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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 16th WARD, CITY OF CHICAGO, ILLINOIS, TO BE VOTED UPON AT THE FEBRUARY 26, 2019 MUNICIPAL GENERAL ELECTION

Linda Stamps

Petitioner-Objector

19-EB-ALD-090

v.

Toni L. Foulkes

Respondent-Candidate

OBJECTOR'S PETITION

BOARD OF ELECTIONS
COMMISSIONERS
2019 DEC - 3 P

The objector, Linda Stamps states that she resides at 5307 South Hermitage Ave, Chicago, IL 60609, , and further state that she is a duly qualified and registered legal voter of the 16th 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 16th 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 Toni Foulkes a candidate for election to the office of Alderman of the 16th 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 16th 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 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,

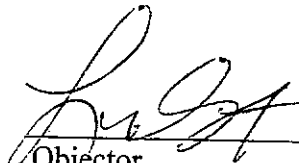
under the heading, Column A "Signer Not Validly Registered At Address Shown on Petition", in violation of the Illinois Election Code.

3. The Nomination Papers contain the names of persons who did not sign said papers in 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 B, "Signature not genuine signature of registered voter", 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 16th 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 jurisdiction", in violation of the Illinois Election Code.
5. 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 D, "Signer signed multiple times: Page #Line #", in violation of the Illinois Election Code.
6. The Nomination Papers contain signatures of persons who signed a petition of another candidate for the same office prior to signing the petition of this candidate, and only the first signature by law is valid as a set forth specifically in the Appendix - Recapitulation attached hereto and incorporated herein under the heading Column E "signed another Petition first" and the signature is invalid.
7. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 16th 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.
8. The Appendix-Recapitulation is incorporated herein and the objections made therein are made a part of this Objectors' Petition.

9. 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 B of the Appendix-Recapitulation. Also included are all petition sheets where the heading "Circulator Affidavit Invalid" "Circulator did not reside at address shown on circulator's affidavit at time of affidavit", "Circulator did not sign affidavit in notary's presence", "purported circulator did not circulate" and "Signers did not sign it circulators presence" are marked on the attached Appendix Recapitulation. Additional actions of circulators 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. These actions also include, without limitation, persons signing petitions as duly qualified voters multiple times.

10. Pursuant to Illinois law, candidates must be residents of the 16th Ward in order to seek the office of Alderman of the 16th Ward. The Statement of Candidacy filed by this candidate is deficient in that it only reflects a statement under oath by the candidate that the Candidate resides in "Chicago" but nowhere on the statement of candidacy, either in the heading or the text is it identified that the Candidate is a resident of the 16th Ward of the City of Chicago. This deficiency invalidates all the nomination papers.

WHEREFORE, your objector prays that the nomination papers of Toni L. Foulkes as a candidate for election to the office of Alderman of the 16th 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 Toni L. Foulkes as a candidate for election to the office of Alderman of the 16th 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

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