

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF NOMINATION OBJECTIONS TO
NOMINATION PAPERS OF CANDIDATES FOR ELECTION TO THE
OFFICE OF ALDERMAN OF THE 21st WARD OF THE
CITY OF CHICAGO, STATE OF ILLINOIS

- Debra Parker & Geralda Morgan,)
)
 Petitioner-Objectors,)
)
 v.)
)
 Julius Modeliste,)
)
 Respondent-Candidate.)

19-EB-ALD-038

OBJECTOR'S PETITION

INTRODUCTION

Debra Parker and Geralda Morgan, hereinafter sometimes referred to as the Objectors, states as follows:

2018 DEC - 3 P 1000
BOARD OF ELECTION
COMMISSIONER

1. The Objector Debra Parker resides at 9616 S. Carpenter, Chicago, Illinois, Zip Code 60643, in the 21st Ward of City of Chicago, State of Illinois, and is a duly qualified, legal and registered voter at that address. The Objector Geralda Morgan resides at 9157 S. Aberdeen, Chicago, Illinois, Zip Code 60620, in the 21st Ward of City of Chicago, State of Illinois, and is a duly qualified, legal and registered voter at that address.

2. The Objectors' 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 of the 21st Ward of the City of Chicago, State of Illinois are properly complied with, and that only qualified candidates appear on the ballot for said office.

3. The Objectors make the following objections to the purported nomination papers ("Nomination Papers") of Julius Modeliste as a candidate for the office of Alderman of the 21st Ward of the City of Chicago, State of Illinois ("Office") to be voted for at the Municipal General Election on February 26, 2019 ("Election"). The Objectors state that the Nomination Papers are insufficient in fact and law for the following reasons:

OBJECTIONS

4. Pursuant to State law, nomination papers for the Office to be voted for at the Election must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of the 21st Ward of the City of Chicago, State of Illinois collected in the manner

prescribed by law. In addition, 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 of in excess of 473 such voters, and further purport to have been gathered, presented and executed in the manner provided by the Illinois Election Code.

5. The Nomination Papers contain petition sheets with the names of persons who are not registered voters, or who are not registered voters at the address specified in the petition, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein under the heading, Column A, "Signer Not Registered at Address Shown," in violation of the Illinois Election Code.

6. The Nomination Papers contain petition sheets with the names of persons who did not sign the papers in their own proper persons, and such 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," in violation of the Illinois Election Code.

7. The Nomination Papers contain petition sheets with the names of persons for whom the addresses stated are not in the 21st Ward of the City of Chicago, State of Illinois, and such persons are not registered voters in the 21st Ward of the City of Chicago, State of Illinois, 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 petition 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 petition sheets with 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 Petition More Than Once at Sheet Indicated," in violation of the Illinois Election Code.

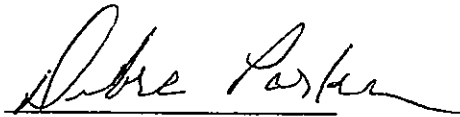
10. The Candidate's Nomination Papers are invalid in their entirety because the Candidate did not file a receipt with his Nomination Papers demonstrating that he had filed a Statement of Economic Interests with the County Clerk as required by Illinois law. The Candidate also failed to separately file such a receipt with the Board of Elections prior to the close of the petition filing period, as required by Illinois law. As a result of his failure to file a receipt reflecting the filing of a Statement of Economic Interests, the Candidate's nomination papers are invalid in their entirety.

11. The Appendix-Recapitulation is incorporated herein, and the objections made

therein are a part of this Objector's Petition.

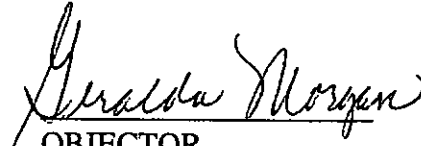
12. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 21st Ward of the City of Chicago, State of Illinois, signed by such voters in their own proper person with proper addresses, below the number required under Illinois law, as is set forth by the objections recorded in the Appendix-Recapitulation attached hereto and incorporated herein.

WHEREFORE, the Objectors request: a) a hearing on the objections set forth herein; b) an examination by the aforesaid Electoral Board of the official records relating to voters in the 21st Ward of the City of Chicago, State of Illinois, to the extent that such examination is pertinent to any of the matters alleged herein; c) a ruling that the Nomination Papers are insufficient in law and fact, and d) a ruling that the name of Julius Modeliste shall not appear and not be printed on the ballot for election to the office of Alderman of the 21st Ward of the City of Chicago, State of Illinois, to be voted for at the Municipal General Election to be held February 26, 2019.



OBJECTOR

Address:
Debra Parker
9616 S. Carpenter
Chicago, IL 60643



OBJECTOR

Address:
Geralda Morgan
9157 S. Aberdeen
Chicago, IL 60620

VERIFICATION

STATE OF ILLINOIS

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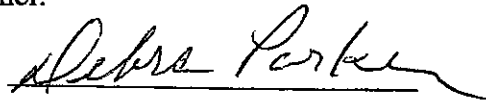
COUNTY OF COOK

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SS.

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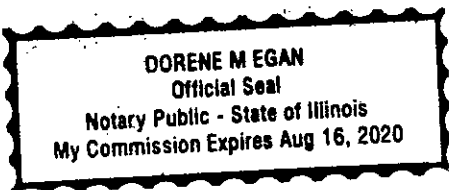
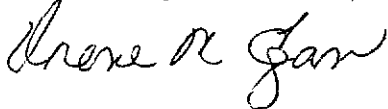
I, Debra Parker, being first duly sworn upon oath, depose and state that I have read the above and foregoing OBJECTOR'S PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.



Subscribed and sworn to before me

by Debra Parker

this 3rd day of December, 2018.



VERIFICATION

STATE OF ILLINOIS

)

COUNTY OF COOK

) SS.

)

I, Geralda Morgan, being first duly sworn upon oath, depose and state that I have read the above and foregoing OBJECTOR'S PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.

Geralda Morgan

Subscribed and sworn to before me

by Geralda Morgan

this 2nd day of December, 2018.

Dorene M Egan

