

COPY

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 27th WARD OF THE
CITY OF CHICAGO, STATE OF ILLINOIS

Jerrell Reid and Darlena Burnett,)
)
 Petitioner-Objectors,)
)
 v.)
)
Cynthia Bednarz,)
)
 Respondent-Candidate.)

19-EB-ALD-053

OBJECTOR'S PETITION

INTRODUCTION

Jerrell Reid and Darlena Burnett, hereinafter sometimes referred to as the Objectors, states as follows:

1. The Objector Jerrell Reid resides at 3440 W. Franklin Blvd., Chicago, Illinois, Zip Code 60624, in the 27th Ward of City of Chicago, State of Illinois, and is a duly qualified, legal and registered voter at that address. The Objector Darlena Burnett resides at 1648 W. Warren Blvd., Chicago, Illinois, Zip Code 60612, in the 27th 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 27th 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 Cynthia Bednarz as a candidate for the office of Alderman of the 27th 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 27th 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 for whom the addresses stated are not in the 27th Ward of the City of Chicago, State of Illinois, and such persons are not registered voters in the 27th 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 B, "Signer Resides Outside District," in violation of the Illinois Election Code.

7. 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 c, "Signer's Signature Not Genuine," 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 Appendix-Recapitulation is incorporated herein, and the objections made therein are a part of this Objector's Petition.

11. The Nomination Papers contain petition sheets that were signed by a circulator, Kevin Gregg, who does not reside at the address indicated in the circulator's affidavit of the petition sheets that he allegedly circulated. Petition Sheet numbers 29, 32, 33, 34, 35, 36, 37, 39, 44, 45, 46, 49, 71, 72, and 73 indicate that the circulator resides at "139 W. Hoyne, Chicago, Illinois." However, there is no such address in the City of Chicago and, as a result, each of these sheets is invalid in its entirety.

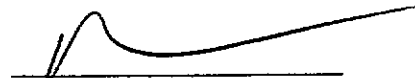
12. The Nomination Papers contain petition sheets that were signed by a circulator, Ernestine Humphries, who does not reside at the address indicated in the circulator's affidavit of the petition sheets that he allegedly circulated. Petition Sheet numbers 59, 60, 61, 62, 83, 84, and 103 indicate that the circulator resides at "1816 N. Lotus, Chicago, Illinois." However, Ernestine Humphries does not reside at that address and, as a result, each of these sheets is invalid in its entirety.

13. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 27th 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.

14. The Nomination Papers are invalid in their entirety because the Statement of Economic Interests filed by the Candidate with the Cook County Clerk does not set forth any office for which the Statement was filed, in violation of Illinois law. As a result of the failure to indicate any office on the Statement of Economic Interests, the Nomination Papers are invalid in their entirety.


15. The Nomination Papers are invalid in their entirety because the receipt for the Statement of Economic Interests filed by the Candidate with the Board of Elections does not set forth any office for which the Statement was filed, in violation of Illinois law. As a result of the failure to indicate any office on the receipt for the Statement of Economic Interests, the Nomination Papers are invalid in their entirety.

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 27th 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 Cynthia Bednarz shall not appear and not be printed on the ballot for election to the office of Alderman of the 27th 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:
Jerrell Reid
3440 W. Franklin Blvd.
Chicago, IL 60624



OBJECTOR

Address:
Darlena Burnett
1648 W. Warren Blvd.
Chicago, IL 60612

VERIFICATION

STATE OF ILLINOIS

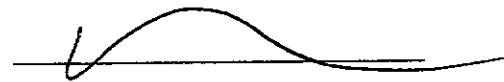
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) SS.

COUNTY OF COOK

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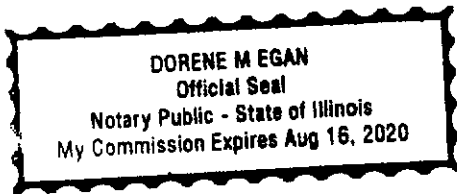
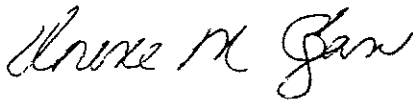
I, Jerrell Reid, being first duly sworn upon oath, depose and state that I have read the above and foregoing OBJECTOR'S PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.



Subscribed and sworn to before me

By Jerrell Reid

this 3rd day of December, 2018.



VERIFICATION

STATE OF ILLINOIS

)

) SS.

COUNTY OF COOK

)

I, Darlena Burnett, 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.

Darlena Burnett

Subscribed and sworn to before me

by Darlena Burnett

this 3rd day of December, 2018.

Dorene M. Egan

