

APPELLATE COURT OF ILLINOIS, SECOND DISTRICT

Village of Hampshire v. Illinois Fraternal Order of Police Labor Council

2026 IL App (2d) 250080 · No. 2-25-0080 · Decided January 14, 2026

SUMMARY

The Illinois Appellate Court, Second District, affirmed the circuit court’s denial of the Village of Hampshire’s motion to vacate an arbitration award and confirmed the award reinstating police officer Sandro Palomares. The court held that the Village had not shown that reinstatement violated a well-defined and dominant Illinois public policy concerning police officer honesty. The court emphasized the narrow scope of judicial review of labor arbitration awards and the fact-dependent nature of the public-policy exception.

CASE DETAILS

COURT	Appellate Court of Illinois, Second District
WRITING FOR THE COURT	Justice Mullen; Justice Hutchinson; Justice Birkett
JURISDICTION	Illinois Appellate Court, Second District
DECIDED	January 14, 2026
DOCKET	2-25-0080
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Village appealed from an order of the Circuit Court of Kane County denying its motion to vacate an arbitration award and confirming the award reinstating police officer Sandro Palomares.
STANDARD OF REVIEW	Judicial review of an arbitral award is extremely limited; courts accept the arbitrator's view of the facts and contract interpretation and do not reweigh evidence or witness credibility. Whether an arbitration award violates public policy is a question of law reviewed de novo, although the inquiry is fact dependent.
PRECEDENTIAL VALUE	Published and precedential Illinois appellate decision
PARTIES	The Village of Hampshire v. Illinois Fraternal Order of Police Labor Council

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QUESTIONS PRESENTED

1. Whether reinstatement of Palomares under the collective bargaining agreement violated a well-defined and dominant Illinois public policy requiring police officers to be honest and truthful.
2. Whether the Village clearly demonstrated that the arbitrator's award contravened that public policy under the narrow public-policy exception to enforcement of arbitration awards.

HOLDINGS

1. Illinois recognizes a public policy that police officers must be honest and must not provide false, misleading, or incomplete statements in connection with their duties, but that policy does not create a blanket prohibition against employing or reinstating every police officer found to have been dishonest.
2. The Village failed to clearly demonstrate that enforcement of the collective bargaining agreement, as interpreted by the arbitrator, contravened explicit or implicit Illinois public policy; therefore, the award reinstating Palomares did not violate public policy.
3. The circuit court properly denied the Village's motion to vacate and confirmed the arbitration award.

KEY QUOTATIONS

“This public-policy exception, however, is very narrow and can “be invoked only when a party clearly shows enforcement of the contract, as interpreted by the arbitrator, contravenes some explicit public policy.”” (¶ 30)

“there is a recognized public policy in Illinois that a police officer must be honest and not provide false, misleading, or incomplete statements in connection with his duties.” (¶ 40)

“Therefore, we find that plaintiff has failed to clearly show that the enforcement of the contract, as interpreted by the arbitrator, contravened explicit public policy.” (¶ 45)

FACTUAL BACKGROUND

Sandro Palomares was hired as a Hampshire police officer in 2021 after disclosing prior discipline and a voluntary separation from the Wheeling Police Department arising from a 2014 incident involving alteration of a traffic-stop disposition. After anonymous allegations and communications from the Kane County State's Attorney's Office raised concerns about using Palomares as a witness, the office stated that it would no longer call him in misdemeanor or felony cases, and Hampshire terminated his employment in February 2023. The arbitrator found that Hampshire lacked just cause under the collective bargaining agreement because Palomares could still testify, the Village had known of his prior history when it hired him, and his subsequent performance was exemplary.

PROCEDURAL HISTORY

Palomares grieved his termination under the parties' collective bargaining agreement, and the arbitrator found that the Village lacked just cause to discharge him, ordering reinstatement and make-whole relief. The Village moved to vacate the award, arguing that reinstatement violated Illinois public policy concerning police-officer honesty. The circuit court denied the motion and confirmed the award. The Appellate Court of Illinois affirmed.

DISPOSITION

affirmed

CASES CITED

- Brady v. Maryland, 373 U.S. 83 (1963)
- Giglio v. United States, 405 U.S. 150 (1972)
- American Federation of State, County & Municipal Employees, AFL-CIO v. Department of Central Management Services, 173 Ill. 2d 299, 304, 311 (1996)
- Griggsville-Perry Community Unit School District No. 4 v. Illinois Educational Labor Relations Board, 2013 IL 113721, ¶ 18
- City of Country Club Hills v. Charles, 2020 IL App (1st) 200546, ¶¶ 23, 25-30, 35
- Illinois State Toll Highway Authority v. International Brotherhood of Teamsters, Local 700, 2015 IL App (2d) 141060, ¶ 44
- City of Chicago v. Fraternal Order of Police, Chicago Lodge No. 7, 2020 IL 124831, ¶¶ 25-26
- City of Des Plaines v. Metropolitan Alliance of Police, Chapter No. 240, 2015 IL App (1st) 140957, ¶¶ 20, 23
- City of Highland Park v. Teamster Local Union No. 714, 357 Ill. App. 3d 453, 462 (2005)
- City of Aurora v. Association of Professional Police Officers, 2019 IL App (2d) 180375, ¶ 54