

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON NOMINATION OBJECTIONS TO THE NOMINATION PAPERS OF CANDIDATES FOR THE OFFICE OF ALDERMAN OF THE TWENTY-THIRD WARD OF THE CITY OF CHICAGO, COUNTY OF COOK, STATE OF ILLINOIS, TO BE VOTED UPON AT THE FEBRUARY 26, 2019, MUNICIPAL GENERAL ELECTION.

ARLYCE GIUDICE)	
)	
Petitioner-Objector)	
)	
v.)	Case No. 19-EB-ALD-002
)	
BETSY JOVAN WATKINS)	
)	
Respondent-Candidate)	

VERIFIED OBJECTOR'S PETITION

INTRODUCTION

Arlyce Giudice, hereinafter sometimes referred to as the Objector, states as follows:

1. The Objector resides at 6650 West 63rd Place, Chicago, Illinois, Zip Code 60638, in the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, and is a duly qualified, legal, and registered voters at that address.
2. The Objector's interest in filing this Petition is that of voters desirous that the laws governing the filing of nomination papers for the office of Alderman of the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, are properly complied with and that only qualified candidates appear on the ballot for said office.

OBJECTIONS

3. The Objector makes the following objections to the purported nomination papers ("Nomination Papers") of Betsy Jovan Watkins ("Candidate") as a candidate for election to office of Alderman of the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois ("Office") to be voted for at the Municipal General Election on February 26, 2019 ("Election"). The Objector states that the Nomination Papers are insufficient in fact and law for the following reasons:

4. Pursuant to State Law, nomination papers for the Office to be voted for at the Election must contain the signatures of not less than 473 duly qualified, registered, and legal voters of the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, collected in the manner prescribed by law. In addition, said Nomination Papers must truthfully allege the qualifications of the candidate, be gathered and presented in the manner provided for in the Illinois Election Code, and otherwise be executed in the form and manner required by law.

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5. The Nomination Papers contain petition sheets with the names of persons who are not registered voters, or who are not registered voters at the address shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading "**A. Signer not registered at address shown,**" in violation of the Illinois Election Code.

6. The Nomination Papers contain petition sheets with the names of persons who did not sign the papers in their own proper persons, and such signatures are not genuine and are forgeries, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein under the column designated with the heading "**B. Signature not genuine (includes Printed),**" in violation of the Illinois Election Code.

7. The Nomination Papers contain petition sheets with the names of persons for whom the addresses stated are not in the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, and such persons are not registered voters in the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein under the column designated with the heading "**C. Signer resides outside District**", in violation of the Illinois Election Code.

8. The Nomination Papers contain petition sheets with the names of persons for who the addresses given are either missing entirely or incomplete, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading "**D. Signer's address missing or incomplete,**" in violation of the Illinois Election Code.

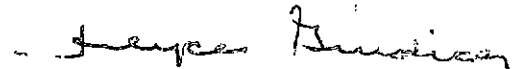
9. The Nomination Papers contain petition sheets with the names of persons who have signed the Nomination Papers more than one time as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading "**E. Signer signed petition more than once at Sheet/Line indicated**", in violation of the Illinois Election Code.

10. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, signed by such voters in their own proper person with proper addresses, below the number required by Illinois law, as is set forth by the objections recorded in the Appendix-Recapitulation, attached hereto and incorporated herein.

11. The Candidate's Nomination Papers are legally and factually insufficient due to her filing less than 473 validly collected signatures of qualified and duly registered legal voters of the Twenty-Third Ward of the City of Chicago, County of Cook, State of Illinois, signed by such voters in their own proper person with proper addresses. Therefore she has failed to comply with a mandatory provision of the Illinois Election Code. By the law of the State of Illinois and the precedent of this Electoral Board, the name of Betsy Jovan Watkins is not eligible to appear on the ballot for the Office at the Election.

12. The Appendix-Recapitulation is incorporated herein, and the objections made therein are a part of this Objector's Petition.

WHEREFORE, the Objector requests: a) a hearing on the objections set forth herein; b) an examination by the aforesaid Electoral Board of the official records relating to voters in the 23rd Ward of the City of Chicago, County of Cook, State of Illinois, to the extent that such examination is pertinent to any of the matters alleged herein; c) a ruling that the Nomination Papers are insufficient in law and fact, and d) a ruling that the name of BETSY JOVAN WATKINS shall not appear and shall not be printed on the ballot for Election to the office of Alderman of the 23rd Ward of the City of Chicago, County of Cook, State of Illinois, to be voted for at the Municipal General Election to be held on the 26th day of February, 2019.



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OBJECTOR
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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION

I, ARLYCE GIUDICE, being first duly sworn upon oath, depose and state that I have read the above and foregoing VERIFIED OBJECTOR'S PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.

Arlyce Giudice

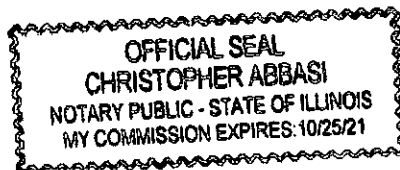
ARLYCE GIUDICE
OBJECTOR
6650 West 63rd Place
Chicago, Illinois 60638

Subscribed and sworn to before me,
a Notary Public, by ARLYCE GIUDICE,
who is to me personally known,

this the 2nd day of December, 2018.

Christopher Abbasi
Notary Public

(STAMP)



APPENDIX-RECAPITULATION