

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 4TH WARD OF THE CITY OF CHICAGO, COUNTY OF COOK, STATE OF ILLINOIS TO BE VOTED UPON AT THE FEBRUARY 26, 2019 MUNICIPAL GENERAL ELECTION

MILDRED HARE,)
)
 Petitioner-Objector,)
)
 vs.)
)
 EBONY D. LUCAS,)
)
 Respondent-Candidate)

No. **19-EB-ALD-120**

VERIFIED OBJECTOR'S PETITION

Mildred Hare, hereinafter sometimes referred to as the "Objector", states as follows

1. Objector Mildred Hare resides at 4701 S. Woodlawn, Chicago IL 60615, and is a duly qualified, legal and registered voter at that address in the 4th 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 desirous that the laws governing the filing of nomination papers for the office of Alderman of the 4th 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 - 6 of this Petition, to the purported nomination papers (herein referred to as the "Nomination Papers") of Ebony D. Lucas, (hereinafter referred to as "Respondent-Candidate") as a candidate for election to the office of Alderman of the 4th 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

BOARD OF ELECTION COMMISSIONERS
CITY OF CHICAGO
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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 4th 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 4th 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.

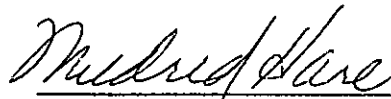
5. The Respondent-Candidate filed a Statement of Economic Interests with the Cook County Clerk which did not state the office which she was seeking, and instead listed an office address, violating the requirement that such Statement must be filed "in relation to [her] candidacy", as required by Section 4A-101 of the Illinois Governmental Ethics Act, 5 ILCS 420/4A-101, and Section 10-5 of the Illinois Election Code, 10 ILCS 5/10-5, and accordingly, the Nomination Papers are invalid in their entirety. *Jones v. Municipal Officers Electoral Board*, 112 Ill.App.3d 926, 446 N.E.2d 256 (1st Dist. 1983).

6. The Respondent-Candidate filed a Receipt with her Nomination Papers which did not state the office which she was seeking, violating the requirement that such Statement must be filed "in relation to [her] candidacy", as required by Section 10-5 of the Illinois Election Code, 10 ILCS 5/10-5, and accordingly, the Nomination Papers are invalid in their entirety. *Jones v. Municipal Officers Electoral Board*, 112 Ill.App.3d 926, 446 N.E.2d 256 (1st Dist. 1983). A copy of the Receipt is attached hereto and incorporated herein as Exhibit A.

7. 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 Ebony D. Lucas shall not appear and be not printed on the ballot for election to the office of Alderman of the 4th 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

Michael C. Dorf
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Attorney for Objector
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(773) 218-7260 - mobile
mdorf@michaeldorfllaw.com

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.

Mildred Hare
OBJECTOR

Subscribed and sworn to before me, a Notary Public, by Mildred Hare on
December 3, 2018.

Dianne L. Thompson
NOTARY PUBLIC

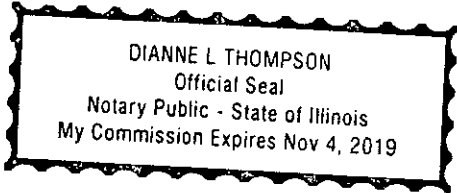


EXHIBIT A



STATEMENT OF ECONOMIC INTERESTS
TO BE FILED WITH THE COOK COUNTY CLERK

COOK COUNTY CLERK - For official use
RECEIVED
ELECTION DEPARTMENT
2018 NOV 16 PM 4 18
OFFICE OF COUNTY CLERK

FOR CANDIDATES ONLY
(type or hand print)

NAME: Ebony Lucas

FULL MAILING ADDRESS: 4138 S. Ellis Ave. Chicago, IL 60653 **BOARD OF ELECTION COMMISSIONERS FOR THE CITY OF CHICAGO**

NOV 19 2018

OFFICE: 541 E. Pershing St., Ste. E, Chicago, IL 60653 **9:00 A.M. PETITION FILING**

GENERAL DIRECTIONS

The interest (if constructively controlled by the person making the statement) of a spouse or any other party, shall be considered to be the same as the interest of the person making the statement. Campaign receipts shall not be included in this statement. If additional space is needed, please attach supplemental listing. (Use blue or black ink only.)

1. List the name and instrument of ownership in any entity doing business with a unit of local government in relation to which the person is required to file, in which the ownership interest held by the person at the date of filing is in excess of \$5,000 fair market value or from which dividends in excess of \$1,200 were received during the preceding calendar year. (In the case of real estate, location thereof shall be listed by street address, or if none, then by legal description.) No time or demand deposit in a financial institution, nor any debt instrument shall be listed.

BUSINESS ENTITY	INSTRUMENT OF OWNERSHIP	POSITION OF MANAGEMENT
None. N/A		

2. List the name, address and type of practice of any professional organization in which the person making the statement was an officer, director, associate, partner or proprietor or served in any advisory capacity, from which income in excess of \$1,200 was derived during the preceding calendar year.

NAME	ADDRESS	TYPE OF PRACTICE
None. N/A		

3. List the nature of professional services rendered (other than to the unit or units of local government in relation to which the person is required file) and the nature of the entity to which they were rendered if fees exceeding \$5,000 were received during the preceding calendar year from the entity for professional services rendered by the person making the statement. ("Professional services" means services rendered in the practice of law, accounting, engineering, medicine, architecture, dentistry, or clinical psychology.)

Practice of law.

4. List the identity (including the address or legal description of real estate) of any capital asset from which a gain of \$5,000 or more was realized during the preceding calendar year.

6620 S. Kenwood Unit 4S, 4518 S. Indiana, 4933 S. Prairie, 1040 E. 47th St., Unit 2N, 4244 S. Vincennes, Unit 1, 725-727 E
50th St Units 1E, 1W, 2E, 2W, 4532 S. Indiana Unit 2N, 5837 S Calumet Unit 1S, 5739 S Calumet 3N, 5741 S Calumet, Unit 1S
542 E. 48th St. Units 2E, 3E, 540 E. 48th St., Unit 2W

5. List the name of any entity and the nature of the governmental action requested by any entity which has applied to a unit of local government in relation to which the person must file for any license, franchise or permit for annexation, zoning or rezoning of real estate during the preceding calendar year if the ownership interest of the person filing is in excess of \$5,000 fair market value at the time of filing or if income or dividends in excess of \$1,200 were received by the person filing from the entity during the preceding calendar year.

Air BNB license- Overflow Properties, LLC

6. List the name of any entity doing business with a unit of local government in relation to which the person is required to file from which income in excess of \$1,200 was derived during the preceding calendar year other than for professional services and the title or description of any position held in that entity. No time or demand deposit in a financial institution nor any debt instrument need be listed.

None.

7. List the name of any unit of government which employed the person making the statement during the preceding calendar year other than the unit or units of government in relation to which the person is required to file.

None.

8. List the name of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500, was received during the preceding calendar year.

None.

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FOR THE CITY OF CHICAGO**

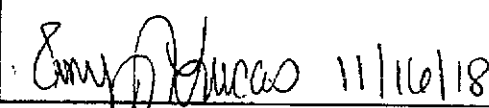
VERIFICATION

NOV 19 2018

"I declare that this statement of economic interests (including any accompanying schedules and attachments) has been examined by me and to the best of my knowledge and belief is a true, correct and complete statement of my economic interests as required by the Illinois Governmental Ethics Act. I understand that the penalty for willfully filing a false or incomplete statement shall be a fine not to exceed \$1,000 or imprisonment in a penal institution other than the penitentiary not to exceed one year, or both fine and imprisonment."

9:00 A.M. PETITION FILING

Sign Here:

 11/16/18

(SIGNATURE OF PERSON MAKING THE STATEMENT BLUE OR BLACK INK ONLY) (DATE)

**LAST PAGE OF THE
DOCUMENT FILED.**

September 1, 2015


BEC