

No. 129453
IN THE
SUPREME COURT OF ILLINOIS

DAN CAULKINS; PERRY LEWIN;)	PETITION TO VACATE
DECATUR JEWELRY & ANTIQUES)	JUDGMENT WITH
INC.; and LAW-ABIDING GUN)	OPINION ISSUED
OWNERS OF MACON COUNTY, a)	AUGUST 11, 2023
voluntary unincorporated association,)	
)	
Post Judgment Petitioners)	
)	
v.)	No. 129453
)	
Governor JAY ROBERT PRITZKER,)	
in his official capacity; KWAME RAOUL)	
in his capacity as Attorney General;)	
EMANUEL CHRISTOPHER WELCH, in)	
in his capacity as Speaker of the House; and)	
DONALD F. HARMON, in his capacity as)	
Senate President,)	
)	
Post Judgment Respondents)	ORAL ARGUMENT
)	REQUESTED
and)	
)	
Justice ELIZABETH ROCHFORD &)	
Justice MARY KAY O'BRIEN)	
)	
Nominal Post Judgment Respondents.)	

PETITION TO VACATE JUDGMENT WITH OPINION ENTERED AUGUST 11, 2023, PURSUANT TO 735 ILCS 5/2-1401(a)

Now Come the Plaintiffs/Petitioners, Dan Caulkins, Perry Lewin, Decatur Jewelry & Antiques, Inc., an Illinois corporation, and Law-Abiding Gun Owners of Macon County, a voluntary unincorporated association [*Caulkins*], by their attorneys, Jerrold H. Stocks and Brian D. Eck, Featherstun, Gaumer, Stocks, Flynn & Eck, LLP and hereby Petition this Court to Vacate the Judgment with Opinion entered August 11, 2023, (2023 IL 129453) for the following reasons:

I. Issues Presented:

A. Was \$7.3 Million Dollars indirect campaign support to the campaigns of Justices Rochford and O'Brien from a political committee administered by Defendant Harmon's counsel, including the contribution of \$700,000 from Harmon controlled funds to the committee, not appearing of record at the time of Orders denying recusal or Judgment with Opinion, in the context of the recusal/disqualification relief requested:

1. Information Justices Rochford and O'Brien should have disclosed because any objective judge would believe that Caulkins or their lawyers might reasonably consider it relevant to the issues raised by the motion for disqualification, even if the judge believes there is no basis for disqualification?

OR;

2. Matters of fact not appearing of record, which, if known of record at the time the Judgment or Orders on Recusal/Disqualification were rendered, would have prevented their rendition? OR;

3. Additional matter that establishes the actuality or appearance of a denial of due process under the 14th Amendment?

B. Is vacatur of the August 11, 2023, Judgment with Opinion pursuant to 735 ILCS 5/2-1401(a) required to prevent injustice, unconscionability or fraud and/or to preserve the actual or apparent integrity of the Illinois Supreme Court?

II. Summary of Requested Relief:

Caulkins contends that the Illinois Supreme Court denied *Caulkins* their due process rights to a fair hearing before an impartial court of review as guaranteed under the

14th Amendment of the United States Constitution (see *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876-77 (2009)) because the Court declined to disqualify Justices Rochford and O’Brien from participating in the consideration of the case [See Motion for Recusal/Disqualification and Supporting Record, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453)] and let the decision on recusal to each challenged justice. [See Order Denying Motion for Disqualification, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453)]. Justice Rochford declined recusal. [See Order of Justice Rochford Denying Motion for Recusal, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453)]. Justice O’Brien declined recusal. [See Order of Justice Rochford Denying Motion for Recusal, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453)]. [collectively, the Orders on the Motion for Recusal/Disqualification may be referred to as “the Orders.”] Noteworthy, the Defendants did not file any opposition to the Motion for Recusal/Disqualification. Effectively, Justices Rochford and O’Brien, themselves, undertook to oppose the requested relief. Both challenged Justices participated in the consideration of the case, Justice Rochford issued the majority (4-3) Opinion in support of Judgment. *Caulkins v. Pritzker*, 2023 IL 129453.

Caulkins petitioned the Supreme Court of the United States for Writ of Certiorari to review the Judgment and Orders referenced above. [S.R.002]. After filing the Petition for Writ of Certiorari, *Caulkins* learned additional facts material to the question presented in the Motion for Recusal/Disqualification which supported a Supplemental Brief to Petition for Writ of Certiorari.¹ [S.R.002; S.R.66; S.R.68]. The additional material facts included \$7,300,000 indirect campaign support to the campaigns of Justices Rochford and

¹ On January 8, 2024, the petition for writ of certiorari was denied. However, the denial imparts no implication or inference concerning the Supreme Court’s view of the merits of the case. *Hughes Tool Co. v. TWA*, 409 U.S. 363 (1973).

O'Brien originating from a Defendant or campaign committees controlled by counsel for a Defendant in this case. Neither Justice Rochford, nor Justice O'Brien disclosed the fact or extent of the indirect support in the Orders declining recusal.

“A judge should disclose on the record information that the judge believes the parties or their lawyers might reasonably consider relevant to a possible motion for disqualification, even if the judge believes there is no basis for disqualification.” Ill. Code of Jud. Conduct, R. 2.11 cmt. 5. The non-record material facts unknown to *Caulkins*, without *Caulkins*' neglect, related to the \$7,300,000 indirect campaign support not disclosed by the Justices with the duty to disclose. Whether the failure to disclose or consider the non-record facts on the original Motion was the result of fraud or excusable mistake,

“[u]nbiased, impartial adjudicators are the cornerstone of any system of justice worthy of the label. And because deference to the judgments and rulings of courts depends upon public confidence in the integrity and independence of judges, jurists must avoid even the appearance of partiality. Such a stringent rule, to be sure, may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties. But to perform its high function in the best way, the Supreme Court has emphasized, justice must satisfy the appearance of justice.” (Internal citations and quotation marks omitted.) *In re Al-Nashiri*, 921 F.3d 224, 233-34 (D.C Cir., 2019).

Here, the newly discovered (to *Caulkins*) evidence was material to rendering the Judgment with Opinion because its author was disqualified from participating in the case.

Caulkins requests that the Judgment with Opinion issued in this Cause on August 11, 2023, be vacated pursuant to 735 ILCS 5/2-1401(a).

III. Grounds for Relief

1. Pursuant to 735 ILCS 5/2-1401(a):

“Relief from final orders and judgments, after 30 days from the entry thereof, may be had upon petition as provided in this Section. Writs of error coram

nobis and coram vobis, bills of review, and bills in the nature of bills of review are abolished. All relief heretofore obtainable and the grounds for such relief heretofore available, whether by any of the foregoing remedies or otherwise, shall be available in every case, by proceedings hereunder, regardless of the nature of the order or judgment from which relief is sought or of the proceedings in which it was entered.”

“The petition must be filed in the same proceeding in which the order or judgment was entered but is not a continuation thereof.” (Emphasis added.) 735 ILCS 5/2-1401(b) (West 2024). The proceeding in which the challenged judgment was entered was 2023 IL 129453 with jurisdiction based on Ill. S. Ct. R 302(a)(1) (eff. Oct. 4, 2011). While no Ill. S. Ct. Rule squarely describes procedures for 2-1401(a) relief in the Illinois Supreme Court related to a judgment entered by the Illinois Supreme Court, the relief is sought as a Motion in the original proceeding under Ill. S. Ct. R. 361.

2. While abolished as such, the relief sought is in the nature of the writ of error coram nobis, said relief includible in relief available under Section 2-1401(a). 735 ILCS 5/2-1401(a); *Hanson v. DeKalb County State’s Attorney’s Office*, 391 Ill. App. 3d. 902, 908-09 (2d Dist. 2009). A motion in the nature of a writ of error coram nobis “bring[s] to the attention of the court matters of fact not appearing of record, which, if known at the time the judgment was rendered, would have prevented its rendition. *Michel v. Edgewater Hospital*, 18 Ill. App. 2d 160, 162 (1st Dist. 1958). Statutorily, the use of this motion “has not been restricted to the narrow confines of its common-law antecedent, rather . . . it has been used extensively to prevent injustice.” *O’Connell v. Providence Mutual Casualty Co.*, 23 Ill. App. 2d 364, 366 (1st Dist. 1959). Section 2-1401 of the Code of Civil Procedure defines the available relief in “the broadest possible terms.” *People v. Lawton*, 212 Ill. 2d 285, 297 (2004). “One of the guiding principles, however, in the administration of section 2-1401 relief is that the petition invokes the equitable powers of the . . . court, which should

prevent enforcement of a . . . judgment when it would be unfair, unjust, or unconscionable.” *Smith v. Airoom, Inc.*, 114 Ill.2d 209, 225 (1986). Here, the facts not appearing of record and not disclosed by Justices Rochford and O’Brien, at time of the Recusal Orders or at time of Judgment with Opinion (authored by Justice Rochford) was discovered by *Caulkins* on or after November 21, 2023. (S.R.066, S.R.068). The failure to disclose by the Justices constituted a breach of the Code of Judicial Conduct [see: Ill. Code of Jud. Conduct, R. 2.11 cmt. 5], was relevant to the subject matter of the relief requested, and was material to the reality and/or appearance of a fair hearing. For the reasons herein stated, vacating the August 11, 2023, Judgment with Opinion is necessary to correct an unfair, unjust, and unconscionable denial of due process to *Caulkins* and to preserve the appearance of legitimacy to the Illinois Supreme Court.

3. On or after November 21, 2023, *Caulkins* discovered undisclosed \$7,300,000 additional (to the \$2.6 Million direct financial contributions in the original Motion for Recusal/Disqualification), indirect campaign expenditures supporting the candidacies of Justices Rochford and O’Brien by a political committee backed by Defendant, Illinois Senate President Don Harmon. S.R013. The sole officer of the political committee, All for Justice, was Luke Casson, a counsel of record for Defendant Harmon in the proceedings below in this case. S.R.005. The expenditures for the benefit of Justices Rochford and O’Brien were concealed from the public until several months after the election. See S.R.005-010; S.R.038-045. On November 21, 2023, a Final Order issued by the Illinois State Board of Elections assessed a fine against All for Justice in the sum of \$108,500 for violating campaign disclosure laws by the failure to file timely public disclosure of the expenditures supporting Justices Rochford and O’Brien. S.R.041-042. Funds controlled by

Defendant Harmon contributed \$700,000 to All for Justice. S.R013. Neither Justice Rochford, nor Justice O'Brien, disclosed or otherwise acknowledged the All for Justice expenditures supporting their campaigns originating with one of the Defendants, including his counsel of record in this case, when issuing their Orders denying the Motion for Recusal/Disqualification. The non-record material facts were not disclosed on Rochford or O'Brien Campaign Disclosures, which prevented discovery of the indirect support by diligent search. See Motion for Recusal/Disqualification and Supporting Record, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453).²

4. *Caulkins'* original Motion for Recusal/Disqualification was based on three distinct grounds³ operating alone or in combination:

- A. Direct campaign contributions from Defendants, including Defendant's counsel appearing in the case, to Justice Rochford and Justice O'Brien exceeding \$2,600,000, aggregate;⁴

² Judicial elections by District and the size and form of indirect contributions present circumstances from which one reasonably may infer knowledge by each challenged Justice that she was receiving massive indirect support during the campaign and well before the Orders in April 2023 or the Judgment with Opinion in August, 2023. Once the Motion for Recusal/Disqualification was reposed to their respective consideration, a duty of inquiry on the part of the Justice and disclosure on each issue raised by *Caulkins* attached.

³ *Caulkins* incorporates herein all legal and factual matters of record in support of the Motion for Recusal/Disqualification in support of the relief requested herein.

⁴ See Motion for Recusal/Disqualification and Supporting Record, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453). The leaders of the other branches of government were the largest financial contributors to the respective judicial campaigns of Justices Rochford and O'Brien. More specifically: Contributions to Rochford Campaign Committee pursuant to Illinois State Board of Elections for the election cycle, July 1, 2021, to December 31, 2022: Total Individualized Contributions: \$2,113,122.80. Total Transfer-In Contributions (from other Committees): \$1,401,475.00. On September 23, 2022, JB for Governor Transferred In the sum of \$500,000.00. On October 27, 2022, Jay Robert Pritzker Revocable Trust, Individually Contributed \$500,000.00. On October 13, 2022, the campaign committee for Defendant Welch Transferred In \$150,000.00. Contributions to O'Brien Campaign Committee for July 1, 2021 to December 31, 2022: Total Individualized Contributions:

- B. Public commitment to support an assault weapon's ban when the General Assembly convened after the Election evidenced by allowing a third party to publish the endorsement of the desired outcome for an assault weapon ban which published endorsement remained active throughout pendency of proceeding before the Illinois Supreme Court;⁵
- C. The identity of the Defendant/Contributors whose conduct was at issue in the case and their status as leaders of the separate branches of government and the reality or appearance that the judiciary was subordinating its role to the other branches.

\$1,459,061.78. Total Transfer-In Contributions (from other Committees): \$2,203,725.00. On May 24, 2022, JB Exploratory committee (Pritzker) Transferred In the sum of \$500.00. On September 29, 2022, JB for Governor Transferred In the sum of \$500,000.00. On October 28, 2022, Jay Robert Pritzker Revocable Trust, Individually Contributed \$500,000.00. In October 2022, the campaign committee for Defendant Welch Transferred In the sum of \$350,000.00. Attorneys, inclusive of respective firms/partners appearing for one or more Defendants on the appeal contributed \$117,750.00 to Justices Rochford and O'Brien, combined. Illinois law caps the maximum contribution from a single contributor to a judicial candidate at \$500,000. 10 ILCS 5/9-8.5(b-5)(1.1) (West 2022). Pritzker's split contributions, if splitting lawful to trigger another maximum limit, were the maximum contributions allowed under Illinois law. Excepting Welch, Governor Pritzker's contributions approximate 5 to 10 times the amount of the next closest individual contributor for either candidate.

⁵ See Motion for Recusal/Disqualification and Supporting Record, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453). Justices Rochford and O'Brien (as well as all Defendants) allowed their candidacies to be represented as supporting the "#1 legislative priority" of the Gun Violence Prevention Pac during the next legislative session, namely, "banning assault weapons and large-capacity magazines." Motion for Recusal/Disqualification and Supporting Record at S.R.299, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453). The content of the statement was for a specific outcome, including the process and timing thereof. Justices Rochford and O'Brien effectively respond that "endorsers" said publicly that they committed, but Caulkins had no evidence that they "publicly" committed to ban assault weapons. The Justices imply that a disqualifying commitment requires their direct statement to the public. However, a judicial candidate cannot be permitted to allow other persons to do or say what the candidate is prohibited from doing, that is, commit to an outcome in a matter likely to appear for their consideration. Ill. Code Jud. Conduct., R. 4.1(C)(3), (4)(a).

Given the issues drawn by *Caulkins* in the Motion for Recusal/Disqualification, the indirect financial contributions for the benefit of Justices Rochford and O'Brien from the political committee heavily funded by Defendant, Senate President Harmon, and controlled by one of his counsel of record, inescapably were germane to ruling on the relief requested and were, minimally, relevant to *Caulkins*. "A judge should disclose on the record information that the judge believes the parties or their lawyers might reasonably consider relevant to a possible motion for disqualification, even if the judge believes there is no basis for disqualification." Ill. Code of Jud. Conduct, R. 2.11 cmt. 5.⁶ Whether Justices Rochford and O'Brien knowingly concealed the non-disclosed facts from the record or the information was unknown for any excusable reason, the non-record facts were material to the rendition of the Orders, directly, and, ultimately, the Judgment, in fact and to appearances, to require vacating the Judgment with Opinion entered August 11, 2023.

5. Based on the record before us, disqualification/recusal of Justices Rochford (author of majority opinion) and O'Brien would have not yielded Four Justices joining to reverse the Trial Court Judgment invalidating the Act⁷ under review. ILL. CONST., Article VI, § 3. Disqualification or Recusal would have resulted if the non-record facts were disclosed (or known) at the time Orders and Judgment were entered if this Court intended to honor *Caulkins*' rights to a fair hearing under the 14th Amendment (see *Caperton*, 556 U.S. at 876-77) or to preserve the integrity of the Illinois Supreme Court consistent with the following standards:

⁶ An affirmative duty for disclosure by the judge of relevant information is a necessary element for due process when one considers that the litigant has no discovery mechanisms to probe judicial bias. Accordingly, a breach of duty *ipso facto* denies due process.

⁷ The Criminal Code provisions of the Protect Illinois Communities Act, 720 ILCS 5/24-1.9 and 1.10. [the "Act" herein]

It is axiomatic that a fair hearing before a fair tribunal is “a basic requirement of due process.” *In re Murchison*, 349 U.S. 133, 136 (1955). “In deciding cases, a judge is not to follow the preferences of his supporters, or provide any special consideration to his campaign donors. A judge instead must observe the utmost fairness, striving to be perfectly and completely independent, with nothing to influence or control him but God and his conscience.” (Internal quotation marks omitted.) *Williams-Yulee v. Fl. Bar*, 575 U.S. 433, 446-47 (2015). The risk that a contributor’s cash would influence bias must be forbidden if the guarantee of due process is to be adequately safeguarded. *Caperton*, 556 U.S. at 885. The inquiry is not whether the amount of cash was a necessary and sufficient cause for election success. *Id.* Instead, the test asks whether a realistic appraisal of psychological tendencies supports bias in favor of the disproportionately large contributors. *Id.* at 883-84. The question is “whether a reasonable and informed observer would question the judge’s impartiality.” *United States v. Microsoft Corp.*, 253 F.3d 34, 114 (D.C. Cir., 2001).

“[O]bjective standards may . . . require recusal whether or not actual bias exists or can be proved. Due process may sometimes bar [review] by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between the contending parties. The failure to consider objective standards requiring recusal is not consistent with the imperatives of due process.” (Internal quotation marks and citations omitted.) *Id.* at 886.

There are circumstances “in which experience teaches that the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable.” (Internal quotation marks omitted.) *Id.* at 877.

On issues of judicial impartiality, courts “confront a question of reasonable appearances, not just formal designations.” *In re Al-Nashiri*, 921 F.3d at 236.

The principle that judges must preserve both the reality and appearance of impartiality finds expression in many sources of law. It is axiomatic, of course, that due process demands an unbiased

adjudicator, and the Supreme Court has therefore identified several circumstances in which the probability of actual bias on the part of the judge . . . is too high to be constitutionally tolerable. But the Due Process Clause demarks only the outer boundaries of judicial disqualifications, and various statutes and codes of conduct, in service of their essential function to maintain the integrity of the judiciary and the rule of law, provide more protection than due process requires. (Internal quotation marks and citations omitted, and emphasis added.) *Id.* at 234.

Recusal requirements serve vital purposes. Unbiased, impartial adjudicators are the cornerstone of any system of justice worthy of the label. And because deference to the judgments and rulings of courts depends upon public confidence in the integrity and independence of judges, jurists must avoid even the appearance of partiality. As the Supreme Court has stated, to perform its high function in the best way justice must satisfy the appearance of justice." (Internal quotation marks and citations omitted, and emphasis added.) *United States v. Trump*, 2023 U.S. Dist. LEXIS 173165 (D.C. Dist. Ct., September 27, 2023).

To provide context, in *Caperton*, the direct contribution informing the challenge was \$1,000. *Caperton*, 556 U.S. at 873. The indirect contributions were \$3,000,000. *Id.* Here, the direct contributions from parties or attorneys appearing on their behalf to Rochford and O'Brien approximated \$2,600,000. The material, non-record facts here show \$7,300,000 of indirect contributions linked to Defendants. In *Caperton*, there was no indication that the contributions were unlawful. Here, there is a basis to conclude that the contributions were, in part, unlawful.⁸ However, unlawful, unreasonable, and disproportionate are not co-extensive or interchangeable terms on the issue presented. The probability for bias from lawful, direct, and indirect independent contributions, alone, in

⁸ 10 ILCS 5/9-8.5(b-5)(2) appears to require the aggregation of Pritzker contributions to exceed lawful limits and could reach the non-record, indirect contributions if subject to aggregation as expenditures made by "any person in concert or cooperation with, or at request or suggestion of a candidate, his or her designated committee, or their agents."

Caperton was held to be constitutionally intolerable.⁹ Here, before consideration of the additional grounds to question impartiality not presented in *Caperton*, the cash contributions were magnitudes greater. Likewise, it was constitutionally intolerable for Justices Rochford and O'Brien to participate in the consideration of this case. Vacating the August 11, 2023, Judgment with Opinion remedies the unconscionable injustice resulting from tolerating the involvement of Justices Rochford and O'Brien in the consideration of the case to correct the appearance or actuality of a partial judiciary.

6. It is undisputed that the non-record, material facts were not disclosed affirmatively by the time of the Orders on Recusal and Disqualification in April 2023. It is undisputed that the indirect contribution of \$7,300,000 was not disclosed on campaign committee reports for Justices Rochford or O'Brien. It is undisputed that the committee providing the support to the Rochford and O'Brien campaigns did not disclose expenditures in compliance with Campaign Disclosure requirements during the campaign resulting in a final order assessing fines against the committee on or about November 21, 2023, fines of which the committee denied knowledge until after November 21, 2023.¹⁰ *Caulkins* denies knowledge of the non-record, indirect support (relevant under *Caperton* standards) at any time while the matter was pending before the Illinois Supreme Court or

⁹ Notwithstanding expressly supporting the Motion for Recusal/Disqualification squarely on the *Caperton* holding, the Orders did not reference or attempt to analyze the recusal based on the standards stated in *Caperton*.

¹⁰ The facts support the reasonable inference that the objective of the indirect contributor was to hide the fact of support for the Justices from the public during the election cycle. However, that does not support an inference that the Justices did not know that the contributor was making massively disproportionate financial contributions in support of their respective campaigns. A reasonable inference (if not irrebuttable) that the millions in media advertising during the campaign would be recognized by the candidates seeking election. As illustrated in law school, "you may infer Mars is not made of green cheese."

within thirty (30) days after its Judgment with Opinion issued August 11, 2023. S.R.066; S.R.068. It is undisputed that the Code of Judicial Conduct obligated the Justices to disclose the non-record facts when ruling on recusal. It is axiomatic that any claim by either Justice Rochford or O'Brien that she did not know that she received indirect support as discovered by the non-record facts when each was in a better position with duty to inquire compared to *Caulkins* establishes that *Caulkins* lack of knowledge on March 29, 2023 (date Motion for Recusal/Disqualification filed) was not the product of his negligence. Any contention that *Caulkins* knew the non-record facts seasonably but the Justices with the duty to disclose did not know would be patently invalid. In this case, *Caulkins* exhibited great diligence to raise the issues early and not after the issuance of an adverse decision on the merits. Given the specific facts of this case, a contention alleging *Caulkins*' neglect cannot present a basis to deny the requested relief.

The content of the Orders issued by Justices Rochford and O'Brien are suggestive that each knew, *without disclosure to Caulkins*, that dollars from attorneys¹¹, in addition to party dollars, were significant because each offered a tacit defense to attorney contribution.¹² Justice O'Brien, while characterizing *Caulkins*' concerns as "baseless

¹¹ Obviously, one of the counsel for Defendant Harmon had actual knowledge of the \$7,300,000 indirect contribution to the Justices while the Motion for Recusal/Disqualification was pending but stood silent on the subject. Perhaps, said counsel had no duty to disclose since nothing was filed on behalf of Harmon opposing the Motion. In and of itself, an unopposed Motion was denied at the instance of Justices seeking to participate in the case. Whether a duty to disclose under R.P.C. 3.3 Candor Toward the Tribunal to preserve the integrity of the adjudicative process was required is a question for which *Caulkins* offers no opinion or argument. However, the fact of a question does show the materiality of the facts to the ultimate rendition of the Judgment.

¹² The Motion for Recusal/Disqualification presented the attorney contributions as secondary compared to the party contributions. However, the non-record facts show attorney directed contributions dwarfing the party contributions nearly 3 to 1. Thus, the new facts are manifestly material and relevant.

accusations” wrote that the Illinois Judicial Ethics Committee has long advised that a judge has no obligation to disqualify herself “*merely* because a lawyer or party appearing before the judge was a campaign contributor.” (Emphasis added) Order of Justice O’Brien Denying Motion for Recusal, *Caulkins v. Pritzker*, 2023 IL 129453 (No. 129453). First, Justice O’Brien quoted a 1993 committee opinion issued 16 years before *Caperton*. Second, the aggregate direct and indirect contributions from a handful of parties and their respective counsel appearing in the case approximated \$10,000,000. Would a reasonable and informed person consider the circumstances as *merely* a contribution raising no issue related to impartiality? Think not! Similarly defending attorney contributions, Justice Rochford relied on authority antedating *Caperton* by 18 years and 11 years, respectively. However, that authority did not hold that limits on fundraising from lawyers were unconstitutional. Rather, the opinion recognized the state interest in regulating judicial fundraising. See *Stretton v. Disciplinary Bd. of the Supreme Court of Penn.*, 944 F.2d 137 (3rd. Cir., 1991). The second case addressed dismissal of a Section 1983 claim against an absolutely immunized judge because an attorney and his firm contributed \$21,000 to the judge, contributions the court distinguished from “extreme” scenarios raising constitutional concern. See *Sheperdson v. Nigro*, 5 F. Supp. 2d 305 (E.D. Pa., 1998). The Orders strained to avoid any *Caperton* analysis to embrace stale, non-precedential authority from Pennsylvania to create an illusion for impartiality. A “reasonable” observer would reject that the circumstances here presented any valid expectation for impartiality. Through the lens of appearances, the circumstances defy impartiality.

Also, the dollars contributed did not exist in a vacuum and must be considered with the other grounds raised in the unopposed Motion for Recusal/Disqualification. While the

content of the Orders implied actual knowledge of material attorney contribution, the Justices did not disclose or discuss the extent thereof in the Orders, opting to diminish the issue by characterizing the attorney contribution as merely incidental to a judicial campaign. The Orders' failure to address the non-record \$7,300,000 in indirect support, viewed in the context of *Caperton*, now appear constructed to sweep aside what each Justice had every reason to know was disqualifying. If known to the Justices, the lack of candor or transparency on issues drawn for which each Justice had the duty to be informed¹³ was unconscionable. Tolerating the analysis proffered in the Orders yields a stain on the legitimacy of the Illinois Supreme Court as an institution. The undisclosed, non-record facts deepen that stain.

7. Any argument that a rule of necessity overrides disqualification is devoid of merit in the circumstances presented. See Ill. Code of Jud. Conduct, R. 2.7. First, the rule of necessity/duty to serve is qualified by, "except when disqualification is required by Rule 2.11." Rule 2.11(A), in mandatory terms, provides that a judge "shall be disqualified in any proceeding in which the judge's impartiality might reasonably be questioned." The definition of "impartiality" incorporates Rules 1.2, 2.2, 2.10, 2.11, 2.13, 3.1, 3.12, 4.1 and 4.3. Ill. Code of Jud. Conduct, "Terminology." Rule 2.11(A) lists multiple examples where disqualification is required but does not limit the duty to disqualify to the enumerated areas. Notwithstanding, Rule 2.11(A)(1)¹⁴ and (5) directly are implicated.¹⁵ Additionally, as

¹³ Ill. Code of Judicial Conduct, R. 2.11(B). "Knowledge" includes that which may be inferred from circumstances. Ill. Code of Judicial Conduct (2023), Terminology.

¹⁴ See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) for disqualifying bias arising from campaign contributions from a party litigant.

¹⁵ Ill. Code of Jud. Conduct, Rules 1.2, 2.2, 2.4(B)(C), 2.10, 4.1(C)(3), and 4.4 also required recusal/disqualification.

explained above, the due process clause of the 14th Amendment undermines any necessity to serve contention. (*infra.* para. 5) Here, the Justices did not disclose the non-record, indirect support or the content of communications to explain the endorsed commitment to an assault weapons' ban as the Illinois Code of Judicial Conduct required. See Ill. Code of Jud. Conduct, Rule 2.11(C) and cmt 5. Here, the Defendants did not oppose the Motion for Recusal/Disqualification. Thus, the inference that the Justices “wanted” to hear this case, ostensibly affirming the articulated concerns raised by *Caulkins*, to wit: a commitment to a shared outcome with the Defendant contributors. Consider the paradox confronting the Justices here. On the one hand, the Justices assert necessity¹⁶ to serve on a case involving an important rule of decision overrides the actual or apparent bias undermining due process arising from the circumstances. On the other hand, the Judgment with Opinion declared that the Judgment does not reach the merits on those important public issues to create a rule of decision (precedent) informing the alleged necessity. *Caulkins v. Pritzker*, 2023 IL 129453, ¶ 4. Necessity analysis also fails because a sufficient number of justices would have remained, assuming sufficient concurrence, to act.¹⁷ Setting aside the resulting scramble the majority opinion delivered to well-established precedent that all matters of record for affirming judgment below may be relied upon¹⁸, especially in a matter reviewed *de novo*, the Judgment with Opinion decides very little other than

¹⁶ The Justices commented, in passing, that recusal could apply in all cases involving Defendants. First, this case presents more than just cash contributions. While the cash contributions are required grounds to recuse, recusal is not necessarily permanent. Here, the Illinois Code of Judicial Conduct informs an apt analogy that recusal should be for three years after taking office. See Ill. Code of Jud. Conduct, R. 2.11(A)(5).

¹⁷ ILL. CONST. Article VI, Sec. 3.

¹⁸ *Caulkins v. Pritzker* 2023 IL 129453, ¶¶ 87-90 (citing *Ultsch v. Illinois Municipal Retirement Fund*, 226 Ill. 2d 169, 192 (2007)).

Caulkins you lose—without another day in court—apparently to protect an outcome to which committed with the Contributors/Defendants¹⁹, an appearance animated by the massively disproportionate indirect, non-record contributions triggering this petition. Notwithstanding, all disqualification/recusal factors greatly outweighed serving under the facts presented. The “necessity” contention offers the most pernicious threat to the legitimacy of judicial action because,

“no amount of appellate review can remove completely the stain of judicial bias, both because it is too difficult to detect all the ways that bias can influence a proceeding and because public confidence is irreparably dampened once a case is allowed to proceed before a judge who appears to be tainted.” *In re Al-Nashiri*, 921 F.3d at 238.

8. The remedy of vacatur of the August 11, 2023, Judgment with Opinion finds compelling support in the following:

Strict as it is, that standard is easily satisfied here. While the ordinary route to relief is to appeal from a final judgment, when the relief sought is recusal of a disqualified judicial officer, the injury suffered by a party required to complete judicial proceedings overseen by that officer is by its nature irreparable. After conviction, no amount of appellate review can remove completely the stain of judicial bias, both because it is too difficult to detect all of the ways that bias can influence a proceeding and because public confidence is irreparably dampened once a case is allowed to proceed before a judge who appears to be tainted. The same is true for proceedings in which the disqualified adjudicator is gone but his orders remain. If a judge should have been recused from the proceedings, then any work produced by that judge must also be 'recused'—that is, suppressed. (Internal quotation marks and citations removed, and emphasis added.) *Id.*

The participation of Justices Rochford and O’Brien in the consideration of the case invalidates the Judgment and Opinion and yields disqualification of the balance of the

¹⁹ The fact that Justice O’Brien issued a dissent does not negate commitment to an assault weapons ban. Her dissent concluded that a general law was possible to remove the special benefits and immunities from the prohibition, that is, an actual categorical ban for all outcome.

Court to prevent a re-hearing on the merits of the Defendants' appeal. See *Williams v. Pennsylvania*, 579 U.S. 1, 15 (2016). Here, the taint attaches to this Court as a whole by the failure of two to recuse. Objective commands for due process required then and requires now that the decision not be reposed to the subjective review of the challenged Justices. The relief sought herein requires action by the Court—for the first time with the additional facts in the record. Accordingly, the only remedy is vacating the Judgment with Opinion.

The consequences flowing from vacatur of the August 11, 2023, Judgment with Opinion are equitable. The Judgment with Opinion (majority) states that no decision is made with respect to whether the Act survives constitutional challenge under the Second Amendment or Article I, Section 22 of the Illinois Constitution. Further, the majority declined to rule on the constitutionality of the process for the Act's enactment. Thus, vacating the Judgment with Opinion does not yield precedent on these constitutional issues. In a broader sense, one cannot ignore that the effect of the Judgment with Opinion was to tolerate state action to redefine Second Amendment rights and tacit approval of challenged procedures related to enactment that two dissenting Justices deemed unconstitutional and fatal to the Act. The Defendants' hands are not clean as they are complicit in the denial or appearance of denial of fair process as it was their actions, officially and as contributors, informing the bases for recusal/disqualification, including the decision to not oppose the Motion for Recusal/Disqualification, which, if opposed, certainly would have triggered an affirmative duty to disclose the additional \$7,300,000 of indirect support under R.P.C. 3.3. The public interest does not balance favorably under the totality of circumstances in preserving the Judgment with Opinion.

Once the August 11, 2023, Judgment with Opinion is vacated, as to the parties, the Trial Court Final Judgment would apply and stand as res judicata. *Nowak v. St. Rita High Sch.*, 197 Ill. 2d 381, 389 (2001). While questions reserved to subsequent litigation and advisory for purposes of this request for relief, once the August 11, 2023, Judgment with Opinion is vacated, as to all other citizens in Illinois, the Trial Court Final Judgment declaring the Act invalid may operate to estop collaterally any enforcement by the Defendants, including the Executive Branch through judgment against Pritzker and Raoul, in official capacities. *Id.* at 389-91; see also *Morr-Fitz, Inc. v. Blagojevich*, 231 Ill. 2d 474, 498 (2008); see also *In re N.G.*, 2018 IL 121939, ¶¶ 50-51. Similarly, preclusive effects could impact federal litigation focused solely on the Act. See *Allen v. McCurry*, 449 U.S. 90, 94 (1980). The Trial Court Final Judgment could establish clearly that Defendants know that any attempt to enforce or seize person or property under the auspices of the Act would violate the Fourth Amendment rights of the Illinois citizen to support remedy under 42 U.S.C. Section 1983.

It is true that the General Assembly may need to repeal (or amend) the Act in its present form to circumvent preclusive effect of the Trial Court Final Judgment in any application of the Act. Arguably, after the debate stemming from litigation and other venues, action by the General Assembly now would be expected to receive public input in a process far more likely to be transparent and compliant with the constitutional issues raised in the dissent. *Caulkins v. Pritzker*, 2023 IL 129453, ¶¶ 92-113 (Holder-White, J., dissenting). No public injury necessarily flows from a reboot, especially when the broader context of how the challenged law was enacted and the potential infringement of fundamental rights which the majority claimed was not considered in its Judgment. *Id.* at

¶ 4. If it is the will of the People and the interpretation of the Courts, then the law will develop deliberately and legitimately. Most importantly, this Court can cleanse the actual or apparent taint that has attached, and the self-rebuke could advance a new perspective on the intersection of judicial ethics, judicial campaigns, independence of the judiciary from the influence of separate branches, disproportionate contributions, and shared commitments. Vacating the August 11, 2023, Judgment with Opinion promises something transcendent, that is, rejecting the “Illinois Way” of the past to embrace a “Constitutional Way” for the future. That would be justice, conscionable action, flowing from the relief requested.

WHEREFORE, *Caulkins* respectfully requests the following:

A. An Order vacating the Judgment with Opinion issued on August 11, 2023, pursuant to 735 ILCS 5/2-1401(a);

B. If issued, the recall of any Mandate issued to the Trial Court pursuant to Illinois Supreme Court Rule 368(c) based on the vacated Judgment with Opinion;

C. An Order dismissing the Appeal in Docket No. 129453 on the basis that the Illinois Supreme Court is unable to convene a quorum or concurrence of four justices to render a decision as required by ILL. CONST. (1970) Art. VI, Section 3; and

D. For issuance of Mandate to the Trial Court that the Final Judgment entered by the Trial Court on March 3, 2023, stands in force and effect pursuant to Illinois Supreme Court Rule 369(b).

Dan Caulkins, Perry Lewin, Decatur Jewelry
& Antiques, Inc and Law-Abiding Gun
Owners of Macon County, a voluntary
unincorporated association,
Petitioners

FEATHERSTUN, GAUMER, STOCKS,
FLYNN & ECK, LLP, their Attorneys.

By: /s/ Jerrold H. Stocks
/s/ Brian D. Eck

Jerrold H. Stocks
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Brian D Eck
ARDC No. 06296309
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E-mail: beck@decatur.legal

CERTIFICATE OF FILING AND SERVICE

I certify that on January 22, 2024, I electronically filed the foregoing **Petition to Vacate Judgment with Opinion Entered August 11, 2023 Pursuant to 735 ILCS 5/2-1401(a)** with the Clerk of the Court for the Supreme Court of Illinois by using the Odyssey eFileIL system.

I further certify that the other participants in this appeal, named below, are registered service contacts on the Odyssey eFileIL system and that they will thus be served by the Odyssey eFileIL system, with a courtesy copy transmitted by e-mail. Justices Rochford and O'Brien were served by certified mail, return receipt requested, at the Illinois Supreme Court Building.

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Under the penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

Jerrold H. Stocks
 ARDC No. 6201986
 Brian D. Eck
 ARDC No. 06296309
 FEATHERSTUN, GAUMER, STOCKS,

/s/Jerrold H. Stocks
/s/Brian D. Eck
 Attorneys for Dan Caulkins,
 Perry Lewin, Decatur Jewelry
 & Antiques Inc., and Law
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Macon County, a voluntary
unincorporated association.

No. 129453

IN THE

SUPREME COURT OF ILLINOIS

DAN CAULKINS; PERRY LEWIN;)	PETITION TO VACATE
DECATUR JEWELRY & ANTIQUES)	JUDGMENT WITH OPINION
INC.; and LAW-ABIDING GUN)	ISSUED AUGUST 11, 2023
OWNERS OF MACON COUNTY, a)	
voluntary unincorporated association,)	
)	
Post Judgment Petitioners)	
)	
v.)	No. 129453
)	
Governor JAY ROBERT PRITZKER,)	
in his official capacity; KWAME RAOUL)	
in his capacity as Attorney General;)	
EMANUEL CHRISTOPHER WELCH, in)	
in his capacity as Speaker of the House; and)	
DONALD F. HARMON, in his capacity as)	
Senate President,)	
)	
Post Judgment Respondents)	
)	
and)	
)	
Justice ELIZABETH ROCHFORD and)	
Justice MARY KAY O'BRIEN)	
)	
Nominal Post Judgment Respondents.)	

**SUPPORTING RECORD ON PETITION TO VACATE JUDGMENT WITH OPINION
ENTERED AUGUST 11, 2023, PURSUANT TO 735 ILCS 5/2-1401(a)**

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UNITED STATES SUPREME COURT DOCKET; NO. 23-510

The material submitted in this section of the supporting record may be considered as evidence subject to judicial notice. See, *e.g.*, *Taylor v. Huntley*, 2020 IL App (3d) 180195, ¶ 12 (taking judicial notice of the docket and complaint from a federal district court action); IRE 803(8).

		Search documents in this case: <input type="text"/>	<input type="button" value="Search"/>
No. 23-510			
Title:	Dan Caulkins, et al., Petitioners v. Jay Robert Pritzker, in His Official Capacity as Governor of the State of Illinois, et al.		
Docketed:	November 14, 2023		
Linked with	23A527		
Lower Ct:	Supreme Court of Illinois		
Case Numbers:	(129453)		
Decision Date:	August 11, 2023		

DATE	PROCEEDINGS AND ORDERS
Nov 09 2023	Petition for a writ of certiorari filed. (Response due December 14, 2023) Petition Appendix Proof of Service Certificate of Word Count
Dec 01 2023	Waiver of right of respondent Jay Robert Pritzker, et al. to respond filed. Main Document
Dec 04 2023	Supplemental brief of petitioners Dan Caulkins, et al. filed. (Distributed) Main Document Other Certificate of Word Count Proof of Service
Dec 06 2023	DISTRIBUTED for Conference of 1/5/2024.
Dec 06 2023	Application (23A527) for writ of injunction, submitted to Justice Barrett. Main Document Lower Court Orders/Opinions Proof of Service
Dec 13 2023	Application (23A527) denied by Justice Barrett.
Jan 08 2024	Petition DENIED.

NAME	ADDRESS	PHONE
Attorneys for Petitioners		
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Party name: Dan Caulkins, et al.		
Attorneys for Respondents		
Jane Elinor Notz Counsel of Record	Office of the Attorney General, State of Illinois 100 West Randolph Street, 12th Floor Chicago, IL 60601 JANE.NOTZ@ILAG.GOV	312-814-5376
Party name: Jay Robert Pritzker, et al.		

Illinois State Board of Elections; Newly Discovered, Non-Record, Material Evidence

The material in this section of the supporting record may be considered as a public record, which are subject to judicial notice. See *Finish Line Express, Inc. v. Chicago*, 72 Ill. 2d 131, 136 (1978); IRE 803(8).

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[<https://www.elections.il.gov/CampaignDisclosure/CommitteeDetail.aspx?ID=pjvvqB5sFmnVGaAVjM2gRg%3d%3d>]

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results
Business Registration	Press Room	About the Board	

All for Justice	
Committee ID:	38661
Purpose:	Elect Supreme Court Justices who support justice
Address:	c/o Luke A. Casson 661 West Lake St. Suite 2N Chicago, IL 60661
Status:	Active
Type of Committee:	Independent Expenditure
Creation Date:	8/15/2022

Officers		
Name	Title	Address
Casson, Luke A	Chair	661 W Lake St., Suite 2N Chicago, IL 60661
Casson, Luke A	Treasurer	661 W Lake St., Suite 2N Chicago, IL 60661

Reports				
Report Type	Reporting Period	Filed	Pages	Clarification
<u>D-2</u> <u>Quarterly</u> <u>Report</u>	7/1/2023 to 9/30/2023	10/16/2023 10:37:18 AM Filed elec- tronically	3	
<u>D-2</u> <u>Quarterly</u> <u>Report</u>	4/1/2023 to 6/30/2023	7/7/2023 11:54:29 AM Filed elec- tronically	1	
<u>D-2</u> <u>Quarterly</u> <u>Report</u>	1/1/2023 to 3/31/2023	4/12/2023 5:00:13 PM Filed elec- tronically	1	
<u>D-2</u> <u>Quarterly</u> <u>Report</u> <u>(Amend- ment)</u>	10/1/2022 to 12/31/2022	1/31/2023 5:36:58 PM Filed elec- tronically	16	To correct descriptions of inde- pendent ex- penditures in Form B-9
<u>D-2</u> <u>Quarterly</u> <u>Report</u> <u>(Amend- ment)</u>	8/15/2022 to 9/30/2022	1/31/2023 5:35:31 PM Filed elec- tronically	8	To correct the descrip- tion of inde- pendent expendi- tures in Form B-9

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<u>D-2 Quarterly Report (Amendment)</u>	10/1/2022 to 12/31/2022	1/24/2023 10:37:46 AM Filed electronically	15	Mid America When originally entered, the amount was \$20,000, when in fact it was \$200,000. Corrected \$28,000 duplicate entry in 3Q, which affected 4Q totals. Fixed transposed ISDF and Fair Fight deposits.
<u>D-2 Quarterly Report (Amendment)</u>	8/15/2022 to 9/30/2022	1/23/2023 2:54:48 PM Filed electronically	8	There as a duplicate entry of \$28,000 for Edelson PC on 9/28/2022. Schedule A was corrected.

<u>D-2</u> <u>Quarterly</u> <u>Report</u>	10/1/2022 to 12/31/2022	1/17/2023 5:23:00 PM Filed elec- tronically	14	
<u>D-2</u> <u>Quarterly</u> <u>Report</u> <u>(Amend- ment)</u>	8/15/2022 to 9/30/2022	1/17/2023 5:08:56 PM Filed elec- tronically	8	The amount of a receipt had the num- bers trans- posed and this was corrected.
<u>Letter/</u> <u>Corre- spondence</u>		1/17/2023 12:44:05 PM Filed on paper	1	
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	1/17/2023 12:41:28 PM Filed elec- tronically	1	
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	1/17/2023 10:47:17 AM Filed elec- tronically	1	

<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	1/17/2023 9:14:30 AM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	11/7/2022 2:50:29 PM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	11/4/2022 11:40:40 AM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	11/3/2022 10:08:42 AM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	11/2/2022 9:46:55 AM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	10/31/2022 12:55:49 PM Filed elec- tronically	1

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<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	10/31/2022 10:47:40 AM Filed elec- tronically	1
<u>A-1</u> <u>(\$1000+</u> <u>Year</u> <u>Round)</u>	10/1/2022 to 12/31/2022	10/28/2022 1:54:00 PM Filed elec- tronically	1

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results
Business Registration	Press Room	About the Board	

State of Illinois Coronavirus Response Site

All for Justice
D-2 Quarterly Report
8/15/2022 to 9/30/2022
This report has 33 itemized
Individual Contributions totaling \$3,004,750.00.

129453

Contributed By	Address	Amount	Description
			Vendor Name
			Vendor Address
AFSCME Working Families Fund	1625 L St. Washington, DC 20036	\$225,000.00 9/14/2022	
Ankin Law Offices LLC	10 N. Dear- born Street #500 Chicago, IL 60602	\$15,000.00 9/23/2022	
Associated Firefighters of Illinois	927 S 2nd St Springfield, IL 62704	\$25,000.00 9/19/2022	
Cavanaugh Law Group	161 North Clark Street #2070 Chicago, IL 60601-3434	\$76,000.00 9/28/2022	
Chicago Stagehands Local 2 PAC	216 West Jefferson Street, #400 Chicago, IL 60661	\$5,000.00 9/28/2022	
Coplan & Crane, LTD	1111 West- gate Street Oak Park, IL 60301	\$15,000.00 9/23/2022	

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Corboy & Demtrio, PC	33 N. Dearborn Street, Fl. 21 Chicago, IL 60602	\$76,000.00 9/23/2022
Dudley & Lake LLC	325 N. Milwaukee Avenue, #202 Libertyville, IL 60048	\$16,000.00 9/28/2022
Edelson PC	350 N. LaSalle Street, 14th Floor Chicago, IL 60654	\$28,000.00 9/28/2022
Engineers Political Education Committee	1125 17th St. NW Washington, DC 20036	\$50,000.00 9/22/2022
Fair Fight	P.O. Box 501 LaGrange, IL 60525	\$500,000.00 9/19/2022
Friends of Bill Cunningham	10400 South Western Avenue Chicago, IL 60643	\$50,000.00 9/30/2022

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Friends of Don Harmon	6941-A W. North Ave. Oak Park, IL 60302	\$500,000.00 9/22/2022
Hurley McKenna & Mertz, P.C.	20 S. Clark Street, Ste. 2250 Chicago, IL 60603	\$62,666.66 9/23/2022
Illinois Political Action Com- mittee for Education	100 East Edwards St. Springfield, IL 62704	\$100,000.00 9/21/2022
Keefe, Keefe, Unsell, P.C.	6 Executive Woods Court Belleville, IL 62226	\$151,000.00 9/23/2022
Levin & Perconti	325 N. LaSalle Drive, #300 Chicago, IL 60654	\$76,000.00 9/23/2022
McKenna, Mark & Lisa	1169 South Scoville Oak Park, IL 60304	\$6,666.67 9/23/2022
Mertz, Michael & Victoria	1035 Ridge Avenue Evanston, IL 60202	\$6,666.67 9/23/2022

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Motherway & Napleton, LLP	140 S. Dearborn Street #1500 Chicago, IL 60603	\$15,000.00 9/23/2022
Phillips Law Office	161 North Clark Street, #4925 Chicago, IL 60601	\$20,000.00 9/28/2022
Phillips, Stephen J.	3 West Onwentsia Road Lake Forest, IL 60045	\$5,000.00 9/28/2022
Prince Law Firm	404 North Monroe PO Box 1050 Marion, IL 62959	\$19,000.00 9/28/2022
Quinn, Terrence	333 West Hubbard, #810 Chicago, IL 60654	\$25,000.00 9/28/2022
Roofers & Waterproofers Local 11	2021 Swift Dr. Suite A Oak Brook, IL 60523	\$5,000.00 9/22/2022

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Salvi, Schostok & Pritchard	218 N. Martin Luther King Jr. Ave. Waukegan, IL 60085	\$136,750.00 9/28/2022
SEIU IL Council PAC Fund	2229 S. Halsted Street Chicago, IL 60608	\$450,000.00 9/29/2022
Smart Illi- nois State Council	8124 42nd Street West Rock Island, IL 61201	\$10,000.00 9/15/2022
Smith Laden LLP	70 West Madison Street Chicago, IL 60602	\$30,000.00 9/28/2022
Taxman, Pollock, Murray & Beckker- man, LLC	225 W. Wacker Drive, #1650 Chicago, IL 60606	\$76,000.00 9/23/2022
The Cates Law Firm	216 West Pointe Drive, Ste. A Swansea, IL 62226	\$28,000.00 9/23/2022

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The Gori Law Firm, P.C.	156 North Main Street Edwards- ville, IL 62025	\$151,000.00 9/23/2022
Ullico Management Company	8403 Coles- ville Road Silver Spring, MD 20910	\$50,000.00 9/23/2022

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results
Business Registration	Press Room	About the Board	

State of Illinois Coronavirus Response Site

All for Justice
D-2 Quarterly Report
8/15/2022 to 9/30/2022
This report has 2 itemized
Individual Contributions totaling \$220,000.00.

129453

Contributed By	Address	Amount	Description
			Vendor Name
			Vendor Address
Liuna Chicago Laborers District Council PAC	999 McClintock Dr. Suite 300 Burr Ridge, IL 60527	\$200,000.00 9/12/2022	
Planned Parenthood of Illinois Action IE PAC	601 N. Brunns Lane Springfield, IL 62702	\$20,000.00 9/15/2022	

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results	Business Registration	Press Room	About the Board
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State of Illinois Coronavirus Response Site

All for Justice
D-2 Quarterly Report
8/15/2022 to 9/30/2022

This report has 2 itemized
Individual Contributions totaling \$1,500,000.00.

Received By	Address	Amount	Expended By	Purpose / Beneficiary	Candidate Name	Office – District	Supporting / Opposing
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA	\$750,000.00 9/29/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA	\$750,000.00 9/29/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting

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ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results
Business Registration	Press Room	About the Board	

State of Illinois Coronavirus Response Site

All for Justice
 D-2 Quarterly Report
 10/1/2022 to 12/31/2022
 This report has 76 itemized
 Individual Contributions totaling \$4,236,500.00.

Contributed By	Address	Amount	Description
			Vendor Name
			Vendor Address
Administrative District Council 1 of Illinois	660 N. Industrial Drive Elmhurst, IL 60126	\$3,000.00 10/17/2022	
AFSCME IL Council No. 31 PAC	615 Second Street PO Box 2328 Springfield, IL 62705	\$10,000.00 10/18/2022	

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AFT Solidarity 527	555 New Jersey Avenue, NW Washington, DC 20001	\$100,000.00 10/11/2022
Beam Legal Team LLC	954 W. Washington Blvd. #215 Chicago, IL 60607	\$20,000.00 10/24/2022
Boiler- makers Black- smiths Local No. 1	2941 S. Archer Avenue Chicago, IL 60608	\$2,500.00 10/24/2022
Boiler- makers Local 60 PAC	426 W. Edgewood Court Morton, IL 61550	\$2,500.00 10/24/2022
Boiler- makers – Black- smiths LEAP	753 State Avenue, #565 Kansas City, KS 66101	\$2,500.00 10/24/2022
Cavanaugh Law Group	161 North Clark Street, #2070 Chicago, IL 60601-3434	\$5,000.00 10/27/2022

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Citizens for Castro	940 N. Spring Street Elgin, IL 60120	\$15,000.00 11/4/2022
Citizens for Linda Holmes	PO Box 6374 Aurora, IL 60598	\$50,000.00 10/20/2022
Coffman Law Offices PC	2615 N Sheffield Ave, #1 Chicago, IL 60614	\$5,000.00 10/28/2022
Cogan & Powers, PC	1 E. Wacker Drive, #510 Chicago, IL 60601	\$26,000.00 10/11/2022
Committee to Elect Jay C. Hoffman	PO Box 23738 Belleville, IL 62223	\$25,000.00 10/24/2022
Committee to Elect Jay Hoffman	PO Box 23738 Belleville, IL 62223	\$50,000.00 10/7/2022
Conway, Kevin	1426 Clinton Place River Forest, IL 60305	\$44,000.00 10/11/2022

129453

Cooney & Conway	120 N. LaSalle Street Chicago, IL 60602	\$10,000.00 10/27/2022
Cooney Jr., Robert J.	931 Ashland Avenue River Forest, IL 60305	\$44,000.00 10/11/2022
Cooney, John	2238 N. Fremont Chicago, IL 60614	\$44,000.00 10/11/2022
Dudley & Lake LLC	325 N. Milwaukee Avenue, #202 Libertyville, IL 60048	\$5,000.00 10/27/2022
Fair Fight	P.O. Box 501 LaGrange, IL 60525	\$100,000.00 10/28/2022
Friends of Omar Aquino	1000 N. Rockwell Chicago, IL 60622	\$50,000.00 10/11/2022
Friends of Ram	3849 W. Devon Chicago, IL 60659	\$50,000.00 10/7/2022

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Great Lakes Region Organizing Committee	8770 W. Brwyn Mawr Avenue, #1212 Chicago, IL 60631	\$200,000.00 10/3/2022
Holland Law Firm LLC	211 N. Broadway, #2625 St. Louis, MO 63102	\$25,000.00 10/24/2022
IBEW Local 134	2722 S. Dr. Martin Luther King Jr. Chicago, IL 60616	\$50,000.00 10/25/2022
IBEW Local 146	3390 N. Woodford Street Decatur, IL 62526	\$5,000.00 11/7/2022
IBEW Local 176	1100 NE Frontage Road Joliet, IL 60431	\$15,000.00 10/25/2022
IBEW Local 21 PAC	1307 But- terfield Road, #422 Downers Grove, IL 60515	\$4,000.00 11/2/2022

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IBEW Local 309	2000A Mall Street Collinsville, IL 62234	\$3,000.00 10/25/2022
IBEW Local Union 51	3171 Green- head Drive Springfield, IL 62711	\$10,000.00 10/24/2022
IL Laborer's Legislative Committee	1 N. Old State Capitol Plaza #525 Springfield, IL 62701	\$250,000.00 10/19/2022
IL Political Active Letter Carriers	PO Box 7008 Rock Island, IL 61204	\$5,000.00 10/12/2022
IL Trial Lawyers Association PAC	401 Edwards Street Springfield, IL 62704	\$150,000.00 10/25/2022
IL Trial Lawyers Association PAC	401 Ed- wards Street Springfield, IL 62704	\$52,500.00 10/27/2022
Illinois Pipe Trades PAC Account	534 South Second Street #311 Springfield, IL 62701	\$500,000.00 10/4/2022

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International Brotherhood of Boilermakers	2358 Mascoutah Ave. Belleviller, IL 62220	\$2,500.00 10/24/2022
Iron Workers District Council of St. Louis and Vicinity	212 N. Kingshighway Blvd, #1025 St. Louis, MO 63108	\$10,000.00 10/31/2022
Ironworkers District Council of Chicago & Vicinity PAC	2700 South River Road' #118 Des Plaines, IL 60018	\$10,000.00 10/26/2022
Ironworkers District Council of Chicago & Vicinity PAC	2700 South River Road' #118 Des Plaines, IL 60018	\$10,000.00 10/18/2022
Ironworkers Local 498	5640 Sockness Drive Rockford, IL 61109	\$5,000.00 10/24/2022
Ironworkers PAC	1750 New York Avenue, N.W. Washington, DC 20006	\$10,000.00 11/2/2022

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ISDF, NFP	6939 W. North Avenue Oak Park, IL 60302	\$200,000.00 10/28/2022
IUPAT Political Action Together	7234 Park- way Drive Hanover, MD 21076	\$50,000.00 10/20/2022
Julie Morrison for State Senate	PO Box 646 Deerfield, IL 60015	\$50,000.00 10/7/2022
Keefe, Keefe, Unsell, P.C.	6 Executive Woods Court Belleville, IL 62226	\$10,000.00 10/25/2022
Korein &Tillery, LLC	205 N. Michigan Avenue #1950 Chicago, IL 60601	\$176,000.00 10/11/2022
Law Offices of Steven Malman & Assoc.	205 W. Ran- dolph, #610 Chicago, IL 60606	\$26,000.00 10/19/2022
Levin & Perconti	325 N. LaSalle Drive, #300 Chicago, IL 60654	\$5,000.00 10/25/2022

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Maune Raichle Hartley French & Muss LLC	1015 Locust Street St. Louis, MO 63101	\$100,000.00 10/25/2022
McNabola & Associ- ates, LLC	161 N. Clark Street, #2550 Chicago, IL 60601	\$11,000.00 10/11/2022
Mertz, Michael & Victoria	1035 Ridge Avenue Evanston, IL 60202	\$7,500.00 10/25/2022
Meyers & Flowers	225 N. Wacker Drive, #1515 Chicago, IL 60606	\$76,000.00 10/11/2022
Mid America Carpenters Regional Council	12 E. Erie Street Chicago, IL 60611	\$500,000.00 10/13/2022
Mid America Carpenters Regional Council	12 E. Erie Street Chicago, IL 60611	\$200,000.00 11/3/2022
NEA Advocacy Fund	1201 16th Street NW Washington, DC 20036	\$50,000.00 10/31/2022

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Parente & Noram	221 N. LaSalle Street, #1750 Chicago, IL 60601	\$15,000.00 10/11/2022
Phillips Law Office	161 North Clark Street, #4925 Chicago, IL 60601	\$5,000.00 10/25/2022
Planned Parenthood of Illinois Action IE PAC	601 N. Bruns Lane Springfield, IL 62702	\$20,000.00 10/21/2022
Prince Law Firm	404 North Monroe PO Box 1050 Marion, IL 62959	\$5,000.00 10/25/2022
Romanucci & Blandin, LLC	321 N. Clark Street, #900 Chicago, IL 60654	\$76,000.00 10/11/2022
Romanucci & Blandin, LLC	321 N. Clark Street, #900 Chicago, IL 60654	\$5,000.00 10/27/2022

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Salvi, Schostok & Pritchard	218 N. Mar- tin Luther King Jr. Ave. Waukegan, IL 60085	\$10,000.00 10/25/2022
Scott M. Bennett dba Bennett for Senate	PO Box 1383 Champaign, IL 61824	\$50,000.00 10/20/2022
SEIU Healthcare IL IN	2229 S. Halsted Street Chicago, IL 60608	\$100,000.00 10/11/2022
Shevlin Rev Trust, Gregory	26 Lashley Estates Drive Swansea, IL 62226	\$15,000.00 10/11/2022
Simmons, Hanly, Conroy	One Court Street Alton, IL 60202	\$10,000.00 10/25/2022
Simmons, Hanly, Conroy	One Court Street Alton, IL 60202	\$151,000.00 10/11/2022
Southern IL Political Victory	PO Box 611 Marion, IL 62959	\$25,000.00 10/25/2022

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State Conference of IBEW IL	6820 Mill Road Rockford, IL 61108	\$112,500.00 11/3/2022
Stephan, Zouras LLP	100 N. Riverside Plaza Ste. 2150 Chicago, IL 60606	\$15,000.00 10/8/2022
SWMW Law	701 Market Street, #1000 St. Louis, MO 63101	\$24,000.00 10/19/2022
Taxman, Pollock, Murray & Beckerman, LLC	225 W. Wacker Drive, #1650 Chicago, IL 60606	\$5,000.00 10/27/2022
The Driscoll Firm	211 N. Broadway, 40th Floor St. Louis, MO 63102	\$50,000.00 10/4/2022
The Gori Law Firm, P.C.	156 North Main Street Edwardsville, IL 62025	\$10,000.00 10/25/2022

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Wise Morrissey	161 N. Clark Street, #3250 Chicago, IL 60601	\$76,000.00 10/11/2022
Zayed Law Office	161 N. Clark Street, #3250 Chicago, IL 60601	\$15,000.00 10/11/2022

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results
Business Registration	Press Room	About the Board	

State of Illinois Coronavirus Response Site

All for Justice
D-2 Quarterly Report
10/1/2022 to 12/31/2022
This report has 2 itemized
Individual Contributions totaling \$147,943.58.

129453

Contributed By	Address	Amount	Description
			Vendor Name
			Vendor Address
Committee on Political Educa- tion(COPE)	555 New Jersey Ave. NW Wash- ington, DC 20001	\$100,000.00 10/3/2022	
Left Hook Communi- cations	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$47,943.58 12/23/2022	

ILLINOIS STATE BOARD OF ELECTIONS

Information for Voters	Campaign Disclosure	Running for Office	Candidate Filing and Results	Business Registration	Press Room	About the Board
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State of Illinois Coronavirus Response Site

All for Justice
D-2 Quarterly Report
10/1/2022 to 12/31/2022

This report has 33 itemized
Individual Contributions totaling \$5,830,044.56.

Received By	Address	Amount	Expended By	Purpose / Beneficiary	Candidate Name	Office – District	Supporting / Opposing
ALG Polling d/b/a Impact Research	260 Commerce Street, 4th Floor Montgomery, AL 36104	\$16,850.00 10/20/2022	<u>All for Justice</u>	Polling	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
ALG Polling d/b/a Impact Research	260 Commerce Street, 4th Floor Montgomery, AL 36104	\$16,850.00 10/20/2022	<u>All for Justice</u>	Polling	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
ALG Polling d/b/a Impact Research	260 Commerce Street, 4th Floor Montgomery, AL 36104	\$86,300.00 10/20/2022	<u>All for Justice</u>	Polling	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
ALG Polling d/b/a Impact Research	260 Commerce Street, 4th Floor Montgomery, AL 36104	\$86,300.00 10/20/2022	<u>All for Justice</u>	Polling	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting

(S.R.033)

Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$858,382.35 10/3/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$858,382.35 10/4/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$90,000.00 11/7/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$90,000.00 11/7/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$50,000.00 11/4/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$50,000.00 11/4/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$225,000.00 10/31/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting

(S.R.034)

Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$225,000.00 10/31/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$70,000.00 10/31/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$70,000.00 10/31/2022	<u>All for Justice</u>	Media – production hird	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$100,000.00 10/24/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$100,000.00 10/24/2022	<u>All for Justice</u>	Media – production hird	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$200,000.00 10/27/2022	<u>All for Justice</u>	Media – production hird	Elizabeth Rochford	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$200,000.00 10/27/2022	<u>All for Justice</u>	Media – production hird	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting

Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$375,000.00 10/11/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA	\$375,000.00 10/11/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$359,313.82 10/12/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$359,313.83 10/14/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$60,347.50 10/14/2022	<u>All for Justice</u>	Media – production	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Left Hook Communications	2601 Ocean Park Drive, #324 Santa Monica, CA 90405	\$60,347.50 10/14/2022	<u>All for Justice</u>	Media – production	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
The Sexton Group	440 N. Wells St., Ste. 540 Chicago, IL 60654	\$50,870.56 11/15/2022	<u>All for Justice</u>	Robo calls	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting

Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$292,708.86 10/20/2022	<u>All for Justice</u>	Mailing	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$23,736.81 10/7/2022	<u>All for Justice</u>	Mailing	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$47,473.61 10/12/2022	<u>All for Justice</u>	Mailing	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$47,473.61 10/12/2022	<u>All for Justice</u>	Mailing	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$34,474.05 10/14/2022	<u>All for Justice</u>	Mailing	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$34,474.05 10/14/2022	<u>All for Justice</u>	Mailing	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$292,708.86 10/20/2022	<u>All for Justice</u>	Mailing	Mary K. O'Brien	Illinois Supreme Court – Third District	Supporting
Wildfire Mail Co LLC	220 SE 6th Street, #300 Des Moines, IL 50309	\$23,736.80 10/7/2022	<u>All for Justice</u>	Mailing	Elizabeth Rochford	Illinois Supreme Court – Second District	Supporting

ILLINOIS STATE BOARD OF ELECTIONS

129453

Information For Voters	Campaign Disclosure	Voting Systems	Running for Office	Candidate Filing and Results	Business Registration	Press Room	About The Board
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Print This List

Committee Name	Imposed Date	Balance Due	Doc Name	Rpt Pd End Date	Reason	Violation Type
<u>All Citizens for Matthew Johnson</u>	3/19/2013	\$5,000.00			VIOLATION OF BOARD ORDER	Violation of Board Order
<u>All for Justice</u>	8/3/2023	\$500.00	B-1	9/30/2022	77 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$1,000.00	B-1	9/30/2022	77 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	71 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	71 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	44 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	67 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	67 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	67 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	67 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	67 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	69 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	69 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	69 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	70 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	70 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	58 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	58 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	61 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	61 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report
<u>All for Justice</u>	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report

(S.R.038)

All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	56 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	52 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	52 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	52 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	51 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	51 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	63 days late	Late Report
All for Justice	8/3/2023	\$3,000.00	B-1	9/30/2022	74 days late	Late Report
All for Justice	8/3/2023	\$2,000.00	B-1	9/30/2022	75 days late	Late Report
Allen For Illinois	5/15/2023	\$275.00	Quarterly	12/31/2022	11 days late	Late Report
Allen For Illinois	1/13/2023	\$500.00	Quarterly	6/30/2022	64 days late	Late Report
Allen For Illinois	10/6/2023	\$50.00	Quarterly	3/31/2023	1 day late	Late Report
Alliance of Automotive Service Providers of Illinois (AASPI)-PAC	12/13/2021	\$500.00	Quarterly	3/31/2021	63 days late	Late Report
Alliance of Automotive Service Providers of Illinois (AASPI)-PAC	6/6/2022	\$600.00	Quarterly	9/30/2021	8 days late	Late Report
Alliance of Automotive Service Providers of Illinois (AASPI)-PAC	3/25/2022	\$50.00	Quarterly	6/30/2021	1 day late	Late Report
Alton Township Democrats	10/6/2023	\$500.00	Quarterly	3/31/2023	24 days late	Late Report
Alton Township Democrats	3/7/2023	\$500.00	Quarterly	9/30/2022	14 days late	Late Report
American Conservative PAC	1/13/2023	\$1,000.00	Quarterly	6/30/2022	64 days late	Late Report
American Conservative PAC	9/27/2022	\$125.00	Quarterly	3/31/2022	5 days late	Late Report
American Conservative PAC	5/15/2023	\$200.00	Quarterly	12/31/2022	4 days late	Late Report

Springfield Office
2329 S. MacArthur Blvd.
Springfield, IL 62704
Phone: 217-782-4141
Fax: 217-782-5959

Chicago Office
69 W. Washington Suite LL08
Chicago, IL 60602
Phone: 312-814-6440
Fax: 312-814-6485

External Links
Illinois Amber Alert
National Center for Missing and Exploited Children
Illinois Election Statutes
Federal Election Commission
State of Illinois Homepage
Election Assistance Commission

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Publications
Glossary
Frequently Asked Questions



STATE OF ILLINOIS)
) SS
COUNTY OF SANGAMON)

STATE BOARD OF ELECTIONS
STATE OF ILLINOIS

All for Justice ID# 38661
c/o Luke A. Casson
661 West Lake St.
Suite 2N
Chicago, IL 60661

In the Matter Of:)
Illinois State Board of Elections,)
Complainant,)
vs.) Case # 22MA003
All for Justice,)
Respondent,)

FINAL ORDER

This matter coming to be heard this 21st day of November, 2023, as an assessment of a civil penalty under Article 9 of the Illinois Election Code (10 ILCS 5/9-1 *et seq.*), and the State Board of Elections being advised in the premises through assessment letters, based upon the Board's business records,

THE BOARD FINDS:

- 1. On August 03, 2023, in case number 22MA003, \$108,500.00 in civil penalties were assessed against Respondent for delinquent filings of:

September 2022 B-1	\$500.00	\$500.00
September 2022 B-1	\$1,000.00	\$1,000.00
September 2022 B-1	\$2,000.00	\$2,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
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September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
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September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
September 2022 B-1	\$3,000.00	\$3,000.00
Totals:	\$108,500.00	\$108,500.00

and Respondent was notified thereof by a letter of the same date.

- 2. An appeal of the civil penalty was not submitted by the Committee; and

IT IS ORDERED:

- 1. The assessment of a \$108,500.00 fine for the delinquent filing of the reports listed above is affirmed; and
- 2. Civil penalties in the amount of \$108,500.00 are now due and owing, to be paid within 30 days of the date of this order; and
- 3. The effective date of this Order is December 4, 2023; and
- 4. This is a Final Order subject to review under Administrative Review Law and Section 9-22 of the Election Code.

DATED: December 4, 2023



Casandra B. Watson, Chair

CERTIFICATE OF SERVICE

The undersigned of the Illinois State Board of Elections hereby certifies that the foregoing order was served upon each of the addresses listed in the order by enclosing the same in an envelope prepaid and depositing the envelope in a U.S. mailbox in Springfield, Illinois on this 4th day December, 2023.



Tom Newman

**STATE BOARD OF ELECTIONS
STATE OF ILLINOIS**

2329 S. MacArthur Blvd.
Springfield, Illinois 62704-4503
217/782-4141
Fax: 217/782-5959

69 W. Washington St, Ste. LL-08
Chicago, Illinois 60602
312/814-6440
Fax: 312/814-6485



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EXECUTIVE DIRECTOR
Bernadette M. Matthews
August 3, 2023

All for Justice ID# 38661
Luke A Casson
661 West Lake Street, Ste 2N
Chicago, IL 60661

Dear All for Justice:

This committee has failed to timely report the following independent expenditures of \$1000 or more (Schedule B-1) as required by the Illinois Campaign Disclosure Act for the 3rd Quarter 2022:

<u>Expended to</u>	<u>Date of Independent Expenditure</u>	<u>Amount of Independent Expenditure</u>	<u>Date Reported</u>	<u>Days Late</u>	<u>Violation number</u>	<u>Fine Assessed</u>
Left Hook Communications	9/29/2022	\$750,000	1/31/2023	77	1	\$500
Left Hook Communications	9/29/2022	\$750,000	1/31/2023	77	2	\$1000

AMOUNT DUE

\$1,500

In addition, this committee has failed to timely report the following independent expenditures of \$1000 or more (Schedule B-1) as required by the Illinois Campaign Disclosure Act for the 4th Quarter 2022:

<u>Expended to</u>	<u>Date of Independent Expenditure</u>	<u>Amount of Independent Expenditure</u>	<u>Date Reported</u>	<u>Days Late</u>	<u>Violation number</u>	<u>Fine Assessed</u>
Left Hook Communications	10/3/2022	\$858,382.35	1/31/2023	75	3	\$2000
Left Hook Communications	10/4/2022	\$858,382.35	1/31/2023	74	4	\$3000
ALG Polling d/b/a Impact Research	10/20/2022	\$16,850	1/31/2023	63	5	\$3000
ALG Polling d/b/a Impact Research	10/20/2022	\$16,850	1/31/2023	63	6	\$3000
ALG Polling d/b/a Impact Research	10/20/2022	\$86,300	1/31/2023	63	7	\$3000
ALG Polling d/b/a Impact Research	10/20/2022	\$86,300	1/31/2023	63	8	\$3000
Left Hook Communications	11/7/2022	\$90,000	1/31/2023	51	9	\$3000
Left Hook Communications	11/7/2022	\$90,000	1/31/2023	51	10	\$3000

www.elections.il.gov

Left Hook Communications	11/4/2022	\$50,000	1/31/2023	52	X ¹¹	\$3000
Left Hook Communications	11/4/2022	\$50,000	1/31/2023	52	X ¹²	\$3000
Left Hook Communications	10/31/2022	\$225,000	1/31/2023	56	X ¹³	\$3000
Left Hook Communications	11/4/2022	\$50,000	1/31/2023	52	X ¹¹	\$3000
Left Hook Communications	10/31/2022	\$225,000	1/31/2023	56	X ¹⁴	\$3000
Left Hook Communications	10/31/2022	\$70,000	1/31/2023	56	X ¹⁵	\$3000
Left Hook Communications	10/31/2022	\$70,000	1/31/2023	56	X ¹⁶	\$3000
Left Hook Communications	10/24/2022	\$100,000	1/31/2023	61	X ¹⁷	\$3000
Left Hook Communications	10/24/2022	\$100,000	1/31/2023	61	X ¹⁸	\$3000
Left Hook Communications	10/27/2022	\$200,000	1/31/2023	58	X ¹⁹	\$3000
Left Hook Communications	10/27/2022	\$200,000	1/31/2023	58	X ²⁰	\$3000
Left Hook Communications	10/11/2022	\$375,000	1/31/2023	70	X ²¹	\$3000
Left Hook Communications	10/11/2022	\$375,000	1/31/2023	70	X ²²	\$3000
Left Hook Communications	10/12/2022	\$359,313.82	1/31/2023	69	X ²³	\$3000
Left Hook Communications	10/14/2022	\$359,313.83	1/31/2023	67	X ²⁴	\$3000
Left Hook Communications	10/14/2022	\$60,347.50	1/31/2023	67	X ²⁵	\$3000
Left Hook Communications	10/14/2022	\$60,347.50	1/31/2023	67	X ²⁶	\$3000
Left Hook Communications	11/15/2022	\$50,870.56	1/31/2023	44	X ²⁷	\$3000
Wildfire Mail Co LLC	10/20/2022	\$292,708.86	1/31/2023	63	X ²⁸	\$3000
Wildfire Mail Co LLC	10/7/2022	\$23,736.81	1/31/2023	71	X ²⁹	\$3000
Wildfire Mail Co LLC	10/12/2022	\$47,473.61	1/31/2023	69	X ³⁰	\$3000
Wildfire Mail Co LLC	10/12/2022	\$47,473.61	1/31/2023	69	X ³¹	\$3000
Wildfire Mail Co LLC	10/14/2022	\$34,474.05	1/31/2023	67	X ³²	\$3000
Wildfire Mail Co LLC	10/14/2022	\$34,474.05	1/31/2023	67	X ³³	\$3000
Wildfire Mail Co LLC	10/20/2022	\$292,708.86	1/31/2023	63	X ³⁴	\$3000
Wildfire Mail Co LLC	10/7/2022	\$23,736.80	1/31/2023	71	X ³⁵	\$3000
Left Hook Communications	10/31/2022	\$225,000	1/31/2023	56	X ¹⁴	\$3000
Left Hook Communications	10/31/2022	\$70,000	1/31/2023	56	X ¹⁵	\$3000

AMOUNT NOW DUE**\$98,000**

As authorized by Section 9-10(g) of the Illinois Campaign Disclosure Act (10 ILCS 5/9-1, *et seq.*), your committee is subject to a fine for the delinquent filings. This fine will be imposed and due with the issuance of a Final Board Order after the 30-day appeal period has expired. This amount must be paid, including any previously assessed fines, within 30 days of the issuance of the Order.

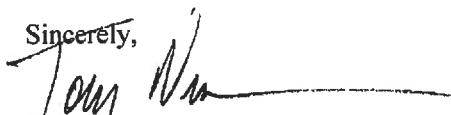
Enclosed, please find the forms with which you may appeal the assessed fine if you believe the civil penalty has been assessed in error. **Notice of Appeal must be filed within 30 days of the date of this assessment notice. If you fail to file a Notice of Appeal by September 3, 2023 you forfeit the right to contest this assessment.**

TOTAL AMOUNT NOW DUE**\$99,500**

If you do not appeal this assessment, you must pay your fine within 30 days of the Final Board Order. However, you may also elect to pay the fine at this time. You may mail or deliver payments to the State Board of Elections, Attn: Campaign Disclosure, 2329 S MacArthur Blvd., Springfield, IL 62704. You may also pay by MasterCard, Discover or American Express for an additional fee.

Additional information regarding assessments is available in 26 Ill. Adm. Code §125.425. If you have any questions regarding the appeal procedure, please call Laura Marbold at 217-782-1543.

Sincerely,



Tom Newman, Director
Campaign Disclosure Division

TN: lm

Enclosures: appeal packet

Illinois Media Articles

The material in this section of the supporting record is not submitted to prove the truth of the matter asserted. Rather, the material is provided to show the type of information being provided to Illinois citizens, which information would cause a reasonable and informed observe to question Justice Rochford and Justice O'Brien's impartiality. Self-Authenticated (Self-Authenticating IRE 902(6)).

129453

Democratic PAC shifts cash out of its account as it gets hit with one of the biggest state election board fines ever

**Rick Pearson and Jeremy Gorner, Chicago Tribune
Nov 21, 2023**



A political committee that helped expand the Democratic majority on the Illinois Supreme Court and was backed by Illinois Senate President Don Harmon emptied its bank account just weeks after being notified it faced one of the largest state election fines ever for failing to timely disclose millions of dollars it spent until after last November's election.

On Tuesday, the State Board of Elections issued a final order assessing \$99,500 in fines against the All for Justice political action committee. The action followed a Tribune story earlier this year detailing the PAC's reporting deficiencies as it spent more than \$7.3 million on independent expenditures supporting Democratic Justices Elizabeth Rochford and Mary Kay O'Brien, both of whom won their campaigns and increased the court's Democratic majority to 5-2 from a previous 4-3 advantage.

All for Justice was notified Aug. 3 by the state elections board it would be fined for 35 specific violations of failing to timely disclose to the public its spending on behalf of Rochford and O'Brien in the crucial closing months before the November 2022 election.

The PAC was given 30 days to appeal or seek a reduction in the fines, but did not do so. Instead, on Aug. 31, it transferred its remaining cash balance of \$149,516 to another independent expenditure committee, Chicago Independent Alliance, a PAC that has been dormant since July 2019, six months after it was created.

All for Justice and the Chicago Independent Alliance share the same Chicago address as the Andreou & Casson law firm. Documents filed with the state elections board show Luke Casson, a founding partner of the law firm, as chair and treasurer of All for Justice. On his previous LinkedIn profile, which is no longer active, Casson listed himself as "counsel for the office of the president of the Illinois Senate," who is Harmon, and political director of the Democratic Party of Oak Park, which is Harmon's political base.

A day before All for Justice transferred its remaining cash to the Chicago Independent Alliance PAC, the alliance PAC also received a \$200 donation from the Andreou & Casson law firm. It was the first contribution the alliance PAC had received in more than 4 ½ years.

State election board officials said they moved forward with a final order to assess the fines against All for Justice – despite its empty bank account – by citing a provision in its administrative rules that makes the

officers of a PAC “personally liable” for civil penalties if the PAC “lends or donates funds to a second political committee” while it owes fines to the State Board of Elections.

Casson is the only officer of the All for Justice PAC, according to state election records.

Reached by the Tribune, Casson said he had no comment on the board’s action. He said, “I didn’t know” and “I had no knowledge” of the fines, despite the board’s Aug. 3 notice levying the fines. He did not respond when asked if he was saying he did not receive the board’s notice.

Asked why 28 days after the board’s notice of the fines was issued All for Justice transferred its remaining funds to the dormant Chicago Independent Alliance PAC, Casson responded: “That’s none of your business.” Asked if the funds transfer was an attempt to circumvent paying the fines, Casson said, “It wasn’t. I just said we don’t have any comment.”

The Chicago Independent Alliance PAC was launched with \$20,000 in small donations and spent more than \$13,000 in its first three months, including \$9,000 in support of a Chicago mayoral candidate that it did not name – a violation of state campaign finance laws but it was never cited by the state election board.

The Chicago Independent Alliance previously paid a \$950 fine to the state elections board in July 2019 for filing its required quarterly report of funds raised and spent 25 days late, state records showed. The alliance

PAC lists its purpose as making “independent expenditures in support of independent candidates and common sense economic policies for growth and prosperity,” state election records showed.

For years, the Chicago Independent Alliance PAC had a cash balance of \$5,206. With the transfers from All for Justice PAC and the contribution from Casson’s law firm, the independent alliance PAC reported a cash balance of nearly \$155,000.

The All for Justice committee was fined Tuesday by the state elections board for failing to timely file expenditures of \$1,000 or more within two days of spending the money. The committee spent heavily on television ads painting Rochford and O’Brien’s Republican opponents as virulent anti-abortion candidates in the months after the U.S. Supreme Court decision ended *Roe v. Wade* and sent the issue of abortion rights to the states.

Rochford, a Lake County judge, beat Mark Curran, a former Lake County sheriff, with a healthy 55.2% of the vote. O’Brien, an appellate court judge, defeated Michael Burke, a sitting Supreme Court justice who had been appointed to fill a vacancy, with only 51.1% of the vote.

By not following the disclosure rules, the spending by All for Justice – which represented a quarter of the more than \$23 million spent overall on the two Supreme Court races and nearly 40% of the money behind the Democratic candidates – went undisclosed until the end of January, months after the election.

All for Justice was formed in August 2022 as an independent expenditure political action committee, which can raise and spend unlimited amounts of money to support or oppose candidates but cannot coordinate its spending with the contenders it backs.

Because it began spending money on Sept. 29, within 60 days of the Nov. 8, 2022, election, All for Justice was required to file detailed public reports within two days for each expenditure of \$1,000 or more that it made on behalf of Rochford and O'Brien or against Curran and Burke. Instead, they filed nothing until amended reports were filed months after the election.

Kent Redfield, a professor emeritus of political science at the University of Illinois at Springfield and a campaign finance expert, called the actions of All for Justice in shedding its bank account "the moral and ethical equivalent of hiding assets before filing for divorce or bankruptcy."

"The Illinois campaign finance law relies on transparency and timely reporting to (ensure) that the general public and the news media know who is supporting a candidate for public office," Redfield said. "When the system is working correctly, citizens and the news media know in real time where the money supporting elections comes from and who it is benefiting."

But, he said, "A willful violation of this magnitude strikes at the heart of the trust and sense of legitimacy that is necessary to sustain our political system."

Although All for Justice did not file timely expenditure reports, it did file the mandated timely reports on money it was taking in from contributors, indicating an awareness of the state's campaign finance laws.

All for Justice filed quarterly reports on what it raised and spent, but because the filing of the report covering Oct. 1 through Dec. 31, 2022, was not required until Jan. 17, it wasn't until more than two months after the election that the group publicly disclosed spending nearly \$6 million of its \$7.3 million in independent expenditures.

And even then, it did not list which candidates it spent money on to benefit from the work of specific vendors, such as those involved in nearly \$6.3 million in TV ads and nearly \$800,000 in mailers, as required by law.

Election authorities, alerted to the transparency issue by Redfield and the Tribune earlier this year, contacted representatives of All for Justice and it filed amended quarterly reports providing the required detailed expenditure information Jan. 31 – weeks after Rochford and O'Brien were sworn in.

Harmon, the state Senate president, was a major donor to All for Justice, contributing \$500,000 from his personal campaign fund and another \$200,000 from the Illinois Senate Democratic Fund he controls.

The Harmon-backed donations were part of nearly \$1.1 million in contributions from Democratic politicians, including \$75,000 from state Rep. Jay Hoffman of Swansea and five senators who gave \$50,000 each.

Another nearly \$3.4 million came in to All for Justice from organized labor groups, while lawyers, law firms and related entities provided more than \$2.3 million to the group.

Overall, All for Justice spent \$3.7 million on behalf of Rochford and more than \$3.6 million on behalf of O'Brien, election reports ultimately showed.

Harmon has played a leading role in the passage of several campaign finance reform initiatives.

A spokesman for Harmon said Casson acts as an outside legal counsel for the Senate president's office and is not a state employee.

Asked through his spokesmen about what relationship Harmon has with Casson and the actions Casson has taken divesting funds from the All for Justice PAC, Harmon did not directly respond.

Instead, Harmon released a statement saying, "All political committees in Illinois have a responsibility and duty to comply with all applicable campaign finance regulations."

When the Tribune first reported issues surrounding the transparency of All for Justice's spending in February, Harmon said in a statement that if the state elections board "needs new tools" to make disclosures "more intuitively and more timely, I am happy to work with them to achieve the shared goal of meaningful campaign finance transparency."

129453

The General Assembly took no action on the issue this year.

129453

COOK COUNTY RECORD

Tuesday, November 28, 2023

Campaign committee created to smear GOP IL Supreme Court candidates hit with big campaign finance fine

HOT TOPICS



Don Harmon | Illinois Senate President

By Jonathan Bilyk

Nov 22, 2023

A political spending committee run by a close political ally of Illinois State Sen. President Don Harmon, and which spent millions of dollars to ensure Democratic control of the Illinois Supreme Court, has been hit with one of the largest fines in state history for violating campaign finance rules.

Further, campaign finance records show that, after the state elections board issued a notice of assessment and warning of the potential penalties, the committee transferred all of the remaining funds to a different

political spending committee, also purportedly led by the same Harmon ally.

On Nov. 21, the Illinois State Board of Elections signed off on an order directing the All for Justice campaign committee to pay \$99,500 in penalties for refusing to file campaign spending reports, as required by state law and Illinois elections rules.

The news was first reported by the Chicago Tribune.

The All for Justice independent expenditure committee was created in August 2022 by personal injury lawyer Luke Casson.

Casson is one of the principles at the firm of Andreou & Casson, located on West Lake Street in Chicago's Loop.



Luke A. Casson | andreou-casson.com

Casson, however, resides in suburban Oak Park, where he has been active in the local Democratic Party for years. He also serves as an elected member of the board of trustees at Triton College.

Casson has been politically linked to his fellow powerful Oak Park Democrat, Senate President Harmon. Perhaps as a symbol of his position, Casson was selected to represent Harmon as part of the legal team that led the defense of the controversial SAFE-T Act, the state criminal justice reform law that made Illinois the first state in the country to prohibit judges from using cash bail to keep criminal defendants in jail pending trial.

That defense included proceedings before the Illinois Supreme Court, including two new Democratic justices that Casson's All for Justice committee helped elect.

From its inception, All for Justice raised and spent more than \$7 million to back the campaigns of Democratic state Supreme Court justices Elizabeth Rochford and Mary K. O'Brien.

The ad campaign targeted Republican state Supreme Court nominees former Lake County Sheriff Mark Curran and former state Supreme Court Justice Michael Burke, particularly asserting that the Republicans would somehow overturn abortion rights in Illinois, which is led by Gov. JB Pritzker, regarded as one of the most enthusiastically pro-abortion governors in the country, and a pro-abortion Democratic supermajority in General Assembly.

The ads smeared the Republican candidates as ideologues who would rule in line with the wishes of conservative politicians. Those accusations came despite Rochford's and O'Brien's own campaign pledges in support of abortion rights and touted endorsements from left-wing political groups.

Rochford and O'Brien also received millions of dollars in donations from Pritzker, Harmon and Illinois House Speaker Emanuel "Chris" Welch, the most powerful Democratic lawmaker in the state House.

Rochford and O'Brien have been publicly accused of violating Illinoisans' rights to due process by refusing to step aside from ruling on the constitutionality of controversial new laws supported by Pritzker, Harmon and Welch.

Recently, challengers to the state's ban on so-called "assault weapons" has asked the U.S. Supreme Court to step in and review the Illinois state high court's ruling, authored by Rochford, upholding the gun ban law. The challengers say Rochford and O'Brien refusal to recuse themselves in that case amounts to defiance of the U.S. Supreme Court's 2009 ruling in the case known as *Caperton v. Massey*. In that case, the SCOTUS ruled that a West Virginia Supreme Court justice violated litigants' constitutional rights by refusing to recuse himself in a case in which he received substantial campaign support from one of the parties.

The All for Justice campaign was heavily bankrolled by the state's trial lawyers, as well as other big Democratic donors, such as labor unions, teachers unions, out-of-state left-wing political action committees, and hundreds of thousands of dollars from a campaign connected to Harmon himself.

Notably, the committee also received \$500,000 from the Fair Fight group, associated with failed Democratic Georgia gubernatorial candidate Stacy Abrams.

The big donation from Abrams' group was accepted despite Democrats' protests that Republicans were intending to use big money donations from outside the state to fund state Supreme Court candidates in 2022. Democratic lawmakers cited those concerns in passing a law barring people from outside Illinois from donating directly to judicial campaigns and candidates in Illinois.

The law, however, exempted independent expenditure committees, like All for Justice, from the ban.

The race in 2022 was also literally shaped by Democratic lawmakers, who moved in 2021 to take the unprecedented step of gerrymandering Illinois State Supreme Court judicial district boundaries, in what critics said was a nakedly partisan move to prevent Republicans from potentially securing a majority on the court, using the old district lines that had remained unchanged since 1963.

Ultimately, Rochford's and O'Brien's victory allowed Democrats to increase their majority on the Illinois Supreme Court from 4-3 to 5-2. That supermajority has since issued rulings upholding several highly controversial state laws and policies enacted by Pritzker and his allies in the General Assembly.

According to the state Board of Elections, however, the All For Justice campaign committee ignored state law by failing to file reports detailing its campaign spending from its inception in August 2022 to the end of the year.

In August 2023, **the ISBE sent Casson a letter notifying him that the board had determined All For Justice had violated Illinois campaign finance laws** and was being assessed \$99,500 in penalties.

That figure alone would rank among the highest ever levied in Illinois history for such a violation, an ISBE spokesperson said.

However, the spokesperson said, Casson and All For Justice declined the option to appeal within a 30 day period prescribed by the law.

The spokesperson said nearly all such penalties are appealed, and typically reduced on appeal.

Campaign finance records show that about a month after ISBE notified Casson of the penalties, All For Justice then transferred \$149,515 – all that remained in its accounts – to the Chicago Independent Alliance campaign committee.

According to online campaign disclosure records, the president and treasurer of the Chicago Independent Alliance is identified as Mary C. Hunsdale, of Hinsdale.

However, the business address for the Chicago Independent Alliance committee is 661 W. Lake St., Suite 2N, Chicago – the same address as Casson’s law office and the same address used by All for Justice.

The Chicago Independent Alliance committee states as its purpose: “To make independent expenditures in support of independent candidates and common sense economic policies for growth and prosperity.”

While All For Justice’s accounts have been allegedly cleared, under state law, a committee’s officers may still be held individually liable for penalties assessed against the committee by the ISBE.

ORGANIZATIONS IN THIS STORY

ILLINOIS STATE BOARD OF ELECTIONS. STATE SENATOR DON

Editorial | PAC's shenanigans another sign of political class' disrespect for law, Illinois

The Editorial Board+

Nov 26, 2023

Here's another reason to be disgusted with Illinois politics.

No one is ever going to brag about the effective oversight of campaign spending in Illinois. Campaign disclosure rules were written to be ineffective, and the Illinois State Board of Elections designed to be pretty much toothless.

But the board does do its job within the limits of its authority. The Chicago Tribune recently reported what can happen when it does.

Connected Democrats funded a political action committee – All for Justice – to elect two Democrats to the seven-member Illinois Supreme Court.

The PAC spent more than \$7.3 million to put Justices Elizabeth Rochford and Mary Kay O'Brien in office.

But it failed to disclose the millions it spent until nearly three months after the November 2022 general election.

As a consequence, the PAC faced substantial fines for its violations of state law.

The committee responded by transferring nearly \$150,000 to another committee, the Chicago Independent Alliance.

The Tribune story reported that the committees have the same address as the Andreou & Casson law firm, which was founded by Luke Casson.

Who is Casson? State election records show he's the chairman and treasurer of All for Justice. He's further identified as counsel for Senate President Don Harmon and the political director of Oak Park's Democratic Party, "Harmon's political base," according to the Tribune.

Casson was considerably less than forthcoming when contacted by the Tribune. His responses included, "I didn't know," "I had no knowledge (of the fines)" and "That's none of your business."

Asked if he made the transfer to avoid what turned out to be a \$99,500 fine for noncompliance, he said, "It wasn't. I just said we don't have any comment."

Campaign disclosure rules are intended to allow voters to find out who's backing whom in our costly election process.

All for Justice spent more than \$7 million on behalf of two candidates, roughly a third of total campaign expenditures.

Spending on that level obviously contributed to the wins by Rochford and O'Brien. Rochford collected 55 percent of the vote in her race while O'Brien won narrowly with 51.1 percent.

The elections board isn't giving up on collecting the fine. It contends that administrative rules make PAC

officers – in this case Casson – “personally liable” for payment.

People will just have to wait and see how that works out. But the transfer speaks volumes about the committee leaders’ desire to follow the law.

Millions of dollars flowed into All for Justice from organized labor, lawyers and lawyer groups and Democratic politics. But Harmon, Casson’s political buddy, was among the biggest donors, contributing \$700,000 from campaign committees he controls.

Harmon declined to answer questions about the fine-dodging transfer. But he did issue a bold statement saying “all political committees” have a “responsibility” and “duty” to comply with the law.

Politics is, by its nature, a tough and sometimes dirty business. But the transfer ploy demonstrates a level of clever sleaze and evasion showing – once again – how little respect the political class has for both the law and the people of Illinois.

Dan Caulkins, Section 1-109 Certified Statement

The material in this section of the supporting record is submitted pursuant to 735 ILCS 5/2-1401(b) (West 2024) to support matters not of record.

CERTIFICATION- Daniel P. Caulkins

I, Daniel P. Caulkins, being of lawful age, do hereby certify pursuant to Section 1-109 of the Code of Civil Procedure as follows:

1. I, counsel for Petitioners, first received information regarding campaign expenditures by an independent committee supporting the candidacies of Elizabeth Rochford and Mary Kay O'Brien for Illinois Supreme Court from the Second and Third Districts, respectively, known as "All for Justice" after the November 21, 2023 Chicago Tribune Article written by Rick Pearson and Jeremy Gorner.

2. I reside and maintain offices in the Fifth District and did not observe or have opportunity to see or recognize that any independent entity known as "All for Justice" was funding media in support of the Rochford or O'Brien candidacies.

Certified this 19th day of January, 2024.

/s/ Daniel P. Caulkins

Daniel P. Caulkins

Jerrold Stocks, Section 1-109 Certified Statement

The material in this section of the supporting record is submitted pursuant to 735 ILCS 5/2-1401(b) (West 2024) to support matters not of record.

CERTIFICATION- JERROLD H. STOCKS

I, Jerrold H. Stocks, being of lawful age, do hereby certify pursuant to Section 1-109 of the Code of Civil Procedure as follows:

1. I, counsel for Petitioners, first received information regarding campaign expenditures by an independent committee supporting the candidacies of Elizabeth Rochford and Mary Kay O'Brien for Illinois Supreme Court from the Second and Third Districts, respectively, known as "All for Justice" after the November 21, 2023 Chicago Tribune Article written by Rick Pearson and Jeremy Gorner.

2. I, as counsel for Petitioners and counsel as Appellees requesting recusal or disqualification of Justices Rochford and O'Brien from participating in the consideration of this cause in March, 2023, undertook diligent research, including review of the State Board of Elections Campaign finance reports for the O'Brien and Rochford campaigns for the 2024 General Election cycle which did not disclose the "All for Justice" support nor did I have any notice inciting inquiry related to an independent committee called "All for Justice." Thus, while patently germane to the subject matter of the Motion for Recusal/Disqualification, I was without knowledge. Prior to the issuance of the Judgment with Opinion on August 11, 2023, I had no knowledge.

3. I reside and maintain offices in the Fifth District and did not observe or have opportunity to see or recognize that any independent entity known as "All for Justice" was funding media in support of the Rochford or O'Brien candidacies.

Certified this 19th day of January, 2024.

/s/ Jerrold H. Stocks

Jerrold H. Stocks

CERTIFICATE OF FILING AND SERVICE

I certify that on January 22, 2024, I electronically filed the foregoing **Supporting Record on Petition to Vacate Judgment with Opinion Entered August 11, 2023 Pursuant to 735 ILCS 5/2-1401(a)** with the Clerk of the Court for the Supreme Court of Illinois by using the Odyssey eFileIL system.

I further certify that the other participants in this appeal, named below, are registered service contacts on the Odyssey eFileIL system and that they will thus be served by the Odyssey eFileIL system, with a courtesy copy transmitted by e-mail. Justices Rochford and O'Brien were served by certified mail, return receipt requested, at the Illinois Supreme Court Building.

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Under the penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

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