

JULIE L. AJSTER
ATTORNEY AT LAW

October 3, 2018

State Board of Elections
100 W. Randolph St.
Suite 14-100
Chicago, IL 60601-3232

RE: Complaint for Campaign Disclosure Violations
Julie L. Ajster v. Friends of Lance Yednock; Friends of Michael J.
Madigan and Friends of Marty Durkan

Dear Board of Elections:

Please accept the enclosed Complaint for Violations of the Campaign Disclosure Act against the following committees: Friends of Lance Yednock, Friends of Michael J. Madigan and Friends of Marty Durkan.

I am requesting that the State Board of Elections accept my Complaint for Violations of 10 ILCS 5/9-25 and 10 ILCS 5/9-8.5 of the Election Code.

“No person shall make an anonymous contribution or a contribution in the name of another person, and no person shall knowingly accept any anonymous contribution or contribution made by one person in the name of another person.” 10 ILCS 5/9-25.

“During an election cycle, a candidate political committee may not accept contributions with an aggregate value over the following: (i) \$5,000 from any individual, (ii) \$10,000 from any corporation, labor organization, or association, or (iii) \$50,000 from a candidate political committee or political action committee.” 10 ILCS 5/9-8.5(b).

It is my belief that Friends of Michael J. Madigan laundered a \$55,400.00 campaign contribution to Friends of Lance Yednock through Friends of Marty Durkan.

Marty Durkan was a candidate for a position with the Metropolitan Water Reclamation District of Greater Chicago. Friends of Marty Durkan is the candidate political committee for candidate Marty Durkan.

Michael J. Madigan is the State Representative for Illinois' 22nd District and is currently running for re-election. Friends of Michael J. Madigan is the candidate political committee for candidate Michael J. Madigan.

REPRESENTING THE INJURED
• AUTO ACCIDENTS • WORKER'S COMPENSATION AND ALL AREAS OF PERSONAL INJURY

P.O. Box 255 PERU, IL 61354 815-220-9054 815-220-9194 FAX AJSTER@COMCAST.NET

Lance Yednock is a candidate for State Representative for Illinois' 76th District. Friends of Lance Yednock is the candidate political committee for candidate Lance Yednock.

On or about February 22, 2018, Friends of Michael J. Madigan contributed \$55,400.00 to Friends of Marty Durkan. (Exhibit A). On or about March 19, 2018, Friends of Marty Durkan accepted the \$55,400.00 contribution. (Exhibit B). On or about August 29, 2018, Friends of Lance Yednock accepted a \$55,400.00 contribution from Friends of Marty Durkan. (Exhibit C).

A review of the quarterly reports for Friends of Marty Durkan for the fourth quarter of 2017, first quarter of 2018, and second quarter of 2018, evidence contributions from Friends of Marty Durkan to other political candidates. However, Friends of Marty Durkan's contributions to all other political candidates were \$250.00 or \$500.00. The \$55,400.00 contribution from Friends of Marty Durkan to Friends of Lance Yednock, the exact same amount Friends of Marty Durkan received from Friends of Michael J. Madigan, is 110 times more than Friends of Marty Durkan contributed to any other political candidate.

The \$55,400.00 contribution to Friends of Lance Yednock accepted by Friends of Marty Durkan was actually a contribution to Friends of Lance Yednock by Friends of Michael J. Madigan in violation of 10 ILCS 5/9-25.

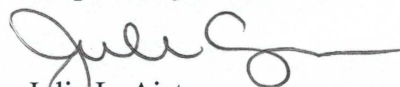
In addition to the laundered \$55,400.00 contribution, Friends of Michael J. Madigan contributed directly to Friends of Lance Yednock on five occasions. (Exhibit D). The total of Friends of Michael J. Madigan's non-laundered contributions to Friends of Lance Yednock total \$1,582.21.

The \$55,400.00 contribution to Friends of Lance Yednock laundered through Friends of Marty Durkan in addition to the \$1,582.21 makes the total contributed to Friends of Lance Yednock by Friends of Michael J. Madigan \$56,982.21. Said total contributions violate 10 ILCS 5/9-8.5. Said statute limits campaign contributions to \$55,400.00 (statute says \$50,000.00 but due to inflation, the amount is \$55,400.00). Friends of Michael J. Madigan contributed to Friends of Lance Yednock the sum of \$56,982.21, in excess of the limits of 10 ILCS 5/9-8.5.

I respectfully request that the Illinois State Board of Elections accept my Complaint and set said matter for hearing before the Board.

I declare that this Complaint (including any accompanying schedules and statements) has been examined by me and to the best of my knowledge and belief is a true and correct complaint as required by Article 9 of The Election Code. I understand that the penalty for willfully filing a false complaint shall be a fine not to exceed \$500 or imprisonment in a penal institution other than the penitentiary not to exceed 6 months, or both fine and imprisonment. (See attached Verification).

Respectfully submitted,

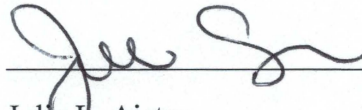


Julie L. Ajster

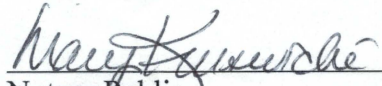
Enc.

VERIFICATION

I, Julie L. Ajster, an attorney being first duly sworn on oath, do hereby affirm that I have the foregoing Complaint and/or Document and the allegations contained therein are true, correct and complete to the best of my knowledge, information and belief.


Julie L. Ajster

Subscribed and sworn to and before
me this 3rd day of October, 2018.


Notary Public



D-2 Quarterly Report
1/1/2018 to 3/31/2018

Received By	Address	Amount	Expended By	Purpose / Beneficiary
Friends for Marty Durkan	PO Box 10478 Chicago, IL 60610	\$55,400.00 2/22/2018	Transfer Out Friends of Michael J Madigan	Contribution Friends for Marty Durkan
Friends of Moira Dunn	271 Pine Street Beecher, IL 60401	\$1,000.00 2/19/2018	Transfer Out Friends of Michael J Madigan	Contribution Friends of Moira Dunn
Houlihan Campaign Fund	2409 Country Club Dr Springfield, IL 62704	\$1,000.00 3/6/2018	Transfer Out Friends of Michael J Madigan	Contribution Houlihan Campaign Fund

This report has 3 itemized Transfers Out totaling \$57,400.00

Friends of Michael Madigan to Friends for Marty Durkan. 2-22-18 \$55,400.00.

EXHIBIT A

SCHEDULE A-1

REPORT OF CAMPAIGN CONTRIBUTIONS OF \$1000 OR MORE

FILED
3/19/2018 5:48:29 PM
FOR OFFICE USE ONLY
IDENTIFICATION NO.
Candidate 31872
Audit District: 03

Friends for Marty Durkan
PO Box 10478
Chicago, IL 60610

ITEMIZED RECEIPTS

DATE
RECEIVED

AMOUNT OF
EACH RECEIPT

Receipt Type: Transfer In

13th Ward Democratic Organization
6500 S Pulaski
Chicago, IL 60629

3/19/2018

\$55,400.00

Receipt Type: Transfer In

Engineers Political Education Committee
1125 17th St NW
Washington, DC 20036

3/19/2018

\$50,000.00

Receipt Type: Transfer In

Friends of Michael J. Madigan
PO Box 3188
Chicago, IL 60654

3/19/2018

\$55,400.00

VERIFICATION

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

Marty Durkan

3/19/2018 5:48:29PM

SIGNATURE OF TREASURER OR CANDIDATE

DATE

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

Friends for Marty Durkan receives \$55,400.00 from
Friends of Michael J. Madigan. 3-19-18.

SCHEDULE A-1

REPORT OF CAMPAIGN CONTRIBUTIONS OF \$1000 OR MORE

FILED
8/29/2018 3:45:58 PM
FOR OFFICE USE ONLY
IDENTIFICATION NO.
Candidate 34286
Audit District: 13

Friends of Lance Yednock
2441 Circle Dr
Ottawa, IL 61350

ITEMIZED RECEIPTS

DATE
RECEIVED

AMOUNT OF
EACH RECEIPT

Receipt Type: Transfer In

Friends of Marty Durkan
PO Box 10478
Chicago, IL 60610

8/29/2018

\$55,400.00

VERIFICATION

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

Lance Yednock

8/29/2018 3:45:58PM

SIGNATURE OF TREASURER OR CANDIDATE

DATE

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

Friends of Lance Yednock receives \$55,400.00
from Friends of Marty Durkan 8-29-18

EXHIBIT C

Your search found 147 receipts totaling \$761,260.64 for 1 candidates.

[Download This List](#)
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[Print This List](#)

Contributed By	Amount	Received By	Description	Vendor Name	Vendor Address
Engineers Political Education Committee 1125 17th St NW Washington DC, DC 20036	\$30,000.00 2/18/2018	Transfer In Friends of Lance Yednock			
Friends of Marty Durkan PO Box 10478 Chicago, IL 60610	\$55,400.00 8/29/2018	Transfer In Friends of Lance Yednock			
Friends of Michael J Madigan P.O. Box 3188 Chicago, IL 60654-0188	\$513.40 3/19/2018	In-Kind Contribution Friends of Lance Yednock	Campaign work 3/15/2018	Whelan, Thomas J.	4215 W 83rd St Chicago, IL 60652
Friends of Michael J Madigan P.O. Box 3188 Chicago, IL 60654-0188	\$288.97 3/19/2018	In-Kind Contribution Friends of Lance Yednock	Campaign work 3/15/2018	Kodatt, Edward	5831 S Natoma Chicago, IL 60638
Friends of Michael J Madigan P.O. Box 3188 Chicago, IL 60654-0188	\$298.49 3/12/2018	In-Kind Contribution Friends of Lance Yednock	Campaign work 2/28/2018	Whelan, Thomas J.	4215 W 83rd St Chicago, IL 60652
Friends of Michael J Madigan P.O. Box 3188 Chicago, IL 60654-0188	\$287.60 3/12/2018	In-Kind Contribution Friends of Lance Yednock	Campaign work 2/28/2018	Kodatt, Edward	5831 S Natoma Chicago, IL 60638
			Payroll 3-30-18		

EXHIBIT D

Friends of Michael J Madigan P.O. Box 3188 Chicago, IL 60654-0188	\$193.75 4/7/2018	In-Kind Contribution Friends of Lance Yednock		Kodatt, Edward	5831 S Natoma Chicago, IL 60638
General Teamsters Local 179 PAC Fund 1000 NE Frontage RD Joliet, IL 60431	\$1,000.00 2/28/2018	Transfer In Friends of Lance Yednock			
Heat & Frost Insulators & Allied Workers Local 17 Political Action Com 18520 Spring Creek Drive-Suite U Tinley Park, IL 60477	\$1,000.00 2/21/2018	Transfer In Friends of Lance Yednock			
Hoffenberg, Jeffery and Elyse 1030 S Stone Ave La Grange, IL 60525-2730 Occupation: Attorney Employer: Levenfeld Pearlstein/Law Office of Elyse Hoffenberg	\$2,000.00 2/7/2018	Individual Contribution Friends of Lance Yednock			

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