

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. )  
)  
Marvin McNeil, )  
)  
Respondent-Candidate. )

**19-EB-ALD-046**

OBJECTOR'S PETITION

INTRODUCTION

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

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 Marvin McNeil 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

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COMMISSIONER

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.

9. The Nomination Papers contain petition sheets that were notarized prior to the first date upon which candidates could legally circulate nomination petitions for the Election. The first date that candidates could legally circulate petitions and gather signatures for this office was Tuesday, August 28, 2018. Petition Sheet number 43 of the Candidate's Nomination papers was notarized on August 18, 2018, earlier than the first date upon which signatures could be legally gathered and placed on a petition. Petition Sheet number 44 of the Candidate's Nomination papers was notarized on August 19, 2018, earlier than the first date upon which signatures could be legally gathered and placed on a petition. Petition Sheet number 45 of the Candidate's Nomination papers was notarized on August 19, 2018, earlier than the first date

upon which signatures could be legally gathered and placed on a petition. As a result, Petition Sheet numbers 43, 44 and 45 are invalid in their entirety.

10 Petition Sheet number 5 is invalid because it is not properly notarized because the date of notarization is not provided. As a result, Petition Sheet number 5 of the Candidate's Petitions is invalid in its entirety.

11. Petition Sheet number 38 is invalid in its entirety because the petition circulator did not personally appear before the notary and execute the affidavit. The circulator's affidavit on Sheet Number 38 is executed by the Candidate, but his signature does not appear anywhere on Petition Sheet number 38. Instead, a person name "Leroy Davis" signed Petition Sheet number 38. Because the person who completed the circulator's affidavit (the Candidate) is not the same person who signed as the Circulator (Leroy Davis), Petition Sheet number 38 is invalid in its entirety.

12. Petition Sheet number 39 is invalid in its entirety because the Circulator's address is missing from circulator's affidavit and cannot be located elsewhere on Petition Sheet number 39. As a result, Petition Sheet number 39 is invalid.

13. Petition Sheet number 24 is invalid because it does not contain the original signatures of voters, but instead Petition number 24 is a photocopy of Petition Sheet number 85. Petition Sheet number 46 is invalid because it does not contain the original signatures of voters, but instead Petition number 46 is a photocopy of Petition Sheet number 47. Petition Sheet number 45 is invalid because it does not contain the original signatures of voters, but instead Petition number 45 is a photocopy of Petition Sheet number 43. As a result, Petition Sheet numbers 43, 44 and 45 are each invalid in their entirety.

14. As indicated in Paragraph 13 above, Petition Sheet numbers \_\_\_ and \_\_\_ are photocopies of other original petition sheets. However, the circulator's affidavit on both sheets do contain original signatures of the purported circulators as follows:

| <u>Original Sheet</u> | <u>Photocopy</u> | <u>Circulator of Photocopy</u> |
|-----------------------|------------------|--------------------------------|
| 85                    | 24               | Helen McNeil                   |
| 47                    | 46               | Helen McNeil                   |
| 45                    | 23               | Helen McNeil                   |

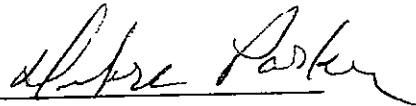
This intentional execution of circulator's affidavits for petition sheets that contain photocopied signatures constitutes a pattern of fraud and false swearing by the Helen McNeil to such a degree that each and every Petition Sheet signed by her as circulator is invalid in its entirety.

15. The Appendix-Recapitulation is incorporated herein, and the objections made therein are a part of this Objector's Petition.

16. 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 Marvin McNeil 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

)

) SS.

COUNTY OF COOK

)

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.

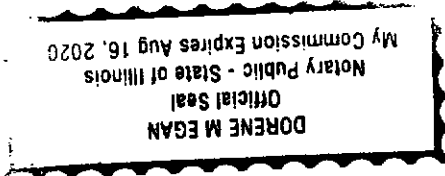
Geralda Morgan

Subscribed and sworn to before me

by Geralda Morgan

this 3<sup>rd</sup> day of December, 2018.

Dorene M. Egan



VERIFICATION

STATE OF ILLINOIS )  
 ) SS.  
COUNTY OF COOK )

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.

Debra Parker

Subscribed and sworn to before me  
by Debra Parker  
this 3rd day of December, 2018.

Dorene M. Egan

