

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN MATTHEW CHANCEY, FAIR COURTS
AMERICA, and RESTORATION PAC

Plaintiffs,

v.

THE ILLINOIS STATE BOARD OF
ELECTIONS; IAN LINNABARY, *in his
official capacity as Chair of the Illinois
State Board of Elections*; CASANDRA B.
WATSON, WILLIAM J. CADIGAN, LAURA K.
DONAHUE, TONYA L. GENOVESE,
CATHERINE S. MCCRORY; WILLIAM M.
MCGUFFAGE, *and* RICK S. TERVEN, SR.,
*in their official capacities as members of
the Illinois State Board of Elections*;
KWAME RAOUL, *in his official capacity
as Illinois Attorney General*,

Defendants.

Case No. 22-04043

**Plaintiffs' Motion for
Preliminary Injunction**

Plaintiffs John Matthew Chancey, Fair Courts America, and Restoration PAC move this Court to enter an order preliminarily enjoining the enforcement of two recently enacted provisions of the Illinois Election Code: 1) a provision prohibiting contributions to judicial candidates by “out-of-state person[s],” 10 ILCS 5/9-8.5(b-5)(1), and 2) a provision capping contributions to independent expenditure committees supporting judicial candidates at \$500,000, 10 ILCS 5/9-8.5(b-5)(1.2). In support thereof, Plaintiffs refer to the Memorandum in Support of Motion for Preliminary Injunction filed in conjunction with this Motion.

Further, Plaintiffs request that this Court provide them preliminary relief as expeditiously as possible, as the campaigns for Illinois' upcoming election are already underway, and a denial of their right to fully participate in that election cannot be cured after the election takes place on November 8, 2022.

Dated: August 3, 2022

Respectfully Submitted,

John Matthew Chancey, Fair Courts
America, and Restoration PAC

By: /s/ Jeffrey M. Schwab
One of their Attorneys

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*application to the General Bar for the Northern District of Illinois submitted

Certificate of Service

I, Jeffrey M. Schwab, an attorney, certify that on August 3, 2022, I filed Plaintiffs' Motion for Preliminary Injunction on Defendants' counsel through the Court's electronic case filing system and caused it to be served on Defendants with the Summons and Complaint via a special process server as follows:

Defendants Illinois State Board of Elections, Ian Linnabary, Casandra B. Watson, William J. Cadigan, Laura K. Donahue, Tonya L. Genovese, Catherine S. McCrory, William M. McGuffage, and Rick S. Terven, Sr., in their official capacities are to be served at the Board' Chicago office: 69 W. Washington Suite LL08, Chicago, IL 60602.

Attorney General Kwame Raoul is to be served at his Chicago office: 100 West Randolph Street, Chicago, IL 60601.

/s/ Jeffrey M. Schwab