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**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OBJECTIONS
TO MUNICIPAL OFFICES IN THE CITY OF CHICAGO**

ZAC PLANTZ,)
)
Petitioner-Objector,)
)
v.)
)
WILLIAM M. DALEY,)
)
Respondent-Candidate.)

Case No.: **19-EB-MUN-025**

OBJECTOR'S PETITION

Zac Plantz, referred to herein as the "Objector", brings this Objector's Petition as a citizen desirous of seeing that the Election Code of Illinois as well as other election laws governing the filing of nomination papers for the office of Mayor of the City of Chicago, County of Cook, State of Illinois, ("Office") are properly complied with, and that only qualified candidates who meet all statutory and legal requirements appear on the applicable ballot as candidates for said office for the February 26, 2019 municipal general election. In support of this Objector's Petition, Objector states as follows:

2019 JAN 1
BOARD OF ELECTIONS

THE PARTIES

1. Zac Plantz, Objector, resides at 1870 N. Halsted Street, Apartment 1R, Chicago, Illinois-60614, and is a duly qualified and registered legal voter at that address.
2. William M. Daley ("Candidate") has filed nomination papers ("Nomination Papers") as a candidate for Mayor of the City of Chicago, County of Cook, State of Illinois, to be voted at the municipal general election to be held on February 26, 2019 ("Election").

NATURE OF OBJECTION

3. Pursuant to 10 ILCS 5/10-8, Objector makes the objections set forth herein to the nomination papers of Candidate as a candidate for the Office to be voted upon at the Election.
4. This duly constituted electoral board has jurisdiction over this Objector's Petition pursuant to the authority granted it under the Election Code of Illinois, including without limitation, 10 ILCS 5/10-9 and 10 ILCS 5/10-10.
5. Pursuant to state law, Nomination Papers for the election to the Office to be voted for at the Election, must contain the signatures of not fewer than the statutorily required minimum

number of duly qualified, registered and legal voters of the City of Chicago (12,500) collected in the manner prescribed by law. 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, and otherwise executed in the form provided by law. The Nomination Papers purport to contain signatures in excess statutory minimum of such voters, and further purport to have been gathered, presented and executed in the manner provided by the Illinois Election Code.

Petition Signature Based Objections

6. The Appendix-Recapitulation attached hereto and incorporated herein as "**Group Exhibit A**" is incorporated herein and the objections made therein are a part of this Objector's Petition and set forth the following objections to the Nomination Papers. An "X" or "√" placed on a line of the Appendix-Recapitulation indicates that an objection is made to the corresponding signature line of the referenced petition sheet for the reasons stated above, as well as the other specific allegations made in this Objector's Petition.

7. The Nomination Papers contain the names of persons who are not properly registered voters at the addresses shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation attached hereto and incorporated herein, under the heading, **Column a**, "Signer not validly registered at address shown", in violation of the Illinois Election Code.

8. The Nomination Papers contain the names of persons who did not sign said papers in their own proper persons, and said 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. These include signatures, such as printed signatures, where the signatures do not match the signature on the Voter Registration record.

9. The Nomination Papers contain petition sheets with the names of persons for whom addresses are stated which are not in the City of Chicago, County of Cook, State of Illinois and such signatures are not valid, 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.

10. The Nomination Papers contain the names of persons for whom the signer's address is missing or 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.





11. The Nomination Papers contain 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/Line indicated", in violation of the Illinois Election Code, thereby invalidating at least one of the duplicate signatures.

12. The Nomination Papers contain the signatures of various individuals who had previously signed a nominating petition of another candidate for the same office for the Election, thereby precluding them from petitioning for the Candidate's attempt to access the ballot at the Election for the office of Mayor of the City of Chicago, as more fully set forth in the Supplemental Appendix-Recapitulation, marked "Group Exhibit B," and attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided. From left to right on Group Exhibit B, the applicable voter is set forth in the first column, the second column sets forth the applicable voters address, and the third column identifies the applicable Chicago Mayoral candidate for which the voter has signed nominating petitions, the fourth and fifth column, respectively, identify the sheet and line number at which the voter signed the identified candidates nominating petitions, and the sixth column merely identifies the date on which the applicable petition of the identified candidates were notarized (such dates, which may be used as evidence, are not the alleged date on which the voter signed the respective petition sheets).

Circulator Based Objections

13. The Nomination Papers contain petition sheets circulated and/or notarized by individuals whose petition sheets demonstrate a pattern of fraud and disregard of the Election Code to such a degree that every signature on every petition sheet purportedly circulated by said individuals are invalid, and should be invalidated, in order to protect the integrity of the electoral process. Specifically, but without limitation, the disregard of the Election Code is evidenced by certain purported circulators' submission of petition sheets that contain signatures that were not placed on the petition sheet or sheets by the voters in their own proper person but were signed by other individual(s) and numerous signatures on said purported circulator's petition sheets appear to be not genuine, and such signatures appear to have been forged and written in the same hand and exhibit evidence of that one or a number of individuals simply printed voters' names or forged voters' signatures; that numerous petition sheets were submitted which contain the names of purported petition signers whose name appears on many of the petition sheets purportedly circulated by the same circulator and on the petition sheets of other circulators and, on information and belief, the excessively high number of duplicate names were intentionally added as a means to undermine the electoral process in violation of the Illinois Election Code; that numerous petition sheets were submitted where the petition signers did not sign in the presence of the purported circulator and the purported circulator was not the true circulator of the petition sheet; and numerous petition sheets were notarized for alleged circulators who did not personally appear before the notary and swear or affirm their oath, all in flagrant violation and disregard of the Election Code.

The following circulators, and all signatures and petition sheets submitted by them, are subject to the allegations of this paragraph 13, and all such signatures and petition sheets are hereby challenged for the reasons stated in this paragraph:

- i.) Johnnie Anderson
 - ii.) Jacqueline Dean
 - iii.) Tommy Richardson
 - iv.) 
 - v.) 
 - vi.) 
- 

Further, the specific nominating petitions subject to the allegations of this paragraph 13 are identified by circulator and page number in **Group Exhibit C**.

The foregoing petition sheets purportedly circulated by the above Circulators reveal a pervasive and systematic attempt to undermine the integrity of the electoral process, wherein the Circulators did not witness the purported signers subscribe their names and/or did not circulate their petition sheets; said purported signers not signing their names in the presence of the purported Circulator invalidates all signatures on each and every sheet of each Circulator listed above. Consequently, this Electoral Board should void the entire nomination papers or minimally the petition sheets circulated by the individuals identified in this paragraph as being illegal and void in their entirety.

14. The Nomination Papers contain petition sheets circulated by Johnnie Anderson wherein he states in the Circulator Affidavits that his address/residence is 163 Parkside Avenue, Chicago, Illinois. Said Circulator's Affidavits are false as his residence address is not the address set forth in the applicable Circulator's Affidavits. Accordingly, the residence address of Johnnie Anderson cannot be ascertained from any information on Candidate's Nomination Papers and the sheets circulated by Johnnie Anderson are invalid in their entirety.

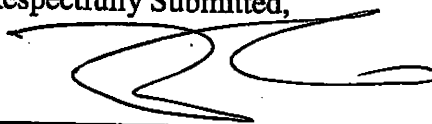
Conclusion

15. Each of the Group Exhibits are incorporated herein and the objections made therein are a part of this Objector's Petition.

16. The Nomination Papers contain less than the statutory minimum of validly collected signatures of qualified and duly registered legal voters 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 this Objection and the incorporated Group Exhibits attached hereto and incorporated herein.

WHEREFORE, Objector requests a hearing on the objections set forth herein, an examination by the aforesaid Electoral Board of the official records relating to voters in the applicable district, to the extent that such examination is pertinent to any of the matters alleged herein, a ruling that the Nomination Papers are insufficient in law and fact, and a ruling that the name of WILLIAM M. DALEY shall not appear and not be printed on the ballot for election to the office of MAYOR of the CITY of CHICAGO, County of Cook, State of Illinois, to be voted for at the Municipal General Election to be held February 26, 2019.

Respectfully Submitted,



Zac Plantz, Petitioner-Objector
1870 N. Halsted Street, Apartment 1R
Chicago, Illinois 60614

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OBJECTOR'S PETITION

GROUP EXHIBIT A

APPENDIX-RECAPITULATION