

Ethics Complaint and FOIA Request Regarding District 15 Superintendent Laurie Heinz and Referendum-Related Political Activity

To:

Community Consolidated School District 15 Board of Education
District 15 Ethics Officer / General Counsel

CCUSD 15 Ethics Commission

Cook County State's Attorney, Public Corruption and Financial Crimes Unit
Illinois Attorney General, Public Access Bureau / appropriate referral unit

From:

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Date: June 29, 2026

Re: Request for Investigation and Public Records Regarding Potential Use of Public Resources for Referendum Campaign Activity by Community Consolidated School District 15 and Superintendent Dr. Laurie Heinz

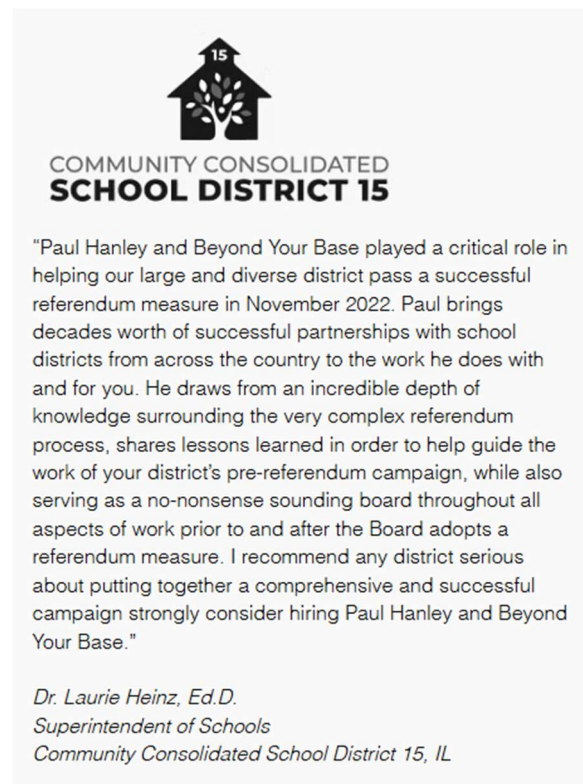
I. Introduction

I submit this ethics complaint and Freedom of Information Act request seeking an investigation into whether Community Consolidated School District 15, Superintendent Dr. Laurie Heinz, and/or district-paid consultants engaged in prohibited political activity, election interference, official misconduct, or misuse of public resources in connection with the District's November 8, 2022 referendum campaign.

The basis for this complaint includes District 15's public "Moving 15 Forward" referendum materials and a public testimonial attributed to Superintendent Dr. Laurie Heinz on the website of Beyond Your Base, a referendum consulting firm.

The [Beyond Your Base testimonial](#) attributed to Dr. Heinz states:

“Paul Hanley and Beyond Your Base played a critical role in helping our large and diverse district pass a successful referendum measure in November 2022. Paul brings decades worth of successful partnerships with school districts from across the country to the work he does with and for you. He draws from an incredible depth of knowledge surrounding the very complex referendum process, shares lessons learned in order to help guide the work of your district’s pre-referendum campaign, while also serving as a no-nonsense sounding board throughout all aspects of work prior to and after the Board adopts a referendum measure. I recommend any district serious about putting together a comprehensive and successful campaign strongly consider hiring Paul Hanley and Beyond Your Base.” – Dr. Laurie Heinz, Ed. D. Superintendent of Schools, Community Consolidated School District 15, IL



This statement is not neutral language about public education or factual information. It describes Beyond Your Base as helping District 15 “pass a successful referendum,” guiding the district’s “pre-referendum campaign,” and supporting “all aspects of work prior to and after the Board adopts a referendum measure.”

This information was discovered recently, found by Brian Costin on May 14th, 2026 and shared with co-complainant Justin Hegy on the same day.

That language raises serious questions about whether public funds, public employee time, district communications infrastructure, district mailings, survey instruments, voter targeting, or vendor services were used to support passage of a ballot proposition.

According to a 2022 FOIA by Justin Hegy, through June 1, 2022 Beyond Your Base was paid \$35,925 by CCSD 15 for financial costs association with “Moving 15 Forward” campaign. According to the Illinois State Board of Elections Beyond Your Base was paid \$5,540 on 11/4/22 by the political campaign committee “Yes for CCSD15 Referendum” for Graphic Design, Web Development, Communications.

This complaint names Superintendent Dr. Laurie Heinz because her public testimonial directly describes the District’s referendum effort as a “pre-referendum campaign” and states that Beyond Your Base played a “critical role” in helping CCUSD 15 “pass a successful referendum measure.” However, this complaint also requests investigation of any District 15 officers, Board members, employees, agents, consultants, vendors, outside committees, or other persons acting in concert with District officials who may have authorized, directed, funded, prepared, reviewed, distributed, or participated in the challenged activity.

II. Applicable Law and Penalties

A. Election Code: Election Interference, 10 ILCS 5/9-25.1

Illinois law provides:

“No public funds shall be used to urge any elector to vote for or against any candidate or proposition, or be appropriated for political or campaign purposes to any candidate or political organization.”

The same section allows public funds to be used for “dissemination of factual information” about a ballot proposition, but not for advocacy. The statute separately classifies first and subsequent violations as misdemeanor offenses. Investigators and prosecutors should evaluate any available administrative, corrective, referral, civil, or criminal remedies permitted by law based on the facts established by the investigation.

Official link:

<https://www.ilga.gov/Documents/legislation/ilcs/documents/001000050K9-25.1.htm>

B. State Officials and Employees Ethics Act: Prohibited Political Activities, 5 ILCS 430/5-15

Illinois law provides:

“State employees shall not intentionally perform any prohibited political activity during any compensated time.”

It also provides:

“State employees shall not intentionally misappropriate any State property or resources by engaging in any prohibited political activity for the benefit of any campaign for elective office or any political organization.”

The Act further provides:

“At no time shall any executive or legislative branch constitutional officer or any official, director, supervisor, or State employee intentionally misappropriate the services of any State employee by requiring that State employee to perform any prohibited political activity.” ([Illinois General Assembly](#))

Official link:

<https://www.ilga.gov/documents/legislation/ilcs/documents/000504300K5-15.htm>

Although Section 5-15 refers to “State employees,” the Act expressly requires local governmental entities to adopt ethics rules regulating the political activities of their own officers and employees in a manner **“no less restrictive than Section 5-15 and Article 10 of this Act.”**

Specifically, 5 ILCS 430/70-5 requires each covered governmental entity to adopt an ordinance or resolution regulating, in a manner no less restrictive than Section 5-15 and Article 10, “the political activities of officers and employees of the governmental entity.”

Official link:

<https://www.ilga.gov/Documents/legislation/ilcs/documents/000504300K70-5.htm>

Accordingly, District 15 may not avoid the Ethics Act’s political activity restrictions simply because it is a local school district rather than a State agency. Illinois law requires school districts and other governmental entities to adopt and enforce local ethics rules at least as restrictive as the State Act’s prohibition on compensated-time political activity and misuse of public resources.

C. Official Misconduct, 720 ILCS 5/33-3

Illinois law provides that a public officer or employee commits official misconduct when, in his or her official capacity, he or she:

“Intentionally or recklessly fails to perform any mandatory duty as required by law;”

“Knowingly performs an act which he knows he is forbidden by law to perform;”

“With intent to obtain a personal advantage for himself or another, he performs an act in excess of his lawful authority.”

A public officer or employee convicted of violating this section **forfeits his or her office or employment** and commits a **Class 3 felony**.

Official link:

<https://www.ilga.gov/Documents/legislation/ilcs/documents/072000050K33-3.htm>

A Class 3 felony carries a sentence of **2 to 5 years**, or **5 to 10 years** for an extended term.

Official link:

<https://www.ilga.gov/Documents/legislation/ilcs/documents/073000050K5-4.5-40.htm>

D. Timeliness, Discovery, and Prompt Referral for Official Misconduct Review

Illinois law provides an extended limitations rule for offenses based upon misconduct in office by a public officer or employee. Under 720 ILCS 5/3-6(b), such a prosecution may be commenced within one year after discovery of the offense by a person having a legal duty to report the offense, or, in the absence of such discovery, within one year after the proper prosecuting officer becomes aware of the offense. The same provision states that the period may not be extended more than three years beyond the expiration of the otherwise applicable limitations period.

Official link:

<https://www.ilga.gov/documents/legislation/ilcs/documents/072000050K3-6.htm>

The complainants discovered the public Beyond Your Base testimonial attributed to Dr. Laurie Heinz on May 14, 2026, and this complaint is being submitted promptly after that discovery and review of related District 15 referendum materials, available payment information, and public records. The complainants are not aware that any proper prosecuting officer previously had actual notice of the specific alleged misconduct described here: namely, the potential use of public resources, district-paid consulting, official branding, polling, voter communications, and staff time to conduct or support a campaign to pass a referendum.

To the extent any respondent argues that a vendor testimonial was publicly viewable before this complaint, mere public availability on a private consultant’s website should not be treated as actual awareness by a proper prosecuting officer of the specific suspected offense. The relevant question for official misconduct review is when the proper prosecuting officer became aware of the offense or when a person with a legal duty to report discovered it, not when scattered public-facing materials could theoretically have been located by a member of the public.

For that reason, the complainants request prompt referral to the Cook County State's Attorney and any other appropriate prosecuting authority for review of official misconduct and any related offenses, together with immediate preservation of records needed to determine discovery, knowledge, authorization, intent, public-resource use, and any applicable limitations analysis.

III. Factual Basis for Complaint

The public record raises multiple red flags.

First, District 15's own website identifies a coordinated referendum effort under "**Moving 15 Forward: Referendum**," including the official ballot language for the **\$93,000,000 school building bond proposition**, the Board resolution submitting the proposition to voters, the March 2022 "**Letter to Registered Voters/Public Opinion Survey**," community mailings, Board presentations, and November 2022 voter information materials.

District 15's referendum page also states that the proposition was approved by voters on **November 8, 2022**.

Relevant District 15 links include:

District 15 Moving 15 Forward: Referendum

<https://www.ccsd15.net/our-district/about-district-15/moving-15-forward/m15f-referendum>

March 28, 2022 Letter to Registered Voters/Public Opinion Survey PDF

<https://resources.finalsite.net/images/v1708208804/ccsd15net/i8spy2ajdpbw7pmms73v/CCSD15LettertoRegisteredVoters3282022.pdf>

Second, District 15's broader "**Moving 15 Forward**" page describes the plan as a "community-driven plan" and lists claimed benefits including safer schools, reduced emergency repairs, improved accessibility, energy efficiency, updated classrooms, full-day kindergarten, reduced overcrowding, and "**protecting property values**."

District 15 Moving 15 Forward

<https://www.ccsd15.net/our-district/about-district-15/moving-15-forward>

Third, the ballot measure was not merely a general planning exercise. It was an actual public question asking voters to approve **\$93,000,000 in school building bonds**.

Fourth, Superintendent Heinz's testimonial describes Beyond Your Base as having played a "critical role" in helping District 15 "pass a successful referendum measure." It also

describes Beyond Your Base as guiding the district’s “pre-referendum campaign” and assisting before and after Board adoption of the measure.

Fifth, Beyond Your Base’s public testimonial page includes other language suggesting the firm’s work includes campaign strategy, likely-voter identification, message development, and determining dollar amounts with “a fighting chance of success.”

Beyond Your Base Testimonials

<https://www.beyondyourbase.com/testimonials>

Taken together, these facts create a reasonable basis to investigate whether District 15’s taxpayer-funded referendum activity crossed from neutral factual information into prohibited campaign activity.

The evidence cited in this complaint does not require investigators to assume guilt. Rather, it establishes a reasonable factual basis to examine whether District 15’s taxpayer-funded referendum activities, consultant work, public opinion survey, voter communications, official website materials, mailings, Board presentations, post-election communications, and related public resources crossed the legal line from neutral factual information into prohibited political activity or taxpayer-funded referendum advocacy.

IV. Alleged Violations

Count I: Prohibited Political Activity Through Public Opinion Polling

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, other referendum consultants, vendors, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act defines prohibited political activity to include:

“Planning, conducting, or participating in a public opinion poll in connection with a campaign for elective office or on behalf of a political organization for political purposes or for or against any referendum question.”

Evidence supporting this count:

District 15’s own “Moving 15 Forward: Referendum” page lists a March 2022 “**Letter to Registered Voters/Public Opinion Survey**” under community mailings. That document was issued during the lead-up to the November 8, 2022 referendum and concerned the same \$93 million bond proposition later submitted to voters.

The existence of a district-linked public opinion survey connected to the referendum creates a factual basis to investigate whether Dr. Heinz, District 15 employees, Beyond Your Base, Paul Hanley, or other vendors planned, conducted, paid for, reviewed, or participated in referendum-related polling.

The Beyond Your Base testimonial attributed to Dr. Heinz states that Paul Hanley and Beyond Your Base helped guide the District's "**pre-referendum campaign**" and played a "critical role" in helping the District "**pass a successful referendum measure.**" That language creates additional grounds to investigate whether the public opinion survey was part of a campaign-oriented polling operation rather than a neutral public information exercise.

Potential penalty:

If performed during compensated time or through misappropriated public resources, this may constitute a violation of 5 ILCS 430/5-15. Depending on enforcement and charging decisions, the conduct may also support Election Code or official misconduct review.

Count II: Surveying or Gathering Voter Information to Determine Probable Referendum Outcome

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, survey vendors, data vendors, polling firms, communications consultants, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act defines prohibited political activity to include:

"Surveying or gathering information from potential or actual voters in an election to determine probable vote outcome in connection with a campaign for elective office or on behalf of a political organization for political purposes or for or against any referendum question."

Evidence supporting this count:

District 15 publicly identifies a March 2022 "**Letter to Registered Voters/Public Opinion Survey**" as part of its referendum-related community mailings. The title itself indicates that the District or its agents gathered public opinion information from voters in advance of the referendum. The referendum page also identifies the official ballot proposition and confirms that the measure asked voters to approve **\$93,000,000 in school building bonds** on November 8, 2022.

Beyond Your Base’s public testimonial page includes Dr. Heinz’s statement that the firm guided District 15’s **“pre-referendum campaign”** before and after Board adoption of the referendum measure. On the same page, Beyond Your Base publishes testimonials from other public entities crediting the firm with “voter analysis,” “understanding of the electorate,” “analyze voter tendencies,” and turning “community support into voter action.”

These statements create a factual basis to investigate whether District 15’s survey was used to determine probable vote outcome, voter tendencies, message effectiveness, tax tolerance, or support/opposition levels.

Potential penalty:

If performed during compensated time or using public resources, this may constitute prohibited political activity under 5 ILCS 430/5-15 and may also support review under 10 ILCS 5/9-25.1 if public funds were used to influence the outcome.

Count III: Use of Public Funds to Urge Voters to Support the Referendum

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, communications vendors, mail vendors, digital vendors, campaign consultants, and any other persons acting in concert with them.

Statutory violation language:

The Election Code provides:

“No public funds shall be used to urge any elector to vote for or against any candidate or proposition, or be appropriated for political or campaign purposes to any candidate or political organization.”

Evidence supporting this count:

The District’s referendum page states that the official ballot question was a **“PROPOSITION TO ISSUE \$93,000,000 SCHOOL BUILDING BONDS”** and included a yes-or-no vote. It also lists community mailings and November 2022 voter information materials tied to the referendum. These facts show that District resources were used to communicate with voters about a live ballot proposition.

The strongest evidence requiring investigation is Dr. Heinz’s testimonial. She states that Beyond Your Base played a “critical role” in helping District 15 **“pass a successful referendum measure”** and guided the District’s **“pre-referendum campaign.”** If public funds were used to hire or pay Beyond Your Base or related vendors for work described in

those terms, investigators should determine whether those funds were used to urge voters to support the proposition rather than merely disseminate factual information.

District 15's November 9, 2022 post-election letter, signed by Dr. Heinz and the Board President, thanks voters for their "confidence, enthusiasm, and support," calls the plan a "game changer," and references the "positive vote." While issued after the vote, it is evidence of the District's official posture toward passage of the measure and supports the need to review pre-election communications for similar persuasive language.

Potential penalty:

The Election Code classifies first and subsequent violations as misdemeanor offenses. Investigators and prosecutors should evaluate what enforcement, referral, corrective, or criminal remedies remain legally available based on the facts established and applicable limitations rules.

Count IV: Preparation or Distribution of Campaign Material

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, communications consultants, graphic designers, printers, mail vendors, website administrators, social media vendors, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act defines prohibited political activity to include:

"Distributing, preparing for distribution, or mailing campaign literature, campaign signs, or other campaign material on behalf of any candidate for elective office or for or against any referendum question."

Evidence supporting this count:

District 15's referendum page lists multiple voter-facing communications during the referendum period, including community mailings, a March 2022 public opinion survey, Spring 2022 facilities planning overview, November 2022 voter information documents, and a November 2022 voter information postcard.

The testimonial attributed to Dr. Heinz states that Beyond Your Base helped guide the District's "**pre-referendum campaign**" and supported "all aspects of work prior to and after the Board adopts a referendum measure." That statement creates a basis to investigate whether Beyond Your Base, Paul Hanley, District administrators, or other

vendors drafted, reviewed, edited, approved, mailed, posted, or otherwise prepared referendum materials that crossed from factual information into campaign material.

The District's own referendum page reports that the measure was "overwhelmingly approved" and thanks the community for "support," demonstrating that the District was tracking and communicating in terms of support for passage. That post-election language is relevant evidence for reviewing whether pre-election materials were similarly framed to generate support.

Potential penalty:

If campaign material was prepared or distributed during compensated time or through public resources, this may violate 5 ILCS 430/5-15. If public funds were used to urge a vote for the proposition, it may also trigger 10 ILCS 5/9-25.1 penalties.

Count V: Use of Official District Branding and the "Moving 15 Forward" Campaign Name as Prejudicial Referendum Advocacy

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, communications staff, website administrators, consultants, Beyond Your Base, Paul Hanley, and any other persons acting in concert with them.

Statutory violation language:

The Election Code prohibits the use of public funds to urge any elector to vote for or against any proposition. The Ethics Act and local ethics rules prohibit compensated-time political activity and misuse of public resources for prohibited political activity.

Evidence supporting this count:

District 15 did not merely create a neutral informational page titled "Referendum Information" or "Facilities Bond Question." Instead, the District used the official slogan and campaign-style name "**Moving 15 Forward**" for its referendum-related effort.

The phrase "Moving 15 Forward" is not neutral. It is inherently directional and promotional. It communicates that approval of the District's plan would move the District "forward," while opposition or rejection would imply moving backward, standing still, or obstructing progress. That is prejudicial language in the context of a live yes-or-no ballot proposition.

The District's own materials connected "Moving 15 Forward" to the referendum, public opinion survey, community mailings, Board presentations, voter information materials, and the \$93,000,000 school building bond question. The broader "Moving 15 Forward" materials also described claimed benefits of the plan, including safer schools, reduced

emergency repairs, improved accessibility, energy efficiency, updated classrooms, full-day kindergarten, reduced overcrowding, and “protecting property values.” In context, those are not merely neutral descriptions. They are persuasive referendum themes presented under a publicly funded, pro-progress campaign label.

Investigators should determine whether public funds, staff time, District communications infrastructure, consultants, mailings, websites, graphics, logos, slogans, or other public resources were used to develop, test, approve, publish, or distribute the “Moving 15 Forward” brand in connection with the referendum.

Why this matters:

A school district may provide neutral factual information about a ballot proposition. But it may not use public resources to brand the proposition with language that implies one electoral outcome is progress and the alternative is opposition to progress. The official use of “Moving 15 Forward” should therefore be investigated as potential taxpayer-funded advocacy, campaign material, or referendum persuasion.

Potential penalty:

If public funds or compensated staff time were used to create, approve, publish, or distribute this campaign-style branding for the referendum, the conduct may support violations of 10 ILCS 5/9-25.1, 5 ILCS 430/5-15, local ethics rules required to be no less restrictive than the State Ethics Act, and, where knowing unlawful conduct is established, official misconduct review.

Count VI: Soliciting Votes or Campaigning for the Referendum

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, communications consultants, community engagement consultants, parent or community groups coordinating with the District, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act defines prohibited political activity to include:

“Soliciting votes on behalf of a candidate for elective office or a political organization or for or against any referendum question or helping in an effort to get voters to the polls.”

It also includes:

“Campaigning for any elective office or for or against any referendum question.”

Evidence supporting this count:

The testimonial attributed to Dr. Heinz does not merely say Beyond Your Base helped District 15 educate the public. It states that the firm played a “critical role” in helping the District “**pass a successful referendum measure**” and guided the District’s “**pre-referendum campaign**.” The words “pass” and “campaign” are direct evidence that the work may have been designed to achieve an electoral outcome.

District 15’s referendum page also lists voter-facing materials issued before the election, including November 2022 voter information documents and a voter information postcard. Because these communications occurred in connection with a yes-or-no ballot proposition, they should be reviewed to determine whether they solicited support, encouraged a yes vote, targeted likely supporters, or otherwise campaigned for the referendum.

Beyond Your Base’s own testimonial page includes other public-sector testimonials referring to “voter analysis,” “understanding of the electorate,” “voter tendencies,” and turning “community support into voter action.” Those descriptions support a reasonable inference that the firm’s referendum services can include campaign-style voter persuasion and turnout strategy, which warrants investigation into whether similar services were provided to District 15.

Potential penalty:

If performed during compensated time or using public resources, this may violate 5 ILCS 430/5-15 and may also constitute unlawful use of public funds under 10 ILCS 5/9-25.1.

Count VII: Managing or Working on a Referendum Campaign**Potential responsible parties:**

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, campaign consultants, communications consultants, data vendors, polling vendors, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act defines prohibited political activity to include:

“Managing or working on a campaign for elective office or for or against any referendum question.”

Evidence supporting this count:

Dr. Heinz’s testimonial is direct evidence supporting this count. It states that Beyond Your Base guided the District’s “**pre-referendum campaign**” and served as a sounding board

through “all aspects of work prior to and after the Board adopts a referendum measure.” It also states that the firm played a “critical role” in helping District 15 “pass” the referendum.

District 15’s referendum page confirms that the matter was an actual ballot proposition, not merely a facilities-planning discussion. The official ballot asked voters to approve \$93 million in school building bonds and gave voters the options “YES” and “NO.” That means any “campaign” work connected to the measure was work concerning a referendum question.

The District’s community engagement timeline, public opinion survey, mailings, Board presentations, and November voter materials show a structured, multi-step public communications effort leading up to the vote. That structure supports investigation into who managed the work, who paid for it, who approved it, and whether the work constituted managing or working on a referendum campaign.

Potential penalty:

If District officials or employees managed or worked on the referendum campaign during compensated time or using public resources, this may violate 5 ILCS 430/5-15. If the campaign work was paid for with public funds, 10 ILCS 5/9-25.1 may also apply.

Count VIII: Misappropriation of Public Property, Resources, or Employee Services

Potential responsible parties:

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, supervisors, employees, agents, Beyond Your Base, Paul Hanley, district-paid consultants, vendors, and any other persons acting in concert with them.

Statutory violation language:

The Ethics Act provides:

“State employees shall not intentionally misappropriate any State property or resources by engaging in any prohibited political activity for the benefit of any campaign for elective office or any political organization.”

It further provides:

“At no time shall any executive or legislative branch constitutional officer or any official, director, supervisor, or State employee intentionally misappropriate the services of any State employee by requiring that State employee to perform any prohibited political activity.”

Evidence supporting this count:

District 15's public referendum page shows the referendum effort was hosted and promoted on the District's official website and included District-linked public communications, community mailings, Board presentations, and voter information materials. Those facts establish use of District communications infrastructure and official resources in connection with the referendum.

The page further confirms the proposition was placed before voters as a \$93 million bond measure and later approved. Therefore, any staff time, public funds, District websites, email systems, mailings, consultant payments, or administrative work used to advance the measure should be reviewed for compliance with the Ethics Act and Election Code.

Dr. Heinz's testimonial creates a factual basis to investigate whether a district-paid consultant's work was campaign-oriented. If Beyond Your Base or Paul Hanley were paid with public funds for services described as helping the District "pass" the referendum or guiding a "pre-referendum campaign," those facts may support a misappropriation inquiry.

Potential penalty:

Potential consequences may include Ethics Act enforcement, corrective action, referral to appropriate authorities, and official misconduct review if the conduct was knowing and unlawful. Any Election Code remedy should be evaluated by the appropriate enforcement authority under applicable law.

Count IX: Multiple Potential Counts and Repeated Violations**Potential responsible parties:**

Superintendent Dr. Laurie Heinz, District 15 officers, Board members, employees, agents, Beyond Your Base, Paul Hanley, other consultants, vendors, and any other persons acting in concert with them.

Statutory violation language:

The Election Code provides:

"The first time any person violates any provision of this Section, that person shall be guilty of a Class B misdemeanor."

It further provides:

"Upon the second or any subsequent violation of any provision of this Section, the person violating any provision of this Section shall be guilty of a Class A misdemeanor."

Evidence supporting this count:

The public record does not identify a single isolated communication. District 15's

referendum page lists multiple categories of activity and materials: Board presentations, community mailings, a public opinion survey, Spring 2022 facilities planning overview, November 2022 voter information documents, and a postcard.

The testimonial attributed to Dr. Heinz further states that Beyond Your Base was involved with “all aspects of work prior to and after the Board adopts a referendum measure.” That phrasing suggests a continuing course of conduct, not a one-time communication.

Because each publicly funded poll, survey, meeting, invoice, mailing, postcard, website update, social media post, staff assignment, voter communication, or consultant deliverable may constitute a separate act, investigators should determine whether multiple counts or repeated violations occurred.

Potential penalty:

The Election Code classifies first and subsequent violations as misdemeanor offenses. Investigators and prosecutors should evaluate whether any act, course of conduct, referral, corrective action, or related offense remains actionable under applicable law.

Count X: Official Misconduct

Potential responsible parties:

Superintendent Dr. Laurie Heinz, any District 15 public officer, Board member, employee, supervisor, or agent who knowingly authorized, approved, directed, participated in, concealed, or permitted unlawful use of public resources for referendum campaign activity, and any consultants, vendors, or other persons acting in concert with them.

Statutory violation language:

Official misconduct includes when a public officer or employee, in his or her official capacity:

“Knowingly performs an act which he knows he is forbidden by law to perform.”

It also includes when a public officer or employee:

“With intent to obtain a personal advantage for himself or another, he performs an act in excess of his lawful authority.”

And when a public officer or employee:

“Intentionally or recklessly fails to perform any mandatory duty as required by law.”

Evidence supporting this count:

The Election Code expressly states that public funds may not be used to urge electors to vote for or against a proposition. The Ethics Act prohibits compensated-time political

activity and misuse of public resources for prohibited political activity. The official misconduct statute applies when a public officer or employee knowingly performs an act they know is forbidden by law or acts in excess of lawful authority for another's advantage.

The public evidence supporting referral includes District 15's official referendum website; the District's voter-facing mailings and public opinion survey; the official \$93 million yes-or-no ballot proposition; Dr. Heinz's public testimonial stating that Beyond Your Base helped the District "pass" the referendum and guided the District's "pre-referendum campaign"; and the District's post-election letter thanking voters for "support" and describing the plan as a "game changer."

This evidence does not by itself prove criminal intent. It does, however, establish a credible basis to investigate whether Dr. Heinz or other District 15 officials knowingly authorized, approved, directed, funded, or permitted public resources to be used for campaign activity prohibited by law.

Discovery and referral basis:

This complaint also provides notice to the proper prosecuting authorities of the suspected official misconduct. The complainants discovered the Beyond Your Base testimonial attributed to Dr. Heinz on May 14, 2026, and reviewed related public records in connection with this complaint. They are not aware that a proper prosecuting officer had prior actual awareness of the specific alleged misconduct described here. The complaint therefore requests that prosecutors evaluate the matter under 720 ILCS 5/3-6(b), including the one-year discovery rule for misconduct in office and the statutory outer limit on any extension.

Potential penalty:

Official misconduct is a Class 3 felony. A conviction results in forfeiture of the office or employment connected to the offense. A Class 3 felony carries a sentence of 2 to 5 years, or 5 to 10 years for an extended term. Because misconduct in office is subject to the extended limitations rule in 720 ILCS 5/3-6(b), the complainants request prompt prosecutorial review of when the proper prosecuting officer first became aware of the suspected offense and whether the extended limitations provision preserves prosecution or other enforcement action.

V. FOIA Request and Document Preservation Demand

This Section is included in this complaint to identify the records necessary for investigation. The same FOIA request should also be treated as, and may be submitted as, a standalone FOIA request to the District's FOIA Officer so that it proceeds on FOIA's independent statutory timeline and is not delayed, consolidated, or deferred because of any ethics, administrative, or prosecutorial review.

Pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq., I request that Community Consolidated School District 15 produce all public records from November 8, 2021 through February 8, 2023, covering the period 12 months before the November 8, 2022 referendum and 3 months after the referendum, relating to District 15's November 8, 2022 referendum, the "Moving 15 Forward" campaign or initiative, Beyond Your Base, Paul Hanley, any referendum polling, any voter survey, any voter communication, and any referendum-related consultant or vendor work.

This request includes records created, sent, received, modified, reviewed, approved, or maintained during the period **November 8, 2021 through February 8, 2023**, including records in the possession, custody, or control of District 15, its Board members, Superintendent, administrators, employees, agents, attorneys, consultants, vendors, and contractors.

This request includes records maintained on personal devices, private email accounts, text messages, cloud storage, or third-party platforms if used to conduct public business.

For purposes of this request, "records" includes emails, text messages, memoranda, letters, contracts, invoices, purchase orders, payment records, calendars, meeting notes, presentations, drafts, reports, survey instruments, call scripts, mailers, website drafts, social media posts, voter data, spreadsheets, recordings, photographs, and all attachments.

Requested Records

1. Contracts and Vendor Records

All contracts, scopes of work, proposals, bids, amendments, engagement letters, invoices, purchase orders, payment records, check registers, Board approvals, procurement records, and budget records involving Beyond Your Base, Paul Hanley, or any consultant, vendor, polling firm, communications firm, mail vendor, data vendor, public relations firm, law firm, or contractor that performed referendum-related work.

2. Communications with Beyond Your Base and Paul Hanley

All emails, text messages, letters, memos, calendar entries, meeting notes, attachments, and other communications between District 15 officials, employees, Board members, attorneys, agents, vendors, or consultants and Beyond Your Base, Paul Hanley, or any representative of Beyond Your Base.

3. Public Opinion Survey and Polling Records

All records relating to the March 2022 "Letter to Registered Voters/Public Opinion

Survey,” including the full survey instrument, scripts, methodology, sample size, voter universe, respondent demographics, topline, crosstabs, raw results, anonymized response data, turnout models, presentations, reports, vendor communications, and all drafts or revisions.

4. Message Testing and Voter Persuasion Records

All records showing whether actual or potential voters were asked what messages, arguments, tax levels, project descriptions, ballot language, bond amounts, facility priorities, or other information would cause them to support or oppose the referendum.

5. Likely Voter, Turnout, and Targeting Records

All records relating to likely voters, turnout modeling, voter targeting, voter segmentation, voter lists, voter files, demographic targeting, persuasion audiences, supporter identification, opposition identification, undecided voters, and any analysis of probable vote outcome.

6. Referendum Strategy and Campaign Planning Records

All records using or relating to the terms “campaign,” “pre-referendum campaign,” “referendum campaign,” “strategy,” “pass,” “passage,” “win,” “winning,” “support,” “oppose,” “yes,” “no,” “vote yes,” “vote no,” “persuasion,” “turnout,” “GOTV,” “likely voters,” “tax tolerance,” “message testing,” “ballot language,” “fighting chance,” “successful referendum,” or “community support.”

7. Board and Administrative Records

All Board packets, closed-session minutes where legally releasable, open-session minutes, agendas, presentations, reports, memoranda, superintendent updates, administrative team notes, committee materials, and Board communications relating to the referendum, Moving 15 Forward, Beyond Your Base, polling, voter surveys, public communications, or referendum strategy.

8. Public Communications and Drafts

All drafts and final versions of referendum-related mailers, postcards, newsletters, letters, brochures, flyers, FAQs, videos, scripts, robocalls, website pages, social media posts, email blasts, press releases, speeches, talking points, and presentations, including metadata showing authors, editors, reviewers, approval chains, and dates of creation or revision.

9. District Website and Social Media Records

All records relating to the creation, drafting, approval, editing, posting, updating, or

removal of District 15 referendum-related website pages, social media posts, videos, graphics, FAQs, and digital content.

10. Mailing Lists and Distribution Records

All records showing the recipients, target audiences, mailing lists, email lists, distribution lists, voter lists, household lists, addresses, selection criteria, postage costs, printing costs, mail vendor records, and distribution dates for any referendum-related communication.

11. Staff Time and Use of Public Resources

All records showing staff assignments, staff time, compensated time, overtime, meeting participation, use of District equipment, District email, District facilities, District telephones, District software, District mailing systems, District printers, District vehicles, or other public resources for referendum-related work.

12. Coordination with Outside Groups

All communications and records involving any parent group, community group, ballot initiative committee, political committee, union, foundation, advocacy organization, campaign committee, or other outside organization supporting, opposing, discussing, or coordinating around the referendum.

13. Legal Advice and Compliance Reviews

All non-privileged legal opinions, attorney communications subject to disclosure, compliance reviews, ethics reviews, Board policy analyses, memoranda, or guidance concerning permissible referendum activity, prohibited political activity, Election Code compliance, State Officials and Employees Ethics Act compliance, FOIA compliance, Open Meetings Act compliance, use of public funds, polling, surveys, public communications, and campaign activity.

14. Insurance, Risk, and Internal Investigation Records

All records relating to any internal concern, complaint, investigation, legal risk assessment, insurance notification, indemnification issue, or discussion of potential liability concerning the referendum, Beyond Your Base, polling, voter communications, or use of public resources.

15. Records Relating to Dr. Laurie Heinz's Testimonial

All records relating to the drafting, review, approval, submission, publication, editing, or discussion of Dr. Laurie Heinz's testimonial for Beyond Your Base, including communications with Beyond Your Base or Paul Hanley and any internal District communications about the testimonial.

16. Records Relating to Post-Election Activities

All post-election communications, reports, presentations, invoices, analyses, lessons learned, vendor evaluations, debriefs, success metrics, or recommendations relating to the passage of the November 2022 referendum.

17. Records Identifying Other Consultants and Vendors

All records identifying any other person, firm, contractor, consultant, pollster, data analyst, communications strategist, mail vendor, printer, website vendor, or public relations firm involved in the referendum or Moving 15 Forward effort.

18. Retention and Search Records

All records showing the District's document retention instructions, litigation holds, preservation notices, search terms used, custodians searched, systems searched, and methods used to locate records responsive to this request.

Search Terms

Please search, at minimum, the following terms:

“Beyond Your Base”; “Paul Hanley”; “Laurie Heinz”; “Moving 15 Forward”; “M15F”; “referendum”; “bond”; “bond issue”; “\$93 million”; “\$93,000,000”; “campaign”; “pre-referendum campaign”; “successful referendum”; “pass”; “passage”; “win”; “winning”; “support”; “oppose”; “yes”; “no”; “vote yes”; “vote no”; “poll”; “polling”; “survey”; “public opinion”; “registered voters”; “likely voters”; “turnout”; “GOTV”; “message”; “message testing”; “persuasion”; “tax tolerance”; “ballot language”; “voter file”; “crosstabs”; “toplines”; “sample”; “respondents”; “community engagement”; “mailing”; “postcard”; “mailer”; “FAQ”; “talking points”; “fighting chance”; “protecting property values”; “campaign material”; “political activity”; “Election Code”; “Ethics Act”; “5 ILCS 430”; “10 ILCS 5/9-25.1”; “official misconduct.”

Custodians to Search

Please search records of at least the following custodians for the period **November 8, 2021 through February 8, 2023**:

Dr. Laurie Heinz; all District 15 Board of Education members serving during that period; the Superintendent's Office; Assistant Superintendents; Chief School Business Official; Communications Director or communications staff; community engagement staff; facilities staff involved in Moving 15 Forward; finance staff involved in bond or referendum work; legal counsel; Board secretary; technology staff responsible for website, email, or records retention; and any District employee who communicated with Beyond Your Base, Paul Hanley, or referendum-related vendors.

Format of Production

Please produce responsive records electronically in their native electronic format where available, including attachments and metadata. For emails, please include sender, recipients, cc, bcc, date, subject line, body, and attachments. For spreadsheets, please produce the original spreadsheet files rather than flattened PDFs.

Request for Waiver of Fees

I request a waiver of all copying, search, and production fees because disclosure of these records is in the public interest and is likely to contribute significantly to public understanding of government operations, referendum spending, use of public resources, and compliance with Illinois election and ethics laws. The request is not primarily commercial.

Request for Rolling Production

If some records are available before others, please provide records on a rolling basis rather than waiting until the entire request is complete.

Preservation Demand

Because this complaint concerns potential violations of the Election Code, State Officials and Employees Ethics Act, and official misconduct law, District 15 is requested to immediately preserve all potentially relevant records from **November 8, 2021 through February 8, 2023**, including emails, texts, drafts, metadata, cloud files, deleted items, backup files, device records, and third-party vendor records.

This preservation demand applies to District officials, employees, Board members, agents, consultants, vendors, and contractors.

VI. Requested Relief

I respectfully request that the appropriate authorities:

1. Open a formal ethics investigation into District 15's referendum-related activities.
2. Determine whether District funds, staff time, property, websites, mailing lists, communications systems, or vendors were used to advocate for passage of the November 8, 2022 referendum.

3. Determine whether public opinion polling or voter surveys were used to determine probable vote outcome, test persuasive messages, identify likely voters, or shape a campaign for the referendum.
 4. Determine whether Beyond Your Base performed services that constituted campaign strategy, campaign management, message testing, voter targeting, or advocacy, and whether those services were paid for with public funds.
 5. Determine whether each poll, survey, mailing, message test, consultant meeting, staff assignment, publication, or communication constitutes a separate violation or count.
 6. Refer any potential Election Code violations to the Illinois State Board of Elections, Attorney General, and/or Cook County State's Attorney as appropriate.
 7. Refer any evidence of knowing misuse of public resources by a public officer or employee for review under Illinois official misconduct law.
 8. Require District 15 to publicly disclose the full vendor contract, invoices, survey materials, mailings, scripts, presentations, and legal opinions related to the referendum.
 9. Require corrective action to prevent future taxpayer-funded referendum campaign activity, including written policies, staff training, vendor contract restrictions, and Board-level approval before any future referendum-related polling or public communications.
 10. Produce all public records requested in Section V pursuant to the Illinois Freedom of Information Act.
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VII. Conclusion

District 15 and its officials had the right to provide voters with neutral, factual information about a ballot proposition. They did not have the right to use taxpayer funds, public employee time, or public resources to run, manage, or support a campaign to pass that proposition.

Superintendent Heinz's own testimonial states that Beyond Your Base helped District 15 "pass a successful referendum measure" and guided the district's "pre-referendum campaign." That language creates a serious and credible basis for investigation.

This matter may involve violations of the Election Code, the State Officials and Employees Ethics Act, local ethics rules required to be no less restrictive than the State Act, and official misconduct law. The potential consequences may include corrective action, ethics enforcement, referral to appropriate authorities, and, where knowingly unlawful official conduct is proven and remains legally actionable, Class 3 felony exposure and forfeiture of public office or employment.

For these reasons, I request immediate preservation of all relevant records from **November 8, 2021 through February 8, 2023**, a formal investigation, public disclosure of the referendum-related contracts and work product, full production of the FOIA records requested above, and referral for enforcement where supported by the evidence.

Respectfully submitted,

Brian Costin

Deputy State Director

Americans for Prosperity – Illinois

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