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**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OF OBJECTIONS TO NOMINATION PAPERS OF CANDIDATES FOR ELECTION TO THE OFFICE OF ALDERMAN OF THE 1<sup>st</sup> WARD, CITY OF CHICAGO, ILLINOIS, TO BE VOTED UPON AT THE FEBRUARY 26, 2019 MUNICIPAL GENERAL ELECTION**

**Jay G. Ramirez,**

Petitioner-Objector

v.

**19-EB-ALD-068**

**Daniel La Spata,**

Respondent-Candidate

**OBJECTORS' PETITION**

The objector Jay G. Ramirez states that he resides at 1311 West Erie St. Apartment 3 Chicago, IL 60642 and that he is a duly qualified and registered legal voters of the 1<sup>st</sup> Ward, City of Chicago, State of Illinois, the district in which the candidate is to be voted upon, and that his interest in filing the following objections is that of a citizen desirous of seeing that the election laws governing the filing of nomination papers for the office of Alderman of the 1<sup>st</sup> Ward, City of Chicago, State of Illinois, are properly complied with, and that only qualified candidates appear on the Municipal General Election ballot for said office as candidates for the February 26, 2019 Municipal General Election.

Therefore, he makes the following objections to the Nomination Papers of Daniel La Spata as a candidate for election to the office of Alderman of the 1<sup>st</sup> Ward, City of Chicago, State of Illinois, to be voted upon at the February 26, 2019 Municipal General Election.

1. Pursuant to state law, nomination papers for candidates for election for the office of Alderman of the 1<sup>st</sup> Ward, City of Chicago, State of Illinois to be voted for at the February 26, 2019 Municipal General Election, must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of said District 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 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.
2. The Nomination Papers contain the names of persons who did not sign said papers in

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CITY OF CHICAGO  
ELECTIONS  
COMMISSIONER

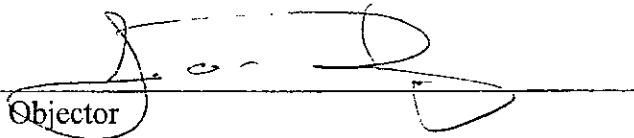
their own proper persons, and said signatures are not genuine and are forgeries, including signatures that do not match the signature on the official voter registration record of the purported signer – voter, including signatures that are printed and not written in cursive which do not match the signature on the official voter registration record of the purported signer – voter, including signatures that do not match the signature of a registered voter in the Ward, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column a, “Signer’s Signature not genuine”, and column f “Signer’s signature printed not written not genuine” in violation of the Illinois Election Code.

3. 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 b “Signer Not Registered At Address Shown”, in violation of the Illinois Election Code.
4. The Nomination Papers contain petition sheets with the names of persons who for whom addresses are stated which are not located within the 1<sup>st</sup> Ward, City of Chicago State of Illinois, and not residents within the district, and such signatures are not valid, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading Column c, “Signer resides out of district”, in violation of the Illinois Election Code.
5. The Nomination Papers contain the names of persons whose addresses are missing or incomplete in violation of section 10 –4 of the Illinois Election Code which requires the residence address to be written or printed opposite each qualified voter’s name to include the street address as well as the county city village town or state and these signatures are invalid 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.
6. The Nomination Papers contain the names of persons who have signed the Nomination Papers of this candidate more than one time as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column e, “Signer sign petition more than once at sheet/line indicated”, in violation of the Illinois Election Code.
7. The Nomination Papers contain numerous sheets circulated by individuals whose sheets demonstrate a pattern of fraud and disregard of the Election Code to such a degree that every sheet circulated by said individuals is invalid and should be invalidated in order to protect the integrity of the electoral process. Such circulators are those who circulated the sheets in which objections are made in Column a of the Appendix-Recapitulation. Specifically, but without limitation, the nomination petitions purportedly circulated by

Daniel La Spata demonstrate the disregard of the Election Code evidenced by the actions of this circulator includes the submission of voters' signatures which were not signed by the voters in their own proper persons, and signatures of persons that were not signed in the presence of the purported circulator.

8. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 1<sup>st</sup> Ward, City of Chicago, State of Illinois, signed by such voters in their own proper person with proper addresses, far below the number required under Illinois law, as is set forth by the objections recorded in the Appendix-Recapitulation attached hereto and incorporated herein.
9. The Appendix-Recapitulation is incorporated herein and the objections made therein are made a part of this Objector's Petition.
10. Pursuant to the Illinois Election Code, the statement of candidacy for a candidate for the office of 1<sup>st</sup> Ward Alderman must specifically identify that the candidate is a resident of the 1<sup>st</sup> Ward the district in which the candidate is running. Here, the Statement of Candidacy does not specifically identify that the candidate is a resident of the 1<sup>st</sup> Ward but states only an address "in the City of Chicago". The Statement of Candidacy is legally and factually deficient and invalidates this candidacy.

**WHEREFORE**, your objector prays that the nomination papers of Daniel La Spata as a candidate for election to the office of Alderman of the 1st Ward of the City of Chicago, Cook County, State of Illinois, to be voted for at the February 26, 2019 Municipal General Election be declared to be insufficient and not in compliance with the laws of the State of Illinois, and that this name be stricken and that this Board enter its decision declaring that the name of Daniel La Spata as a candidate for election to the office of Alderman of the 1st Ward of the City of Chicago, Cook County, State of Illinois to be voted for at the February 26, 2019 Municipal General Election be not printed upon the official ballot for the Municipal General Election to be conducted February 26, 2019.

  
Objector

James P. Nally, P.C.  
8 South Michigan Avenue  
Suite 3500  
Chicago, IL 60603  
312/422-5560

Candidate	Office / Jurisdiction	Sheet Number
Daniel LaSpata	Alderman - 1 <sup>st</sup> Ward - Chicago	1

An "x" indicates that the signature on the designated sheet and line is objected to for the reasons set forth above the column in which the "x" appears, in accordance with the Objector's Petition, of which this Appendix-Recapitulation is made a part.

Objection	a. Signer's signature not genuine	b. Signer not registered at address shown	c. Signer resides outside District	d. Signer's address missing or incomplete	e. Signer signed Petition more than once at Sheet/Line indicated	f. Signer's signature printed not written Not genuine	g. Other
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1	X		X				
2							
3	X	X					
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8	X						
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An "x" to the left of an objection below indicates that each and every signature on the designated sheet is objected to for reasons stated by the objection, in accordance with the Objector's Petition, of which this Appendix-Recapitulation is made a part.

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| <input type="checkbox"/> Circulator is under 18 years old                       | <input checked="" type="checkbox"/> Other: <u>Did not circulate city</u> |
| <input type="checkbox"/> Circulator Did Not Sign Petition Sheet                 | <input type="checkbox"/> Purported Circulator did not circulate sheet    |
| <input type="checkbox"/> Circulator Does Not Reside at Address Shown            | <input type="checkbox"/> Circulator Did Not Appear Before Notary         |
| <input type="checkbox"/> Circulator Is Not U.S. Citizen                         | <input type="checkbox"/> Sheet not notarized                             |
| <input type="checkbox"/> Circulator's Signature Not Genuine                     | <input type="checkbox"/> Dates of Circulation Not Given                  |
| <input type="checkbox"/> Circulator's Address is Incomplete                     | <input type="checkbox"/> Dated of Circulation Incomplete                 |
| <input type="checkbox"/> Circulator Circulated for a Candidate of Another Party | <input type="checkbox"/> Purported Notary Did Not Notarize Sheet         |
| <input type="checkbox"/> Circulator's affidavit Not Properly Notarized          |  |

Allison Carver no