letter to the landlord that the property was at risk of violating the municipality's crime-free ordinance.

Discriminatory Impact on Renters of Color

CFNOs target people of color and further residential segregation. In Illinois and nationally, people of color are arrested at far higher rates than white people - even for violations, like those related to substance use, that are committed at similar rates.¹² People of color are often more likely than white people to be renters as opposed to homeowners. By using enforcement criteria that disproportionately affects renters of color, these ordinances compound inequity and level more long-lasting penalties towards communities of color, such as eviction records and poor credit.¹³ **The use of interactions with law enforcement and the fact that CFNOs target renters means that, by design, CFNO enforcement has a discriminatory effect on communities of color.**

Under the Fair Housing Act and the Illinois Human Rights Act, intentional discrimination based on race or a policy with a disparate impact on a certain racial group is explicitly prohibited. Yet, enforcement of crime-free housing policies across Illinois have disproportionately targeted Black and Latinx residents, raising serious concerns about racial discrimination and inequitable treatment. Data from municipalities across the state demonstrates that these policies are being enforced in ways that undermine the principles of fair housing and target communities of color.

¹¹ Mary Hansen, *With Crime Free Rules, Tenants Evicted Over Overdose Calls*, Illinois Public Media (May 10, 2019)

¹² *Highlights by Race/ Ethnicity for 2021 National Survey on Drug Use and Health*, Substance Abuse and Mental Health Service Administration (2021)

¹³ *Guidance on Application of the Fair Housing Act to the Screening of Applicants for Rental Housing*, U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity (April 19, 2024) (detailing the ways that tenant screening companies use of eviction and arrest records has a discriminatory impact)

Unintended Harms Violate Existing Illinois and Federal Law



In Addison, where Latine residents make up around 46% of the population, they account for 78% of all crime-free enforcement incidents documented between January 2021 and September 2024. Similarly, Black residents, who represent only 3% of Addison’s population, accounted for 17% of these enforcement actions. White residents, who make up 41% of the population, faced enforcement in only 5% of cases. This stark disparity suggests that crime-free ordinances are being enforced in a manner that disproportionately penalizes communities of color.

Although not all municipalities provided race data in their enforcement records, the municipalities that did showed similar patterns. In 2014, based on enforcement data where a tenant’s race was identified, 60% of tenants who faced enforcement action from DeKalb’s ordinance were Black, while 36% were White. This is despite DeKalb’s 2014 population being 72.9% White and 15.2% Black. Later FOIA data from DeKalb from 2013-2018 revealed that eviction rates due to crime-free enforcement were far higher in predominantly black neighborhoods than predominantly White neighborhoods.¹⁴

While Belleville’s enforcement data did not include racial demographics, 50% of all renters in Belleville are Black, despite Black residents making up just 32% of the population. This fact, along with vigorous enforcement triggered by arrest and interactions with law enforcement, predictably means that this ordinance targets people of color. This pattern repeats across many municipalities, where enforcement frequently targets residents of color even when there is no evidence of wrongdoing, or the underlying alleged conduct does not result in a conviction. For example, municipalities that penalize tenants for reliance on “excessive calls for service” are likely to disproportionately affect communities of color, who often require more frequent emergency services due to systemic inequities in public safety and social support.¹⁵

CFNO Enforcement Violates State Protections for Juveniles

Despite protections safeguarding the privacy of juvenile arrest records, **CFNOs are regularly enforced against children based on their interactions with the juvenile justice system.** Under Illinois law, juvenile court records are supposed to be treated as confidential and criminal convictions for juveniles are not supposed to carry the same accompanying civil penalties as convictions for adults.¹⁶ Likewise, housing providers cannot discriminate based on a juvenile court record under the IHRA.¹⁷ These protections are in place because the Illinois law recognizes that a young person’s mistakes should not follow them for life. The stigma of a juvenile record can have long lasting impacts on education, employment, and future housing. However, CFNO enforcement violates this confidentiality when police notify landlords that a child in their rental property is involved in juvenile court proceedings.

¹⁴ Letter Entitled *Violations of Illinois Civil Rights Law Arising From the City of DeKalb’s Crime-Free Housing Ordinances* to Attorney General Kwame Raol (May 17, 2023)

¹⁵ Parast, Layla, et al. “Racial/Ethnic Differences in Emergency Department Utilization and Experience.” *Journal of General Internal Medicine*, vol. 37, no. 1, 2022, pp. 49–56. National Center for Biotechnology Information, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8021298/>. Accessed 11 Feb. 2025.

¹⁶ 705 ILCS 405/1-8

¹⁷ 775 ILCS 5/3-102

Unintended Harms Violate Existing Illinois and Federal Law



This violation makes juvenile court records public. Further, CFNO enforcement that causes housing instability interferes with the rehabilitative goals of the juvenile justice system at a time when housing stability is most crucial.

Park Forest reported 74 enforcement incidents from November 2019 to June 2024, including 13 incidents enforced against juveniles. Six of these 13 incidents included an eviction notice against the minor child. Likewise, Aurora documented one incident based on a pending juvenile court action for an alleged offense for a child in the household. Whether these ordinances are separating minors from their families or displacing whole families for a child's mistakes, they violate state law and carry devastating consequences.

200 Lakewood Blvd . Park Forest, IL 60466
708-748-4700 . 708-748-7044 fax

CONFIRMATION OF ARREST – EVICTION REQUIRED

Report Number: [REDACTED]

A report has been filed with the Park Forest Police Department. The following information is provided concerning this report.

Date of Report: [REDACTED] 2022 Time of Report: 8:47 PM Type of Report: Juvenile Arrest
Type of Charges: Residential Burglary

Brief description of factual circumstances surrounding incident/arrest:

On 10/20/22, a juvenile residing at your property located at [REDACTED] was arrested at your residence after fleeing the scene of a Residential Burglary that he had committed in the Ash Street Cooperatives. During this burglary, the juvenile entered an occupied residence and stole items. The juvenile charged with Residential Burglary.

Charges: Residential Burglary
Arrestee: JUVENILE
Address: [REDACTED] Park Forest, IL 60466

Copies of police reports, other than traffic collisions, are only available by Subpoena or by completing a Freedom of Information form. Based on the severity of this crime and the application of the Crime Free Housing Ordinance, you are required of this time to **immediately issue a 10 day notice to terminate the tenant's lease or a 30 day notice if the residents are under the Housing Authority Voucher Program. You must provide me with a copy of this notice given to the tenant(s) no later than [REDACTED] 24.** Keep in mind that the person arrested may live at your property but may not be on the lease agreement.

Today's Date: [REDACTED] 22
Information Released to:
[REDACTED]

Released by:
[REDACTED]

Enforcement Notice of the Park Forest Crime-Free Program Against a Juvenile

CITY OF AURORA ADMINISTRATIVE ORDINANCE HEARING

City of Aurora, a municipal corporation, Petitioner, Case Number(s) [REDACTED]
Address [REDACTED]

Respondent [REDACTED]

Other [REDACTED]

Hearing Officer [REDACTED] Housing Code Clerk [REDACTED] City Attorney [REDACTED]
City Inspector/Zoning Administrator [REDACTED] Deputy City Treasurer [REDACTED] Resp. Attorney [REDACTED]

FINDINGS

Cited violations have been cured; property is now in compliance as to said violations.
 Some or all of the cited violations have not been cured; property is **not** in compliance as to said violation(s).
 Other Findings: **IN JANUARY 2023 A JUVENILE COMMITTED AN OFFENSE WHICH WAS JUST CHARGED; Δ 15% EVICTING TENANTS**

DECISION & ORDER

All Exhibits, Inspection Reports and/or Photographs are admitted and part of the administrative record.
 Matter continued to [REDACTED] 23 for status of repair. **9:30**
 Property Owner shall cure all remaining violations and make a re-inspection appointment with the hearing inspector for verification of compliance within thirty (30) days of the entry of this order.
 Case is CLOSED.
 Final Fees assessed: \$ [REDACTED]
 Order: **STATUS OF EVICTION**

NOTICE

This administrative order is authorized by City of Aurora Ordinance and State of Illinois Statute. You have the right to appeal this decision pursuant to the Illinois Administrative Review Law, 735 ILCS 5/9-101, et seq., by filing a proper lawsuit against the City of Aurora and other necessary parties within 30 days of service of this order. If you fail to pay your fines, the City of Aurora may proceed to collection. Any vehicle impounded will be subject to being disposed of as an unclaimed vehicle after thirty (30) days from the date of this decision.

CERTIFICATE OF SERVICE

I certify that copies of this decision are [REDACTED] sent to the [REDACTED] parties at the above address(es) by first class mail with postage prepaid on [REDACTED] 23. Or given to the [REDACTED] at hearing on [REDACTED] 23.

Date: [REDACTED] 23 Hearing Officer: [REDACTED] (Phone [REDACTED])

Enforcement Notice of the Aurora Crime-Free Program Against a Juvenile

Many Municipalities Falsely Credit CFNOs with Providing Community Safety

In February, 2024 the Coalition first introduced the Community Safety Through Stable Homes Act in the Illinois House and Senate. This act would prohibit local governments and public housing authorities from forcing or encouraging landlords to evict tenants based on alleged criminal or nuisance behavior. We believed then, as we do now, that destabilizing families and endangering survivors of domestic or sexual violence and neighbors with disabilities does not result in safer communities and that a statewide bill is necessary to prevent discrimination and displacement, help people contact emergency services without fear, and put the focus on better responses to crime.

Many Municipalities Falsely Credit CFNOs with Providing Community Safety



The Illinois Municipal League, alongside a number of municipalities, opposed the Coalition's 2024 effort to stop the harm caused by CFNOs by citing their importance and effectiveness in creating safe and stable communities. While many of the municipalities who opposed the bill underestimated the harm caused by the enforcement of their ordinances, others have mistakenly cited their ordinances as part of the reason their communities are safe. Our investigation requested CFNO enforcement data for Naperville,¹⁸ Oak Park, Rockford, Buffalo Grove, Glenview, Oak Brook, Hoffman Estates, and Des Plaines because of their stated opposition to the bill or because they have a crime-free ordinance or a crime-free program.¹⁹ However, all of these communities either said there was no enforceable crime-free ordinance or that the ordinance on the books had not been enforced between 2021 and 2024.

Community safety is understandably a top concern among municipal leaders. Municipalities with robust crime-free programs have pointed to a decrease in the number of calls for emergency services as proof that crime-free programs deter and lessen crimes. However, **reports analyzing crime-free programs in California before the passage of their statewide preemption challenge the fact that CFNOs decrease crime and suggest they either have no effect or slightly increase crime rates.**²⁰

While the policy considerations that contribute to safety and stability are complex, these municipalities should consider the serious harms of these ordinances before advocating that their program is necessary instead of using other available tools to promote community safety. If these communities decided to implement or enforce their ordinances, they would create the same discriminatory and destabilizing patterns we have seen in other communities, contributing to the targeting of renters of color and fear around calling for help.

Naperville's Crime-Free Program Web Page

Naperville's FOIA Denial of any Enforcement of their Crime-Free Program Since 2021

18 Naperville, the 4th most populous city in Illinois, is a long time member of the Illinois Crime Free Association. As part of their advocacy, representatives of Naperville's government opposed the bills trying to curb the harms caused by CFNOs. Yet, in response to enforcement data, Naperville, which has not codified a crime-free ordinance, denied that there had been any enforcement of their city's Crime-Free Program since 2021.

19 The towns of Oak Brook and Hoffman estates as well as the police departments of Naperville, Buffalo Grove, and Des Plaine all slipped to oppose the bills trying to curb the harms caused by CFNOs introduced last year.

20 *Griswold et. al., supra* note 1.

The Need for State Level Action



Over the past few years, scholarship, administrative guidance, and investigations into the civil rights implications of Crime-Free and Nuisance Property Ordinances have consistently pointed out the damage they have caused to people of color, low-income renters, survivors of domestic violence, and people with disabilities. The recent enforcement data highlighted in this report confirms that statewide carve outs, piecemeal investigations, and agency guidance are not enough to curb this unfair use of municipal police power. **Only robust statewide action preventing CFNOs and giving advocates and tenants the ability to defend their rights will keep these harmful ordinances from continuing to displace vulnerable residents, cause discriminatory impacts, and undermine public safety.**

Additional Resources

This report adds to a large set of investigations, scholarships and guidance concerning CFNOs. To learn more, please visit the resources below:

- [Nuisance and Crime-Free Ordinance Initiative](#), National Housing Law Project (December 2024)
- [U.S. Dept. of Justice Guidance on CFNOs](#), United States Department of Justice (August, 2024)
- Jenna Prochaska, [Breaking Free From “Crime Free”: State Level Responses to Harmful Housing Ordinances](#), Lewis and Clark Law Review, Vo. 27, No. 1 (2023)
- Max Griswold et. al. [An Evaluation of Crime Free Housing](#), The Rand Corporation (2023)
- [Guidebook on Fair Housing Applications of Nuisance and Crime-Free Ordinances](#), Illinois Department of Human Rights (January 20, 2023)
- Deborah N. Archer, [The New Housing Segregation: The Jim Crow Effects of Crime-Free Housing Ordinances](#), 118 Mich. L. Rev. 173 (2019)
- [Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Enforcement of Local Nuisance and Crime-Free Housing Ordinances Against Victims of Domestic Violence, Other Crime Victims, and Others Who Require Police or Emergency Services](#), U.S. Department of Housing and Urban Development (September 2016)
- Emily Werth, [The Cost of Being Crime-Free](#), Shriver Center (2013)
- [Assessing Claims of Housing Discrimination against Victims of Domestic Violence under the Fair Housing Act \(FHA\) and the Violence Against Women Act \(VAWA\)](#), U.S. Department of Housing and Urban Development (February 2011)
- Campaign Zero. [Database for Criminal Activity Nuisance Ordinances Campaign](#) [Data set]. Campaign Zero, New York.

Authors



Campaign Zero

Campaign Zero is an activist-led organization dedicated to ending police violence and mass incarceration within this lifetime. We aim to create lasting change by redefining safety beyond policing.

Chicago Coalition to end Homelessness

Chicago Coalition to end Homelessness works to prevent and end homelessness across Chicago and Illinois because housing is a human right.

Chicago Lawyers' Committee for Civil Rights

Chicago Lawyers Committee for Civil Rights works to secure racial equity and economic opportunity for all by providing legal representation through partnerships with the private bar and collaborating with grassroots organizations and other advocacy groups to implement community-based solutions that advance civil rights.

Crime Survivors for Safety and Justice

Crime Survivors for Safety and Justice is a national network of crime survivors joining together to create healing communities and shape public safety policy.

Housing Action Illinois

Housing Action Illinois mobilizes a statewide coalition of more than 190 organizations to end homelessness, increase affordable rental housing, and expand homeownership opportunities.

The Network: Advocating Against Domestic Violence

The Network is a group of 40+ member organizations dedicated to improving the lives of those impacted by gender-based violence through education, public policy and advocacy, and connecting community members with direct service providers. The Network also runs the Illinois Domestic Violence Hotline: 877-863-6338

Open Communities

Open Communities makes our area more welcoming for all by investigating and enforcing fair housing practices, preventing eviction and foreclosure through free housing counseling, and fighting housing discrimination through education and advocacy

The Shriver Center on Poverty Law

The Shriver Center on Poverty Law fights for economic and racial justice through litigation, shaping policy, and training and convening multi-state networks of lawyers, community leaders, and activists nationwide.