

LIBERTY
JUSTICE CENTER

December 29, 2025

VIA HAND DELIVERY AND ELECTRONIC MAIL

Marni Malowitz, General Counsel
State Board of Elections
69 W. Washington St., Suite LL08
Chicago, Illinois 60602

Re: **Notice of Filing: Joel A. Bulluck, Complainant vs Don Harmon, Joseph Seliga, and Friends of Don Harmon for State Senate, Respondents**

Dear Marni:

Enclosed please find a revised Form D-4, Complaint for Violation of the Campaign Disclosure Act, filed by Liberty Justice Center client, Joel A. Bulluck, against Friends of Don Harmon for State Senate (Committee ID No. 16238).

The complaint has been revised to expressly include the names of the committee candidate and the treasurer as respondents. Additionally, a copy of this revised complaint has been placed in the U.S. Mail via certified letter to effectuate service on them.

As with the previously filed complaint, this revised complaint shares common issues of law and fact with the now disposed of staff-initiated enforcement matter, *SBE v. Friends of Don Harmon for State Senate* (SBE Case No. 25CL001).

Very truly yours,



Jeffrey Schwab
Senior Counsel and Interim Director of Litigation

Enclosures



FORM D-4	COMPLAINT FOR VIOLATION OF THE CAMPAIGN DISCLOSURE ACT
---------------------	---

Complainant Name, Address, Telephone Number, and E-Mail Address:

Joel A. Bulluck
 444 Drexel Ave. Glencoe, IL 60022
 (708) 617-2530 jschwab@libertyjusticecenter.org

vs. _____ No. _____

Name and Address of Respondent (provide Telephone Number and/or E-Mail Address, if available):

Don Harmon, Candidate and Joseph Seliga, Treasurer
 Friends of Don Harmon for State Senate
 6939 W. North Ave. Oak Park, IL 60302 708.848.2002

Section 1. Has Respondent filed a Statement of Organization (Form D-1) as a Political Committee with The State Board of Elections? Yes No

Section 2. Statutory Provisions: State the portion(s) of The Campaign Disclosure Act (10 ILCS 5/9) that have been violated. (Use additional plain sheets if necessary and refer to this Section.)
 10 ILCS 5/9-1.9; 10 ILCS 5/9-8.5

Section 3. State the nature of the offense(s) or violation(s). (Use additional plain sheets if necessary and refer to this Section.)
 Respondent committee accepted the contributions in violation of the contribution limits provided
 in 10 ILCS 5/9-8.5 et seq. during the 3/20/24 to 12/31/24 election cycle. The time and place and nature of the
 violations are set forth on Exhibit A to this Form D-4. Exhibit A is expressly incorporated by reference.

Section 4. Attach all statements, schedules, or other documents relevant to this complaint. **See attached Exhibit A.**

VERIFICATION

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.

26 Dec 2025
 DATE


 SIGNATURE OF COMPLAINANT

(If Complainant is a corporation, then Verification MUST be signed by an authorized Officer and attested to by the Secretary)

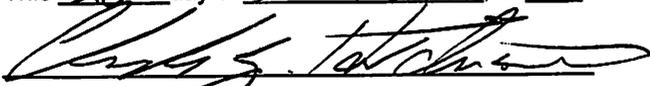
Proof of Service

I, Joel A. Bulluck Hereby swear or affirm that I served a copy of the foregoing complaint upon the following:

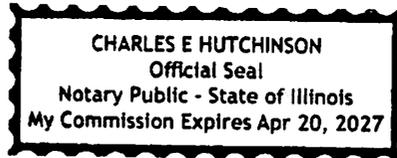
- a) Name(s) and Address(es) of person(s) served:
Don Harmon, 6939 W North Ave., Oak Park, IL 60302-1024
Joseph Seliga, 33 W 14th St., Chicago, IL 60605
- b) By personally delivering the same on the _____ day of _____, 20__ at ___ o'clock ___ m.
(List Name and Title of person - or if Name is unknown, a physical description including race, sex, and approximate age in the space below): or
- c) By placing a copy thereof in the United States Postal Service, proper postage prepaid, registered or certified, to the above indicated Address(es), on the 26th day of December 2025, at the mail box or postal station located at:
Glencoe, IL 60022



 Signature of Complainant or Agent

Subscribed and sworn to before me
 This 26 day of December, 2025


 Notary Public



Instructions

1. This form is used to file complaints for violations arising out of An Act to Regulate Campaign Financing (IL Compiled Statutes, Chapter 10, 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. The Complainant must serve a copy of the complaint upon all Respondents prior to the time of filing with the Board, and the Proof of Service section above must be completed. Copies of the Rules and Regulations are available upon request.
3. Following the filing of a complaint, the State Board of Elections will send notice via certified mail to all parties, regarding the time and location of the closed preliminary hearing.
4. Complaints must be filed by mail or in person at either of the following locations:

State Board of Elections
 2329 S MacArthur Blvd
 Springfield, IL 62704-4503

State Board of Elections
 69 W Washington St, Suite LL-08
 Chicago, IL 60602-3026

Exhibit A

**Contributions Received by Respondent
In Violation of the Contribution Limits Provided In
Election Code 10 ILCS 5/9-8.5**

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Accel Entertainment Gaming, LLC	\$30,000	Individual Contribution	10/04/2024		
Accel Entertainment Gaming, LLC	\$20,000	Individual Contribution	10/18/2024	\$13,700	\$36,300
Affordable Assisted Living Coalition PAC	\$100,000	Transfer In	07/31/2024		
Affordable Assisted Living Coalition PAC	\$100,000	Transfer In	11/01/2024	\$68,500	\$131,500
Amazon.com Services, LLC	\$15,000	Individual Contribution	11/01/2024	\$13,700	\$1,300
Ankin Law Offices, LLC	\$18,000	Individual Contribution	10/25/2024	\$13,700	\$4,300
Beam Legal Team, LLC	\$18,000	Individual Contribution	09/16/2024	\$13,700	\$4,300
Breakthru Bev Illinois	\$10,000	Individual Contribution	08/27/2024		
Breakthru Bev Illinois	\$10,000	Individual Contribution	09/06/2024	\$13,700	\$6,300
Burdi, Peter	\$9,500	Individual Contribution	12/13/2024	\$6,900	\$2,600
Camelot Illinois	\$1,000	Individual Contribution	09/16/2024		
Camelot Illinois	\$25,000	Individual Contribution	10/25/2024	\$13,700	\$12,300

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Carpentry Advancement Political Action Committee Fund	\$200,000	Transfer In	05/31/2024		
Carpentry Advancement Political Action Committee Fund	\$200,000	Transfer In	07/23/2024		
Carpentry Advancement Political Action Committee Fund	\$100,000	Transfer In	09/06/2024		
Carpentry Advancement Political Action Committee Fund	\$100,000	Transfer In	10/18/2024	\$68,500	\$531,500
Cavanagh Law Group	\$26,750	Individual Contribution	08/27/2024	\$13,700	\$13,050
Chicago Journeymen Plumbers	\$2,000	Transfer In	06/28/2024		
Chicago Journeymen Plumbers	\$10,000	Transfer In	09/06/2024		
Chicago Journeymen Plumbers	\$10,000	Transfer In	10/18/2024		
Chicago Journeymen Plumbers	\$75,000	Transfer In	11/01/2024	\$68,500	\$28,500
Chicago Land Operators Joint Labor Management PAC	\$200,000	Transfer In	05/31/2024		

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Chicago Land Operators Joint Labor Management PAC	\$350,000	Transfer In	06/28/2024		
Chicago Land Operators Joint Labor Management PAC	\$400,000	Transfer In	09/16/2024		
Chicago Land Operators Joint Labor Management PAC	\$275,000	Transfer In	10/04/2024		
Chicago Land Operators Joint Labor Management PAC	\$5,000	Transfer In	10/18/2024	\$68,500	\$1,161,500
Chicago Mercantile Exchange	\$70,000	Individual Contribution	09/16/2024	\$13,700	\$56,300
Cinema Chicago Main, LLC	\$15,000	Individual Contribution	10/04/2024	\$13,700	\$1,300
Clifford Law Offices, PC	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
Cogan & Power, P.C.	\$14,250	Individual Contribution	08/27/2024	\$13,700	\$550
Cooney & Conway	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
Coplan & Crane	\$18,000	Individual Contribution	09/16/2024	\$13,700	\$4,300
Corboy & Demetrio	\$25,000	Individual Contribution	09/16/2024	\$13,700	\$11,300
DailyPay, Inc.	\$24,000	Individual Contribution	12/30/2024	\$13,700	\$10,300

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Davita	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
Disparti Law Group	\$18,000	Individual Contribution	09/16/2024	\$13,700	\$4,300
Downstate IL Laborers' District Council PAC Fund	\$75,000	Transfer In	10/25/2024	\$68,500	\$6,500
Driscoll, John	\$10,000	Individual Contribution	09/20/2024	\$6,900	\$3,100
Dudley & Lake LLC	\$15,000	Individual Contribution	09/16/2024	\$13,700	\$1,300
Edelson PC	\$18,000	Individual Contribution	09/16/2024	\$13,700	\$4,300
F.H. Paschen, S.N. Nielsen & Assoc. LLC	\$5,000	Individual Contribution	06/18/2024		
F.H. Paschen, S.N. Nielsen & Assoc. LLC	\$5,000	Individual Contribution	09/06/2024		
F.H. Paschen, S.N. Nielsen & Assoc. LLC	\$10,000	Individual Contribution	10/25/2024	\$13,700	\$6,300
Fanduel Group	\$50,000	Individual Contribution	07/31/2024	\$13,700	\$36,300
Health Care Council of Illinois Political Action Committee	\$100,000	Transfer In	09/16/2024		
Health Care Council of Illinois Political Action Committee	\$100,000	Transfer In	10/04/2024		

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Health Care Council of Illinois Political Action Committee	\$1,000	Transfer In	11/14/2024		
Health Care Council of Illinois Political Action Committee	\$2,500	Transfer In	12/30/2024	\$68,500	\$135,000
Hurley McKenna & Mertz	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
IBEW Illinois PAC	\$333,000	Transfer In	09/16/2024	\$68,500	\$261,500
Illinois Federation of Teachers COPE	\$250,000	Transfer In	08/06/2024		
Illinois Federation of Teachers COPE	\$250,000	Transfer In	09/18/2024		
Illinois Federation of Teachers COPE	\$100,000	Transfer In	10/09/2024	\$68,500	\$531,500
Illinois Laborers' Legislative Committee	\$225,000	Transfer In	08/27/2024		
Illinois Laborers' Legislative Committee	\$25,000	Transfer In	08/27/2024	\$68,500	\$206,500
Illinois Restaurant Association	\$15,000	Individual Contribution	12/30/2024	\$13,700	\$1,300
Illinois Risk Management Services, Inc.	\$25,000	Individual Contribution	07/23/2024	\$13,700	\$11,300
JRDC Managed Services, LLC	\$15,000	Individual Contribution	10/18/2024	\$13,700	\$1,300
Keefe, Keefe, & Unsell, PC	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Korein Tillery LLC	\$20,000	Individual Contribution	09/16/2024	\$13,700	\$6,300
Law Offices of Parente & Norem, PC	\$14,000	Individual Contribution	10/25/2024	\$13,700	\$300
Levin & Perconti	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
LIUNA Chicago Laborers' District Council PAC	\$20,000	Transfer In	07/23/2024		
LIUNA Chicago Laborers' District Council PAC	\$250,000	Transfer In	09/27/2024		
LIUNA Chicago Laborers' District Council PAC	\$50,000	Transfer In	10/18/2024	\$68,500	\$251,500
LR Development Company LLC	\$25,000	Individual Contribution	05/31/2024	\$13,700	\$11,300
Marquis Energy LLC	\$40,000	Individual Contribution	07/23/2024	\$13,700	\$26,300
McDonald's Corporation	\$20,000	Individual Contribution	09/06/2024		
McDonald's Corporation	\$10,000	Individual Contribution	09/06/2024	\$13,700	\$16,300
Meyers & Flowers LLC	\$20,000	Individual Contribution	10/25/2024	\$13,700	\$6,300
Morrissey Legal Group	\$15,250	Individual Contribution	09/16/2024	\$13,700	\$1,550
Nicor Gas	\$12,000	Individual Contribution	10/25/2024		

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Nicor Gas	\$3,000	Individual Contribution	11/14/2024	\$13,700	\$1,300
North Central Illinois Laborers' District Council	\$75,000	Transfer In	08/27/2024	\$68,500	\$6,500
Phillips Law Offices	\$18,500	Individual Contribution	10/25/2024	\$13,700	\$4,800
PhRMA	\$20,000	Individual Contribution	09/20/2024	\$13,700	\$6,300
Pipefitters' Association Local 597 UA Illinois PAC Fund	\$100,000	Transfer in	11/01/2024	\$68,500	\$31,500
Power Rogers, LLP	\$25,000	Individual Contribution	09/16/2024	\$13,700	\$11,300
Rich Rich Cooksey & Chappell, PC	\$18,000	Individual Contribution	09/16/2024	\$13,700	\$4,300
Rivers Casino	\$15,000	Individual Contribution	10/04/2024	\$13,700	\$1,300
Romanucci & Blandin	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
Salvi, Schostok & Pritchard P.C.	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
SEIU Healthcare IL/IN	\$59,900	Transfer In	06/28/2024		
SEIU Healthcare IL/IN	\$68,500	Transfer In	10/25/2024	\$68,500	\$59,900
Simmons Hanly Conroy	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300

Contributor Name	Amount	D-2 Part	Date of Receipt	Maximum Contribution Allowed	Overage in Violation of Election Code Limits
Smith Lacion LLP	\$25,000	Individual Contribution	09/16/2024	\$13,700	\$11,300
Sports Betting Alliance	\$250,000	Individual Contribution	10/18/2024	\$13,700	\$236,300
Taxman, Pollock, Murray, & Bekkerman, LLC	\$25,000	Individual Contribution	09/16/2024	\$13,700	\$11,300
The Gori Law Firm, PC	\$25,000	Individual Contribution	08/27/2024	\$13,700	\$11,300
Tomasik Kotin & Kasserman LLC	\$25,000	Individual Contribution	09/16/2024	\$13,700	\$11,300
Walgreens	\$10,000	Individual Contribution	08/27/2024		
Walgreens	\$15,000	Individual Contribution	11/01/2024		
Walgreens	\$4,500	Individual Contribution	12/30/2024	\$13,700	\$15,800
Total					\$4,074,050