

COPY

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF NOMINATION
OBJECTIONS TO NOMINATION PAPERS OF CANDIDATES FOR
ELECTION TO THE OFFICE OF ALDERMAN OF THE SEVENTH WARD
OF CITY OF THE CHICAGO OF THE STATE OF ILLINOIS**

**IN THE MATTER OF THE OBJECTIONS)
OF NATHANIEL MOORE TO THE)
NOMINATION PAPERS OF JEDIDIAH L.)
BROWN OF 9716 S. CHAPPEL AVENUE,)
CHICAGO, ILLINOIS, 60617, AS A)
CANDIDATE FOR ELECTION TO THE)
OFFICE OF ALDERMAN OF THE SEVENTH)
WARD OF THE CITY OF CHICAGO OF THE)
STATE OF ILLINOIS TO BE VOTED)
ON AT THE FEBRUARY 26, 2019,)
MUNICIPAL GENERAL ELECTION.)**

19-EB-ALD-127

BOARD OF ELECTIONS
CITY OF CHICAGO

VERIFIED OBJECTOR'S PETITION

INTRODUCTION

Nathaniel Moore, hereinafter sometimes referred to as the Objector, states as follows

1. The Objector resides at 9042 S. Crandon Avenue, Chicago, Illinois 60617, in the 7th ward of the city of Chicago, county of Cook, of the State of Illinois and is a duly qualified, legal and registered voter at that address.
2. The Objector's interest in filing this petition is that of a voter desirous that the laws governing the filing of nomination papers for the office of Alderman for the 7th ward in the city of Chicago, Cook County, Illinois are properly complied with, and that only qualified candidates appear on the ballot for said office.

OBJECTIONS

3. The Objector makes the following objections to the purported nomination papers ("Nomination Papers") of Jedidiah L. Brown as a candidate for the office of Alderman of the 7th ward in the city of Chicago, county of Cook, state of Illinois ("Office") to be voted for at the Municipal General Election on February 26, 2019. ("Election"). The Objector states that the Nomination Papers are insufficient in fact and law for the following reasons:
4. Pursuant to State law, nomination papers for the Office to be voted for at the Election must contain the signatures of not fewer than 473 duly qualified, registered and legal voters of the 7th ward of the city of Chicago, county of Cook, state of Illinois collected in the manner prescribed by law. In addition, 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.

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 address specified in the petition, 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.

6. The Nomination Papers contain petition sheets with the names of persons who did not sign the papers in their own proper persons, and such signatures are not genuine and are forgeries, 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.

7. The Nomination Papers contain petition sheets with the names of persons for whom the addresses stated are not in the 7th ward in the city of Chicago, county of Cook, state of Illinois, and persons are not registered voters in the 7th ward in the city of Chicago, county of Cook, state of Illinois, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column C, "Signer Resides Outside District", in violation of the Illinois Election Code.

8. Your Objector further states that the nomination papers contain the names of numerous persons whose addresses are missing or incomplete and their signatures are therefore invalid, as more fully set forth in the Appendix-Recapitulation under the column designated "SIGNER'S ADDRESS MISSING OR INCOMPLETE (D)," attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.

9. The Nomination Papers contain petition sheets with the names of persons who have signed the Nomination Papers more than one time, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, Column E, "Signer Signed Petition More Than Once", in violation of the Illinois Election Code.

10. The Nomination Papers contain less than 473 validly collected signatures of qualified and duly registered legal voters of the 7th ward of the city of Chicago, county of Cook, state of Illinois, signed by such voters in their own proper person with proper addresses, below the number required under Illinois law, as is set forth by the objections recorded in the Appendix Recapitulation attached hereto and incorporated herein.

11. The Objector will establish a clear pattern of fraud and false swearing and a total disregard of the requirements of the Election Code, the Objector investigation continues.

12. There is evidence the circulators did not appear before a notary public. The notary, Brenda Watkins, notarized Sheets 96, 97, and 101 and the circulator affidavits are blank. All the sheets notarized by Brenda Watkins are invalid. SEE ATTACHED SHEETS AS

EXHIBIT A.

13. That raises the question of whether any of the circulators appeared before notaries in violation of the Illinois Election Code, Teyonda Wertz Seay, Angela Velasco, Rhonda Shelby, Dana Boggus Mack, Kesha Stewart, and Shemeka, Horst, disqualifying any petition sheets that they notarized. Objector's investigation continues.

14. There is evidence that the Candidate himself pattern of fraud and false swearing and a total disregard of the requirements of the Election Code. On October 19, 2018, said Candidate posted on his facebook page the with a picture that some persons came from Ohio and Texas to campaign, tagged were Tika Lawson, Valencia Givens-Harris and Adelia Lyn Vazquetelles-Ramirez. In the photo everyone is holding a clipboard with a petition sheet attached, however none of the Candidate's petition sheets contain circulators with an address outside of Chicago. SEE ATTACHED COPY OF FACEBOOK POST AS EXHIBIT B.

15. The Candidate identifies himself as a national advocate for a group called The Justice and has often claimed on Facebook Live or posted that he has been too busy to go out and campaign yet he signed as circulator for most of the petitions that were filed. Clearly, the Candidate signed as circulator for petition sheets he did not in fact circulate. Our investigation continues.

16. Candidate admitted in testimony that several people circulated his nominating petitions but that he signed each petition sheet as the circulator. When testimony clearly discloses a pattern of fraud, false swearing and a total disregard for the mandatory requirements of the Election Code, then it is proper to invalidate the entire sheet. Williams v. Partlow, 99-EB-Ald-032 (Chicago Electoral Board 1999), citing Fortas v. Dixon, 122 Ill.App.3d 697, 462 N.E.2d 615 (1984).

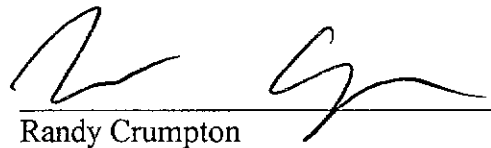
17. All sheets circulated by the Candidate must declared invalid.

18. Upon information and belief the Candidate does not live at the Address claimed and thus his nomination papers are invalid as a matter of law, in violation of the Illinois Election Code. Objector's investigation continues.

19. The Nomination Papers are invalid because, even if the Candidate lives at the addressed claimed according to registration records he has lived there less than year prior to the time he would take office and is therefore disqualified, in violation of the Illinois Election Code. Objector's investigation continues. SEE VOTER REGISTRATION RECORD ATTACHED AS EXHIBIT C.

Wherefore, the Objector requests:

- a) a hearing on the objection set forth herein;
- b) an examination be the aforesaid Electoral Board of the official records relating to voters in the 7th ward of the city of Chicago, county of Cook, state of Illinois, to the extent that such examination is pertinent to any matters alleged herein;
- c) a ruling that the Nomination Papers are insufficient in and law and fact, and
- d) a ruling that the name of Jedidiah L. Brown shall not appear and not be printed on the ballot for election to the office of Alderman for the 7th ward in the city of Chicago, county of Cook, state of Illinois ("Office") to be voted for at the Municipal General Election on February 26, 2019.



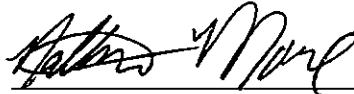
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STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

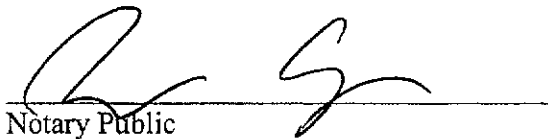
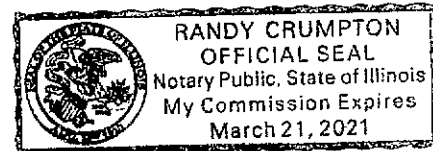
VERIFICATION

I, Nathaniel Moore, first being duly sworn on oath, now deposes and says that she has read this Verified Objector's Petition and that the statements therein 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 she verily believes the same to be true and correct.



Nathaniel Moore

Subscribed to and Sworn before me, a Notary Public, by Nathaniel Moore, the Objector, on this the 2nd day of December, 2018, at Chicago, Illinois.


Notary Public

My Commission expires: March 21, 2021.

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