

**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 46th  
WARD, CITY OF CHICAGO, ILLINOIS, TO BE VOTED UPON AT THE FEBRUARY  
26, 2019 MUNICIPAL GENERAL ELECTION**

**Clarence S. Deisch,**

Petitioner-Objector

**19-EB-ALD-096**

v.

**Jon -Robert McDowell,**

Respondent-Candidate

**OBJECTORS' PETITION**

The objector, Clarence S. Deisch states that he resides at 834 West Sunnyside Ave. Chicago, IL 60640 and further state that he is a duly qualified and registered legal voter of the 46<sup>th</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 46<sup>th</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, they makes the following objections to the Nomination Papers of Jon-Robert McDowell as a candidate for election to the office of Alderman of the 46<sup>th</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 46<sup>th</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 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.

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 46<sup>th</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 the names of persons who signed the nomination petition of another candidate for the same office prior to signing the nomination petition for this candidate as set forth in the Supplemental Appendix – Recapitulation attached hereto indicating the name and address of the voter, and the name of the candidate petition signed prior to this candidate's petition, along with the sheet and line number of the first signed candidate's petition and the sheet and line number for this candidate's petition. Pursuant to section 10 – 4 of the Illinois Election Code only the first signed signature is

valid, and the signature of the voter contained on this candidate's petition is invalid and must be stricken as it is in violation of the Illinois Election Code.

8. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 46<sup>th</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 Objectors' Petition.

**WHEREFORE**, your objector prays that the nomination papers of Jon-Robert McDowell as a candidate for election to the office of Alderman of the 46th 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 Jon-Robert McDowell as a candidate for election to the office of Alderman of the 46th 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.

A handwritten signature in cursive script, appearing to read "Clarence J. Smith", written over a horizontal line.

Objector

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