

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE
HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION
PAPERS FOR CANDIDATES FOR THE OFFICE OF ALDERMAN OF THE
24TH WARD IN THE CITY OF CHICAGO, COUNTY OF COOK, STATE OF
ILLINOIS, TO BE VOTED UPON AT THE FEBRUARY 26, 2019
MUNICIPAL GENERAL ELECTION**

Toriano Sanzone)
Petitioner-Objector,)
)
V.) Case No. **19-EB-ALD-130**
)
)
Michael Scott)
Respondent-Candidate)

VERIFIED OBJECTOR'S PETITION

INTRODUCTION

Comes now Toriano Sanzone, hereinafter referred to as the "Objector," who respectfully represents that Objector resides at 1439 South Komensky Avenue, Chicago, Illinois 60623; that Objector is a duly qualified, registered, and legal voter at such address; that address is in the 24th Ward of the City of Chicago; that Objector's interest in filing the following objections is that of a citizen desirous of seeing to it that the laws governing the filling of nomination papers for nomination to the office of 24th Ward Alderman in the City of Chicago, Illinois are properly complied with and that only qualified candidates have their names appear on the ballot as candidates for the said office; and therefore Objector makes the following objections to the nomination papers of Michael Scott, 1632 South Albany, Chicago, Illinois, 60623 as a candidate for election to the office of 24th Ward Alderman in the City of Chicago, County of Cook, State of Illinois to be voted on at the February 26, 2019 Municipal General Election, and files the same herewith, and states that the said nomination papers are insufficient in law and in fact for the following reasons:

1. Objector states that, pursuant to the Illinois Election Code in the City of Chicago, Illinois the signatures of not less than 473 duly qualified, registered, and legal voters of the said City of Chicago, Illinois are required for the February 26, 2019 Consolidated Election for the office of Alderman for the 24th Ward of the City of Chicago. 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, be properly notarized, and otherwise be executed in the form and manner required by law.

2. Objector states that the Candidate has filed 184 petition signature sheets which allegedly include 473 signatures of duly qualified, legal, and registered voters of the 24th Ward of the City of Chicago, Illinois.
3. Objector further states that the aforesaid nomination papers contain the names of numerous persons who did not sign the said nomination papers in their own proper persons, and that the said signatures are not genuine, and their signatures are therefore invalid, as more fully set forth in the Appendix-Recapitulation under the column designated "A) Signer not a proper person or signature is not genuine", attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
4. Objector further states that the said nomination papers contain the names of numerous persons who are not in fact duly qualified, registered, and legal voters at the addresses shown opposite their names and their signatures are therefore invalid, as more fully set forth in the Appendix-Recapitulation under the column designated "B) Signer not registered at the address shown", attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
5. Objector further states that the said nomination papers contain the names of numerous persons who purportedly signed said petition but who are not, in fact, duly qualified, registered, and legal voters at addresses that are located within the boundaries of the 24th Ward of the City of Chicago, Illinois as shown by the addresses they have given on the petition, as more fully set forth in the Appendix-Recapitulation under the column designated "C) Signer does not reside in the district", attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
6. Objector further states that said nominating papers contain the purported signatures of various individuals who did not provide a valid address located within the boundaries of the 24th Ward of the City of Chicago, Illinois, as more fully set forth in the Appendix-Recapitulation under the column designated "D) Signer's address is missing or incomplete", attached hereto and made a part hereof, all of said

signatures being in violation of the statutes in such cases made and provided.

7. Objector further states that said nominating papers contain the signatures of various individuals who have signed the petition more than once, and such duplicate signatures are invalid, as more fully set forth in the Appendix-Recapitulation, under the column designated "E) Signer signed more than once at sheet number and line indicated", with a further notation therein of the sheet and line numbers of the alleged duplicate signature(s) attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
8. Objector states that various purported signatures are legally defective and deficient for a variety of reasons, as more fully set forth in the Appendix-Recapitulation, under the column designated "F) Other" (together with an appropriate further reason) attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided. These objections include, but are not limited to improper, partial, incomplete, or no address; names stricken or crossed out from the sheets; use of only a partial name; and improper use of name; or individual signature lines being left unfilled or blank or containing a name that has been crossed off, eradicated, stricken, or removed, all of said signatures being in violation of the statutes in such cases made and provided.
9. Objector states that various sheets purportedly signed by circulators are legally defective and deficient for a variety of reasons, as more fully set forth in the Appendix-Recapitulation, under Section "G) Circulator Objections", with an "X" next to all objections that apply, attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
10. Objector states that petition signature sheets no. 7, 8, 23, 24, 53, 54, 55, 58, 59, 63, 64, 65, 68, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 114, 115, 116, 119, 141, 142, 143, 145, 146, 147, 158, 159, 160, 161, 162, 163, 164, 165, 166, and 167 which purportedly contain valid signatures are defective and void in their entirety and all signatures thereon are invalid because those sheets have not been personally or originally signed by the Notary Public, the absence of such original signature being a fatal defect, as more fully set forth in the Appendix-Recapitulation of each of the sheets identified above, under the column designated "G) Circulator's

affidavit not properly notarized", attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.

11. Objector states that petition signature sheet no. 66, which purportedly contains valid signatures is defective and void in its entirety and all signatures thereon are invalid because the sheet has not been personally or originally signed by the Notary Public, the absence of such original signature being a fatal defect, as more fully set forth in the Appendix-Recapitulation under the column designated "G) Circulator's affidavit not properly notarized", attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
12. Objector states that the nomination papers herein contested consist of various sheets supposedly including the valid and legal signatures of 473 registered voters of the 24th Ward of the City of Chicago. The individual objections cited herein with specificity reduce the number of valid signatures to a total which is below the statutory minimum of 473.
13. Objector further states that Candidate's Petition Signatures should be invalidated since the Candidate filed an original set of Nomination Papers on November 19, 2018 at 9:00 AM including a Statement of Candidacy, Receipt for Statement of Economic Interest properly filed with the Cook County Clerk, and 184 Petition Sheets. Subsequent to that initial proper filing, at 10:02 AM on November 19, 2019, Candidate, by his Attorney Michael Kasper, filed Nomination Papers that did not include a Statement of Candidacy, or any Petition Signature Pages. The subsequent filing invalidated the initial filing which included 184 Petition Sheets containing purported Signatures in excess of 473 signatures. As a result of that subsequent filing the 184 pages of signatures are in violation of the statutes and Objector's Petition renders the entire nomination petition null and void.

WHEREFORE, Objector requests a hearing on the objections set forth herein, and a full and complete voter record check of all petition signature sheets as deemed necessary by this Honorable Electoral Board. Objector prays that the purported nomination papers of Michael Scott as a candidate for election to the office of 24th Ward Alderman in the City of Chicago, Illinois be declared by this Honorable Electoral Board to be insufficient and not in compliance with the laws of the State of Illinois and that the Candidate's name be stricken and that this Honorable Electoral Board enter its decision declaring

that the name of Michael Scott as a candidate for election to the office of 24th Ward Alderman in the City of Chicago, Illinois NOT BE PRINTED on the OFFICIAL BALLOT for the Consolidated Election to be held on February 26, 2019.

Toriano Sanzone

OBJECTOR

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

VERIFICATION

The undersigned as Objector, first being duly sworn on oath, now deposes and says that he 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 he verily believes the same to be true and correct.

Toriano Sanzone

OBJECTOR

1439 South Komensky Avenue, Chicago, IL 60623

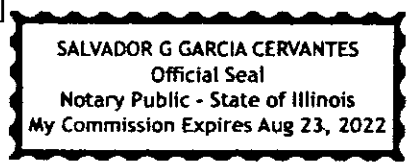
STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

Subscribed to and Sworn before me, a Notary Public, by Toriano Sanzone, the Objector, on this the 3rd day of December, 2018 at Chicago, Illinois.

SALVADOR GARCIA CERVANTES

NOTARY PUBLIC

[notary seal]



APPENDIX - RECAPITULATION

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