

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 23rd WARD OF THE  
CITY OF CHICAGO, STATE OF ILLINOIS

Nicholas George Dirscherl, )  
 )  
Petitioner-Objector, )  
 )  
v. )  
 )  
Betsy Jovan Watkins, )  
 )  
Respondent-Candidate. )

**19-EB-ALD-041**

OBJECTOR'S PETITION

INTRODUCTION

Nicholas George Dirscherl, hereinafter sometimes referred to as the Objector, states as follows:

1. The Objector resides at 5437 S. Neva Avenue, Chicago, Illinois, Zip Code 60638, in the 23rd Ward of City of Chicago, State of Illinois, 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 of the 23rd 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 Objector makes the following objections to the purported nomination papers ("Nomination Papers") of Betsy Jovan Watkins as a candidate for the office of Alderman of the 23rd 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 Objector states 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 23rd 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,

2018 DEC - 14 P 2:28  
BOARD OF ELECTIONS  
COMPLAINTS DIVISION

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 23rd Ward of the City of Chicago, State of Illinois, and such persons are not registered voters in the 23rd 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 Nomination Papers contain petition sheets with signatures of voters who had previously signed the nomination petition of candidate Silvana Tabares for the same office as the Candidate. As a result, each of the duplicative, later signatures from those voters appearing on the Candidate's petitions are invalid. Such signatures are:

Tabares: Sheet 225, Line 8

Watkins: Sheet 38, Line 6

Tabares: Sheet 73, Line 5

Watkins: Sheet 3, Line 6

Tabares: Sheet 130, Line 8  
Watkins: Sheet 17, Line 5

Tabares: Sheet 242, Line 1  
Watkins: Sheet 5, Line 1

Tabares: Sheet 242, Line 9  
Watkins: Sheet 18, Line 2

Tabares: Sheet 243, Line 8  
Watkins: Sheet 5, Line 4

Tabares: Sheet 49, Line 3  
Watkins: Sheet 9, Line 6

Tabares: Sheet 51, Line 6  
Watkins: Sheet 9, Line 10

Tabares: Sheet 37, Line 5  
Watkins: Sheet 18, Line 10

Tabares: Sheet 51, Line 4  
Watkins: Sheet 6, Line 2

Tabares: Sheet 231, Line 1  
Watkins: Sheet 14, Line 6

Tabares: Sheet 49, Line 18  
Watkins: Sheet 6, Line 5

Tabares: Sheet 51, Line 3  
Watkins: Sheet 10, Line 8

Tabares: Sheet 221, Line 5  
Watkins: Sheet 2, Line 7

Tabares: Sheet 220, Line 1  
Watkins: Sheet 47, Line 6

Tabares: Sheet 306, Line 4  
Watkins: Sheet 58, Line 3

Tabares: 63, Line 20  
Watkins: Sheet 63, Line 2

Tabares: Sheet 63, Line 18  
Watkins: Sheet 20, Line 3

Tabares: Sheet 306, Line 4  
Watkins: Sheet 4, Line 4

Tabares: Sheet 131, Line 7  
Watkins: Sheet 34, Line 4

Tabares: Sheet 131, Line 4  
Watkins: Sheet 17, Line 3

Tabares: Sheet 129, Line 6  
Watkins: Sheet 55, Line 3

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 23rd 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 Objector requests: 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 23rd 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 Betsy Jovan Watkins shall not appear and not be printed on the ballot for election to the office of Alderman of the 23rd Ward of the City of Chicago, State of Illinois, to be voted for at the Municipal General Election to be held February 26, 2019.

*Nicholas George Dirscherl*  
OBJECTOR

Address:  
Nicholas George Dirscherl  
5437 S. Neva Avenue  
Chicago, IL 60638

VERIFICATION

STATE OF ILLINOIS

COUNTY OF COOK

)  
) SS.  
)

I, Nicholas George Dirscherl, 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.

*Nicholas George Dirscherl*

Subscribed and sworn to before me  
by Nicholas George Dirscherl  
this 3<sup>rd</sup> day of December, 2018.

*Dorene M. Egan*

