

 **COPY**

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD**

IN THE MATTER OF THE OBJECTIONS OF: )

George Brown, )

Objector, )

v. )

Rachel Williams, )

Candidate. )

No.

**19-EB-ALD-010**

**OBJECTOR'S PETITION**

**INTRODUCTION**

George Brown, hereinafter sometimes referred to as the "Objector", states as follows:

1. The Objector resides at 12473 S. Wabash Avenue in the City of Chicago, State of Illinois, 60628, and is a duly qualified, legal and 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 filing of nomination papers for the office of Alderman, 9<sup>th</sup> Ward, City of Chicago, ("Office") 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 Rachel Williams, a candidate for Alderman, 9<sup>th</sup> Ward, City of Chicago, to be voted at the 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 Alderman, 9<sup>th</sup> Ward, City of Chicago, Cook County, to be voted for at the Election to be held February 26, 2019, must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of said district 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.
5. The Statement of Economic Interests ("SOEI") was not filed as required by the Constitution of the State of Illinois, the Illinois Governmental Ethics Act, and the Election Code. The SOEI contains no answers to any questions, and is a nullity.

2019 DEC -3 PM 1:18  
ELECTION COMMISSIONERS  
BOARD OF

6. The Statement of Candidacy is invalid, false, and perjurious since the Candidate has failed to file her SOEI as required by the Illinois Governmental Ethics Act and the Election Code, and has asked to be placed on the ballot for the February 26, 2018 election. Obviously, the 2018 election has passed.

7. Because of the above-listed violations in the Statement of Candidacy, the Nomination Papers are invalid in their entirety.

8. The Candidate's petitions are not numbered as required by the Illinois Election Code, and are therefore invalid.

9. The Candidate filed approximately 76 total signatures, far below the minimum requirement required by law.


CONCLUSION

WHEREFORE, the Objector requests a hearing on the objections set forth herein, an examination by the aforesaid Electoral Board of the official records relating to voters in the applicable district, to the extent that such examination is pertinent to any of the matters alleged herein, a ruling that the Nomination Papers are insufficient in law and fact, and a ruling that the name of RACHEL WILLIAMS shall not appear and not be printed on the ballot for election to the office of Alderman, 9<sup>th</sup> Ward, City of Chicago, to be voted for at the Election to be held February 26, 2019.

  
\_\_\_\_\_  
OBJECTOR

Burton S. Odelson  
Ross D. Secler  
**ODELSON & STERK, LTD.**  
3318 West 95<sup>th</sup> Street  
Evergreen Park, IL 60805  
708/424-5678 – office  
708/424-5755 – fax  
[attyburt@odelsonsterk.com](mailto:attyburt@odelsonsterk.com)  
[rsecler@odelsonsterk.com](mailto:rsecler@odelsonsterk.com)  
Attorneys for Objector

LAST PAGE OF THE  
DOCUMENT FILED.

  
\_\_\_\_\_  
BEC