

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF OBJECTIONS**

George Brown,)
)
 Petitioner-Objector,)
)
 v.)
)
 Essie Hall,)
)
 Respondent-Candidate.)

No. **19-EB-ALD-012**

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, 9th 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 Essie Hall, a candidate for Alderman, 9th 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, 9th 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 Nomination Papers contain petition sheets with the names of persons who are not properly 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

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the heading, Column a. "Signer not registered at address shown", in violation of the Illinois Election Code.

6. 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 signatures of registered voters and are forgeries, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column b. "Signature not genuine signature of registered voter" 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 9th Ward of the City of Chicago and such signatures are not valid as not being within the geographical boundaries, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column c. "Signer resides outside district", in violation of the Illinois Election Code.

8. The Nomination Papers contain petitions sheets with the 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 missing or incomplete", in violation of the Illinois Election Code.

9. The Nomination Papers contain the names of persons who have signed the Nomination Papers more than one time as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column e. "Signer signed more than once at sheet/line indicated", in violation of the Illinois Election Code, thereby invalidating at least one of the duplicate signatures.

10. The Nomination Papers contain the signatures of various individuals who had previously signed a nominating petition of another candidate for the same office, thereby precluding them from petitioning for the Candidate's attempt to access the ballot at the 2019 Municipal General Election in the City of Chicago, as more fully set forth in the Supplemental Appendix-Recapitulation, marked "**Group Exhibit B,**" and attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.

11. The Nomination Papers contain petition sheets with a heading that states, "provided that no primary election is required, the candidate's name will appear on the ballot at the Consolidated Election for election to said office and term." Candidates for election to municipal office in the City of Chicago seek *election* at the Municipal General Election on February 26, 2019. The instance where a candidate may appear on the April, Consolidated Election ballot is in the case of a run-off election. Candidates *must* first appear on the February 26, 2019 election ballot and, as such, the language in the Candidate's petition sheet heading is invalid, causes confusion, and is in violation of Illinois Law. Therefore, every petition sheet submitted by Candidate as part of the Nomination Papers is invalid as a matter of law.

12. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 9th Ward, City of Chicago, 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 the objections recorded in 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 Objector's Petition. The headings in the Appendix-Recapitulation in Columns a-e are specific objections, as well as the **Group Exhibit B**.

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 ESSIE HALL shall not appear and not be printed on the ballot for election to the office of Alderman, 9th Ward, City of Chicago, to be voted for at the Election to be held February 26, 2019.


OBJECTOR

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