



**FORM
D-4**

**COMPLAINT FOR VIOLATION OF
THE CAMPAIGN DISCLOSURE ACT**

COMPLAINANT NAME, ADDRESS AND TELEPHONE NUMBER:

Cynthia Canary
Illinois Campaign for
Political Reform
325 W. Huron, Suite 309
Chicago, IL 60610
312-333-1767
vs.

Dr. Kent Redfield
Director, Sunshine Project
University of Illinois at Springfield
One University Plaza, MS PAC 466
Springfield, IL 62703-5407
217-206-6574

No. _____

NAME AND ADDRESS OF RESPONDENT:

Illinois Coalition for Jobs, Growth & Prosperity
1301 W. 22nd Street, Suite 610
Oak Brook, IL 60523
217-522-1257

SECTION 1. HAS RESPONDENT FILED A STATEMENT OF ORGANIZATION AS A POLITICAL COMMITTEE WITH THE STATE BOARD OF ELECTIONS, COUNTY CLERK, OR NONE. IF FILED WITH THE COUNTY CLERK IDENTIFY COUNTY; No

SECTION 2. STATUTORY PROVISIONS: STATE THE PORTIONS OF THE CAMPAIGN DISCLOSURE ACT (ARTICLE 9, ELECTION CODE) THAT HAVE BEEN VIOLATED. (USE ADDITIONAL PLAIN SHEETS IF NECESSARY AND REFER TO THIS SECTION.)

See Attached

SECTION 3. STATE THE NATURE OF THE OFFENSE(S) OR VIOLATION(S), IF APPLICABLE. (USE ADDITIONAL PLAIN SHEETS IF NECESSARY AND REFER TO THIS SECTION.)

See Attached

SECTION 4. ATTACH ALL STATEMENTS, SCHEDULES, OR OTHER DOCUMENTS REFERRING TO THIS COMPLAINT.

VERIFICATION

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

Jan 27, 2005
DATE

[Signature]
SIGNATURE OF COMPLAINANT

Complainants represented by:
Suzanne Novak, Deborah Goldberg

Brennan Center for Justice, 161 Ave. of the Americas, 12th Fl., New York, NY 10013
212-998-6730

(IF COMPLAINANT IS A CORPORATION THEN VERIFICATION MUST BE SIGNED BY AN AUTHORIZED OFFICER AND ATTESTED TO BY THE SECRETARY)

COMPLAINT AGAINST THE ILLINOIS COALITION FOR JOBS, GROWTH AND PROSPERITY

Section 2:

Complainants allege that the Illinois Coalition for Jobs, Growth and Prosperity has violated the following provisions of the Campaign Disclosure Act:

10 Ill. Comp. Stat. 5/9-3: Requiring state political committees to file a statement of organization with the State Board of Elections.

10 Ill. Comp. Stat. 5/9-10(a),(b),(c): Requiring state political committees to file campaign contribution reports with the State Board of Elections.

Section 3:

The Illinois Coalition for Jobs, Growth and Prosperity is a state political committee under Illinois law, yet it has failed to fulfill the requirements of a state political committee under Illinois's Campaign Disclosure Act. In particular, it has failed to file a statement of organization with the Illinois State Board of Elections. It has also failed to file with the Illinois State Board of Elections any of the required reports of campaign contributions, and semi-annual reports of campaign contributions and expenditures.

Relevant 2004 Illinois Elections

1. In 2004, there were several races for public elected office in Illinois, including races for seats in the Illinois House of Representatives and on the Illinois Supreme Court.
2. Candidates Lloyd Karmeier and Gordon Maag ran against each other in the 2004 race for Illinois Supreme Court justice in the Fifth Judicial District of Illinois.

3. Primaries for those elections took place on March 16, 2004, and the general election occurred on November 2, 2004.

The Illinois Coalition for Jobs, Growth and Prosperity Is a State Political Committee

Statutory Framework

4. A “state political committee” includes “any individual, trust, partnership, committee, association, corporation, or other organization or group of persons which accepts contributions or makes expenditures during any 12-month period in an aggregate amount exceeding \$3,000 and has as its primary purpose the furtherance of governmental, political or social values, is organized on a not-for-profit basis, and which publicly endorses or publicly opposes” a candidate for public office, including a candidate for a seat in the Illinois House Representative. Comp. Stat. 5/9-1.8(c); 5 Ill. Comp. Stat. 420/4A-101(a).

5. A “state political committee” also includes “any individual, trust, partnership, committee, association, corporation, or other organization or group of persons which accepts contributions or grants or makes expenditures during any 12-month period in an aggregate amount exceeding \$3,000 on behalf of or in opposition to” a candidate for public office, including a candidate for a seat in the Illinois House Representative or on the Illinois Supreme Court. 10 Ill. Comp. Stat. 5/9-1.8(a); 5 Ill. Comp. Stat. 420/4A-101(a),(e).

6. In addition, “a person or whoever” becomes a political committee if he, she or it “solicits or receives funds for political purposes or acts as a conduit for political funds.” Ill. Adm. Code tit. 26, §100.10(g).

7. "Person" or "whoever" means an individual, trust, partnership, committee, association, corporation, or any other organization or group of persons, including all not-for-profit corporations. 10 Ill. Comp. Stat. 5/9-1.6; Ill. Adm. Code tit. 26, §100.10(f).

8. A contribution includes "a gift, subscription, donation, dues, loan, advance, or deposit of money or anything of value, knowingly received in connection with the nomination for election, or election, of any person to public office." 10 Ill. Comp. Stat. 5/9-1.4.

9. The definition of expenditure includes "a payment, distribution, purchase, loan, advance, deposit, or gift of money or anything of value, in connection with the nomination for election, or election, of any person to public office." 10 Ill. Comp. Stat. 5/9-1.5.

The Coalition for Jobs, Growth and Prosperity Endorsed Candidates

10. The Illinois Coalition for Jobs, Growth and Prosperity (hereinafter "the Coalition") incorporated as a not-for-profit corporation under Illinois law on January 22, 2004, shortly before the 2004 primary elections.

11. Based on its articles of incorporation and website, the Coalition's primary purpose is the furtherance of governmental, political and social values including, among other things, "activating . . . elected officials to . . . implement a stable pro-job, pro-growth, pro-investment climate in Illinois." <http://www.jobsillinois.us/about>.

12. Between March 16 and October 22, 2004 the Coalition made payments of \$445,000.00 to the Illinois Coalition for Jobs, Growth and Prosperity PAC (hereinafter the "Coalition PAC"). See Coalition PAC Schedule A, filed August 2, 2004 (\$100,000.00) (attached hereto as Exhibit A); Coalition PAC Schedule A, filed October 15, 2004 (\$150,000.00) (attached hereto as Exhibit B); Coalition PAC Schedule A-1, filed October 15, 2004 (\$125,000.00)

(attached hereto as Exhibit C); Coalition PAC Schedule A-1, filed October 26, 2004 (\$70,000.00) (attached hereto as Exhibit D).

13. In 2004, the Coalition publicly endorsed and publicly opposed candidates for public office. On October 25, 2004, the Coalition issued a press release listing candidates for the Illinois House of Representatives that it “has supported through mailings, phone calls” and other means, and listing candidates it “has opposed.”

<http://www.jobsillinois.us/news/contentview.asp?c=129207>

14. The Coalition, therefore, qualifies as a state political committee. 10 Ill. Comp. Stat. 5/9-1.8(c).

The Coalition Acts As a Conduit for Political Funds

15. A charitable organization is required to file a registration statement with the Illinois Attorney General’s Office before soliciting contributions by any means. 225 Ill. Comp. Stat. 460/2.

16. As of February 8, 2005, the Coalition has not filed a registration statement with the Illinois Attorney General’s Office.

17. The Coalition solicits donations on its website. <http://www.jobsillinois.us/donate/>.

18. The Coalition received at least \$445,000.00 in contributions between January 22 and October 22, 2004.

19. The Coalition was the sole source of funds contributed to the Coalition PAC.

20. The Coalition consists of “major employer groups” and its founding members include the Illinois Business Roundtable, Illinois State Chamber of Commerce, Illinois Manufacturers’ Association, Illinois Civil Justice League, and Chicagoland Chamber of Commerce. <http://www.jobsillinois.us/about>.

21. Four of the five founding members of the Coalition publicly endorsed judicial candidate Karmeier and/or gave money directly to his campaign through their affiliated organizations or PACs.

22. On October 20, 2004, the Coalition PAC contributed \$8,000.00 directly to "Citizens for Karmeier," the official campaign committee of Lloyd Karmeier, candidate for Illinois Supreme Court justice in the Fifth Judicial District of Illinois. *See* Citizens for Karmeier Schedule A-1, filed October 20, 2004 (attached hereto as Exhibit E).

23. The Coalition PAC also made an expenditure on September 29, 2004, of \$150,000.00 to JUSTPAC, the PAC of Coalition member Illinois Civil Justice League. *See* Coalition PAC Schedule B, filed October 15, 2004 (attached hereto as Exhibit F). JUSTPAC's monetary and in-kind contributions to candidate Karmeier exceeded \$1.19 million. *See* JUSTPAC Schedule B, filed August 2, 2004 (\$66,017.06) (attached hereto as Exhibit G); JUSTPAC Schedule B, filed October 18, 2004 (\$6,150.00) (attached hereto as Exhibit H); JUSTPAC Schedule B, filed January 31, 2005 (\$1,120,435.65) (attached hereto as Exhibit I).

24. The Coalition PAC made additional election-related expenditures of more than \$284,000.00 between March 16 and October 26, 2004, but failed to indicate on its required expenditure reports which political candidate or candidates the expenditures benefited. *See* Coalition PAC Schedule B, filed August 2, 2004 (attached hereto as Exhibit J); Coalition PAC Schedule B, filed January 28, 2005 (attached hereto as Exhibit K).

25. On information and belief, the Coalition "act[ed] as a conduit for political funds" and therefore is a state political committee.

The Illinois Coalition for Jobs, Growth and Prosperity Has Violated the Law By Failing to File A Statement of Organization with the State Board of Elections

26. Every state political committee must file a statement of organization with the State Board of Elections within 10 business days of the creation of such committee. 10 Ill. Comp. Stat. 5/9-3. Failure to file a statement subjects a state political committee to a mandatory fine. 10 Ill. Comp. Stat. 5/9-3.

27. As of February 8, 2005, the Coalition has not filed a statement of organization with the State Board of Elections.

The Illinois Coalition for Jobs, Growth and Prosperity Has Violated the Law By Failing to File Campaign Contribution Reports with the State Board of Elections

28. The treasurer of every state political committee must file with the State Board of Elections reports of campaign contributions, and semi-annual reports of campaign contributions and expenditures. 10 Ill. Comp. Stat. 5/9-10(a).

29. Reports of campaign contributions are required to be filed no later than the 15th day preceding each election in connection with which the political committee has accepted or is accepting contributions or has made expenditures. 10 Ill. Comp. Stat. 5/9-10(b). Any violation of that requirement subjects a state political committee to a mandatory fine. 10 Ill. Comp. Stat. 5/9-10(b).

30. In addition, any contribution of more than \$500 received in between the time period covered by the reports required to be filed 15 days before the election and the election must be filed and received within two business days of the receipt of the contribution. 10 Ill. Comp. Stat.

5/9-10(b-5). Any violation of that requirement subjects a state political committee to a fine. 10 Ill. Comp. Stat. 5/9-10(b-5).

31. State political committees are also required to file semi-annual reports of campaign contributions and expenditures no later than January 31 and July 31 of each year. 10 Ill. Comp. Stat. 5/9-10(c). Any violation of that requirement subjects a state political committee to a mandatory fine. 10 Ill. Comp. Stat. 5/9-10(c).

32. The Coalition received contributions between January 22 and October 22, 2004, of at least \$445,000.00.

33. The Coalition made expenditures between March 16 and October 22, 2004, of at least \$445,000.00.

34. Accordingly, the Coalition was required to file reports of campaign contributions between January 22 and October 24, 2004.

35. The Coalition was also required to file semi-annual reports of campaign contributions and expenditures on both July 31, 2004 and January 31, 2005.

36. As of February 8, 2005, the Coalition has not filed with the State Board of Elections any reports of campaign contributions or semi-annual reports of campaign contributions and expenditures.

NAME OF POLITICAL COMMITTEE
 L Coalition for Jobs, Growth & Prosperity PAC

REPORTING PERIOD
 3/9/2004 12:00:00AM thru 6/30/2004 12:00:00AM

FILED
 8/2/2004 1:13:07PM

SCHEDULE A

FOR OFFICE USE ONLY
 IDENTIFICATION NO.
 S8678 03

PART 1 - INDIVIDUAL CONTRIBUTIONS

ITEMIZED RECEIPTS	DATE	AMOUNT OF EACH RECEIPT	AGGREGATE AMOUNT
FULL NAME, MAILING ADDRESS, AND ZIP CODE	RECEIVED		FOR THIS REPORTING PERIOD
Illinois Coalition for Jobs Growth and Prosperity 1301 W. 22nd Street Ste 610 Oak Brook, IL 60523	03/16/2004	\$50,000.00	\$50,000.00
	03/19/2004	\$40,000.00	\$90,000.00
	04/01/2004	\$10,000.00	\$100,000.00
	Total for this part :		\$100,000.00

EXHIBIT B

NAME OF POLITICAL COMMITTEE

REPORTING PERIOD

Coalition for Jobs, Growth & Prosperity PAC 7/1/2004 12:00:00AM thru 10/3/2004 12:00:00AM

FILED 10/15/2004 12:37:13PM

SCHEDULE A

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S8678 03

PART 1 - INDIVIDUAL CONTRIBUTIONS

ITEMIZED RECEIPTS	DATE	AGGREGATE AMOUNT	
FULL NAME, MAILING ADDRESS, AND ZIP CODE	RECEIVED	AMOUNT OF EACH RECEIPT	FOR THIS REPORTING PERIOD
Illinois Coalition for Jobs Growth and Prosperity 1301 W. 22nd Street Ste 610 Oak Brook, IL 60523	09/27/2004	\$150,000.00	\$150,000.00
Total for this part :		\$150,000.00	

EXHIBIT C

SCHEDULE A-1
REPORT OF CAMPAIGN CONTRIBUTIONS
OF
MORE THAN \$500

FILED
10/15/2004 12:19:18PM

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S8678 03

L Coalition for Jobs, Growth & Prosperity PAC
301 W 22nd St, Ste 610
Oak Brook, IL 60523-2075

General Election - Election date: 11/ 2/2004

ITEMIZED RECEIPTS	RECEIPT	DATE	AMOUNT OF
FULL NAME, MAILING ADDRESS, AND ZIP CODE	TYPE	RECEIVED	EACH RECEIPT
Individual Contribution			
Illinois Coalition for Jobs Growth and Prosperity 301 W. 22nd Street Ste 610 Oak Brook, IL 60523		10/13/2004 12:00:00AM	\$125,000.00

SCHEDULE A-1
REPORT OF CAMPAIGN CONTRIBUTIONS
OF
MORE THAN \$500

FILED
10/26/2004 8:31:42AM

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S8678 03

IL Coalition for Jobs, Growth & Prosperity PAC
1301 W 22nd St, Ste 610
Oak Brook, IL 60523-2075

General Election - Election date: 11/ 2/2004

ITEMIZED RECEIPTS FULL NAME, MAILING ADDRESS, AND ZIP CODE	RECEIPT TYPE	DATE RECEIVED	AMOUNT OF EACH RECEIPT
Individual Contribution			
Illinois Coalition for Jobs Growth and Prosperity 1301 W. 22nd Street Ste 610 Oak Brook, IL 60523		10/22/2004 12:00:00AM	\$70,000.00

SCHEDULE A-1
REPORT OF CAMPAIGN CONTRIBUTIONS
OF
MORE THAN \$500

FILED
10/20/2004 4:50:18PM
FOR OFFICE USE ONLY
IDENTIFICATION NO.
S8502 10

Citizens for Karmeier
81 E St Louis St
PO Box 303
Ashville, IL 62263-0303

General Election - Election date: 11/ 2/2004

ITEMIZED RECEIPTS FULL NAME, MAILING ADDRESS, AND ZIP CODE	RECEIPT TYPE	DATE RECEIVED	AMOUNT OF EACH RECEIPT
	Transfer In		
American Family Insurance Illinois PAC 20 East Butterfield Rd. Suite 300 Ombard, IL 60146		10/20/2004 12:00:00AM	\$15,000.00
	Transfer In		
Coalition for Jobs Growth & Prosperity 301 W. 22nd St. Oak Brook, IL 60523		10/20/2004 12:00:00AM	\$8,000.00
	Transfer In		
Illinois Hospital Association PAC 100 South Second Street Springfield, IL 62704		10/20/2004 12:00:00AM	\$4,100.00

NAME OF POLITICAL COMMITTEE
- Coalition for Jobs, Growth & Prosperity PAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 10/3/2004 12:00:00AM

FILED
10/15/2004 12:37:13PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8678

PART 6 - TRANSFERS OUT

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
JSTPAC 36 S Belmont Ave Springfield Heights, IL 60005 Purpose: contribution	9/28/2004 12:00:00AM	\$150,000.00 Beneficiary: IL Coalition for Jobs Growth & Prosperity PAC	\$150,000.00

Total for this part: \$150,000.00

EXHIBIT G

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
1/1/2004 12:00:00AM thru 6/30/2004 12:00:00AM
FILED
6/2/2004 4:19:22PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
Domite Alan 34 Lower Marine Road Croy, IL 62294	4/14/2004 12:00:00AM	\$2,950.00	\$2,950.00
Purpose: consulting	Beneficiary: JUSTPAC		
	5/14/2004 12:00:00AM	\$2,950.00	\$5,900.00
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	6/15/2004 12:00:00AM	\$2,950.00	\$8,850.00
Purpose: consulting	Beneficiary: Citizens for Karmeier		
City Club of Washington 55 13th Street NW Washington, DC 20004	6/7/2004 12:00:00AM	\$791.01	\$791.01
Purpose: Reception	Beneficiary: Citizens for Karmeier		
John Pastuovic Communications 17 Oneida Street Imhurst, IL 60126	3/8/2004 12:00:00AM	\$31,520.00	\$31,520.00
Purpose: Printing and postage	Beneficiary: Citizens for Karmeier		
	4/9/2004 12:00:00AM	\$1,673.10	\$33,193.10
Purpose: Printing and postage	Beneficiary: JUSTPAC		
	6/4/2004 12:00:00AM	\$2,377.35	\$35,570.45
Purpose: Printing and postage	Beneficiary: JUSTPAC		
Maldaner's Restaurant 22 South Sixth Street Springfield, IL 62701	5/12/2004 12:00:00AM	\$585.13	\$585.13
Purpose: Reception	Beneficiary: Citizens To Elect Jim Wright		
Sangamo Club 17 East Adams Street Springfield, IL 62701	6/7/2004 12:00:00AM	\$2,806.06	\$2,806.06
Purpose: Reception	Beneficiary: Citizens for Karmeier		

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
1/1/2004 12:00:00AM thru 6/30/2004 12:00:00AM

FILED
6/30/2004 4:19:22PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
the MPGH Agency Inc. 300 13th Street NW Washington, DC 20005 Purpose: Advertising	5/19/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$10,000.00	\$10,000.00
Purpose: Advertising	6/1/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$10,000.00	\$20,000.00
Purpose: consulting	6/11/2004 12:00:00AM Beneficiary: JUSTPAC	\$25,000.00	\$45,000.00
Trudy Nichol and Associates 20 North Clark Street Chicago, IL 60603 Purpose: Reception	4/7/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$5,000.00	\$5,000.00
Total for this part:		\$98,602.65	

EXHIBIT H

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 6 - TRANSFERS OUT

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
Citizens for Frank Watson PO Box 391 Greenville, IL 62246 Purpose: contribution	8/18/2004 12:00:00AM	\$1,000.00 Beneficiary: Citizens for Frank Watson	\$1,000.00
Citizens for Karmeier P.O. Box 303 Mashville, IL 62263 Purpose: Contribution - Golf Outing	7/14/2004 12:00:00AM	\$150.00 Beneficiary: Citizens for Karmeier	\$150.00
Purpose: contribution	9/14/2004 12:00:00AM	\$6,000.00 Beneficiary: Citizens for Karmeier	\$6,150.00
Citizens To Elect Jim Wright 101 Main Street Peoria, IL 61620 Purpose: contribution	8/4/2004 12:00:00AM	\$1,000.00 Beneficiary: Citizens To Elect Jim Wright	\$1,000.00
Purpose: contribution	9/28/2004 12:00:00AM	\$15,000.00 Beneficiary: Citizens To Elect Jim Wright	\$16,000.00
St. Clair County Republican Party 112 Indian Springs Road M'Fallon, IL 62269-1211 Purpose: contribution	10/1/2004 12:00:00AM	\$10,000.00 Beneficiary: St. Clair County Republican Party	\$10,000.00

Total for this part: \$33,150.00

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 6 - TRANSFERS OUT

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
Citizens for Frank Watson PO Box 391 Greenville, IL 62246			
Purpose: contribution	8/18/2004 12:00:00AM	\$1,000.00	\$1,000.00
	Beneficiary:	Citizens for Frank Watson	
Citizens for Judge Holdridge RR 1 Box 104 Farmington, IL 61531			
Purpose: contribution	10/20/2004 12:00:00AM	\$500.00	\$500.00
	Beneficiary:	Citizens for Judge Holdridge	
Purpose: contribution	11/8/2004 12:00:00AM	\$1,000.00	\$1,500.00
	Beneficiary:	Citizens for Judge Holdridge	
Citizens for Karmeier P.O. Box 303 Vashville, IL 62263			
Purpose: Golf Outing	7/14/2004 12:00:00AM	\$150.00	\$150.00
	Beneficiary:	Citizens for Karmeier	
Purpose: contribution	9/14/2004 12:00:00AM	\$6,000.00	\$6,150.00
	Beneficiary:	Citizens for Karmeier	
Purpose: contribution	10/5/2004 12:00:00AM	\$35,000.00	\$41,150.00
	Beneficiary:	Citizens for Karmeier	
Purpose: contribution	10/12/2004 12:00:00AM	\$150,000.00	\$191,150.00
	Beneficiary:	Citizens for Karmeier	
Purpose: contribution	10/20/2004 12:00:00AM	\$150,000.00	\$341,150.00
	Beneficiary:	Citizens for Karmeier	
Citizens To Elect Jim Wright 401 Main Street Peoria, IL 61620			
Purpose: contribution	8/4/2004 12:00:00AM	\$1,000.00	\$1,000.00
	Beneficiary:	Citizens To Elect Jim Wright	
Purpose: contribution	9/28/2004 12:00:00AM	\$15,000.00	\$16,000.00
	Beneficiary:	Citizens To Elect Jim Wright	
Purpose: contribution	10/13/2004 12:00:00AM	\$50,000.00	\$66,000.00
	Beneficiary:	Citizens To Elect Jim Wright	
Purpose: contribution	10/28/2004 12:00:00AM	\$5,000.00	\$71,000.00
	Beneficiary:	Citizens To Elect Jim Wright	

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM

FILED
12/28/2005 3:11:32PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 6 - TRANSFERS OUT

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
St. Clair Republican Party 112 Indian Springs Road D'Fallon, IL 62269-1211 Purpose: contribution	10/1/2004 12:00:00AM Beneficiary: St. Clair Republican Party	\$10,000.00	\$10,000.00

Total for this part: \$424,650.00

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM

FILED
07/29/2005 3:11:32PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
domite Allen 94 Lower Marine Road roy, IL 62294	7/14/2004 12:00:00AM	\$3,075.81	\$3,075.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	8/15/2004 12:00:00AM	\$2,950.00	\$6,025.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	9/14/2004 12:00:00AM	\$2,950.00	\$8,975.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	9/28/2004 12:00:00AM	\$2,950.00	\$11,925.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	10/14/2004 12:00:00AM	\$2,950.00	\$14,875.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	10/27/2004 12:00:00AM	\$2,950.00	\$17,825.81
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	10/27/2004 12:00:00AM	\$5,900.00	\$23,725.81
Purpose: consulting	Beneficiary: JUSTPAC		
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Baer Michael 534 West Vine Springfield, IL 62704	9/14/2004 12:00:00AM	\$2,000.00	\$2,000.00
Purpose: consulting	Beneficiary: Citizens for Karmeier		
	9/28/2004 12:00:00AM	\$2,130.00	\$4,130.00
Purpose: consulting	Beneficiary: Citizens for Karmeier		
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Belleville News Democrat 120 South Illinois Street Belleville, IL 62220	10/28/2004 12:00:00AM	\$3,870.00	\$3,870.00
Purpose: Advertising	Beneficiary: JUSTPAC		
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Campaign Media Analysis Group PO Box 5794 Hicksville, IL 11802	9/27/2004 12:00:00AM	\$5,500.00	\$5,500.00
Purpose: Media Consulting	Beneficiary: JUSTPAC		

AME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM

FILED
7/28/2005 3:11:32PM

SCHEDULE B

FOR OFFICE USE ONLY
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PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
ANA Catering and Conference 5 East Jackson Chicago, IL 60685 Purpose: fund raising - food	7/15/2004 12:00:00AM Beneficiary: Citizens To Elect Jim Wright	\$1,582.93	\$1,582.93
Committee for Legislative Action 20 West Howard Street Pontiac, IL 61764 Purpose: Grass Roots Activity	9/27/2004 12:00:00AM Beneficiary: JUSTPAC	\$5,000.00	\$5,000.00
 Purpose: Grass roots activity	10/19/2004 12:00:00AM Beneficiary: JUSTPAC	\$5,000.00	\$10,000.00
Curtis Scott Advertising 17W601 14th Street Oakbrook Terrace, IL 60181 Purpose: Advertising	9/21/2004 12:00:00AM Beneficiary: Citizens To Elect Jim Wright	\$17,933.34	\$17,933.34
Diversified Direct 3702 Industrial Drive Bridgeview, IL 60455 Purpose: Direct Mail	10/27/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$48,498.38	\$48,498.38
Hosting.com P.O. Box 70309 Louisville, KY 40270-0309 Purpose: Website	10/14/2004 12:00:00AM Beneficiary: JUSTPAC	\$780.00	\$780.00
Image Works 188 Woodcrest Drive Highland, IL 62249 Purpose: signs	10/28/2004 12:00:00AM Beneficiary: JUSTPAC	\$2,176.00	\$2,176.00

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM

FILED
01/28/2005 3:11:32PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8349

PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
John Pastuovic Communications 117 Oneida Street Elmhurst, IL 60126	9/21/2004 12:00:00AM	\$17,863.52	\$17,863.52
Purpose: media - production	Beneficiary: Citizens To Elect Jim Wright		
	10/28/2004 12:00:00AM	\$3,813.00	\$21,676.52
Purpose: printing	Beneficiary: JUSTPAC		
	11/9/2004 12:00:00AM	\$1,063.00	\$22,739.52
Purpose: Advertising	Beneficiary: JUSTPAC		
Murnane Edward 436 South Belmont Avenue Arlington Heights, IL 60005	9/24/2004 12:00:00AM	\$959.00	\$959.00
Purpose: Travel Expenses	Beneficiary: JUSTPAC		
	11/2/2004 12:00:00AM	\$1,054.00	\$2,013.00
Purpose: Travel expenses	Beneficiary: JUSTPAC		
	11/10/2004 12:00:00AM	\$1,345.75	\$3,358.75
Purpose: Travel Expenses	Beneficiary: JUSTPAC		
Prairie State Consulting PO Box 641 Springfield, IL 62705	7/5/2004 12:00:00AM	\$4,000.00	\$4,000.00
Purpose: consulting	Beneficiary: JUSTPAC		
Sangamo Club 217 East Adams Street Springfield, IL 62701	7/7/2004 12:00:00AM	\$1,662.70	\$1,662.70
Purpose: fund raising - food	Beneficiary: Citizens for Karneier		

NAME OF POLITICAL COMMITTEE
JUSTPAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM
FILED
01/20/2005 3:11:32PM

SCHEDULE B

PART 8 - EXPENDITURES

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IDENTIFICATION NO.
S 8349

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
The MPMH Agency Inc. 700 13th Street NW Washington, DC 20005			
Purpose: consulting	8/6/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$3,485.09	\$3,485.09
Purpose: consulting	9/22/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$8,500.00	\$11,985.09
Purpose: consulting	9/22/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$7,500.00	\$19,485.09
Purpose: Media production and placement	9/28/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$290,000.00	\$309,485.09
Purpose: Media production and placement	10/13/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$186,125.00	\$495,610.09
Purpose: consulting	10/13/2004 12:00:00AM Beneficiary: JUSTPAC	\$7,500.00	\$503,110.09
Purpose: Media production and placement	10/21/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$150,000.00	\$653,110.09
Purpose: consulting	10/22/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$30,000.00	\$683,110.09
Purpose: Media production and placement	10/25/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$30,000.00	\$713,110.09
Frover Lance P.O. Box 1341 Carbondale, IL 62903-1341			
Purpose: consulting	10/27/2004 12:00:00AM Beneficiary: Citizens for Karmeier	\$1,558.67	\$1,558.67
Press Professional Services 220 East Adams Springfield, IL 62701			
Purpose: Telemarketing	11/5/2004 12:00:00AM Beneficiary: JUSTPAC	\$15,051.70	\$15,051.70
Purpose: Telemarketing	11/8/2004 12:00:00AM Beneficiary: JUSTPAC	\$7,184.90	\$22,236.60
Total for this part:		\$886,862.79	

AME OF POLITICAL COMMITTEE
IL Coalition for Jobs, Growth & Prosperity PAC

REPORTING PERIOD
3/9/2004 12:00:00AM thru 6/30/2004 12:00:00AM

FILED
3/9/2004 1:13:07PM

SCHEDULE B

PART 8 - EXPENDITURES

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8678

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
Press Professional Services 20 E Adams St Springfield, IL 62701	3/18/2004 12:00:00AM	\$49,585.23	\$49,585.23
Purpose: Direct Mail Pieces	Beneficiary: Illinois Coalition for Jobs PAC		
	3/22/2004 12:00:00AM	\$37,464.60	\$87,049.83
Purpose: Automated Telephone calls	Beneficiary: Illinois Coalition for Jobs PAC		
	3/29/2004 12:00:00AM	\$11,764.25	\$98,814.08
Purpose: telephone polling	Beneficiary: Illinois Coalition for Jobs PAC		
Total for this part:		\$98,814.08	

NAME OF POLITICAL COMMITTEE
IL Coalition for Jobs, Growth & Prosperity PAC

REPORTING PERIOD
7/1/2004 12:00:00AM thru 12/31/2004 12:00:00AM

FILED
12/27/2005 6:09:43PM

SCHEDULE B

FOR OFFICE USE ONLY
IDENTIFICATION NO.
S 8678

PART 8 - EXPENDITURES

ITEMIZED EXPENDITURES	DATE OF EXPENDITURE	AMOUNT	AGGREGATE AMOUNT FOR THIS REPORTING PERIOD
Xpress Professional Services 220 E Adams St Springfield, IL 62701	10/14/2004 12:00:00AM	\$50,000.00	\$50,000.00
Purpose: media - production	Beneficiary: IL Coalition for Jobs Growth & Prosperity PAC		
	10/20/2004 12:00:00AM	\$51,784.96	\$101,784.96
Purpose: media - production	Beneficiary: Xpress Professional Services		
	10/22/2004 12:00:00AM	\$60,000.00	\$161,784.96
Purpose: media - production	Beneficiary: Xpress Professional Services		
	10/26/2004 12:00:00AM	\$25,023.81	\$186,808.77
Purpose: media - production	Beneficiary: Xpress Professional Services		
	11/12/2004 12:00:00AM	\$20,000.00	\$206,808.77
Purpose: media - production	Beneficiary: Xpress Professional Services		
	11/18/2004 12:00:00AM	\$40,000.00	\$246,808.77
Purpose: media - production	Beneficiary: Xpress Professional Services		
Total for this part:		\$246,808.77	


PROOF OF SERVICE

I, Suzanne Novak HEREBY SWEAR OR AFFIRM THAT I SERVED A COPY OF THE FOREGOING COMPLAINT UPON THE FOLLOWING:

Illinois Coalition for Jobs, Growth & Prosperity
1301 W. 22nd Street, Suite 610
Oak Brook, IL 60523
Attn: James A. Spizzo

a) BY PERSONALLY DELIVERING THE SAME ON THE _____ DAY OF _____, 20__ AT _____ O'CLOCK __ M.

b) BY PLACING A COPY THEREOF IN THE UNITED STATES POSTAL SERVICES, PROPER POSTAGE PREPAID, TO THE ABOVE INDICATED ADDRESSES, ON THE 9 DAY OF February 2005 AT THE _____ MAIL BOX OR POSTAL STATION LOCATED AT: 201 Varick St., New York, NY 10014


SIGNATURE OF COMPLAINANT OR AGENT

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 9th DAY OF February, 2005


NOTARY PUBLIC
DEBORAH GOLDBERG
Notary Public, State of New York
No. 21-4951179
Qualified in New York County
Commission Expires May 22, 2007

INSTRUCTIONS

1. THIS FORM IS USED TO FILE COMPLAINTS FOR VIOLATIONS ARISING OUT OF AN ACT TO REGULATE CAMPAIGN FINANCING (ILLINOIS REVISED STATUTES, CHAPTER 46, ART. 9-1 ET SEQ.). SEE RULES AND REGULATIONS OF THE STATE BOARD OF ELECTIONS FOR THE FILING AND HEARING OF COMPLAINTS.
2. THE FILING AND HEARING OF COMPLAINTS ARE GOVERNED BY RULES AND REGULATIONS ADOPTED BY THE BOARD. IF A COMPLAINT IS FILED WITHIN 60 DAYS PRIOR TO THE DATE OF AN ELECTION IN REFERENCE TO WHICH THE COMPLAINT IS FILED, THE COMPLAINANT MUST SERVE A COPY OF THE COMPLAINT UPON ALL RESPONDENTS PRIOR TO THE TIME OF FILING. COPIES OF THE RULES AND REGULATIONS ARE AVAILABLE UPON REQUEST.
3. COMPLAINTS MUST BE FILED BY MAIL OR IN PERSON AT EITHER OF THE FOLLOWING LOCATIONS:

STATE BOARD OF ELECTIONS
1020 SOUTH SPRING STREET
SPRINGFIELD, ILLINOIS 62704

STATE BOARD OF ELECTIONS
100 WEST RANDOLPH, SUITE 14-100
CHICAGO, ILLINOIS 60601