



July 9, 2025

VIA EMAIL AND CERTIFIED MAIL

State's Attorney John C. Milhiser
Sangamon County State's Attorney's Office
200 South Ninth Street, Room 402
Springfield, IL 62701

Attorney General Kwame Raoul
Office of the Illinois Attorney General
500 South Second Street
Springfield, IL 62701

RE: Formal Complaint Regarding Illegal Electioneering by Rochester Public Library District Officials

Dear State's Attorney John C. Milhiser and Attorney General Raoul,

On November 18, 2024, Americans for Prosperity–Illinois (AFP–IL) filed a [formal ethics complaint](#) with the Rochester Public Library District Ethics Commission outlining 35 separate violations of Section 430/5-15(a) of the Rochester Library Ethics Ordinance by library board members and employees. These complaints alleged that public officials misused taxpayer resources and engaged in coordinated political activity to support a November 2024 tax referendum.

The recently released Ethics Commission Report and Recommendations (attached) confirms that the complaints were valid, stating that **“the majority of which have been proven to have occurred.”**

These acts include:

- Sharing confidential patron polling information – including phone numbers and emails - with board members and the “Vote Yes” campaign committee.
- Solicitation of campaign contributions to the “Vote Yes” campaign committee using public resources.
- Library officials request that the Friends of the Library sponsor two public events on library property with the explicit purpose of supporting the Vote Yes Campaign.
- Rochester Library board discussing “Vote Yes” campaign plans at least 11 separate official Library Board meetings.
- Creating two Library Board subcommittees – the Financial Communications Ad Hoc Committee and the Membership Recruiting Ad Hoc Committee - for the express

purpose of supporting the “Vote Yes” campaign – a total of 14 separate meetings were held by these illegal campaign-oriented committees;

- Using public email accounts and computers, library officials coordinated the planning, promotion, and distribution of “Vote Yes” campaign materials and yard signs—leveraging taxpayer-funded resources for political purposes.
- Appearing in and disseminating a partisan campaign video via the official library Facebook page with explicit recruitment of “Vote Yes” campaign supporters.

However, the Ethics Commission declined to recommend any disciplinary or legal action, citing the lack of a clear definition of “prohibited political activity” in the Rochester Library Ethics Ordinance. As a result, the Commission stated it was “unable to determine whether any of the acts of the members of the Board of Trustees or Library District employees, **the majority of which have been proven to have occurred**, violate Section 430/5-15(a).”

Additionally, the Commission accepted the defense that the individuals involved were unaware their actions violated the Ethics Ordinance or state law—setting a troubling precedent that ignorance of the rules can excuse misconduct.

However, Americans for Prosperity obtained multiple documents showing that the Rochester Library Executive Director and members of the Library Board were informed of—and in some cases acknowledged—their obligations under the State Officials and Employees Ethics Act, including the prohibition against using public resources to campaign for the referendum.

- A July 20, 2023 meeting of the [Decennial Committees on Local Government Efficiency Act meeting](#), where the library board and executive director attested, “We have reviewed the following list of laws, statutes, ordinances, policies, training materials, and other documents applicable to the Library District to evaluate our compliance and to determine if any of the forgoing should be amended...State Ethics Laws, including, but not limited to the State Officials and Employees Ethics Act (5 ILCS 430/1-1) policy and appoint members.”
- A [January 12, 2024 email](#) from Board President Sarah Deen to Executive Director with an attachment “Questions for Attorney” which included the question of “What level of involvement can library board members have in Vote Yes committee? In campaign activities?”
- A [February 27, 2024 email](#) from Executive Director Janet McAllister describing, “Vote Yes Political Campaign cannot take place on the library property or with library equipment or funds.”

The Commission’s findings make clear that:

- The law was broken;
- Multiple public officials used government resources to support a political campaign;

- These were not isolated incidents, but part of a widespread and systemic pattern of misconduct;
- The Library lacked meaningful ethics training and compliance mechanisms;
- The Commission ultimately declined to hold anyone accountable, relying on the claimed ignorance of those involved and citing the Library’s failure to adopt an ethics ordinance that met state law requirements—resulting in no disciplinary action or consequences for the confirmed violations.

We write now to **refer this matter to your offices for further investigation and enforcement**. The Sangamon County State’s Attorney Office and Illinois Office of the Attorney General has a duty to ensure that public institutions do not become tools for unlawful political advocacy, and that public resources are not weaponized to influence taxpayers at the ballot box. Furthermore, the report notes that “the Ethics Commission lacks the authority (and expertise) to investigate” allegations “other than [those covered by] the Rochester Library Ethics Ordinance” nor does it “empower the Ethics Commission to make referrals to the State Board of Elections for campaign finance violations.” State authorities must take the lead in holding violators of the law accountable.

We respectfully request your offices to consider:

1. Whether claimed ignorance of a clear legal obligation constitutes a valid defense for public officials;
2. Whether the Library’s failure to adopt a compliant ethics ordinance effectively grant board members and employees the ability to violate the State Officials and Employees Ethics Act without consequence;
3. Whether the pattern of confirmed violations by public officials warrants action under applicable state statutes, including the Illinois State Officials and Employees Ethics Act and the Election Code;
4. Whether the lack of oversight, training, and internal enforcement in the Rochester Public Library District reflects broader systemic governance failures.

Illinois taxpayers deserve transparency, accountability, and equal enforcement of the law—especially when it comes to the integrity of elections. AFP–IL urges the Office of the Attorney General and State Board of Elections to hold these officials to account and to restore trust in the impartial operation of our local government institutions.

Please let us know if we may provide additional documentation or testimony in support of this referral. We look forward to your prompt attention to this matter.

Sincerely,
Brian Costin
Deputy State Director
Americans for Prosperity-Illinois

Attachment:

- Rochester Public Library District Ethics Commission Report and Recommendations
- [AFP-IL Ethics Complaint](#)
 - [Supporting Documentation](#)