

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. )  
 )  
 CHARLES M. HUGHES )  
 )  
 Respondent-Candidate )

Case No. **19-EB-ALD-004**

**VERIFIED OBJECTOR'S PETITION**

INTRODUCTION

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

1. The Objector resides at 6650 West 63<sup>rd</sup> 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 Charles M. Hughes ("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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BOARD OF

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 23<sup>rd</sup> 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 23<sup>rd</sup> 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 26<sup>th</sup> day of February, 2019.



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ARLYCE GIUDICE  
OBJECTOR  
6650 West 63<sup>rd</sup> Place  
Chicago, Illinois 60638

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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*

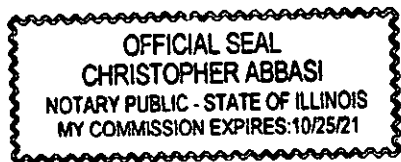
ARLYCE GIUDICE  
OBJECTOR  
6650 West 63<sup>rd</sup> Place  
Chicago, Illinois 60638

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

this the 2<sup>nd</sup> day of December, 2018.

*Christopher Abbasi*  
Notary Public

(STAMP)



**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**



740 N Sedgwick St. 500  
Chicago IL 60654-8483  
312 744-9660

# CITY OF CHICAGO 2018 STATEMENT OF FINANCIAL INTERESTS

To avoid a violation of the Governmental Finance Code, you must complete and sign this form and submit it to the Board of Ethics, 740 N. Sedgwick, Ste. 500, Chicago, IL 60654-8488, no later than the close of business on **July 31, 2018**.

Please do not eat in this room, sign it and then mail or deliver it to the Board of Ethics. Do not check statement if you are not a City employee. Please answer all 16 questions and sign and date your form before returning it. If you need more room, please attach and label extra sheets. Items with an asterisk are listed on the last action sheet.

QUESTIONS 2 & 3: For questions 2 & 3, include all corporate income, commission, or honoraria, including any other income, including but not limited to: \$1,000, \$2,500, \$25,000, \$25,000, \$25,000, \$25,000.

**NOTE:** for security reasons, filers in the Chicago Fire and Police Department, Inspector General's Office, Civilian Office of Police Accountability, Office of Emergency Communication, and building and health inspectors need not disclose the address of business organizations or property in questions 2 or 3; for question 3, however, they must list the number and types of properties owned, for example, "two 3-flats, etc."

Last Name: Hughes First Name: Charles Middle Initial: M  
 Mailing Address: 5441 S LaSalle Boulevard City: Chicago State: IL Zip: 60638  
 City Department Board or Commission: \_\_\_\_\_ Title: \_\_\_\_\_

1. In 2017, were you employed by any governmental unit other than the City of Chicago?  Yes  No

2. In 2017, did you serve as an employee, officer, director, associate, partner, or proprietor or in any advisory capacity for any professional, business or other organization (other than your City employment or appointment) from which you received or derived income of more than \$1,000.00?  Yes  No

| Name & Address | Type of Organization | Your Position | Amount of Income By Category |
|----------------|----------------------|---------------|------------------------------|
|                |                      |               |                              |

3. In 2017, did you receive compensation in excess of \$5,000.00 for professional, business or other services rendered to a person\* or entity doing business\* with the City of Chicago, the Chicago Transit Authority, Chicago Board of Education, Chicago Park District, Chicago City Colleges, or Metropolitan Pier and Exposition Authority?  Yes  No

| Name | Nature of Services | Person or Entity With Which Compensation Was Received | Amount of Income By Category |
|------|--------------------|---|------------------------------|
|      |                    |   |                              |

4. In 2017, did your spouse or domestic partner\* receive compensation or payment in excess of \$5,000.00 for professional, business, employment, work or other services rendered to a person\* or entity doing business\* with the City of Chicago, the Chicago Transit Authority, Chicago Board of Education, Chicago Park District, Chicago City Colleges, or Metropolitan Pier and Exposition Authority?  Yes  No

| Name | Nature of Services | Person or Entity With Which Compensation Was Received | Amount of Income By Category |
|------|--------------------|---|------------------------------|
|      |                    |   |                              |

5. In 2017, did any entity in which you OR your spouse or domestic partner\* have a financial interest\* receive compensation in excess of \$5,000.00 for professional, business or other services rendered to any person\* or entity doing business\* with the City of Chicago, the Chicago Transit Authority, Chicago Board of Education, Chicago Park District, Chicago City Colleges, or Metropolitan Pier and Exposition Authority?  Yes  No

| Name | Nature of Services | Government / Entity With Which Person Did Business | Amount of Income By Category |
|------|--------------------|--|------------------------------|
|      |                    |  |                              |

6. In 2017, did you have a financial interest\* in any person\* doing business\* with the City? (Note: common stock interests in publicly held companies that represent less than 1% (or 5% of the company's outstanding common stock, or time or demand deposit in financial institutions, or endowments, policies, or annuities purchased from insurance companies, need not be disclosed.)  Yes  No

Name: \_\_\_\_\_ Title: \_\_\_\_\_

BOARD OF ELECTIONS  
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2017, did you receive any gifts from any person or entity other than your spouse, child, grandchild, or dependent child? (Note: common stock, bonds, or other securities, including common stock, or time or demand deposits, or other financial instruments, including certificates of deposit, or other financial instruments, need not be disclosed.)

8. In 2017, did you realize a capital gain of \$5,000.00 or more from the sale of any capital asset other than your or your spouse's principal residence? (Include all forms of direct or indirect ownership, such as partnerships or trusts whose corpus consists primarily of real estate. If your principal place of residence is in a multi-unit or mixed use building in which you have a "tenant in common" interest, answer "yes" to this question.)

9. Do you currently have a financial interest in real estate located in the City of Chicago, other than your principal place of residence? (Include all forms of direct or indirect ownership, such as partnerships or trusts whose corpus consists primarily of real estate. If your principal place of residence is in a multi-unit or mixed use building in which you have a "tenant in common" interest, answer "yes" to this question.)

10. In 2017, did you receive from any person other than relatives or a domestic partner one or more gifts having an aggregate value in excess of \$250.00?

11. In 2017, did you receive any improper gift that you disposed of in accordance with Section 2-156-144 of the Governmental Ethics Ordinance?

12. Do you currently have a financial interest in any person or entity who is licensed, registered, or otherwise regulated by the City of Chicago for a license or franchise, or any permit for annexation, zoning or rezoning of real estate?

13. If you currently owe or anyone owes you more than \$5,000.00, did the debtor, creditor, or guarantor of the debt do business with or do work for the City of Chicago in 2017? (Do not include: 1) debt instruments issued by financial institutions whose normal business includes the making of loans of the kind you received in accordance with other terms and conditions standard for such loans at the time the debt was contracted, if the loans are made at the prevailing rate of interest; or 2) debt instruments issued by publicly held corporations and purchased by you on the open market at the price available to the public.)

14. Do you now serve on any board or commission (other than a volunteer or for compensation) (include non-City boards or commissions)?

15. Do you currently have a relative or domestic partner who is registered as a lobbyist with the City's Board of Ethics?

16. Do you currently have a relative or domestic partner who is an employee or full- or part-owner of a City contractor?

VERIFICATION: I declare that I have examined this Statement of Financial Interests, including any accompanying documents, and to the best of my knowledge and belief it is true and complete. I understand that knowingly filing a Statement containing false or misleading information, or failing to file by the deadline, or result in fines, removal from office, or employment sanctions, including discharge, in accordance with applicable rules, regulations and ordinances of the City of Chicago.

Signature: [Handwritten Signature] Date: 8/20/18

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