

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 GIU	DICE)		
	Petitioner-Objector))		
	v.)	Case No.	19-EB-ALD-004
CHARLES M.	HUGHES))		
	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-Tard 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 Charles M. Hughes ("Candidate") as a candidate for election to the 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.

- 5. A candidate for the Office to be voted for at the Election must timely file with the Cook County Clerk a Statement of Economic Interests as required by the Illinois Governmental Ethics Act in relation to his candidacy. In violation of the Election Code, the Candidate has failed to file the required Statement of Economic Interests by the end of the period for the filing of nomination papers.
- 6. A candidate for the Office to be voted for at the Election must timely file with the Chicago Board of Election Commissioners a Receipt for their Statement of Economic Interests from the Cook County Clerk. Such receipt shall be so filed not later than the last day on which nomination papers may be filed. In violation of the Election Code, the Candidate has failed to file the required Receipt for her Statement of Economic Interests by the end of the period for the filing of nomination papers.
- 7. To wit, the Candidate has filed with the Chicago Board of Election Commissioners the Chicago Board of Ethics 2018 Statement of Financial Interests. This is not the Statement of Economic Interests required by the Illinois Governmental Ethics Act or the Illinois Election Code. The Chicago Board of Ethics 2018 Statement of Financial Interests form that the Candidate has filed is attached to this objection as Exhibit A.
- 8. The Candidate's Nomination Papers are legally and factually insufficient due to his failure to file with the Cook County Clerk a Statement of Economic Interests on or before November 26, 2018. The Candidate's Nomination Papers are legally and factually insufficient due to his failure to file with the Chicago Board of Election Commissioners a Receipt for a Statement of Economic Interests on or before November 26, 2018. The Candidate failed to comply with both of these mandatory provisions of the Illinois Election Code. By the law of the State of Illinois and the precedent of this Electoral Board, the name of Charles M. Hughes is not eligible to appear on the ballot for the Office at the Election.

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 CHARLES M. HUGHES 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.

ARLYCE GIUDICE

OBJECTOR

6650 West 63rd Place

Chicago, Illinois 60638

Pericles C. Abbasi, Esq. Attorney for Objectors Cook County Atty No. 57518 ARDC No. 6312209 ElectionLegal.com 6969 W. Wabansia Ave Chicago, Illinois 60707 Phone: (773) 368-5423

Fax: (773) 309-8884 Pericles@UChicago.edu

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 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 Znd day of December, 2018.

pher aller

Notary Public

(STAMP)

OFFICIAL SEAL
CHRISTOPHER ABBASI
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES: 10/25/21

APPENDIX A

2018 CHICAGO BOARD OF ETHICS STATEMENT OF FINANCIAL INTERESTS FILED BY CHARLES M. HUGHES WITH HIS PETITIONS INSTEAD OF A RECEIPT FOR A STATEMENT OF ECONOMIC INTERESTS AS REQUIRED BY THE ILLINOIS ELECTION CODE

Boardof Ethics

740 N. Sedgerick S. e. 500 Chicago L 50654-8483

CITY OF CHICAGO

2018 STATEMENT OF FINANCIAL INTERESTS

To spoid a violation of the Sove Amenta, for an appropriate production of the Sove Amenta, for an appropriate production of the Sove Amenta, for an appropriate production of the Sove Amenta, and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a stored and the Sove Amenta are stored as a st

3 7 7 44-95 50	Board of Ethics 740	N: Sedgwick, Ste. 500 Chica	ge, IL 606	54-8488	
} Hisse to no ete this rotin, sig	n it and then mail and ver it to the	ner a sinics, i erunnat	ccep 5 3 emer	is the local	7
	questions and high and date your fi	ous salora (ethiologis		ч Э	석
1 '	telling the last willian inter-				V
. 'n 1625' 0762 >	n omes embon-schiedische Leit. SE 523 B00 5238	100 Or 1303541 385 VI 51 1	പൂം ന ദമമതമ	'ब'द त रहे । 'ए'	•
NGTE: for security reason». Filer	in the Chicago Fire and Police Dept	aen . Inspector Genera s	ff e Civilian O	Office of Police Acco	unrability
n Kicasi Emergenty Comm	unicets — and building and health question 3, however they must list t	inspectors need not disclose the	he address of ous webserousped for	iness es organica example: "Wo 5-flo	trons ar ts. etc
broberth a directions got at the	question at however, mely must list t	The unit of the Carrier of the Charles	er ras siericas or		******
			,		_ · · · · · · · · · · · · · · · · · · ·
ar Vame Huakes	Est Vame Char	rles _ Middle	lather of	り	
Tailing Address. 544/	5 Latrobe 6	PAROS APTEN Ch.	State:	Tex Zip. 6	0638
ity Department Soard		Title:	œ.		
Commission					
In 2017, were you employed by ac	y governmental unit other than the C	Lity of Chicago?	Samuel efficie diberrala menor menor de la constanta de la con	- Yes	X №
• , = -					
3,, 3 , , .				***************************************	
In 2017 did you serve as an emplo	oyee, officer, director associate, partn azation (other than your City emplo	ier, or proprietor or in any advi:	sory capacity for a which you receiv	eny ed or	
rotessional, outliness or other organ erived income of more than \$1,000;		yment or appointment; nom] Y-5	X No
t					
Jame &	Type of	our		- languat of no.	:me.
ddress.	Organization:	Position		By Category	L
A think the first the state of					
In 2017 did you receive compensi	ation in excess of \$5,000,00 for profes	isional* business or other servi	ices rendered to a	. person* or easily i	na ng
usiness" with the City of Chicago, th	ne Chicago Transit Authority Chicago	: Board of Education, Chicago F	/ank District Crice	igo City Codeges C	, =
letropolitan Pie And Exposition Aut	TOLEN.	makes betreggenames of or agreem. After past of	***************************************	Tes	X, No
this provide the longing right	910 DICCONDICTORNAL CONNOCTOR	to contained			
		Andrew Anna Control of the Control o	***************************************		}
ame		Person or Entity and in the		Amount of the	JA15.
	Marine Ma				
in 2017, did your spouse or dom	estic partner* receive compensation pers "or entity doing business" wi	n or payment in excess of 50.00	00.00 for professio	ona,", business, em oñiv. Chicado Soars	p yment, Fof
rock or other tervices rendered to a muration. Chicago Park Outrict, Chi	area Con Tallana, as Materialis as D	har and Evancinos Auchschil			~.
Buchton, Cheego : 3.4 2 5 11 2 6	,,	had no spouse or domest	ic partner in 2017	. L es	X c
1 200 1 1 200 1	Coch person or entity to living 100 -	to Deductions a 2 of the	1.5 44		
	Nature of	" "TELET ES AUD AT		Amoun orla.	.೨೧೯೪
lame	Services	A Johnson Willy Ded Busine	c» [
	you प्रेने your s pouse or domestic pa	seemetta un a Saannal intaret	tr ^a racalisa n mara	nsation in ix ass of	\$5,000.00
ni professional" business or other s	iervices rendered to any person" or e	intity doing ousiness" with the	CRYOI h cago. c	THE CITY AND THANSH	Authorey.
hicago Board of Education, Chicag	o Park District, Chicago City Colleges,	, or Met opositan Pier and Ek po	isition Authority?	' Ye-	
	SOLUMER	11 11 10 0			, ·
	心がしてつコココ	IMMUJ,	mages at	tury tr	
•	asioner Elections Selections	- <u>6</u> 0,780 u-		Park : revenue with the park at the first of the park at the park	
Name		Nume of Person or Entiry to Which Services were pro-indee			•
	\$\$ 상 부 qZ	AMI GIOS			
Nature of	Soverament Just Wit	y est. alle	Ī	Amount of neome	.
Services	White Parton Did de	ener:		gy -at-dony	ļ
		wat with the City Steam or	Man de l'ares	is noublicly haid	ompenset ti
s in 1017, aid you have a financial i represent less than 1-2 of 1% - 05%	interest" in any derson-doing busine) of the company's outstanding comm	nou stock or time or gement to main the cital labre, count			
	n insurance companies, need not be			.ر. اس ا	>⊄ No
				- y	J-4
				1	
Via,ne		ים אפר Des ה ר"ר ובל שמש מינו			

त्तर होते हैं के प्रस्ता के देखा है		samou stassara na has	രാക്കു നക്ഷ്യൻ നയർ ഉം	e disclosed		Унз	45
wiften browne for to	Lowing for settings were						
ame			Type / Instru Ownership	nent of			
In 2017 dia you realize siden e	a capital gain of \$5,000 00 o r roo			Than your or	808	! ;	*
regions for each state.	er dozen wee none er oppleren					• •	
				III AN AND COM	- Amoun Calegory	iolgan By -	
ms of direct on adirect dep e s n a मार्थ राज्य स्था	a finencial interest* in real estate ownership, such as oartheiships init or intered use bus dring in whi	or tru to whose arous c	variety originarily	ol exiestate en comas o	· If your pre	esidence? Ir nc pal place Yes	iduae <u>sli</u> of P Tireo
			TO SECURITION OF THE PERSON OF				yg,
In 2017, did voureceis gregate value in exiless		elatives" on a domestic o	attner") one or "	nore grits ha	n ud tu	T1 Yes	*\$.ikc
				.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
In 2017, did you receiv vernmental 1th -> Ordi	e any improper gift" that you dis ran 💚	Bosed of in actordance w	van Section 2-19	6-144 of th		š	×
	for annexation south of resout		eps tes to the			se Yes	**
franchise, or any permit	for annexation, zoning of rezoni	ng of real estate?	escribe the Lity	ichonie: .		∭ Y≅s	X 5
franchise, or any permit 1972 - Same de Carlos 1909 Carlon Guiden (1977)	for annexation, zoning of rezoni	ng of real estate?	escribe the Lity	achonite:		∭ Y≅s	-
franchise, or any permits to a second or a	for annexation, conting or reconting or reconting to the law end of the law end o	ng of real estate? end of car internation of a 5.000.00, did the debtor. Instruments issued by final ms and conditions stands	creditor, or, quarance at for such loan sublicty.	action re: lequested [into; of the o i whose non s at the time orations and	leat do butumal business the debt wa	D Yes	s do work e making o
franchise, or any permit to the control of the cont	for annexation, conting or reconting or reconting to the law end of the law end o	ng of real estate? 5.006.00, did the debtor, struments issued by pinstruments issued by p	creditor, or guess and for such loan uplicity held core or am awed more central control of the core of am awed more control of the core of am awed more central core of the co	action re: lequested [into; of the o i whose non s at the time orations and	leat do butumal business the debt wa	nest* with of sincludes the secontraction by you on it. Thes	r do work e making o s. if the
isanchise, or any permission of the control of the	for annexation, conting or reconting or reconting to the law end of the law end o	ag of real estate? 5.006.00, did the debtor. Struments issued by final instruments issued by p It neither owe: It sthe Person a C Creditor or Cuer inter or for compensation (creation, or, quare not an institution and for such loan unbildy. Neld core or am owed more central core.	action (4) lequested [into (6) fine of i whose non s at the time for all of the fine or all of the fine short and fine fine fine fine fine fine fine fine	iest de businesi ihe debt wa i purchased 0.00	nest* with of sincludes the secontraction by you on it. Thes	r do work e making o s. if the he gots
ranchise, or any permit to be a controlled by the controlled by th	for annexation, conting or reconting or reconting the save set of a save set of a save set of an accordance with other terminaling rate of interest or 2) debilled to the public.	og of real estate? 5.000.00, did the debtor, instruments issued by final meither owe of the Person a Condition of Creditor of Cueron and Conditions transport of Creditor of Cuerons of Conditions that instruments is the Person a Condition of Creditor of Cuerons of Conditions that is the Person and Conditions of the Conditions of Creditor of Cuerons of Conditions of the	creator, or quare no at institution sid for ruch loan ublidy held core or am awaid more capture.	action (4) lequested [intoxiof the of whose non sist the time or allowed either \$5.00 leants or comparison or com	leas do business the debt was purchased 8,00. Type of De Instrument	nest; with o sincludes to as contraction by you on it	or do work e making u s. if the he open
ranchise, or any permit to be a constructed by an arm of the construction of the construction of the City of Chicago in a see made at the precise are made at the precise of the processor of the construction of Construction	for annexation, conting or reconting or reconting to the layer of the	og of real estate? 5.000.00, did the debtor, ostruments issued by finance and conditions stands (instruments issued by p Theither owe of the Person at Condition of Guardian and conditions of C	creditor, or quare not a institution and for such loan ublidy field core or am owed more central for such loan or am owed more amount of the form of t	action (4) lequested [intoxiof the of whose non sist the time or allowed either \$5.00 leants or comparison or com	leas do business the debt was purchased 8,00. Type of De Instrument	nest; with o sincludes to as contraction by you on it	or do work e making d s. if the be open
ranchise, or any permit to the care of the kind your edit on a series of the kind your edit or are made at the protected at t	for annexation, conting or reconting at reconting and the lawy of	ing of real estate? 5.000.00, did the debtor, instruments issued by final merthal ower. Is the Person a Condition of Creditor of Cuartiness of the compensation (construments). Some of the boseroes of the compensation (construments).	creditor, or quarance allowers with the Coppers with the	action (4) lequested [intocof the of whose non sat the time or attons and either 55 00 legs of a celeptionship of a Cuy con	iest de business the debt we i purchased 0.00. Type of De instrument	nestri with o sincludes to sontracte by you on it. Tes	r do work e making o sufficie e open
franchise, or any permit is a sum of the contraction to the mineral power of the Caw of Chroage in a first care the price evaluation of Chroage in a first care the price evaluation of Chroage of Debtor. Tredition or Guerantor Do you now have on any in 115 occurs the have in 115 occurs the have in 115 occurs the have in 115 occurs the roop. Mamerally	for annexation, conting or report or anyone pives you more than 5: 0177 (On not include, 11) dept in yed in accordance with other for alking rate of interest: or 2) debt le to the public.) opera or committion interest is a volu- me of object of the second or committion in the risk as relietive or domestic partner or a reletive or domestic partner or	og of real estate? 5.000.00, did the debtor. Instruments issued by fina ms and conditions standi conditions standi conditions of Creditor of Cuer Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p Is the Person a D Creditor of Cuer Instruments issued by p	creditor, or quarance allowers with the Coppers with the	action (4) action (4) lequested [whose non s at the time for atoms and e than 25 00 legations in control of a Cuy con of a Cuy con ctor(s) =:	ieat do businesis the debt we i purchased 0.00. Type of De Instrument i fethics fethi	rest with o	or do work emaking of the readers XA No
ranchise, or any permit to the contract of the	for annexation, conting or report or anyone pives you more than 5: 0177 (On not include, 11) dept in yed in accordance with other for alking rate of interest: or 2) debt le to the public.) opera or committion interest is a volu- me of object of the second or committion in the risk as relietive or domestic partner or a reletive or domestic partner or	og of real estate? 5.000.00, did the debtor. Instruments issued by fina ms and conditions standi clinstruments issued by p It neither owe of It cheditor of Quart instead of the compensation (construction of the boards) who is registered as a feb main to you.	creditor, or, quare no all institutions of an institution of auch loan uplicity held core or am owed more anton include mon-City be object with the Copy and the core of an include mon-City be object with the Copy and the copy	action (4) action (4) lequested [intolof the o i whose non- s at the time for ations and e than 55 00 locations are completed to the complete of a complet	least do business the debt we il purchased 0.00 Type of De instrument ressional!	Ves ves ves ves ves ves ves ves	r do work e making o s. if the re poer. X No

LAST PAGE OF THE DOCUMENT FILED.

(/ BEC