

# BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF ALDERMAN FOR THE CITY OF CHICAGO FOR THE FEBRUARY 26, 2019 MUNICIPAL ELECTION

BRENDA HARDY,	)	80	_
Petitioner-Objector,	)	02 02 02 03 03 04 04 04 04 04 04 04 04 04 04 04 04 04	2 8 87
v.	) No. )	MIS:	UEC - 3
GAYINGA WASHINGTON,	19-EB-ALD-005	JNOIS (C)	U
Respondent-Candidate.	)	RONS	= = = = = = = = = = = = = = = = = = = =

# **VERIFIED OBJECTOR'S PETITION**

## INTRODUCTION

NOW COMES, Brenda Hardy (hereinafter referred to as the "Objector"), and states as follows:

- 1. The Objector resides at 956 N. Massasoit, Chicago, Illinois 60651, in the County of Cook, and is a duly qualified, registered and legal voter at such address in the 29th Ward of Chicago.
- 2. The Objector's interest in filing the following objections is that of a citizen desirous of seeing to it that the laws governing the filing of nomination papers for a candidate for the office of Alderman of the 29th Ward of the City of Chicago in Cook County, Illinois, are properly complied with and that only legally qualified candidates have their names appear upon the ballot as candidates for said office.

### **OBJECTIONS**

- 3. The Objector makes the following objections to the purported nomination papers of Gayinga Washington (the "Nomination Papers"), as a candidate for nomination to the office of Alderman of the 29th Ward of the City of Chicago in Cook County, Illinois, to be voted at the Municipal Election to be held on February 26, 2019, and has filed the same herewith, and states that said Nomination Papers are insufficient in law and in fact for the following reasons:
- 4. The Nomination Papers for Alderman of the 29th Ward of the City of Chicago in Cook County, Illinois, to be voted for at the Municipal Election to be held on February 26, 2019, must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of said ward. 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. The laws pertaining to the securing of ballot access require that certain requirements be met as established by law. Filings made contrary to such requirements must be voided, being in violation of the statutes in such cases made and provided.
- 6. The Candidate has submitted 25 petition signature sheets containing signatures which the Candidate alleges are all duly qualified, legal, and registered voters of the 29th Ward of the City of Chicago in Cook County, Illinois.
- 7. The Nomination Papers contain petition sheets with the names of numerous persons who are not in fact duly qualified, registered, and legal voters at the addresses shown opposite their respective names in the City of Chicago, Illinois and their signatures are therefore invalid, as more fully set forth in the Appendix-Recapitulation attached hereto and incorporated

herein, under the heading, Column A, "Signer Not Registered at Address Shown," all of said signatures being in violation of the statutes in such cases made and provided.

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- 8. The Nomination Papers contain the names of persons who did not sign said papers in their own proper persons, and said signatures are not genuine and are forgeries, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column B, "Signer's Signature Not Genuine," all of said signatures being in violation of the statutes in such cases made and provided.
- 9. The Nomination Papers contain petition sheets with the names of persons who have signed said petition but who are not, in fact, duly qualified, registered, and legal voters of the 29th Ward of the City of Chicago, Illinois, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column C, "Signer Resides Outside District," all of said signatures being in violation of the statutes in such cases made and provided.
- 10. The Nomination Papers contain petition sheets with names of persons for whom the addresses given are either missing entirely or are incomplete, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column D, "Signer's Address is Missing or Incomplete," all of said signatures being in violation of the statutes in such cases made and provided.
- 11. The Nomination Papers contain less than the legally required number of validly and lawfully collected signatures of qualified and duly registered legal voters of the 29th Ward of the City of Chicago. Illinois, signed by such voters in their own proper person with proper addresses, and the actual number of valid and lawful signatures contained in the Nomination

Papers is far below the number required by law, as is set forth by the objections recorded in the Appendix-Recapitulation attached hereto.

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

WHEREFORE, the Objector requests a hearing on the objections set forth herein; an examination by this Honorable Electoral Board of the official records relating to voters in the applicable jurisdiction, to the extent that such examination is pertinent to any of the matters alleged herein; a ruling that the Nomination Papers of Gayinga Washington as a candidate for nomination as Alderman of the 29th Ward of the City of Chicago in Cook County, Illinois, are insufficient in law and fact; and a ruling that the name of Gayinga Washington as a candidate for nomination to the office of Alderman of the 29th Ward of the City of Chicago in Cook County, Illinois, shall not be printed on the official ballot in the 29th Ward of the City of Chicago, Illinois at the Municipal Election to be held on February 26, 2019.

Brenda Hardy, Objector

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Attorney for Objector

Official Seat Princess C Demosey Notary Public State of Illinois My Commission Expires 05/18/2019 STATE OF ILLINOIS )
COUNTY OF COOK )

# **VERIFICATION**

The undersigned as Objector, first being duly sworn on oath, now deposes and says that she has read this **Verified Objector's Petition** and that the statements therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true and correct.

Brenda Hardy, Objector 956 N. Massasoit

Chicago, Illinois 60651

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of December, 2018.

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Notary Public

Official Seal Princess C Dempsey Notary Public State of Illinois My Commission Expires 05/18/2019

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