

BEFORE THE ILLINOIS STATE BOARD OF ELECTIONS
Complaint Pursuant to 10 ILCS 5/9-20

Complainant:

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Respondent:

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NATURE OF THE COMPLAINT AND POTENTIAL VIOLATIONS

This complaint concerns a pattern of reported transfers into Respondent's candidate political committee during the reporting period January 1, 2024 through March 31, 2024, which raises substantial questions regarding compliance with Article 9 of the Illinois Election Code.

Respondent's D-2 Quarterly Report for that reporting period reflects a series of transfers from entities styled as political action committees or similar political committees. These transfers appear within a compressed period during March 2024 and total approximately \$47,975 from the following entities:

Ethics in Government PAC	Illinois Government Accountability PAC
Conservative Leadership PAC	Citizens for Ethical Leadership
Economic Development PAC	Metro East Taxpayer Watchdog Group
Madison County Development PAC	Accountable Metro East Leadership PAC
Metro East Development PAC	Metro East Leadership PAC

These transfers appear within a narrow time window and exhibit a repeated contribution structure, including:

four transfers of \$3,995	four transfers of \$4,700
one transfer of \$3,195	one transfer of \$2,500

All of these transfers appear within approximately a two-week period during March 2024.

Contributions from political committees can vary widely in amount and timing, however the presence of repeated identical contribution amounts across multiple entities within a compressed time period presents a pattern that warrants review by the Board.

Campaign-finance auditors examine repeated or structured contribution amounts when assessing whether contributions reflect independent decisions by separate committees or whether transfers may have been coordinated or processed together.

Article 9 of the Illinois Election Code prohibits a political committee from knowingly accepting a contribution made in the name of another person. See 10 ILCS 5/9-25.1. The purpose of this provision is to ensure that campaign disclosure reports accurately identify the true source of political funds so that the public and regulatory authorities may determine who is financing political campaigns.

The facts described above establish reasonable grounds for further inquiry by the Illinois State Board of Elections.

Complainant does not purport to determine at this stage whether any specific transfer definitively constitutes a violation of the Illinois Election Code. Determining the precise origin of the transferred funds and the organizational status of the contributing entities requires access to records maintained by the Illinois State Board of Elections and, where necessary, the financial records associated with the reported transactions.

However, the objective features appearing on the face of Respondent's filed report raise substantial questions regarding whether the reported committee names accurately identify the true source of the transferred funds.

Those objective features include, among other things:

- repeated contribution amounts appearing across multiple committees
- a cluster of transfers within a short period of time
- closely related naming conventions among numerous committees
- the use of post office box addresses rather than physical street addresses
- the use of the same mailing address by multiple purported committees
- and the inability to deliver certified mail to any of the listed contributor addresses

Taken together, these circumstances are sufficient to warrant review by the Illinois State Board of Elections to determine whether the committees listed in Respondent's report exist as independent political committees and whether the reported transfers accurately identify the true source of the funds as required by Article 9 of the Illinois Election Code.

Where multiple similarly named entities make patterned transfers within a compressed timeframe and from addresses that cannot be verified, it is appropriate for the Board to determine whether the reported committee names accurately identify the true source of the funds transferred.

The Board may review committee depository information and related financial records in order

to determine whether campaign disclosure reports accurately identify the source of political funds. Campaign-finance enforcement reviews commonly examine whether multiple political committees may be established, financed, maintained, or controlled by the same person or group of persons, particularly where committees display similar naming conventions, overlapping addresses, patterned contribution activity, or other indicators of coordinated operation.

The names of the contributing entities also exhibit a series of closely related naming conventions. Several committees incorporate repeated thematic language commonly associated with political reform or oversight themes. The following naming patterns appear repeatedly across the entities listed in Respondent's report:

Leadership
Metro East Leadership PAC
Conservative Leadership PAC
Citizens for Ethical Leadership
Accountable Metro East Leadership PAC

Development
Economic Development PAC
Madison County Development PAC
Metro East Development PAC

Ethics / Ethical
Ethics in Government PAC
Citizens for Ethical Leadership

In addition to the repeated thematic terminology, multiple committees incorporate overlapping geographic identifiers. These geographic references appear in several of the committee names, including: Metro East

Metro East Leadership PAC Metro East Development PAC
Metro East Taxpayer Watchdog Group Accountable Metro East Leadership PAC

Naming similarity alone does not establish common control, the repeated use of closely related terminology across numerous committees appearing within the same report however warrants review to determine whether the entities operate independently or whether they may share organizational origin, administration, or coordination.

The address information reported for the contributing entities also presents a notable pattern. All of the listed contributing entities report post office boxes rather than physical street addresses as their mailing location.

The use of a post office box is not inherently improper, however the absence of any physical street address for any of the listed entities makes independent verification of the committees' physical presence or operations more difficult.

More significantly, the report lists two purportedly separate political committees — Metro East Leadership PAC and Accountable Metro East Leadership PAC — at the identical mailing address:

PO Box 292
Troy, Illinois 62294

These committees are reported as distinct contributors making separate transfers in different amounts and on different dates. The use of the same mailing address by two different political committees raises a reasonable question as to whether the committees may share common control, administration, or officers, and whether the reported committee identities accurately reflect the source of the transferred funds.

Illinois campaign disclosure reports require reporting committees to identify the name and address of each contributing political committee, and where multiple committees are reported using identical mailing addresses, the Board may reasonably review whether the addresses accurately identify independent committees.

In an effort to verify the contributor information reported in Respondent's filing, Complainant sent certified mail through the United States Postal Service on or about December 26, 2024 to each of the contributor addresses listed in the report.

According to the complaint and attached documentation, each item of certified mail was returned by the Postal Service marked:

“Return to Sender” “Not Deliverable as Addressed” or “Unable to Forward.”

The inability to deliver certified mail to any of the reported contributor addresses raises a legitimate question as to whether the addresses reported in the filing correspond to functioning mailing locations associated with the listed political committees.

When contributor addresses reported in campaign filings cannot be verified through ordinary mailing channels, enforcement authorities need review whether the addresses correspond to functioning political committees or whether additional inquiry is necessary to confirm the identity of the contributing entity.

Because the addresses associated with the reported contributing entities could not be verified through certified mail, the only reliable method of confirming the identity of the contributing committees and the origin of the transferred funds is through review of the financial records associated with those transfers.

Under Article 9 of the Illinois Election Code, political committees are required to maintain a designated campaign depository and to conduct financial transactions through that depository account. Campaign disclosure reports filed with the Illinois State Board of Elections must therefore correspond to identifiable financial transactions reflected in the committee's bank records.

Accordingly, if the committees listed in Respondent's report exist as independent political committees, those entities should have:

- a registered Statement of Organization
- a designated treasurer

- a listed campaign depository institution
- bank records reflecting the reported transfers

If the listed committees do not correspond to functioning political committees, review of the banking records associated with the reported transfers would allow the Board to determine the actual source of the funds transferred to Respondent's committee.

Where contributor addresses cannot be verified and multiple similarly named entities report patterned transfers within a compressed timeframe, review of the financial transaction records associated with those transfers may be necessary to confirm whether the reported committee names accurately reflect the true source of the funds.

The Illinois State Board of Elections has authority under Article 9 to obtain and review such records in order to determine whether campaign disclosure reports accurately identify the source of political contributions and whether any amendments, corrective filings, or enforcement action may be warranted.

The timing of the reported transfers also presents a notable pattern. The contributions from the above-named entities appear within a narrow window during March 2024, with most transfers reported in close succession. Independent political committees generally raise funds and make contributions according to their own independent fundraising schedules. The clustering of multiple transfers from similarly named entities within a compressed timeframe warrants review to determine whether the committees were operating independently or whether the transfers were coordinated or processed together.

Based on the objective features appearing on the face of the filed report, the following issues warrant review under Article 9 of the Illinois Election Code.

First, the complaint raises a question whether the contributor identification information reported by Respondent accurately identifies the contributing political committees.

Second, the complaint raises a question whether each of the above-named entities meets the statutory definition of a political committee and whether each was properly organized and registered as required under Article 9.

Third, the complaint raises a question whether some or all of the above-named entities share common control, administration, officers, or organizational origin.

Fourth, the complaint raises a question whether the transfers reported by Respondent accurately reflect the true source of the funds transferred, particularly where similarly named entities make patterned transfers in repeated amounts within a compressed time period.

Illinois law prohibits contributions made in the name of another person and prohibits knowingly accepting such contributions. Complainant does not allege at this stage that any specific transfer definitively constitutes such a violation. However, where multiple similarly named entities make patterned transfers from addresses that cannot be verified, it is appropriate for the Board to

determine whether the reported committee names accurately identify the true source of the funds.

Review of those filings and related records will allow the Board to determine whether the committees referenced in Respondent's report exist as independent political committees operating in compliance with the Election Code or whether further inquiry is warranted.

Taken together, the patterned contribution amounts, the clustering of transfers within a short period of time, the repeated naming conventions across multiple committees, the use of post office boxes rather than physical addresses, the shared mailing address used by multiple committees, and the inability to verify the listed contributor addresses through certified mail present objective features that warrant further review.

These circumstances provide reasonable grounds for the Illinois State Board of Elections to conduct further inquiry under Article 9 of the Illinois Election Code.

This complaint is submitted in good faith for the purpose of ensuring compliance with the reporting and disclosure requirements of Article 9 of the Illinois Election Code.

Accordingly, Complainant respectfully requests that the Illinois State Board of Elections determine that sufficient grounds exist to proceed and conduct appropriate inquiry into the matters described above.