

 **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 CITY CLERK OF THE CITY OF CHICAGO, STATE OF ILLINOIS

Daniel David Gerhardt Rogers, )  
)  
Petitioner-Objector, )  
)  
v. )  
)  
Patricia Horton, )  
)  
Respondent-Candidate. )

**19-EB-MUN-020**

OBJECTOR'S PETITION

INTRODUCTION

Daniel David Gerhardt Rogers, hereinafter sometimes referred to as the Objector, states as follows:

1. The Objector resides at 1229 E. 53<sup>rd</sup> Street, Chicago, Illinois, Zip Code 60615, in the City of Chicago, 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 City Clerk of the City of Chicago, State of Illinois are properly complied with, and that only qualified candidates appear on the ballot for said office.

3. The Objector makes the following objections to the purported nomination papers ("Nomination Papers") of Patricia Horton as a candidate for the office of City Clerk of the City of Chicago, 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:

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BOARD OF ELECTIONS  
COMMISSIONER

OBJECTIONS

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 12,500 duly qualified, registered and legal voters of the City of Chicago, 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 12,500 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, "Signer's Signature Not Genuine," 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 City of Chicago, State of Illinois, and such persons are not registered voters in the City of Chicago, 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. The Nomination Papers contain petition sheets with the names of persons for whom the addresses given are either missing entirely or are incomplete, as is set forth specifically in the Appendix-Recapitulation attached hereto 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 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 at Sheet Indicated," in violation of the Illinois Election Code.

10. The Nomination Papers contain less than 12,500 validly collected signatures of qualified and duly registered legal voters of the City of Chicago, 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.

WHEREFORE, the Objector requests: a) a hearing on the objections set forth herein; b) an examination by the aforesaid Electoral Board of the official records relating to voters in the City of Chicago, State of Illinois, to the extent that such examination is pertinent to any of the matters alleged herein; c) a ruling that the Nomination Papers are insufficient in law and fact, and d) a ruling that the name of Patricia Horton shall not appear and not be printed on the ballot for election to the office of City Clerk of the City of Chicago, State of Illinois, to be voted for at the Municipal General Election to be held February 26, 2019.



OBJECTOR

Address:  
Daniel David Gerhardt Rogers  
1229 E. 53<sup>rd</sup> Street  
Chicago, IL 60615

VERIFICATION

STATE OF ILLINOIS

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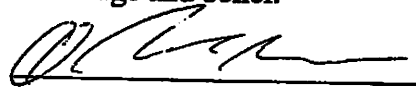
COUNTY OF COOK

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SS.

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I, Daniel David Gerhardt Rogers, being first duly sworn upon oath, depose and state that I have read the above and foregoing OBJECTOR'S PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.



Subscribed and sworn to before me  
by Daniel David Gerhardt Rogers  
this 3<sup>rd</sup> day of December, 2018.

