

Keith Pekau

[REDACTED]  
kpekau@keithpekau.com**RECEIVED**

By OGC/CELA at 6:53 pm, Aug 15, 2023

August 13, 2023

**Via U.S. Mail and Electronic Mail to cela@fec.gov**

Federal Election Commission  
 Office of Complaints Examination  
 and Legal Administration  
 Attn: Trace Keeys, Paralegal  
 1050 First Street, NE  
 Washington, DC 20436

Re: Keith Pekau, Pekau for Congress, William Healy, and People Over Politics Party (Matter Number MUR 8124) - Amendment 7-28-23 and Supplement 8-3-23

To the General Counsel's Office:

This letter is a response for MUR 8124, Amendment 7-28-23 and Supplement 8-3-23. This is in addition to previous responses. Similar to the previous response the complainant Mr. Henry provides no evidence to support his allegations. The claim is that Keith Pekau and William Healy illegally used the Village of Orland Park emails in violation of state and federal law to solicit campaign contributions for a Federal Election.

The original emails from his complaint are attached in Exhibit 1. The email used for William Healy is [bill@healycpa.com](mailto:bill@healycpa.com) and for Keith Pekau is [kpekau@groundskpr.com](mailto:kpekau@groundskpr.com). Neither of these emails are government emails. Additionally, none of the responses are from government emails. Mr. Henry's claims are again fabricated.

Mr. Henry also attached a news article. He does not attach the entire article which is attached in Exhibit 2. This news article provides no evidence to any wrongdoing whatsoever. In fact, the picture on page 2 is doctored and fabricated. This picture is from a video of a Village of Orland Park Village Board Meeting on January 16, 2023, over two months after the federal election. The "Keith Pekau Congress" signs on the televisions are photoshopped. The original video that is the original can be found here <https://www.youtube.com/live/MyFime2PoLw?feature=share&t=191>. Moreover, this is the first day that this board room was re-opened with new video and audio capabilities and the first time these LED displays were ever used.

Pages 5 through 7 of Exhibit 2 use the same emails as Mr. Henry to allege wrong doing. The originals again can be found in Exhibit 1 and clearly show that no government emails were used. This article also insinuates that Keith Pekau and his congressional campaign (Pekau For Congress) coerced vendors. Neither the complainant nor the article show any evidence of a single communication with a

vendor. Additionally, Federal Election Law prohibits campaign donations from corporations and Pekau For Congress has no campaign donations from corporations as the FEC knows from the Pekau For Congress quarterly filings.

Mr. Henry also attempted to file a similar complaint with the Illinois State Board of Elections which has been dismissed as having "not to have been filed on justifiable grounds", in Exhibits 3 and 4.

Mr. Henry also tried to file an Open Meetings Act violation with Illinois State Attorney General Public Access Council. They too denied his request in Exhibit 5.

As noted previously this is Mr. Henry's modus operandi. Submit a FOIA and either file a lawsuit for not receiving anything or filing a complaint/lawsuit using "pieces" of whatever was received. In the enclosed flash drive are all of the emails from Mike Henry to the village of Orland Park (over 200) with hundreds of accusations and threats. Additionally, enclosed are approximately 100 robocalls that Mr. Henry has made to residents in Orland Park and throughout Illinois Congressional District 6. I have also attached Exhibit 6, a letter to the IL State Board of Elections regarding Mr. Henry's history.

We respectfully request that you address this matter as quickly as possible. Otherwise, Mr. Henry will continue to abuse the process by filing amendments every few months to ensure that this matter stays open "in perpetuity".

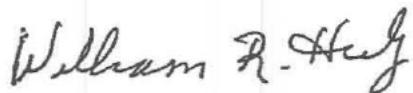
We would likewise ask for sanctions against Mr. Henry for these false claims that are an abuse of process. If you have any questions, we can be reached at [REDACTED] or at [kpekau@keithpekau.com](mailto:kpekau@keithpekau.com).

Please do not hesitate to contact us with any questions.

Respectfully submitted,



Keith Pekau



William Healy

William R. Healy

William Healy, for Pekau For Congress Committee, as its Treasurer

William R. Healy

William Healy, for People Over Politics Committee, as its Treasurer

**From:** Joseph Solek [REDACTED]  
**Subject:** Re: Keith golf outing planning meeting  
**Date:** July 25, 2022 at 10:03 AM  
**To:** Cindy Nelson Katsenes [REDACTED] Michael R. Milani [REDACTED] Bill Healy bill@healycpa.com, Keith Pekau kpekau@groundskpr.com, Sean Kampas skampas@orlandpark.org, Brian Riordan briordan@clausen.com, Abbey Corbett abbey@corstrategies.com, ryan@corestrategies.com, Tom Dubelbeis [REDACTED]

I will be there. Joe

On Monday, July 25, 2022 at 09:30:55 AM CDT, Tom Dubelbeis <[REDACTED]> wrote:

Team,

Please plan on attending a planning meeting for Keith's golf outing. Thursday July 28th, 4pm @ my house [REDACTED]. OP. The rules for congressional fund raising and gold outings are more restrictive than we're used to. So, get your creative juices going so we can develop a plan to raise \$120K for Keith.

RSVP [REDACTED]

Thanks,

Tom

Tom Dubelbeis

[REDACTED]  
[REDACTED]  
US Army 70-72

B2

From: Sean Kampas [REDACTED] &  
Subject: Re: Keith golf outing planning meeting  
Date: July 25, 2022 at 11:36 AM  
To: Cindy Nelson [REDACTED] Joseph Solek [REDACTED] Michael R. Milani [REDACTED] Bill Healy [REDACTED]  
bill@healycpa.com, Kpekau kpekau@keithpekau.com, Brian J. Riordan briordan@clausen.com, Abbey Corbett  
abbey@corstrategies.com, Ryan Kilduff ryan@corstrategies.com, Tom Dubelbeis [REDACTED]

Hi All - Please be aware that the original and subsequent reply alls are going to my official village account (FOIA-able). Please remove that address if you reply.

Regards,  
Sean

On Monday, July 25, 2022 at 11:31:37 AM CDT, Sean Kampas <skampas@orlandpark.org> wrote:

**Sean Kampas | Trustee**  
Village of Orland Park  
14700 Ravinia Avenue | Orland Park, Illinois 60462  
Ph. 708.608.1470 | skampas@orlandpark.org

 ORLAND PARK

---

**From:** Tom Dubelbeis [REDACTED] >  
**Sent:** Monday, July 25, 2022 9:30 AM  
**To:** Cindy Nelson Katsenes; Michael R. Milani; Bill Healy; Keith Pekau; Sean Kampas; Joseph Solek; Brian Riordan; Abbey Corbett; ryan@corstrategies.com  
**Subject:** Keith golf outing planning meeting

[External Mail] Use caution with links and attachments.

Team,

Please plan on attending a planning meeting for Keith's golf outing. Thursday July 28th, 4pm @ my house [REDACTED] OP. The rules for congressional fund raising and gold outings are more restrictive than we're used to. So, get your creative juices going so we can develop a plan to raise \$120K for Keith.

## golf outing

Tom Dubelbeis [REDACTED]

Sat 9/10/2022 7:25 AM

To:Abbey Corbett <abbey@corstrategies.com>; Cindy Nelson Katsenes <[REDACTED]>; Bill Healy <bill@healycpa.com>; Michael Milani <mmilani@orlandpark.org>; Sean Kampas [REDACTED]>; Joni Rad [REDACTED] Keith Pekau <kpekau@groundskpr.com>; Joseph Solek [REDACTED]

1 attachments (21 KB)

Pekau Golf Outing Sponsor List 2020-2022 9-6-2022 (4).xlsx;

[External Mail] Use caution with links and attachments.

Team,

I've contacted 23 of the names on the list and need help with the rest. Again, gray and green have either been contacted or paid.

The names with X's still need to be contacted. Please review the list and let me know who you can contact.

Regards,

Tom

Tom Dubelbeis

[REDACTED]  
[REDACTED]  
US Army 70-72

## Re: golf outing

Joseph Solek &lt;[REDACTED]&gt;

Sat 9/10/2022 8:13 AM

To:Abbey Corbett <abbey@corstrategies.com>; Cindy Nelson Katsenes <[REDACTED]>; Bill Healy <bill@healycpa.com>; Michael Milani <mmilani@orlandpark.org>; Sean Kampas <[REDACTED]>; Joni Rad <[REDACTED]>; Keith Pekau <kpekau@groundskor.com>; Tom Dubelbeis <[REDACTED]>

[External Mail] Use caution with links and attachments.

I have contacted Tinley Park Kitchen and Bath and Girl in the Park. GITP has contributed to Keith in the past. I will get a hold of Mike at Papa Joe's. I know him. I will also contact Dr. Heaney. I will get these for sure. After I get in touch with these, I will move to others. Joe

On Saturday, September 10, 2022 at 07:26:55 AM CDT, Tom Dubelbeis <[REDACTED]> wrote:

Team,

I've contacted 23 of the names on the list and need help with the rest. Again, gray and green have either been contacted or paid.

The names with X's still need to be contacted. Please review the list and let me know who you can contact.

Regards,

Tom

Tom Dubelbeis

[REDACTED]  
[REDACTED]  
US Army 70-72

**From:** Tom Dubelbeis [REDACTED]  
**Subject:** Keith golf outing planning meeting  
**Date:** July 25, 2022 at 9:30 AM  
**To:** Cindy Nelson Katsenes [REDACTED] Michael R. Milani [REDACTED], Bill Healy bill@healycpa.com, Keith Pekau kpekau@groundskpr.com, Sean Kampas skampas@orlandpark.org, Joseph Solek [REDACTED] Brian Riordan briordan@clausen.com, Abbey Corbett abbey@corestrategies.com, ryan@corestrategies.com

Team,

Please plan on attending a planning meeting for Keith's golf outing. Thursday July 28th, 4pm @ my house [REDACTED] B[e] [REDACTED]. OP. The rules for congressional fund raising and gold outings are more restrictive than we're used to. So, get your creative juices going so we can develop a plan to raise \$120K for Keith.

RSVP [REDACTED]

Thanks,

Tom

Tom Dubelbeis

[REDACTED]  
[REDACTED]  
US Army 70-72

Home Illinois News Mayor Keith Pekau was Running Federal Congressional Campaign, Raising Money from City...

[Illinois News](#) [Illinois Politics](#) [TRENDING](#)

# **Mayor Keith Pekau was Running Federal Congressional Campaign, Raising Money from City Contractors, From Taxpayer-Funded**

# Village Hall, FOIA Requests Reveal

By: Illinois Review

Date:

August 1, 2023

*Orland Park Mayor Keith Pekau and Village Trustees during a board meeting. (Source: Illinois Review)*

By Illinois Review



*Orland Park Mayor Keith Pekau and Village Trustees during a board meeting. (Source: Illinois Review)*

A recent Freedom of Information Act (FOIA) request, and provided to Illinois Review, revealed that Orland Park Mayor Keith Pekau and village trustees were using their official taxpayer-funded government email addresses to communicate with members of Pekau's congressional campaign team to discuss political activities, and to review a list of current contractors doing business with the village, so they could gather donations for a golf outing **fundraiser** at Crystal Tree Golf & Country Club last September.



(Source: Keith Pekau for Congress)

In a correspondence dated July 25, 2022, Tom Dubelbeis – a former village trustee and former interim village manager, is communicating with the mayor, his campaign team and village trustees Cindy Nelson Katsenes, Michael Milani, Bill Healy, Sean Kampas and Brian Riordan on their official government email accounts about a “Keith golf outing planning meeting.” In the email, Dubelbeis writes

“Team,

*Please plan on attending a planning meeting for Keith’s golf outing. Thursday July 28th, 4 pm @ my house. The rules for congressional fund raising and golf outings are more restrictive than we’re used to. So, get your creative juices going so we can develop a plan to raise \$120K for Keith. RSVP.*

Thanks,

Tom”

---

**From:** Tom Dubelbeis [REDACTED]  
**Sent:** Monday, July 25, 2022 9:31 AM  
**To:** Cindy Nelson Katsenes; Michael R. Milani; Bill Healy; Keith Pekau; Sean Kampas; Joseph Solek; Brian Riordan; Abby Corbett; ryan@corestrategies.com  
**Subject:** Keith golf outing planning meeting

[External Mail] Use caution with links and attachments.

Team,

Please plan on attending a planning meeting for Keith's golf outing. Thursday July 28th, 4pm @ my house [REDACTED]

[REDACTED] The rules for congressional fund raising and gold outings are more restrictive than we're used to. So, get your creative juices going so we can develop a plan to raise \$120K for Keith.

RSVP [REDACTED]

Thanks,

Tom

Tom Dubelbeis  
[REDACTED]

US Army 70-72

1

---

Source: Village of Orland Park FOIA Request

Minutes later, Trustee Michael Milani replies from his official government email account, "As of now, I will be able to make it."

---

**From:** Michael R. Milani [REDACTED]  
**Sent:** Monday, July 25, 2022 9:42 AM  
**To:** Tom Dubelbeis  
**Cc:** Cindy Nelson Katsenes; Bill Healy; Keith Pekau; Sean Kampas; Joseph Solek; Brian Riordan; Abbey Corbett; ryan@corestrategies.com  
**Subject:** Re: Keith golf outing planning meeting

[External Mail] Use caution with links and attachments.

As of now, I will be able to make it.

Thanks!  
Michael R. Milani  
[REDACTED]

On Jul 25, 2022, at 9:30 AM, Tom Dubelbeis [REDACTED] wrote:

[REDACTED]

Source: Village of Orland Park FOIA Request

In September, the emails continued, but Trustee Brian Riordan, an attorney – is no longer on the email distribution list – most likely removing himself from the conversation – well aware that you cannot mix official government business with political campaign activities.

But in a follow up email dated September 10, 2022, Dubelbeis writes,

*"Team,  
I've contacted 23 of the names on the list and need help with the rest. Again, gray and green have either been contacted or paid.  
The names with X's still need to be contacted. Please review the list and let me know who you can contact.  
Regards,  
Tom"*

---

**From:** Tom Dubelbeis [REDACTED]  
**Sent:** Saturday, September 10, 2022 7:26 AM  
**To:** Abbey Corbett; Cindy Nelson Katsenes; Bill Healy; Michael Milani; Sean Kampas; Joni Rad; Keith Pekau; Joseph Solek  
**Subject:** golf outing  
**Attachments:** Pekau Golf Outing Sponsor List 2020-2022 9-6-2022 (4).xlsx

[External Mail] Use caution with links and attachments.

Team,

I've contacted 23 of the names on the list and need help with the rest. Again, gray and green have either been contacted or paid.

The names with X's still need to be contacted. Please review the list and let me know who you can contact.

Regards,

Tom

Tom Dubelbeis  
[REDACTED]

US Army 70-72

Source:

Village of Orland Park FOIA Request

Attached to the email was a list of businesses that Pekau and his fellow trustees were trying to solicit for federal campaign donations – with many of those companies doing business with the village.



A list of potential donors to Pekau's congressional campaign fundraiser, with many doing business with the village. (Source: Village of Orland Park FOIA Request)

In January, Chicago Mayor Lori Lightfoot's campaign faced potential legal trouble when emails revealed campaign staffers were contacting [Chicago Public School](#) teachers and asking them to identify students who could volunteer on the mayor's re-election campaign.

The [American Civil Liberties Union](#) of Illinois immediately raised an alarm – citing a US Supreme Court case, saying the Lightfoot campaign "*is inappropriately coercive and raises First Amendment concerns. The Supreme Court has made clear that government officials cannot use their office or power to coerce participation or to punish for lack of participation in political campaigns...*"

In other words, Mayor Pekau and village trustees – who oversee village contractors – cannot use their office to persuade people to donate to political campaigns – and in this case, the mayor's congressional campaign.

The list – provided by Dubelbeis, includes several city contractors, including Edwards Realty Group, Fox's Pizza, G.E. Mathis Company, Jeanes Construction, Joe Rizza Enterprises, Mazda of Orland Park and Ziegler Auto Group.

In March of 2022, Pekau and the village board voted in favor of signing a six-figure consulting agreement with one of the mayor's biggest donors to develop village-owned property along one of Orland Park's busiest corridors – [Edwards Realty](#).

In November of 2022, the village board voted to reimburse Edwards Realty up to \$1 million in potential costs as it related to the development project, and could assist in the purchase of the village-owned land.

Ramzi Hassan is the president of Edwards Realty and the current president of the Orland Park Chamber of Commerce.

On December 27, 2022, Hassan made a \$5,000 personal contribution to Chicago Mayor [Lori Lightfoot](#) in support of her failed re-election efforts.



Edwards Realty and  
Orland Park Chamber of Commerce president Ramzi Hassan and former Chicago  
Mayor Lori Lightfoot.

Eric Vates, the president of Orland Park Mazda – and a close friend and ally of Pekau, is routinely seen at local community events **wearing official Orland Park Police gear and a badge** – giving the impression that he is a member of law enforcement.

Orland Park Trustee Sean Kampas, an IT consultant and close friend and ally of Pekau is also seen during community events **wearing an official Orland Park Police Emergency Services polo with an official police badge attached to his belt** – giving the impression that he is a member of law enforcement.

In Illinois, it is unlawful to impersonate a police officer, and a **Class 4 Felony**, punishable by up to three years in jail and \$25,000 in fines.



Eric Vates, left, of Orland Park Mazda, Sean Kampas, center, an IT consultant and Village Trustee, and Orland Park Mayor Keith Pekau pose for a photo during a community event last Summer. Vates and Kampas are wearing official Orland Park Police uniforms and a badge, even though they are not law enforcement.

In March, Pekau and Kampas were caught harassing female Orland Fire Protection District candidates Angela Greenfield and Tina Zekich and their volunteers as they campaigned and knocked on doors in a local neighborhood just a week before the April elections.

Pekau and Kampas spent the morning following the group in Pekau's Dodge Durango as they walked a nearby neighborhood to knock on doors and drop off literature.

Although Pekau and Kampas never got out of the car, numerous witnesses said the pair continued to follow the group as they knocked on doors – staring at them through the car windows in a sad attempt at intimidating the group of

volunteers who were campaigning on behalf of candidates that they opposed.

Healy is a village trustee and served as the treasurer of Pekau's congressional campaign. Healy is also a treasurer for other trustee candidate committees.

## Committee information

---

<b>Committee name:</b>	PEKAU FOR CONGRESS
<b>Mailing address:</b>	PO BOX 2416 ORLAND PARK, IL 60462
<b>Treasurer:</b>	HEALY WILLIAM
<b>Committee type:</b>	House
<b>Committee designation:</b>	Principal campaign committee
<b>Statement of organization:</b>	<input checked="" type="checkbox"/> <a href="#">Current version (PDF)</a> FEC-1689656 Filed 02/17/2023

(Source: Federal Election Commission website)

Nelson-Katsenes is a village trustee, Orland Township committeewoman and serves as the treasurer for Pekau's mayoral campaign.

## Candidates

Name	Address	District Type	Office	District
Pekau, Keith	10640 Bonnie Glen Pl Orland Park, IL 60462	Village	President	Orland Park

## Officers

Name	Title	Address
Nelson, Cindy	Treasurer	9788 W. 151st St. Orland Park, IL 60462
Pekau, Keith	Chair	82 S. LaGrange Road Suite 204 Orland Park, IL 60525

(Source: Illinois State Board of Elections website)

And in an email to constituents from the "[Keith for Mayor](#)" account in August of 2022, Pekau provides a recap from the last village trustee board meeting and then pivots to promote his congressional campaign and his upcoming golf fundraiser on September 26th.

The new revelations shed light on the inner workings of Pekau's congressional campaign, and will undoubtedly catch the attention of state and federal election officials.

Exhibit 3

STATE OF ILLINOIS  
COUNTY OF COOK

BEFORE THE STATE BOARD OF ELECTIONS  
OF THE STATE OF ILLINOIS

Michael F. Henry  
**Complainants**

Vs.

Board File#: 22 CD 041

Keith for Mayor  
**Respondents**

**REPORT OF HEARING OFFICER**

This hearing was held as a result of a Complaint filed pursuant to Article 9 of the Illinois Election Code (10 ILCS 5/9-1, *et seq.*) alleging that the Respondent violated 10 ILCS 5/9-7. Specifically, Respondent failed to keep a detailed and exact account of the Committee's expenditures and falsified reports to cover illegal expenditures. *Michael F. Henry v. Keith for Mayor*, see attached.

To be made a part of this report, a copy of the D-4, Complaint for Violation of the Campaign Disclosure Act, filed on December 15, 2022, at the Board's Chicago office, 69 W Washington St, Chicago, IL 60601; Notice and Summons regarding the Complaint; Notice of the Closed Preliminary Hearing to be conducted in the matter, Wednesday, February 8, 2023, at the Board's Chicago office and via Zoom.

**COMPLAINANT'S CASE-IN-CHIEF**

The Complainant, Michael F. Henry, was present for the hearing. He alleged that Keith Pekau improperly used funds from his mayoral campaign committee to support his federal campaign. Keith Pekau is the Mayor of Orland Park and was a candidate for election to the U.S. House of Representatives from Illinois's 6th Congressional District. Mr. Henry stated that Mr. Pekau formed his Illinois candidate committee, Keith for Mayor, for his 2017 and 2021 mayoral campaigns on November 28, 2016. His federal campaign committee for his congressional campaign, Pekau for Congress, was registered with the Federal Election Commission on November 15, 2021, listing William Healey as the committee treasurer.

Mr. Henry contends that since Mr. Pekau was elected as Mayor in April 2021, his committee, Keith for Mayor, should not have made expenditures for polling, advertising, and consulting fees after the candidate's win. The Complainant submitted a list of contributions and expenditures for Keith for Mayor obtained on Sunshine.org. (Sunshine.org derives its transaction list from the Board's website.) Specifically, expenditures to McPherson Public Affairs Group and COR Services made by Keith for Mayor were alleged to have happened right before and soon after Mr. Pekau announced his congressional campaign.

Using the list of expenditures obtained from Sunshine.org, Mr. Henry provided that Pekau for Congress and Keith for Mayor made payments to both consulting firms around the same time. On March 4, 2022, Keith for Mayor made a \$400 payment to McPherson Public Affairs Group and on March 1, 2022, Pekau for Congress made a \$3,900 payment to McPherson Public Affairs Group. On April 12, 2022, Pekau for Congress paid \$438,343.38 to COR Services, and Keith for Mayor paid \$786.16 to COR Services on April 13, 2022. Then on June 10, 2022, Keith for Mayor paid \$300 to McPherson Public Affairs Group, and Pekau for Congress paid McPherson Public Affairs Group a total of \$9,000. The Complainant stated that the timing of the expenditures is cause to investigate the candidate's spending.

## RESPONDENT'S CASE-IN-CHIEF

The Respondent, Keith Pekau, was present for the hearing. Mr. Pekau stated that Mr. William Healy is not the treasurer for the Keith for Mayor committee, and he is not privy to the dealing of that committee. He explained that Keith for Mayor has filed all reports with the Board, and has properly accounted for all contributions and expenditures paid for by Keith for Mayor. Mr. Pekau also stated that the statement "People Over Politics" is a tagline used by the candidate and committee during his many campaigns for public office. Any mention or visual of the statement was not an endorsement of any organization or committee using the phrase as a name.

## SUGGESTED FINDINGS OF FACT, CONCLUSIONS, AND RECOMMENDATIONS

### 10 ILCS 5/9-7 Allegation

This Section requires:

(1) Except as provided in subsection (2) the treasurer of a political committee shall keep a detailed and exact account of –

- (a) the total of all contributions made to or for the committee;
- (b) the full name and mailing address of every person making a contribution and the date and amount thereof;
- (c) the total of all expenditures made by or on behalf of the committee;
- (d) the full name and mailing address of every person to whom any expenditure is made, and the date and amount thereof;
- (e) proof of payment, stating the particulars, for every expenditure made by or on behalf of the committee. The treasurer shall preserve all records and accounts required by this section for a period of 2 years.

Although the Complainant indicated this Section was violated on the complaint he did not identify how the Respondent violated any part of this Section. He contended that Keith Pekau improperly used funds from his mayoral campaign committee to support his federal campaign because of the timing of the expenditures in relation to his announcement of his congressional campaign. The Respondent explained that his committee has filed all reports with the Board, and has properly accounted for all contributions received and expenditures paid for by Keith for Mayor.

### Recommendation

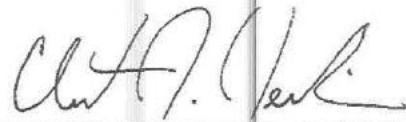
I recommend this allegation be found **not to have been filed upon justifiable grounds** and this allegation be **dismissed**. The Complainant has the burden of introducing evidence or information sufficient for the Board to conclude that an allegation has been filed on justifiable grounds, however, the Complainant didn't allege or provide any evidence or information to support a violation to any part of this Section other than listing this Section as having been violated.

### Allegation made with no statutory section provided

The Complainant says the Respondent falsified reports to cover illegal expenditures. He contended that Keith Pekau improperly used funds from his mayoral campaign committee to support his federal campaign because of the timing of the expenditures in relation to his announcement of his congressional campaign.

The Respondent explained that his committee has filed all reports with the Board, and has properly accounted for all contributions received and expenditures paid for by Keith for Mayor.

Recommendation: The complainant didn't provide a statutory violation to have been violated. The Complainant has the burden of introducing evidence or information sufficient for the Board to conclude that an allegation has been filed on justifiable grounds, however, the Complainant didn't provide any evidence or information to support a violation. I recommend this allegation be found **not to have been filed upon justifiable grounds**, and this allegation be **dismissed**.



---

Clinton J Jenkins – Hearing Officer  
February 10, 2023

*Exhibit 4*

STATE OF ILLINOIS  
COUNTY OF COOK

BEFORE THE STATE BOARD OF ELECTIONS  
OF THE STATE OF ILLINOIS

Michael F. Henry  
Complainants

Vs.

Board File#: 22 CD 042

People Over Politics  
Respondents

**REPORT OF HEARING OFFICER**

This hearing was held as a result of a Complaint filed pursuant to Article 9 of the Illinois Election Code (10 ILCS 5/9-1, *et seq.*) alleging that the Respondent violated 10 ILCS 5/9-7. Specifically, Respondent failed to keep a detailed and exact account of the Committee's expenditures and falsified reports to cover illegal expenditures. *Michael F. Henry v. People Over Politics*, see attached.

To be made a part of this report, a copy of the D-4, Complaint for Violation of the Campaign Disclosure Act, filed on December 15, 2022, at the Board's Chicago office, 69 W Washington St, Chicago, IL 60601; Notice and Summons regarding the Complaint; Notice of the Closed Preliminary Hearing to be conducted in the matter, Wednesday, February 8, 2023, at the Board's Chicago office and via Zoom.

**COMPLAINANT'S CASE-IN-CHIEF**

The Complainant, Michael F. Henry, was present for the hearing. He alleged that Keith Pekau improperly used funds from his mayoral campaign committee to support his federal campaign. Keith Pekau is the Mayor of Orland Park and was a candidate for election to the U.S. House of Representatives from Illinois's 6th Congressional District. Mr. Henry stated that Mr. Pekau formed his Illinois candidate committee, Keith for Mayor, for his 2017 and 2021 mayoral campaigns on November 28, 2016. His federal campaign committee for congressional campaign, Pekau for Congress, was registered with the Federal Election Commission on November 15, 2021, listing William Healey as the committee treasurer.

Mr. Henry contends that since Mr. Pekau was elected as Mayor in April 2021, his committee, Keith for Mayor, should not have made expenditures for polling, advertising, and consulting fees after the candidate's win. The Complainant submitted a list of contributions and expenditures for Keith for Mayor obtained on Sunshine.org. (Sunshine.org derives its transaction list from the Board's website.) Specifically, expenditures to McPherson Public Affairs Group and COR Services made by Keith for Mayor were alleged to have happened right before and soon after Mr. Pekau announced his congressional campaign.

Using the list of expenditures obtained from Sunshine.org, Mr. Henry provided that Pekau for Congress and Keith for Mayor made payments to both consulting firms around the same time. On March 4, 2022, Keith for Mayor made a \$400 payment to McPherson Public Affairs Group and on March 1, 2022, Pekau for Congress made a \$3,900 payment to McPherson Public Affairs Group. On April 12, 2022, his Pekau for Congress paid \$438,343.38 to COR Services, and Keith for Mayor paid \$786.16 to COR Services on April 13, 2022. Then on June 10, 2022, Keith for Mayor paid \$300 to McPherson Public Affairs Group, and Pekau for Congress paid McPherson Public Affairs Group a total of \$9,000. The Complainant stated that the timing of the expenditures is cause to investigate the candidate's spending.

Mr. Henry added that the committee People Over Politics has received a benefit from being listed on the campaign literature for Mr. Keith Pekau. Mr. Henry contends that an In-kind contribution should be listed on the report for People Over Politics.

#### **RESPONDENT'S CASE-IN-CHIEF**

The Respondent, William Healy, was present for the hearing. Mr. William Healy stated that the complaint does not explain how his committee, People Over Politics, violated the Campaign Disclosure Act, Section 10 ILCS 5/9-7. He explained that the committee, People Over Politics, has filed all reports with the Board, and has properly accounted for all contributions received and expenditures paid for by People Over Politics. Mr. Healy testified that the statement "People Over Politics" is also a tagline used by Mr. Keith Pekau and that no conversation was had with Mr. Pekau to include the tagline on his campaign literature for the benefit of the Committee.

#### **SUGGESTED FINDINGS OF FACT, CONCLUSIONS, AND RECOMMENDATIONS**

##### 10 ILCS 5/9-7 Allegation

This Section requires:

(1) Except as provided in subsection (2) the treasurer of a political committee shall keep a detailed and exact account of –

- (a) the total of all contributions made to or for the committee;
- (b) the full name and mailing address of every person making a contribution and the date and amount thereof;
- (c) the total of all expenditures made by or on behalf of the committee;
- (d) the full name and mailing address of every person to whom any expenditure is made, and the date and amount thereof;
- (e) proof of payment, stating the particulars, for every expenditure made by or on behalf of the committee. The treasurer shall preserve all records and accounts required by this section for a period of 2 years.

Although the Complainant indicated this Section was violated on the complaint he did not identify how the Respondent violated any part of this Section. He contended that People Over Politics improperly used funds to support Pekau for Congress because of the timing of the expenditures in relation to Mr. Pekau's announcement of his congressional campaign. The Respondent explained that his committee has filed all reports with the Board, and has properly accounted for all contributions received and expenditures paid for by People Over Politics.

##### Recommendation

I recommend this allegation be found **not to have been filed upon justifiable grounds** and that this allegation be **dismissed**. The Complainant has the burden of introducing evidence or information sufficient for the Board to conclude that an allegation has been filed on justifiable grounds, however, the Complainant didn't allege or provide any evidence or information to support a violation to any part of this Section other than listing this Section as having been violated.

##### Allegation made with no statutory section provided

The Complainant says the Respondent falsified reports to cover illegal expenditures. He contended that People Over Politics improperly used funds to support Pekau for Congress because of the timing of the expenditures in relation to his announcement of Mr. Pekau's congressional campaign. The Respondent explained that his committee has filed all reports with the Board, and has properly accounted for all contributions received and expenditures paid for by People Over Politics.

Recommendation

The complainant didn't provide a statutory violation to have been violated. The Complainant has the burden of introducing evidence or information sufficient for the Board to conclude that an allegation has been filed on justifiable grounds, however, the Complainant didn't provide any evidence or information to support a violation. I recommend this allegation be found **not to have been filed upon justifiable grounds**, and this allegation be **dismissed**.



Clinton J Jenkins – Hearing Officer  
February 15, 2023



OFFICE OF THE ATTORNEY GENERAL  
STATE OF ILLINOIS

KWAME RAOUL  
ATTORNEY GENERAL

August 3, 2023

*Via electronic mail*  
Mr. Michael F. Henry  
[REDACTED]

RE: OMA Request for Review – 2023 PAC 77521

Dear Mr. Henry:

This determination is issued pursuant to section 3.5(e) of the Open Meetings Act (OMA) (5 ILCS 120/3.5(e) (West 2022)). For the reasons explained below, the Public Access Bureau will take no further action in this matter.

In your Request for Review, you alleged that the Village of Orland Park (Village) Board of Trustees (Board) violated OMA in connection with a gathering on July 28, 2022.<sup>1</sup> Specifically, you alleged that the mayor and five of six trustees met to discuss political campaign activities; you also alleged that the Board violated campaign laws.

As an initial matter, section 7(c)(3) of the Attorney General Act (15 ILCS 205/7(c)(3) (West 2022)) limits the Public Access Counselor's authority to resolving disputes concerning alleged violations of OMA and the Freedom of Information Act (FOIA) (5 ILCS 140/1 *et seq.* (West 2022)). Accordingly, this office cannot address the allegations that the Board violated campaign laws or statutes other than OMA.

---

<sup>1</sup>Section 3.5(a) of OMA (5 ILCS 120/3.5(a) (West 2022)) provides:

A person who believes that a violation of this Act by a public body has occurred may file a request for review with the Public Access Counselor established in the Office of the Attorney General not later than 60 days after the alleged violation. If facts concerning the violation are not discovered within the 60-day period, but are discovered at a later date, not exceeding 2 years after the alleged violation, by a person utilizing reasonable diligence, the request for review may be made within 60 days of the discovery of the alleged violation.

Because this office concludes that the July 28, 2022, gathering was not a "meeting" for purposes of OMA, as described below, it is unnecessary for this office to address whether this Request for Review was timely.

Mr. Michael F. Henry  
August 3, 2023  
Page 2

Section 2(a) of OMA (5 ILCS 120/2(a) (West 2022)) provides that "all meetings of public bodies shall be open to the public unless excepted in subsection (c) and closed in accordance with Section 2a." Section 1.02 of OMA (5 ILCS 120/1.02 (West 2022)) defines a "meeting" as:

[A]ny gathering, whether in person or by video or audio conference, telephone call, electronic means (such as, without limitation, electronic mail, electronic chat, and instant messaging), or other means of contemporaneous interactive communication, of a majority of a quorum of the members of a public body held **for the purpose of discussing public business**[.] (Emphasis added.)

Purely partisan political gatherings are not meetings of public bodies subject to OMA. The Illinois Supreme Court explained, in *People ex rel. Difanis v. Barr*, 83 Ill. 2d 191, 202 (1980), that OMA "is not intended to prohibit bona fide social gatherings of public officials, or truly political meetings at which party business is discussed. Rather, the Act is designed to prohibit secret deliberation and action on business which properly should be discussed in a public forum due to its potential impact on the public." The Court counseled that OMA "balance[s] the right of the press and the people to view the deliberative and decision-making processes of government first-hand with the right of public officials to speak their minds freely and associate with whomever they choose." *Barr*, 83 Ill. 2d at 210. This office has consistently determined that public bodies do not violate OMA when a majority of a quorum meets to discuss political matters. *See, e.g.*, Ill. Att'y Gen. PAC Req. Rev. Ltr. 57843, issued May 2, 2019, at 2-3 ("[T]he notion that those three have worked together on electoral matters in private does not indicate that the Council violated OMA because of the legal distinction between political gatherings and meetings held to transact public business."); Ill. Att'y Gen. PAC Req. Rev. Ltr. 13792, issued July 6, 2011, at 2 (attendance of school board members at campaign-related social gathering was not a meeting subject to OMA).

As part of your Request for Review, you included e-mail correspondence that appears to solicit the attendance of a majority of a quorum of the Board to a meeting regarding fundraising efforts for an individual's political campaign. The e-mails are political in nature; they reflect Board members communicating about a fundraiser for a congressional campaign and planning to attend the fundraiser in a political capacity on July 28, 2022. There is no indication from the e-mails that the Board members engaged in contemporaneous interactive communications about the transaction of the Board's public business. Accordingly, this office concludes that no further action is warranted as to your allegation that the Board violated OMA in connection with the July 28, 2022, campaign gathering.

Mr. Michael F. Henry  
August 3, 2023  
Page 3

This file is closed. If you have questions, you may contact me at (773) 590-7878  
or [benjamin.silver@ilag.gov](mailto:benjamin.silver@ilag.gov).

Very truly yours,



BENJAMIN J. SILVER  
Assistant Attorney General  
Public Access Bureau

77521 o no fi war mun

cc: *Via electronic mail*  
The Honorable Keith Pekau  
Mayor  
Village of Orland Park  
14700 South Ravinia Avenue  
Orland Park, Illinois 60462  
[kpekau@orlandpark.org](mailto:kpekau@orlandpark.org)

Exhibit 6



Mayor Keith Pekau  
9501 W. 144<sup>th</sup> Pl. #202  
Orland Park, IL 60462  
Paid for By Keith For Mayor  
[Keithpekau.com](http://Keithpekau.com)  
(708) 831-1570  
mayorkeithpekau@gmail.com

February 17, 2023

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

Dear Board Members,

I, Keith Pekau, candidate and Chairman of Keith For Mayor Campaign Committee request that you impose sanctions on Michael F. Henry (aka Michael E. Henry) of Orland Park, Illinois. The basis for the sanctions is that Mr. Henry has a history of filing frivolous unsubstantiated complaints at the State Board of Election, the courts and multiple other agencies to harass people he does not like.

On Wednesday, February 8<sup>th</sup>, 2023 I represented Keith For Mayor at the preliminary hearing in case #22 CD 041. (Michael F. Henry Vs Keith For Mayor). The recommendation of the hearing officer was, "the complainant didn't provide a statutory violation to have been violated. The Complainant has the burden of introducing evidence or information sufficient for the Board to conclude that an allegation has been filed on justifiable grounds, however, the Complainant didn't provide any evidence or information to support a violation. **I recommend this allegation be found not to have been filed upon justifiable grounds, and this allegation be dismissed.**"

Mr. Henry has not produced any witnesses or evidence to support his reckless claims.

It is my understanding that Mr. Henry has also made other complaints that are now before the board. I believe you will find a pattern of insufficient or no evidence to support Mr. Henry's frequent claims.

Mr. Henry has been barred from filing federal cases in the Illinois Northern District. He is a felon, convicted of threatening a federal judge and pled guilty to threatening public officials at the IRS. A federal judge in Louisiana recommended that Mr. Henry be incarcerated in a federal facility near his home where he could have access to mental health treatments.

More recently has been convicted of misdemeanor littering for distributing flyers in both Tinley Park and Evergreen Park that included accusing a police officer of pedophilia and family of fraud.

He has also sent numerous defamatory letters to my federal and state donors, to my wife's employer defaming her and to residents of Orland Park.

Since 2019, Mr. Henry has filed complaints accusing over 85 different people including all Orland Park Village elected officials, over a dozen judges, two police chiefs, a half a dozen government agencies, the United States, Governor Pritzker, Kwame Raoul, Attorney General Merrick Garland, a dozen businesses, and of course me and my wife of 39 different crimes. These crimes include pedophilia, racketeering, mail fraud, wire fraud, bid fraud, billing fraud, falsifying records and public corruption to name a few. He has filed these complaints with the IL State Board of Elections, the FEC, the ARDC, the public integrity unit of the Illinois Attorney General, the Cook County State's Attorney, the IL Attorney General, the EPA, OSHA, the IRS as well as several US District and County Courts.

Since this complaint was filed on December 15<sup>th</sup> 2022, Mr. Henry has filed IRS complaints for tax fraud against my wife and I as well as Village of Orland Park Trustees Michael Milani, Cindy Katsenes and William Healy, Orland Park resident Joseph Solek, the Village of Orland Park and Dennis Walsh and his firm of Klein Thorpe and Jenkins (Village of Orland Park's attorney) and Crystal Tree Country Club. He also filed complaints with the IRS for bribery against Ziegler Auto Group (an Orland Park Business), Dennis Walsh, the Keith For Mayor Campaign Committee and myself.

Mr. Henry's frequent, frivolous complaints are a massive waste of government resources and money. Combined with his pattern of criminal behavior and it is clear that Mr. Henry's goal is to harass and torment those that he disagrees with. I request that you sanction Mr. Henry and ban him from filing any further complaints with the IL State Board of Elections against any person or committee to stop him from wasting any more of this board's time or taxpayer's money.

To the extent that you have the authority to do so, I request that these sanctions also include monetary fines. Additionally, I request that the IL State Board of Elections refer, Mr. Henry to the Attorney General or the States Attorney in accordance with Section 5/9-26.

The information above is, to the best of my knowledge, is true and correct. I would be happy to provide any documentation that you request.

Sincerely,



Keith Pekau  
Chairman, Keith For Mayor