

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD  
FOR THE HEARING AND PASSING UPON OBJECTIONS TO  
NOMINATION PAPERS OF CANDIDATES FOR ELECTION TO THE  
OFFICE OF ALDERMAN OF THE 17TH WARD, CITY OF CHICAGO, ILLINOIS, TO  
BE VOTED UPON AT THE FEBRUARY 29, 2019 MUNICIPAL GENERAL ELECTION**

**ALBERT BURNS** )  
 )  
 **PETITIONER – OBJECTOR,** )  
 **VS.** )  
 )  
 **RAYNETTA GREENLEAF** )  
 )  
 **RESPONDENT-CANDIDATE** )

**No: 19-EB-ALD-006**

**2019 DEC - 3 P 1:19**  
**BOARD OF ELECTIONS**  
**CHICAGO**

**VERIFIED OBJECTOR'S PETITION**

**INTRODUCTION**

The Petitioner-Objector, **ALBERT BURNS** (hereinafter referred to as the "Objector") states as follows:

1. The Objector resides at 1404 W 72<sup>nd</sup> Place, Chicago, Illinois 60636, and is a duly qualified legal registered voter at that address.

2. The Objector's interest in filing this petition is that of a voter desirous that the laws governing the filling of Nomination Papers for the office of Alderman of the 17<sup>th</sup> Ward, City of Chicago, County of Cook State of Illinois are properly complied with and that only qualified candidates appear on the ballot as a candidate for the Municipal General Election to be conducted on February 26, 2019

3. The Objector makes the following objections to the Nomination Papers of **RAYNETTA GREENLEAF**, as a candidate for election to the office of Alderman of the, 17<sup>th</sup> Ward, City of Chicago, State of Illinois to be voted on at the Election to be held on February 26, 2019. The Objector states the Nomination Papers are insufficient in fact and law for the following reasons:

**OBJECTIONS**

4. Pursuant to state law, nomination papers for candidates for election for the office of Alderman of the 17<sup>th</sup> Ward, City of Chicago, Illinois at the February 26, 2019 Municipal General Election must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of said Ward 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 executed in the form provided by law. The Nomination Papers purport to contain the signatures in excess of 473 such voters, and further purport to have gathered, presented and executed in the manner provided by the Illinois Election Code.

5. 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 C, "Signer did not sign in own proper person, not genuine (incl. PRINTED)", in violation of the Illinois Election Code.

6. The Nomination Papers contain petition sheets with the names of persons who are not registered voters at the addresses shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column A, "Signer Not Validly Registered at Address Shown on Petition", in violation of the Illinois Election Code.

7. The Nomination Papers contain petition sheets with the names of persons for whom addresses are stated which are not in the 17<sup>th</sup> Ward of the City of Chicago, State of Illinois and such signatures are not valid as set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column B, "Signer out of jurisdiction (Dist.=\_\_)", in violation of the Illinois Election Code.

8. The Nomination Papers petition sheets numbered 6, 26, 27, 39, 40, 69, 70, and 71, which bear a circulator's affidavit, do not fully set forth the circulator's name including sheets where the circulator's name on the affidavit is missing, incomplete, inconsistent or incorrect and therefore every signature on such sheets are invalid and in violation of the Illinois Election Code.

9. The Nomination Papers petition sheets numbered 40, 61, 85, 87, 88, and 89 which bear a circulator's affidavit, do not fully set forth the circulator's address including sheets where the circulator's address on the affidavit is missing, incomplete, inconsistent or incorrect and therefore every signature on such sheets are invalid and in violation of the Illinois Election Code.

10. The Nomination Papers petition sheets numbered 3, 60, 65, and 73 have a notary jurat, where the notary public did not indicate the date of execution of the circulator's oath in the presence of the notary public that the signatures on the sheet were signed in the circulator's presence not more than 90 days preceding the last date for filing the nomination petitions and therefore every signature on such sheets are invalid and in violation of the Illinois Election Code.

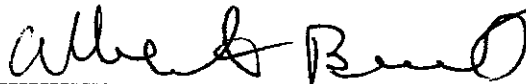
11. The Nomination Papers petition sheets numbered 66 and 67 contain a faulty notary jurat, where the notary public did not stamp their notary public seal on the circulator's oath and therefore every signature on such sheets are invalid and in violation of the Illinois

Election Code.

12. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 17<sup>th</sup> Ward of the City of Chicago, State of Illinois signed by such voters in their own proper person with proper addresses, far below the number required under Illinois law, as is set forth by these objections and the Appendix-Recapitulation attached hereto and incorporated herein.

13. The Appendix-Recapitulation is incorporated herein and the objections made therein are a part of this Objectors' Petition.

**WHEREFORE**, your Objector prays that the nomination papers of RAYNETTA GREENLEAF as a candidate for the office of Alderman of the 17<sup>th</sup> Ward, City of Chicago, State of Illinois at the February 26, 2019 Municipal General Election be declared to be insufficient and not in compliance with the laws of the State of Illinois and that this name be stricken and that this Board enter its decision declaring the name of RAYNETTA GREENLEAF as a candidate for election to the office of Alderman of the 17<sup>th</sup> Ward, City of Chicago, Illinois be not printed on the official ballot for the Municipal General Election to be conducted on February 26, 2019



ALBERT BURNS, OBJECTOR

VERIFICATION

STATE OF ILLINOIS )

) SS.

COUNTY OF COOK )

The undersigned being first duly sworn, deposes and states that he is the objector in the above Verified Objector's Petition, that he has read the contents thereof, and that the allegations therein are true and correct except as to matters stated to be on information and belief and as to such matters the undersigned certifies that such statements are true and correct to the best of the undersigned's knowledge and belief.

*Albert Burns*

ALBERT BURNS, OBJECTOR

SUBSCRIBED AND SWORN TO BEFORE ME BY  
ALBERT BURNS THE OBJECTOR ON THIS 3<sup>rd</sup> DAY OF DECEMBER, 2019  
AT CHICAGO ILLINOIS

*Stephen Stern*  
NOTARY

MY COMMISSION EXPIRES 1/12/19.



Stephen Stern

Attorney for Objector

36 W. Randolph Street, Suite 505

Chicago, Illinois 60605

(312)263-1887

FAX; (312) 264-0771

ssternlawoff@sbcglobal.net