

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
HENDERSON COUNTY, ILLINOIS**

CITIZENS FOR HIGGINS)	
)	
Plaintiffs,)	
)	2026-MR-_____
vs.)	2026MR3
)	
ILLINOIS REPUBLICAN PARTY, KATHLEEN)	
SALVI, in her capacity as Chairperson of the)	
Illinois Republican Party, JOHN FOGARTY, JR.)	
MATTHEW JANES, HOUSE REPUBLICAN)	
ORGANIZATION, AMY ELIK, in her capacity as)	
Chairperson of the House Republican Organization,)	
CITIZENS FOR HAMMOND,)	
)	
Defendants.)	

EMERGENCY MOTION FOR PRELIMINARY INJUNCTION

COMES NOW Plaintiff, by and through its attorney, Thomas G. DeVore, and for its motion for preliminary injunction pursuant to 735 ILCS 5/11-102, alleges as follows:

1. A Verified Complaint (“Complaint”) has been filed in this matter which Verified Complaint is incorporated herein by reference.
2. The Complaint alleges the Defendants have acted in concert to send political mail on behalf of Hammond in violation of USPS mail standards.
3. The Illinois primary is fast approaching with early voting to begin on February 05, 2026.
4. Higgins has a right to a level playing field and to not be disadvantaged by Hammond having been granted access by the ILGOP to the unlawful use of the ILGOP’s significantly reduced nonprofit mail rate.
5. Immediate and irreparable will be suffered by Higgins if Hammond is allowed to continuing being the benefactor of inexpensive nonprofit mail pieces being sent by the ILGOP in violation of USPS mail standards.

6. Higgins has no lawful access to such inexpensive mail rates placing him at a significant competitive disadvantage with the quickly approaching primary.
7. Plaintiff has no other adequate remedy at law to prohibit the Defendants from continuing to send political mail in violation of USPS Mail Standards between now and the looming primary election.
8. There is a reasonable likelihood that Plaintiff will succeed on the merits of the case as shown by the Verified Complaint.

WHEREFORE, the Plaintiff respectfully prays that this Court enter an order that provides for:

- A. A Preliminary Injunction enjoining the ILGOP, Salvi, Fogarty and Janes from continuing to authorize and send political mail on behalf of Hammond which mail is to be paid, or the consideration for sending, has any connection those funds received from Hammond or the HRO in violation of federal mail standard 1.6.10; and
- B. A Preliminary Injunction enjoining Hammond from continuing to directly or indirectly transfer funds to the ILGOP for the purpose of the ILGOP sending political mail for Hammond in violation of federal mail standard 1.6.10;
- C. A Preliminary Injunction enjoining the HRO and Elik from continuing to transfer funds to the ILGOP for the purpose of the ILGOP sending political mail for Hammond in violation of federal mail standard 1.6.10;
- D. Setting this matter for further hearing as the Court deems prudent; and
- E. Such further relief as this Court deems just and equitable.

Respectfully submitted,

By: /s/ Thomas Devore
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VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

By: 
Matthew Rauschert (Jan 28, 2026 10:20:43 CST)
MATTHEW RAUSCHERT, CHAIRMAN