



FORM
D-4

COMPLAINT FOR VIOLATION OF
THE CAMPAIGN DISCLOSURE ACT

Complainant Name, Address, Telephone Number, and E-Mail Address:

Michael F. Henry
13233 Bundoran Ct
Orland Park Illinois 60462

vs. No. _____

Name and Address of Respondent (provide Telephone Number and/or E-Mail Address, if available):

Coalition To Cut Taxes
440 South LaSalle Suite 3100
Chicago Il 60605

Section 1. Has Respondent filed a Statement of Organization (Form D-1) as a Political Committee with The State Board of Elections? Yes No

Section 2. Statutory Provisions: State the portion(s) of The Campaign Disclosure Act (10 ILCS 5/9) that have been violated. (Use additional plain sheets if necessary and refer to this Section.)

see attached violations including Illegal Diversion of Ballot Initiative Money Under 5/9-8.5 (j)

Section 3. State the nature of the offense(s) or violation(s). (Use additional plain sheets if necessary and refer to this Section.)

The Coalition to Cut Taxes was created as Ballot initiative Committee (it checked that box in the attached D1) and it never amended to change it to anything else before it finalized. Under IV in the attached Contribution Limits summary, a Ballot Initiative Committee it is not allowed to contribute to any other type of committee.

Section 4. Attach all statements, schedules, or other documents relevant to this complaint.

VERIFICATION

I DECLARE THAT THIS COMPLAINT (INCLUDING ANY ACCOMPANYING SCHEDULES AND STATEMENTS) HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE AND CORRECT COMPLAINT AS REQUIRED BY ARTICLE 9 OF THE ELECTION CODE. I UNDERSTAND THAT THE PENALTY FOR WILLFULLY FILING A FALSE COMPLAINT SHALL BE A FINE NOT TO EXCEED \$500 OR IMPRISONMENT IN A PENAL INSTITUTION OTHER THAN THE PENITENTIARY NOT TO EXCEED 6 MONTHS, OR BOTH FINE AND IMPRISONMENT.

11/23/2022

DATE

SIGNATURE OF COMPLAINANT

(If Complainant is a corporation, then Verification MUST be signed by an authorized Officer and attested to by the Secretary)

Proof of Service

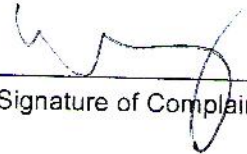
I, Michael F. Henry Hereby swear or affirm that I served a copy of the foregoing complaint upon the following:

a) Name(s) and Address(es) of person(s) served:


State Board of Elections Coalition To Cut Taxes
2329 S MacArthur Blvd 440 South La Salle Suite 3100
Springfield, IL 62704-4503 Chicago, IL 60605

b) By personally delivering the same on the _____ day of _____, 20__ at ____ o'clock ____ m.
(List Name and Title of person - or if Name is unknown, a physical description including race, sex, and approximate age in the space below): or

c) By placing a copy thereof in the United States Postal Service, proper postage prepaid, registered or certified, to the above indicated Address(es), on the 23 day of November 2023, at the mail box or postal station located at:
12100 S 80th Ave, Palos Park, IL 60464



Signature of Complainant or Agent

Subscribed and sworn to before me
This 23rd day of November, 2023


Notary Public



Instructions

1. This form is used to file complaints for violations arising out of An Act to Regulate Campaign Financing (IL Compiled Statutes, Chapter 10, Art. 9-1 Et Seq.). See Rules and Regulations of The State Board of Elections for the filing and hearing of complaints.
2. The filing and hearing of complaints are governed by rules and regulations adopted by the Board. The Complainant must serve a copy of the complaint upon all Respondents prior to the time of filing with the Board, and the Proof of Service section above must be completed. Copies of the Rules and Regulations are available upon request.
3. Following the filing of a complaint, the State Board of Elections will send notice via certified mail to all parties, regarding the time and location of the closed preliminary hearing.
4. Complaints must be filed by mail or in person at either of the following locations:

State Board of Elections
2329 S MacArthur Blvd
Springfield, IL 62704-4503

State Board of Elections
69 W Washington St, Suite LL-08
Chicago, IL 60602-3026

Second Complaint against Sean Morrison and Coalition to Cut Taxes and Coalition to Stop the Tax Hike – Attached are 2 Filings where Morrison received a Total of 300 hundred Thousand Dollars as a Transfer from an Entity called Coalition to Cut Taxes that was funded with 450 Thousand dollars of Money Laundered through an Illegal Campaign Committee – Coalition to Cut Taxes – this fund never filed with the State to be a committee. By Law anything spent or received over 5000 dollars is required by law to file all of these reports.

Somehow a registered Ballot Initiative Coalition to Stop the Proposed Tax Hike Donated 450,540 dollars to the Coalition to Cut taxes 1 Year after the election a not registered entity and the Coalition to cut Taxes was formed after the election. This money was illegally spent as a Donation against Illinois Law.

Then this new entity Sat on this Money for a year

| | | | |
|--|--|--|---|
| NAME OF POLITICAL COMMITTEE Coalition To Stop The Proposed Tax Hike Amendment | REPORTING PERIOD 4/1/2021 thru 6/30/2021 | FILED 7/15/2021 8:45:24PM | FOR OFFICE USE ONLY IDENTIFICATION NO. Ballot Initiative 36052 |
|--|--|--|---|

SCHEDULE B
PART 8 - EXPENDITURES

| ITEMIZED EXPENDITURES | DATE OF EXPENDITURE | AMOUNT | AGGREGATE AMOUNT FOR THIS REPORTING PERIOD |
|--|--|--------------|--|
| Coalition to Cut Taxes 440 S. LaSalle St Suite 3100 Chicago, IL 60605 Purpose: Donation | 6/2/2021 Beneficiary: Coalition to Stop The Proposed Tax Hike | \$450,540.00 | \$450,540.00 |
| TOTAL FOR THIS PART: | | | \$450,540.00 |

3 OF 3

After a Year the Coalition to Cut Taxes somehow transferred 300 thousand dollars to Sean Morrison. Morrison claimed it was a Transfer from a State Registered Committee.

This money was not a Valid Transfer and its is Illegal

All three Groups are the subject of this Complaint I point you to Your Own Rules that require a transfer to be listed as money from One Political Committee to another. Yet this entire set of Transactions violate State Law

5/9-1.4. Contribution.

(A) "Contribution" means:

- (1) a gift, subscription, donation, dues, loan, advance, deposit of money, or anything of value, knowingly received in connection with the nomination for election, election, or retention of any candidate or person to or in public office or in connection with any question of public policy;
- (1.5) a gift, subscription, donation, dues, loan, advance, deposit of money, or anything of value that constitutes an electioneering communication made in concert or cooperation with or at the request, suggestion, or knowledge of a candidate, a political committee, or any of their agents;
- (2) the purchase of tickets for fund-raising events, including but not limited to dinners, luncheons, cocktail parties, and rallies made in connection with the nomination for election, election, or retention of any person in or to public office, or in connection with any question of public policy;
- (3) a transfer of funds received by a political committee from another political committee;

So we have a transfer from a Non Filed Political Committee of some type that illegally received money from a Ballot Initiative or is illegal formed and expended 300 thousand dollars in Violation of the Law.

No matter what type of Political Organization the Coalition to Cut Taxes claimed to be it has Violated State law – never registered and never Filed reports after receiving 450 thousand dollars and now has spent 300 thousand dollars on an election.

Coalition to Stop the Tax Hike illegally made a Donation to an entity after the Ballot was over and a Ballot Initiative entity expired. Coalition to Cut taxes then illegally held this money and failed to file the forms to be a legal Illinois Committee and then Sean Morrison took 300 thousand dollars of this money illegally into his Campaign

- (e) "Ballot initiative committee" means any natural person, trust, partnership, committee, association, corporation, or other organization or group of persons that accepts contributions or makes expenditures during any 12-month period in an aggregate amount exceeding \$5,000 in support of or in opposition to any question of public policy to be submitted to the electors. "Ballot initiative committee" includes any natural person, trust, partnership, committee, association, corporation, or other organization or group of persons that makes electioneering communications during any 12-month period in an aggregate amount exceeding \$5,000 related to any question of public policy to be submitted to the voters. The \$5,000 threshold applies to any contributions or expenditures received or made with the purpose of securing a place on the ballot for, advocating the defeat or passage of, or engaging in electioneering communication regarding the question of public policy, regardless of the method of initiation of the question of public policy and regardless of whether petitions have been circulated or filed with the appropriate office or whether the question has been adopted and certified by the governing body.
- (f) "Independent expenditure committee" means any trust, partnership, committee, association, corporation, or other organization or group of persons formed for the exclusive purpose of making independent expenditures during any 12-month period in an aggregate amount exceeding \$5,000 in support of or in opposition to (i) the nomination for election, election, retention, or defeat of any public official or candidate or (ii) any question of public policy to be submitted to the electors. "Independent expenditure committee" also includes any trust, partnership, committee, association, corporation, or other organization or group of persons that makes electioneering communications that are not made in connection, consultation, or concert with or at the request or suggestion of a public official or candidate, a public official's or candidate's designated political committee or campaign, or an agent or agents of the public official, candidate, or political committee or campaign during any 12-month period in an aggregate amount exceeding \$5,000 related to (i) the nomination for election, election, retention, or defeat of any public official or candidate or (ii) any question of public policy to be submitted to the voters.

FORM D-2

REPORT OF CAMPAIGN CONTRIBUTIONS AND EXPENDITURES
Quarterly Report

FOR OFFICE USE ONLY
IDENTIFICATION NO.
Ballot Initiative 36052
AUDIT DISTRICT
11

Coalition To Stop The Proposed Tax Hike Amendment
P.O Box 9645
Springfield, IL 62791

FILED
7/15/2021 8:45:24 PM

| REPORTING PERIOD 4/1/2021 thru 6/30/2021 | CASH AVAILABLE AT THE BEGINNING OF THE REPORTING PERIOD \$430,930.54 | SECTION B - EXPENDITURES | |
|--|---|---|---------------|
| SECTION A - RECEIPTS | | 6. Transfers Out: | |
| 1. Individual Contributions: | | a. Itemized (from Schedule B) | \$ 0.00 |
| a. Itemized (from Schedule A) | \$ 0.00 | b. Not Itemized | \$ 0.00 |
| b. Not Itemized | \$ 0.00 | | |
| 2. Transfers In: | | 7. Loans Made: | |
| a. Itemized (from Schedule A) | \$ 0.00 | a. Itemized (from Schedule B) | \$ 0.00 |
| b. Not Itemized | \$ 0.00 | b. Not Itemized | \$ 0.00 |
| 3. Loans Received: | | 8. Expenditures: | |
| a. Itemized (from Schedule A) | \$ 0.00 | a. Itemized (from Schedule B) | \$ 450,540.00 |
| b. Not Itemized | \$ 0.00 | b. Not Itemized | \$ 0.00 |
| 4. Other Receipts: | | 9. Independent Expenditures: | |
| a. Itemized (from Schedule A) | \$ 19,609.46 | a. Itemized (from Schedule B) | \$ 0.00 |
| b. Not Itemized | \$ 0.00 | b. Not Itemized | \$ 0.00 |
| TOTAL RECEIPTS (1-4) | \$ 19,609.46 | TOTAL EXPENDITURES (6-9) | \$ 450,540.00 |
| 5. In-Kind Contributions: | | SECTION C - DEBTS AND OBLIGATIONS | |
| a. Itemized (from Schedule I) | \$ 0.00 | 10. a. Itemized (from Schedule C) | \$ 0.00 |
| b. Not Itemized | \$ 0.00 | b. Not Itemized | \$ 0.00 |
| TOTAL IN-KIND | \$ 0.00 | TOTAL DEBTS AND OBLIGATIONS | \$ 0.00 |
| Name and address of person submitting this report if other than the committee's candidate or treasurer: | | SECTION D - CASH BALANCE | |
| _____ _____ _____ | | Funds available at the beginning of the reporting period | \$ 430,930.54 |
| | | Total Receipts (Section A) | \$ 19,609.46 |
| | | Subtotal | \$ 450,540.00 |
| | | Total Expenditures (Section B) | \$ 450,540.00 |
| | | Funds available at the close of the reporting period | \$ 0.00 |
| | | Investment Total | \$ 0.00 |

VERIFICATION

I DECLARE THAT THIS QUARTERLY REPORT OF CAMPAIGN CONTRIBUTIONS AND EXPENDITURES (INCLUDING ACCOMPANYING SCHEDULES AND STATEMENTS) HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE REPORT AS REQUIRED BY ARTICLE 9 OF THE ELECTION CODE. I UNDERSTAND THAT WILLFULLY FILING A FALSE OR INCOMPLETE REPORT IS SUBJECT TO A CIVIL PENALTY OF AT LEAST \$1001 AND UP TO \$5000.

Jennifer Schuster

7/15/2021 8:45:24PM

SIGNATURE OF TREASURER OR CANDIDATE

DATE

Filed Electronically

NAME OF POLITICAL COMMITTEE
Coalition To Stop The Proposed Tax Hike
Amendment

REPORTING PERIOD
4/1/2021 thru 6/30/2021

FILED
7/15/2021
8:45:24PM

FOR OFFICE USE ONLY
IDENTIFICATION NO.
Ballot Initiative 36052

SCHEDULE A

PART 4: OTHER RECEIPTS

| ITEMIZED RECEIPTS | DATE RECEIVED | AMOUNT OF EACH RECEIPT | AGGRAGATE AMOUNT FOR THIS REPORTING PERIOD |
|---|---------------|------------------------|--|
| Target Creative Communications 106 S Columbus St Alexandria, VA 22314 | | | |
| Description: Refund media buy | 5/12/2021 | \$19,609.46 | \$19,609.46 |
| TOTAL FOR THIS PART: | | | \$19,609.46 |

NAME OF POLITICAL COMMITTEE
Coalition To Stop The Proposed Tax Hike
Amendment

REPORTING PERIOD
4/1/2021 thru 6/30/2021

FILED
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8:45:24PM

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IDENTIFICATION NO.
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SCHEDULE B

PART 8 - EXPENDITURES

| ITEMIZED EXPENDITURES | DATE OF EXPENDITURE | AMOUNT | AGGREGATE AMOUNT FOR THIS REPORTING PERIOD |
|--|---------------------|--------------|--|
| Coalition to Cut Taxes 440 S. LaSalle St Suite 3100 Chicago, IL 60605 Purpose: Donation | 6/2/2021 | \$450,540.00 | \$450,540.00 |
| Beneficiary: Coalition to Stop The Proposed Tax Hike | | | |
| TOTAL FOR THIS PART: | | | \$450,540.00 |

SCHEDULE A-1

REPORT OF CAMPAIGN CONTRIBUTIONS OF \$1000 OR MORE

FILED
9/16/2022 2:49:34 PM
FOR OFFICE USE ONLY
IDENTIFICATION NO.
22433
Audit District: 3

Voters for Sean M Morrison
12334 S. Keeler Avenue
Aisip, IL 60803

ITEMIZED RECEIPTS

DATE
RECEIVED

AMOUNT OF
EACH RECEIPT

Receipt Type: Transfer In

Coalition to Cut Taxes
440 S LaSalle Street
Suite 3100
Chicago, IL 60605

9/9/2022

\$200,000.00

VERIFICATION

I DECLARE THAT THIS REPORT OF CAMPAIGN CONTRIBUTIONS OR THIS SEMI-ANNUAL REPORT OF CAMPAIGN CONTRIBUTIONS AND EXPENDITURES (INCLUDING ACCOMPANYING SCHEDULES AND STATEMENTS) HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE REPORT AS REQUIRED BY ARTICLE 9 OF THE ELECTION CODE. I UNDERSTAND THAT WILLFULLY FILING A FALSE OR INCOMPLETE REPORT IS A BUSINESS OFFENSE SUBJECT TO A FINE OF UP TO \$5000.

Sean Morrison

SIGNATURE OF TREASURER OR CANDIDATE

9/16/2022 2:49:34PM

DATE

Name and address of person submitting this report if other
than the committee's candidate or treasurer:

SCHEDULE A-1

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11/9/2022 4:49:15 PM
FOR OFFICE USE ONLY
IDENTIFICATION NO.
22433
Audit District: 3

Voters for Sean M Morrison
12334 S. Keeler Avenue
Alsip, IL 60803

| ITEMIZED RECEIPTS | DATE RECEIVED | AMOUNT OF EACH RECEIPT |
|---|---------------|------------------------|
| Receipt Type: Transfer In | | |
| Coalition to Cut Taxes 440 S LaSalle Street Suite 3100 Chicago, IL 60605 | 11/7/2022 | \$100,000.00 |

VERIFICATION

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1

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