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**WHEELING TOWNSHIP**  
**COOK COUNTY, ILLINOIS**

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**ORDINANCE**  
**NUMBER 2025- 06**

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**AN ORDINANCE ESTABLISHING AND ADOPTING A BUILDING ACCESS AND  
VISITOR POLICY FOR WHEELING TOWNSHIP**

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**MARIA ZELLER BRAUER, Township Supervisor**  
**JOANNA GAUZA, Township Clerk**

**JOHN GEIER**  
**LORRIE GRAINAWI**  
**AUSTIN MEJDRICH**  
**SHERI WILLIAMS**  
**Township Trustees**

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**Prepared by ODELSON, MURPHEY, FRAZIER & McGRATH, LTD. - Township Attorneys**  
**3318 West 95th Street - Evergreen Park, Illinois 60805**

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**WHEELING TOWNSHIP**

**ORDINANCE NO. 2025-06**

**AN ORDINANCE ESTABLISHING AND ADOPTING A BUILDING ACCESS AND  
VISITOR POLICY FOR WHEELING TOWNSHIP**

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**WHEREAS**, Wheeling Township, Cook County, Illinois (the “Township”), is a duly organized and existing township and unit of local government created under the provisions of the laws of the State of Illinois, and is operating under the provisions of Illinois’ Township Code, 60 ILCS 1/1-1, *et seq.*, and all laws amendatory thereto; and

**WHEREAS**, the Township Supervisor and the Township Board of Trustees (the “Township Board”) are committed to ensuring the effective administration of government and responsible management of taxpayer dollars; and

**WHEREAS**, the Township Board seeks to establish a policy governing building access in order to maintain a safe and secure working environment, prevent thefts, ensure the security of equipment, protect confidential information, safeguard employee welfare, and avoid potential disturbances; and

**WHEREAS**, the Township Board seeks to establish policies that promote maintaining civility and orderly conduct among all people on township property or at a township event; and

**WHEREAS**, the Township Board finds it to be in the best interest of the Township to establish and adopt a Visitor and Building Access Policy and a Policy on Unauthorized Recording in Client Service Areas in accordance with the requirements of the Illinois Township Code and any other related legal requirements.

**NOW, THEREFORE, BE IT ORDAINED**, by the Supervisor and the Board of Trustees of Wheeling Township, Cook County, Illinois, as follows:

**Section 1:** That the above recitals and legislative findings contained in the preambles to this Ordinance are true and correct and are hereby incorporated into this Ordinance as if fully set forth herein.

**Section 2:** The Township Board hereby establishes, adopts, and approves the Wheeling Township Visitor and Building Access Policy, attached hereto, and incorporated herein as **Exhibit A**, and directs appropriate Township employees and officials to take all actions necessary and proper to implement said policy.

**Section 3:** The Township Board hereby establishes, adopts, and approves the Wheeling Township Policy on Unauthorized Recording in Client Services Areas, attached hereto, and incorporated herein as **Exhibit B**, and directs appropriate Township employees and officials to take all actions necessary and proper to implement said policy.

**Section 4:** The Township Board hereby authorizes the Township Supervisor and the Township Administrator to employ the use of signage for visitors who enter the Township's building(s) and property to have notice of, *inter alia*, restricted access to areas and limitation on making recordings without consent, and to further ensure copies of the Wheeling Township Building Access and Visitor Policy be readily available for members of the public.

**Section 5:** If any section, paragraph, clause, or provision of this Ordinance shall be held invalid, the invalidity thereof shall not affect any other provision of this Ordinance.

**Section 6:** All ordinances, resolutions, motions, or orders in conflict with this Ordinance are hereby repealed to the extent they are inconsistent with this Ordinance.

**Section 7:** This Ordinance shall be in full force and effect upon its passage and approval.

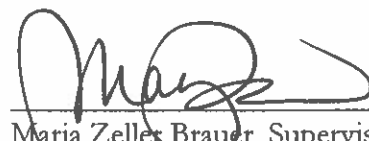
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**ADOPTED** by the Supervisor and Board of Trustees of Wheeling Township, Cook County,  
Illinois this 28<sup>th</sup> day of October 2025, pursuant to a roll call vote, as follows:

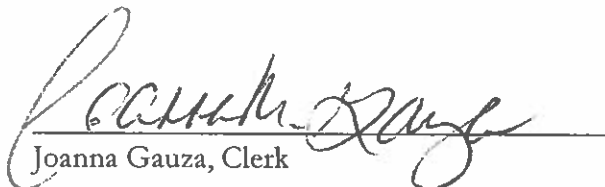
	YES	NO	ABSENT	ABSTAIN
Trustee Geier	✓			
Trustee Grainawi	✓			
Trustee Mejdrich	✓			
Trustee Williams	✓			
Supervisor Zeller Brauer	✓			
<b>TOTAL:</b>	<b>5</b>			

**APPROVED** at a Regular Meeting of the Board of Trustees of Wheeling Township, on  
October 28, 2025.

**APPROVED:**

  
\_\_\_\_\_  
Maria Zeller Brauer, Supervisor

**ATTEST:**

  
\_\_\_\_\_  
Joanna Gauza, Clerk

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**EXHIBIT A**

**WHEELING TOWNSHIP BUILDING ACCESS AND VISITOR POLICY**

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## **WHEELING TOWNSHIP BUILDING ACCESS AND VISITOR POLICY**

### **I. PURPOSE**

Wheeling Township strives to maintain the security of its facilities through strict control of building access. All employees, elected officials, and other appropriate individuals needing regular access to the Township building will be provided with the proper building access. Restricting unauthorized access to visitors helps maintain safety standards, protect against theft, ensure the security of equipment, protect confidential information, safeguard employee welfare, and avoid potential distractions and disturbances.

Public access to areas within enclosed facilities owned, controlled, and/or leased by Wheeling Township may be restricted depending on whether such areas are classified as “designated public forum”, “limited designated public forum”, or “nonpublic forum”.

Certain spaces are intended for the use of Township employees in the conduct of their business in order to help maintain the confidentiality of residents’ personally identifiable information. Other spaces are primarily intended for the use of Township employees in the conduct of their business, but may from time to time be utilized for the convening of public meetings.

### **II. DEFINITIONS**

For purposes of this policy, the following terms have the following definitions:

Township property — Wheeling Township buildings, grounds, Township-owned, controlled, and/or leased property; vehicles used for township purposes; and location used for a township meeting, event, or other township-sponsored event or activity.

Visitor — any individual other than an active township employee or current township official.

Public Forum — Any area that has a long-standing tradition of being used for the general public to access and gather to express ideas and exchange views, and exercise the right to speech.

Limited Public Forum — Any area that is voluntarily created for expressive activity for a specific subject.

Nonpublic Forum — Any area not specifically designated as a public forum or a limited public forum.

### **III. PROCEDURES**

- A. All visitors to the township property, including former employees, employees who are out on any type of leave, and volunteers are required to report to the main entrance, sign in, and receive permission to remain on the Township property. All visitors must sign a visitor’s log. Persons on Township property without permission will be directed to leave, and refusal to comply may be subject to criminal prosecution.
- B. Visitors wishing to use the restroom are required to be escorted by a Township employee to and from the restroom.

- C. Any individual wishing to confer with an employee of the Township should contact the employee directly to make an appointment. Individuals wishing to meet with a Township elected or appointed official may make an appointment directly with the official or by scheduling a meeting with the assistance of a Township employee in a manner prescribed by the Township Administrator.

#### **IV. NONPUBLIC & LIMITED PUBLIC FORUMS**

Public access to areas within enclosed facilities owned, controlled, and leased by the Township may be restricted depending upon whether such areas are classified as “public forum”, “limited public forum”, or “nonpublic forum”. How areas within enclosed facilities owned, controlled, and leased by the Township are classified is based on their intended use. For example, there are certain areas that are intended primarily for the use of Township employees in the conduct of their business; there are certain areas which, while primarily intended for the use of Township employees in the conduct of their business, may from time to time be utilized for the convening of public meetings; there are certain limited areas which may be open to the public while engaging in legitimate business with Township officers or employees; and there may be certain areas which are primarily intended for the convening of public meetings.

The office and conference rooms in the Township are hereby declared to be nonpublic forums unless or until a public meeting is convened, and where such areas would be subject to the Illinois Open Meetings Act, 5 ILCS 120/1, *et seq.* All Township employees’ work areas that are designated by appropriate signage as work areas shall be considered nonpublic forums. All visitors are prohibited from entering Township employee work areas unless they have an appointment and are escorted by a Township employee to such a forum.

All other areas of the Township Building shall be considered limited public forums, and only visitors who are present to engage in public business with the Township officers or employees shall be authorized. A visitor may not be within a nonpublic forum or limited public forum without authorization. An unauthorized person found to be within a nonpublic or limited public forum of the Township building shall be considered a trespasser.

The Township Administrator or his/her designee is hereby authorized to manage public access to enclosed Township-owned, controlled, and/or leased property. In the performance of such responsibilities, the Township Administrator, subject to approval by the Supervisor, shall have the authority to identify which areas are to be considered a designated public forum, limited public forum, or nonpublic forum, if not otherwise stated in this policy.

#### **V. VISITOR CONDUCT**

The Township expects mutual respect, civility, and orderly conduct among all people on township property or at a township event.

##### **A. Audio and Video Recording with the Township**

Audio and/or video recording any person without his/her explicit consent anywhere inside the Township building except during duly noticed public meetings, or as otherwise approved by the Supervisor or his/her designee. Except as otherwise approved by the Supervisor or his/her designee, audio and/or video recording may

only be conducted within the Township Board meeting room if a Township Board or other public meeting is occurring, and any room or office within which said activity has been authorized by law. This Policy shall also be subject to the Wheeling Township's Policy on Unauthorized Recording in Client-Service Areas, as may be amended from time to time and which is incorporated herein by reference.

Any person found to be conducting audio and/or video recording except as authorized herein must cease doing so immediately if any visitor, Township employee, or Township official expresses his/her desire not to be recorded.

This rule does not apply to audio and/or video recording performed by authorized law enforcement personnel engaged in the performance of their official duties. Nor does this rule apply to the Township's ability to maintain and use video security recording devices on its property and otherwise in a manner provided by law.

**B. Audio and Video Recording During a Public Meeting**

Pursuant and subject to the Illinois Open Meetings Act and **Wheeling Township Ordinance Number 2025-04** including as they may be amended from time to time, audio and/or video recording of public meetings must be undertaken in a quiet and orderly manner so as not to interfere with the conduct of the meeting, block the view of any person attending the public meeting, or block any aisle, row, ingress, or egress.

**C. Every visitor of the Township is expected NOT to engage in the following behavior:**

1. Behave in an unsafe manner, or use vulgar or obscene language;
2. Bring any object that can be reasonably considered a weapon, or that looks like a weapon, or any dangerous device, except as permitted by law;
3. Damage or threaten to damage another's property;
4. Violate any federal, Illinois law, or any Township or other local ordinance;
5. Impede, delay, disrupt, or adversely affect any Township function, including conduct which interferes with Township employees or Township officials in the performance of their duties, or interferes with the proper use of the Township facility by others;
6. Engage in abusive or harassing behavior, including the use of obscene language and gestures;
7. Blocking entrances, exits, fire exits, access areas, or otherwise interfering with the provision of services, general public safety, or the use of Township property;
8. Tamper with or unauthorized use of building or facility systems or devices, including electrical, plumbing, locks, doors, or cameras;
9. Pose or affix to Township property without permission from the Township Administrator, or his/her designee, any signs, leaflets, posters, flyers, pamphlets, brochures, and written, pictorial, or graphic material of any kind;



10. Enter upon any portion of Township premises at any time for purposes other than those that are lawful and authorized by the Board;
11. Violate other Township policies or regulations, or a directive from an authorized Township employee or Township Official;
12. Any act which could result in a substantial risk of harm to persons or property.

## **ENFORCEMENT**

- A. If an unauthorized or suspicious individual is observed on or in any Township building or facility, employees should immediately notify their supervisor or, if necessary, call the police immediately.
- B. Any person who engages in conduct prohibited by this policy, or acts in a manner that violates federal, state, or local law (including any other Township ordinance and policy) may be ejected from township property and may be subject to criminal prosecution.

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**EXHIBIT B**

**WHEELING TOWNSHIP'S POLICY ON UNAUTHORIZED RECORDING IN  
CLIENT SERVICE AREAS**

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## **WHEELING TOWNSHIP'S POLICY ON UNAUTHORIZED RECORDING IN CLIENT-SERVICE AREAS**

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### **Purpose**

The purpose of this policy is to protect the privacy, dignity, and confidentiality of individuals receiving general assistance or participating in programs within Wheeling Township facilities. Many township services involve the disclosure of sensitive personal, financial, or medical information of residents. This policy establishes reasonable restrictions on the use of audio and video recording devices in areas where such information may be discussed or observed. This policy applies to all residents, visitors, and employees.

### **Client Service Area**

A client service area is defined as a designated space in which the Township provides its services, outreach, and program support to eligible residents. This includes but is not limited to food pantry offices, the Assessor's Office, general assistance office spaces, private offices, areas where resident private records are kept, or any office/area in which a person would have a reasonable expectation of privacy on the Township property.

### **Visitor Conduct**

The Township expects mutual respect, civility, and orderly conduct among all individuals on Township property.

### **Prohibited Conduct**

Audio and/or video recording any person without his/her explicit consent anywhere inside the Township building except during duly noticed public meetings, or as otherwise approved by the Supervisor or the Administrator. Except as otherwise approved by the Supervisor or the Administrator, audio and/or video recording may only be conducted within the Township Board meeting room if a Township Board or other public meeting is occurring, and any room or office within which said activity has been authorized by law.

Any person found to be conducting audio and/or video recording except as authorized herein must cease doing so immediately if any visitor, Township employee, or Township official expresses his/her desire not to be recorded.

This rule does not apply to audio and/or video recording performed by authorized law enforcement personnel engaged in the performance of their official duties. Nor does this rule apply to the

Township's ability to maintain and use video security recording devices on its property and otherwise in a manner provided by law

The Township specifically prohibits unauthorized audio or video recording in Client Service Areas unless prior consent is obtained from all individuals being recorded. This includes, but is not limited to:

- Making audio or video recordings of meetings, conversations, or interactions with residents or staff
- Taking photographs or videos of residents, staff, or confidential documents.
- Placing any device to secretly record or monitor activity in client service areas, which is a criminal offense under the Unauthorized Video Recording Act.
- Live-streaming or transmitting video or audio activities within the client service areas.

### **Exceptions**

- Recordings conducted by Township personnel or contractors in the course of official duties.
- Law enforcement or other governmental agencies acting under lawful authority.
- Recordings authorized in advance by the Township Supervisor or designee for official or training purposes.
- Recordings made in accordance with the Illinois Open Meetings Act for meetings lawfully open to the public.
- The Township may utilize surveillance cameras as a security measure for staff, residents, and visitors.

### **Client Service Areas Notice**

Client Service Areas shall display clear and visible signage identifying spaces where individuals may reasonably expect privacy. Such signage shall inform clients, visitors, and staff that these areas are intended for confidential discussions and services. The absence of signage in a given area does not negate an individual's reasonable expectation of privacy if, by its nature or customary use, the area is clearly intended to be private.

The lack of posted signage does not grant permission for any individual to audio record, video record, or otherwise capture communications or interactions within a space where a reasonable expectation of privacy exists. Unauthorized recording in such areas is strictly prohibited and may result in disciplinary or legal action, as applicable.

### **Enforcement**

If an unauthorized or suspicious individual is observed in any Township building or facility, employees should immediately notify their supervisor or, if necessary, call the police immediately.

Any person who engages in conduct prohibited by this policy, or acts in a manner that violates federal, state, or local laws (including any other Township ordinance and policy) may be ejected from Township property, terminated (if applicable), and subject to criminal prosecution.