

# BOARD OF ELECTION COMMISSIONERS OF THE CITY OF CHICAGO AS THE DULY CONSTITUTED ELECTORAL BOARD

| LAROY DAVIS             | )                 |    |
|-------------------------|-------------------|----|
| Objector,               | )                 |    |
| V.                      | ) No.             |    |
| HOWARD B. BROOKINS, JR. | )<br>19-EB-ALD-01 | 17 |
| Candidate.              | )                 |    |

IN THE MATTER OF THE OBJECTIONS OF LAROY DAVIS TO THE NOMINATION PAPERS OF HOWARD B. BROOKINS, JR. OF 9636 S. WINSTON AVENUE CHICAGO ILLINOIS 60643, AS A CANDIDATE FOR ELECTION TO THE OFFICE OF ALDERMAN FOR THE 21<sup>ST</sup> WARD TO BE VOTED FOR AT THE MUNICIPAL GENERAL ELECTION TO BE HELD ON FEBRUARY 26, 2019.

## **VERIFIED OBJECTOR'S PETITION**

NOW COMES LAROY DAVIS hereinafter referred to as the "Objector" and respectfully Represents that Objector resides 8809 S. Aberdeen Chicago Illinois 60622 in the 21st Ward in the City of Chicago; that Objector is a duly qualified, registered, and later voter at such address; that Objector's interest in filing the following objections is that of a citizen wanting to see that the laws governing the filing of nomination papers for elections in the office of Alderman for the 21st Ward in the City of Chicago are properly complied in the said office; and therefore your Objector makes the following objections to the nomination papers of HOWARD B. BROOKINS, JR. as a candidate for election to the office of Alderman for the 21st Ward in the City of Chicago, and files the same herewith, and states that the said nomination papers are insufficient in law and in fact for the following reasons::

- 1. Your Objector states that in the 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois the signatures of not less than 473 duly qualified, registered, and legal voters of the said 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois are required. 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.
- 2. Your Objector states that the Candidate has filed petition signature sheets in excess of 473 signatures of allegedly duly qualified, legal, and registered voters of the 18th Ward of the City of Chicago in the County of Cook and State of Illinois.
  - 3. Your Objector further states that the said nomination papers contain the names of

numerous persons who did not sign the said nomination papers in their own proper persons, and that the said signatures are not genuine, as more fully set forth in the Appendix-Recapitulation under the column designated "SIGNER NOT PROPER PERSON AND SIGNATURE NOT GENUINE (A)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.

- 4. Your Objector further states that the aforesaid nomination papers contain the names of numerous persons who are not in fact duly qualified, registered, and legal voters at the addresses shown opposite their names in the 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois and their signatures are therefore invalid, as more fully set forth in the Appendix-Recapitulation under the column designated "SIGNER NOT REGISTERED AT ADDRESS SHOWN (B)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
- 5. Your Objector further states that the said nomination papers contain the names of numerous persons who have signed said petition but who are not, in fact, duly qualified, registered, and legal voters at addresses that are located within the boundaries of the 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois as shown by the addresses they have given on the petition, as more fully set forth in the Appendix-Recapitulation under the column designated "SIGNER RESIDES OUTSIDE DISTRICT (C)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
- 6. Your Objector further states that the said nomination papers contain the names of numerous persons who have signed said petition but who are not, in fact, duly qualified, registered, and legal voters at addresses that are located within the boundaries of the 21 TW ard of the City of Chicago in the County of Cook and State of Illinois as shown by the addresses they have given on the petition, as more fully set forth in the Appendix-Recapitulation under the column designated "SIGNERS ADDRESS MISSING OR INCOMPLETE (D)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
- 7. Your Objector further states that said nominating petition contains the signatures of various individuals who have signed the petition more than once, and such duplicate signatures are invalid, as more fully set forth in the Appendix-Recapitulation, under the column designated "SIGNERS SIGNED PETITION MORE THAN ONCE (E)," with a further notation therein of the sheet and line numbers of the alleged duplicate signature(s) as sheet 55 line 14 and sheet 76 line 3 attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
- 8. Your Objector further states that the said nomination papers contain the names of numerous persons who did not sign or write on the said nomination papers in their own proper persons, but instead printed their signature, as more fully set forth in the

Appendix-Recapitulation under the column designated "SIGNER SIGNATURE PRINTED NOT WRITTEN (F)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.

9. Your Objector states that various purported signatures are legally defective and deficient for a variety of reasons, as more fully set forth in the bottom section of Appendix-Recapitulation and under the column designated as "OTHER" that being "CIRCULATOR'S IS NOT REGISTERED OR RESIDES AT ADDRESS SHOWN" attached hereto and made a part hereof, with specific reference to the following sheets: 220 and 221, all of said signatures being in violation of the statutes in such cases made and provided.

WHEREFORE, your objector prays that the purported nomination papers of HOWARD B. BROOKINS, JR. as a candidate for election to the office of Alderman of the 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois be declared by this Honorable Electoral Board to be insufficient and not in compliance with the laws of the State of Illinois and that the Candidate's name be stricken and that this Honorable Electoral Board enter its decision declaring that the name of HOWARD B. BROOKINS, JR. as candidate for election to the office of Alderman of the 21<sup>ST</sup> Ward of the City of Chicago in the County of Cook and State of Illinois BE NOT PRINTED on the OFFICIAL BALLOT for the Municipal General Election to be held on February 26, 2019.

OBJECTØR

LAROY DAVIS 8809 S. ABERDEEN CHICAGO IL 60620

#### **VERIFICATION**

The undersigned as Objector, first being duly sworn on oath, now deposes and says that he 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 he verily believes the same to be true and correct.

Jakon De OBJECTOR

LAROY DAVIS 8809 S. ABERDEEN CHICAGO IL 60620

County of Cook

State of Illinois

Subscribedto and Sworn before me, a Notary Public, by LARRY

the Objector, on this the 3 day of DECEMBER 2018.

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My Commission expires:

OFFICIAL SEAL
TONYA M DULANEY-LITTLE
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:04/17/21

(SEAL)

# Certification of Registration

I, Karen A. Yarbrough, Cook County Clerk, do hereby certify that the following information is a true and correct copy of the voter registration record on file in this office for:

### JENNICE WITHERSPOON

**Date of Registration:** 10-03-1996 **Certification Number:** S0533829

Status: cancelled

Address: 15231 HASTINGS DR, DOLTON IL 60419

Precinct Number: 9500083 Sex: F

Witness my hand and official seal at Cook County, IL on December 2, 2018.

Karen A. Yarbrough Cook County Clerk

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