

BEFORE THE DULY CONSTITUTED CHICAGO ELECTORAL BOARD

JESSICA A. TERRY, and	)	
KELLE MARTIN	)	
	)	
Petitioners – Objectors,	)	<b>19-EB-ALD-123</b>
v.	)	No. _____
	)	
JENNIFER O. MADDOX,	)	
	)	
Respondent – Candidate.	)	

**OBJECTORS' PETITION**

Objector, JESSICA A. TERRY and KELLE MARTIN, referred to as “Objector” file this Objector’s Petition challenging the legal and factual sufficiency and petition signers contained within the Nomination Papers submitted by JENNIFER O. MADDOX, as follows.

1. Objector, JESSICA A. TERRY, resides 6738 S. Champlain Ave. in Chicago, IL 60637, and is a duly qualified, legal and registered voter at this same address in the 20th Ward of Chicago, Illinois. Objector, KELLE MARTIN, resides 6728 S. Champlain Ave. in Chicago, IL 60637, and is a duly qualified, legal and registered voter at this same address in the 20th Ward of Chicago, Illinois.

2. The Objector’s interest in filing this objection is that of citizen and voter desirous of seeing to it that the election laws of Illinois governing the filing of nomination papers for the office of Alderman in Chicago are properly complied with, and that only duly qualified candidates appear on the ballot for this office at the municipal election to be held on February 26, 2019.

3. The Objector makes the following objections to purported nomination paper (“Nomination Papers”) of Candidate to be voted for at the municipal primary election to be held on February 26, 2019 (“Election”). The Objector states that the Nomination Papers are insufficient in the fact and law for the reasons stated herein and on the attached Appendix-Recapitulation.

4. Pursuant to Illinois law, nomination papers for the office of Alderman must contain the signatures and addresses at least 473 duly qualified, registered and legal voters of the ward in Chicago, Illinois collected in the manner prescribed by law. In addition, nomination papers must truthfully allege

the qualifications of the candidate and be gathered and presented in the manner provided for in the Illinois Election Code.

5. The Nomination Papers contain petition sheets with the names of persons who are not registered voters, or who are not registered voters at the addresses shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column A. "A. Signer is not registered at address shown" in violation of the Illinois Election Code.

6. The Nomination Papers contain petition sheets with the signatures and names of persons who did not personally sign the Nomination Papers in their own proper person, and that such signatures are not genuine signatures, but are forgeries, as is set forth specifically in the Appendix-Recapitulation attached and incorporated herein under the heading, Column B. "Signer's signature is 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 who are not registered voters in the appropriate 20<sup>th</sup> Ward in Chicago, Illinois, as is set forth specifically in the Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column C. "Signer resides outside of district," where the term district refers to the 20<sup>th</sup> Ward of Chicago IL, in violation of the Illinois Election Code.

8. The Nomination Papers contain petitions sheets with the names of persons who have not properly written their voter address, or who have omitted their voter address, as is set forth specifically in the Appendix-Recapitulation attached 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 petitions sheets with the signatures, names and addresses of persons who have signed the same petition more than one time, as more fully set forth in the Appendix-Recapitulation attached and incorporated herein, under the heading Column E. "Signed Petition more than once at Sheet/Line indicated" in violation of the Illinois Election Code.

10. The Nomination Papers are insufficient because they contain fewer than the requisite number of validly collected signatures of duly qualified and registered legal voters of the Chicago, Illinois, signed by such voters in their own proper person with proper addresses, as is set forth by the objections recorded in the Appendix-Recapitulation attached hereto and incorporated herein.

13. The attached Appendix Recapitulation is incorporated herein, and the objections made therein are a part of this Objector's Petition, as if fully stated herein.

14. As such, the combined effect of the errors and deficiencies in Candidate's Nomination Papers renders them legally and factually insufficient, in their entirety, and Candidate has failed to comply with the requirements of the Election Code, and his name should not be printed upon the ballot for the municipal election to be held on February 26, 2019.

WHEREFORE, the Objectors request the following: (a) a hearing on the objections set forth herein; (b) an examination by the Chicago Board of Election Commissioners of the official records relating to voters in the Chicago, IL; (c) a determination that the Nomination Papers are legally and factually insufficient; (d) a decision that the name **Jennifer O. Maddox** shall not be printed upon the official ballot for the office of Alderman, to be voted upon at the municipal election to be held on February 26, 2019.

Respectfully submitted by:

JESSICA A. TERRY 6738 S. Champlain Ave. Chicago, IL 60637  
KELLE MARTIN 6728 S. Champlain Ave. Chicago, IL 60637

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

By: Jessica A. Terry  
Signature

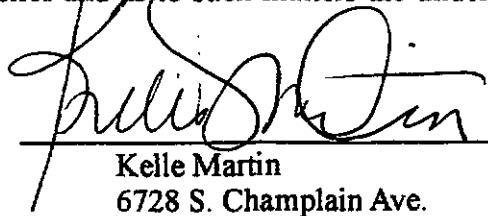
Printed name: Jessica A. Terry

Voter address: 6738 S. Champlain Ave

Chic. IL 60637

## VERIFICATION

The undersigned, Objector, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certifies that the Candidate's nomination papers were reviewed and compared against the voter registration records kept by the Chicago Board of Election Commissioners, and the factual objections alleged in the Objectors' Petition are made in good faith based upon such review, and the factual statements in the Objectors' Petition are true and correct to the best of the undersigned's knowledge and belief, except as to matters therein stated to be on information and belief and as to such matters the undersigned believes the same to be true and correct.



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Kelle Martin  
6728 S. Champlain Ave.  
Chicago, IL 60637