



# Sandy City Council Office

10000 South Centennial  
Parkway Suite 231  
Sandy, UT 84070  
O | 801-568-7141  
Sandy.Utah.Gov

## MEMORANDUM

January 20, 2026

To: The Sandy City Council

CC: Dustin Fratto, Council Director

From: Aaron DeKeyser

Subject: Proposed Ordinances Concerning (1) Campaign Finance Disclosures and Reporting Obligations for Independent Expenditures; and (2) Campaign Contribution Limitations.

---

The purpose of this memorandum is to present the policy concerns that have prompted my request for legislative action and to outline the substance of two proposals I respectfully ask the Council to consider.

### **Proposal One – Independent Expenditures Reporting Requirements**

The role of independent expenditures<sup>1</sup> in municipal elections has created a transparency deficit in the present statutory framework. Although municipal candidates are required to file detailed campaign finance disclosures, other individuals or entities that engage in substantial political expenditures unknown to municipal candidates are not required to submit any disclosure directly to Sandy City. This discrepancy creates a structural gap in the disclosure regime and impedes the public's ability to understand the sources and magnitude of political spending that may influence municipal elections.

The concern is straightforward. Individuals and other entities are capable of spending significant sums of money to influence the outcome of municipal elections without contributing directly to a candidate's campaign and even without a candidate's knowledge. In some instances, these independent expenditures occur at a scale that equals or exceeds traditional candidate fundraising. Nevertheless, the public is left without a clear mechanism for accessing independent expenditure information that relates specifically to Sandy City elections. Although state law requires certain filings with the Lieutenant Governor, the State system is not tailored to the needs of individual municipalities and is not organized in a manner that allows the public to obtain timely and election specific information.

The purpose of the proposed legislation is to promote local transparency and public confidence. I request that the Council consider an ordinance requiring individuals and entities making independent expenditures to file with the City a disclosure statement at the same intervals that candidates are required to disclose contributions and expenditures. This requirement would not prohibit any form of speech. It would not restrict political participation. It would simply place independent expenditures on

---

<sup>1</sup> "Independent expenditure" means an expenditure by a person or other entity expressly advocating the success or defeat of a clearly identified candidate if the expenditure is not made in coordination with, or at the request or suggestion of a candidate, a candidate's personal campaign committee, or a political consultant of a candidate.

an equal reporting schedule with candidates so that the public can see all material election related spending within the same disclosure window.

This proposal draws inspiration from the approach taken by Salt Lake City. Salt Lake City has adopted an ordinance governing disclosure obligations and contribution limits. Although their code uses the term independent expenditure in certain contexts, the overarching principle is that expenditures intended to influence municipal elections should be transparent and accessible to the electorate. The structure of their ordinance provides a helpful model.

For these reasons, I request that the Council consider legislation that requires individuals and other entities making independent expenditures to file disclosure reports with Sandy City at the same intervals required of candidates. The objective is disclosure, clarity, and a level reporting field for all participants in municipal elections.

### **Proposal Two – Campaign Contribution Limits**

The second purpose of this memorandum is to request the Council's consideration of an ordinance to implement campaign contribution limits in our municipal elections. This second proposal seeks to mitigate the appearance of corruption that can arise from large contributions to candidates in local elections.

Again, this proposal draws inspiration from the approach taken by Salt Lake City. Salt Lake has adopted an ordinance setting and governing aggregate campaign contribution limits. The policy concern here is that unlimited campaign contributions may give a disproportionate voice to wealthy individuals, corporations, or special interests, potentially undermining the principle of one person, one vote, and eroding public trust in the impartiality of elected officials. The purpose of these limits is to safeguard the integrity of municipal elections. Large contributions can create a sense of obligation on the part of the candidate, even if no explicit quid pro quo exists, or at least suggest that a public office can be bought, not earned. The proposed code amendment would establish reasonable limits on the amount any single person or entity can contribute to a municipal candidate during an election cycle, ensuring that candidates must seek broader, grassroots support.

I recommend that the initial contribution limit, as referenced in Section 2-1-8 of my proposed redline amendments, be set at \$2,500.00 / per contributor / per candidate / per election cycle. I recommend that the limit remains consistent regardless of the office (mayoral, at-large, district). I'm open to feedback and deliberation on the most appropriate limit.

I appreciate the Council's consideration and look forward to further discussion.