



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):

Voters For Sean M. Morrison - Committee ID: 22433
12334 S Keeler Ave
Alsip IL 60803-1813

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.

11/21/2022

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
2329 S MacArthur Blvd
Springfield, IL 62704-4503

Voters For Sean M. Morrison
12334 S Keeler Ave
Alsip, IL 60803-1813

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 21 day of November, 2022, 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 21st day of November, 2022



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

Sean Morrison's Campaign Fund Illegally diverted campaign Funds Donated by Ken Griffin to dump into his Campaign funds and without this he would have lost the election.

The Illegal Conversion was 300 thousand Dollars. See attached exhibits

Morrison received 200 Thousand Dollars on September 9, 2022 and then he went back again after the State did not catch his Illegal Activity and illegally diverted another 100 thousand dollars on November 7, 2022.

Receipts 2 found

Donor name	Committee name	Amount	Received date
Coalition to Cut Taxes	Voters For Sean M Morrison	\$100,000.00	Nov 07, 2022
Coalition to Cut Taxes	Voters for Sean M Morrison	\$200,000.00	Sep 09, 2022

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.

By Law Coalition to Cut Taxes is just supposed to spend money to fight for or against whatever referendum it was set up for. Yet Sean Morrison ignored the law and illegally Transferred the funds to aid in his election

Morrison then illegally spent this money and used it to change the outcome of his election. Without these illegal funds Morrison would have lost the election, he won a close election with \$300,000 in illegally contributed funds.

Under 5/9-8.5 (j), Morrison has to give the money back or contribute it to charity. If the ISBE notifies him and he does not do it within 30 days, he has to give the money to the State of Illinois and is subject to a fine of 150% of the contribution.

Griffin / Z Tax Pac was the Original Source of the Funds and Gave it to the Coalition to Cut Taxes at that address when they closed down.

The only local current name coming up for that address and suite number is

<https://ecorp.azcc.gov/BusinessSearch/BusinessInfo?entityNumber=23008576>

Corporation/LLC Search/Certificate of Good Standing

Corporation File Detail Report

File Number 10124336
Entity Name RIVERBEND INDUSTRIES INC.
Status ACTIVE

Entity Information

Entity Type CORPORATION
Type of Corp FOREIGN BCA
Qualification Date (Foreign) Wednesday, 13 October 1954
State DELAWARE
Duration Date PERPETUAL

Agent Information

Name ILLINOIS CORPORATION SERVICE COMPANY
Address 801 ADLAI STEVENSON DRIVE, SPRINGFIELD , IL 62703
Change Date Monday, 28 October 2019

Officers

President
Name & Address
RONALD J GIDWITZ 440 SOUTH LASALLE STREET, SUITE 3100 CHICA
Secretary
Name & Address
NOAH MINEO 440 SOUTH LASALLE STREET, SUITE 3100 CHICAGO IL,

Old Corp Name

08/19/2022
CONTINENTAL MATERIALS CORPORATION
[Return to Search](#)

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
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

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

9/16/2022 2:49:34PM

SIGNATURE OF TREASURER OR CANDIDATE

DATE

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

SCHEDULE A-1

REPORT OF CAMPAIGN CONTRIBUTIONS OF \$1000 OR MORE

FILED
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

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

11/9/2022 4:49:15PM

DATE

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

