

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD

IN THE MATTER OF THE OBJECTIONS OF:)
)
 Peter Gariepy,)
)
 Petitioner-Objector,)
)
 v.)
)
 Richard Mayers,)
)
 Respondent-Candidate.)

19-EB-MUN-019

CASE NO. _____

OBJECTOR'S PETITION

NOW COMES, Peter Gariepy, (the "Objector"), and pursuant to §10-8 of the Illinois Election Code, 10 ILCS 5/1-1, et seq., states as follows:

The Objector, Peter Gariepy, states that he resides at 2634 W. Cortland Street in the City of Chicago, Zip Code 60647, and that he is a duly qualified, registered, and legal voter of the City of Chicago, County of Cook, State of Illinois, the political subdivision in which Respondent-Candidate, Richard Mayers (the "Candidate") is to be voted upon. Objector states that Objector's 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 City Treasurer of the City of Chicago in the County of Cook, State of Illinois, are properly complied with, and that only qualified candidates appear on the ballot for said office as a candidate at the February 26, 2019 Municipal General Election ("Election").

Therefore, the Objector makes the following objections, upon information and belief, to the Nomination Papers of Richard Mayers as a candidate for the office of Treasurer of the City of Chicago in the County of Cook, State of Illinois, to be voted upon at the February 26, 2019 Municipal General Election.

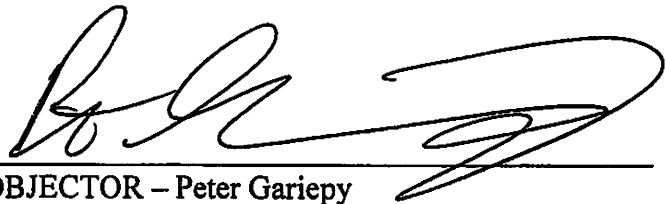
1. Nomination Papers must truthfully allege the qualifications of the candidate, must contain the statutorily required minimum amount of true and genuine signatures of duly qualified, registered, and legal voters in the political subdivision or district in which Candidate seeks nomination or election, must be gathered and presented in the manner provided for in the Illinois Election Code, and must be otherwise executed in the form provided by law.
2. The Candidate has filed Nomination Papers that purport to contain signatures of duly qualified, legal, and registered voters of the political subdivision or district in which the Candidate seeks elective office in excess of the statutory minimum and, further purport to have been gathered, presented and executed in the manner provided by the Illinois Election Code.

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3. The laws pertaining to the securing of ballot access require that certain requirements be met as established by law. Filings made contrary to such requirements must be voided and found invalid, being in violation of the statutes, and/or established case law, in such cases made and provided. Statute and established case law hold these provisions to be mandatory and strictly construed; failing to comply with even one of them will result in the petitions' invalidation.
4. As set forth herein, the Nomination Papers are insufficient in law and fact for the following reasons:
5. Pursuant to Illinois law, nomination papers for the office of City Treasurer for the City of Chicago must, *inter alia*, contain the genuine signatures of not fewer than 12,500 duly qualified, registered, and legal voters of the City of Chicago. The Nomination Papers submitted by the Candidate contain less than 12,500 validly collected signatures of qualified and duly registered voters of the City of Chicago, signed by such voters in their own proper person with proper addresses provided opposite their name. Because the Candidate submitted a total number of signatures below the minimum number required under Illinois law, the Candidate's petitions are invalid and void in their entirety.
6. The Nomination Papers submitted by the Candidate contain a "Statement of Candidacy" that wholly fails to comply with mandatory requirements of Section 10-5 of the Election Code in that, *inter alia*, it does not set out the address of the candidate and does not state that the Candidate has filed a Statement of Economic Interests as required by the Illinois Governmental Ethics Act. The failure to comply with the mandatory requirements of the Election Code render the Statement of Candidacy invalid and the entire Nomination Papers void as a matter of law.
7. The Nomination Papers do not contain a receipt from the filing of a Statement of Economic Interests and, therefore, the entire Nomination Papers are invalid and the candidacy is null and void as a matter of law.
8. Because of the above-listed irregularities and insufficiencies in the Candidate's Nomination Papers, said Nomination Papers are invalid in their entirety.

WHEREFORE, Objector prays that the nomination papers of Richard Mayers as a candidate for the office of City Treasurer of the City of Chicago, County of Cook, State of Illinois, to be voted upon at the February 26, 2019 General Municipal Election be declared to be insufficient and not in compliance with the laws of the State of Illinois, and that the Candidate's name be stricken and **NOT** appear on the February 26, 2019 Municipal General Election ballot, and that this Honorable Electoral Board enter its decision declaring that the name of Richard Mayers as a candidate for the office of City Treasurer of the City of Chicago, County of Cook, State of Illinois, be **NOT** printed upon the official ballot for the Municipal General Election to be held on February 26, 2019.

Respectfully Submitted,



A handwritten signature in black ink, appearing to read 'Peter Gariepy', written over a horizontal line.

OBJECTOR – Peter Gariepy

Address: 2634 W. Cortland Street
Chicago, IL 60647

**LAST PAGE OF THE
DOCUMENT FILED.**



A handwritten signature in black ink, appearing to read 'Peter Gariepy', written over a horizontal line. Below the line is the word 'REC' in a bold, sans-serif font.