

**BEFORE THE BOARD OF ELECTION COMMISSIONERS OF THE CITY OF
CHICAGO AS THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OBJECTIONS TO
NOMINATION PAPERS OF CANDIDATES FOR ELECTION TO THE OFFICE OF
ALDERMAN OF THE 49TH WARD OF THE CITY OF CHICAGO, COUNTY OF COOK,
STATE OF ILLINOIS TO BE VOTED UPON AT THE FEBRUARY 26, 2019
MUNICIPAL GENERAL ELECTION**

LATOYA L. PETERSON,)
)
 Petitioner-Objector,)
)
 vs.) No. **19-EB-ALD-056**
)
 BILL MORTON)
)
 Respondent-Candidate)

VERIFIED OBJECTOR'S PETITION

Latoya L. Peterson, hereinafter sometimes referred to as the "Objector", states as follows:

1. Objector Latoya L. Peterson resides at 7350 N. Damen Avenue, #3, Chicago IL 60645, and is a duly qualified, legal and registered voter at that address in the 49th Ward of the City of Chicago, County of Cook, State of Illinois.

2. The Objector's interest in filing this Petition is that of voters desiring that the laws governing the filing of nomination papers for the office of Alderman of the 49th Ward of the City of Chicago, County of Cook, State of Illinois are properly complied with, and that only qualified candidates appear on the ballot for said office.

3. The Objector makes objections, as hereinafter stated in Paragraphs 5 - 10 of this Petition, to the purported nomination papers (herein referred to as the "Nomination Papers") of Bill Morton (hereinafter referred to as "Respondent") as a candidate for election to the office of Alderman of the 49th Ward of the City of Chicago, County of Cook, State of Illinois, to be voted on at the Municipal General Election on February 26, 2019. The Objector states that the Nomination Papers are insufficient in fact and law for the reasons stated below.

4. Pursuant to Section 10-3.1 of the Illinois Election Code, 10 ILCS 5/10-3.1, and Section

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21-28(a) of the Revised Cities and Villages Act of 1941, 65 ILCS 20/21-28(a), nomination papers for candidates for the office of Alderman of the 49th Ward of the City of Chicago, County of Cook, State of Illinois, to be voted for at the Municipal General Election to be held February 26, 2019, must contain the signatures of not fewer than 473 qualified voters of the 49th Ward of the City of Chicago, County of Cook, State of Illinois collected in the manner prescribed by law. 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 be otherwise executed in the form provided by law. The Nomination Papers purport to contain a sufficient number of the signatures of 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 at the addresses shown opposite their respective names, 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 said papers in their own proper persons, and said 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, "Signature not genuine signature of registered voter", in violation of the Illinois Election Code.

7. The Nomination Papers contain petition sheets with the names of persons whose addresses are not within the 49th Ward of the City of Chicago, County of Cook, State of Illinois and the persons so signing reside outside the 49th Ward of the City of Chicago, 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 stated 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 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/Line Indicated", in violation of the Illinois Election Code. All such objections to duplicate signatures reference the sheet and line number of the duplicate signatures.

10. The Nomination Papers contain sheets circulated by persons (circulators) whose sheets contained an affidavit in which the Circulator certifies and swears to false assertions of signers being registered and signatures being genuine and demonstrate a pattern of fraud and disregard of the Illinois Election Code to such a degree that every sheet circulated by each such Circulator is invalid, and every signature on such petition sheet should be invalidated in order to protect the integrity of the electoral process. Such petition sheet numbers are: all but 51 and 57.

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

12. The Appendix-Recapitulation sheets are referenced to the petition sheet number at the top of each sheet of the Appendix-Recapitulation. An "X" placed on a line of the Appendix-Recapitulation sheet indicates that an objection is made to the corresponding signature line of the referenced petition sheet for the reasons stated above. Each sheet of the Appendix-Recapitulation is incorporated herein, and the objections made therein are a part of this Objector's Petition.

13. Because of the above-listed irregularities and insufficiencies in the Nomination Papers, the Nomination Papers are invalid in their entirety.

WHEREFORE, the Objector requests a hearing on the objections set forth herein, an examination by the aforesaid Electoral Board of the official records relating to voters in the applicable district, to the extent that such examination is pertinent to any of the matters alleged herein, a ruling that the Nomination Papers are insufficient in law and fact, and a ruling that the name of Bill Morton shall not appear and be not printed on the ballot for election to the office of Alderman of the 49th Ward of the City of Chicago, County of Cook, State of Illinois, to be voted on at the Municipal General Election on February 26, 2019.

Respectfully submitted,


OBJECTOR

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VERIFICATION

State of Illinois)
) ss.
County of Cook)

The undersigned, being first duly sworn, deposes and states that the undersigned is one of the Objectors in the above Verified Objector's Petition; that s/he has read the same and knows the contents thereof; and that matters alleged therein are true to the best of the undersigned's knowledge and belief.

Latoya L. Peterson
OBJECTOR

Subscribed and sworn to before me, a Notary Public, by LATYA L. PETERSON on December 2, 2018.

[Signature]
NOTARY PUBLIC

