

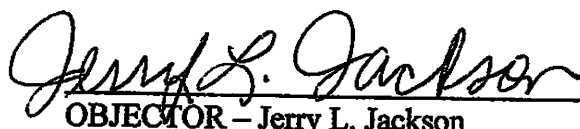


3. The laws pertaining to the securing of ballot access require that certain requirements be met as established by law. Filings made contrary to such requirements must be voided and found invalid, being in violation of the statutes, and/or established case law, in such cases made and provided. Statute 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. Candidate filed Nomination Papers that contain a Statement of Economic Interests form used by candidates who are required, pursuant to the Illinois Governmental Ethics Act, to file said Statement of Economic Interests with the Illinois Secretary of State. The Statement of Economic Interests form to be filed with the Illinois Secretary of State is different from the Statement of Economic Interests form required to be filed with county clerks. Candidates seeking election to the office of Mayor of the City of Chicago are required to file, with all required questions answered therein, the county clerk Statement of Economic Interests form with the office of the Cook County Clerk. Candidate's Nomination Papers fail to include a receipt for the filing of the proper Statement of Economic Interests with the County Clerk, as required by law. Further, on information and belief, Candidate failed to file the correct, county clerk form Statement of Economic Interests in relation to the candidacy with the County Clerk. Candidate's Nomination Papers therefore fail to comply with the mandatory requirements of the Election Code and are invalid in their entirety.
6. The Nomination Papers filed by Candidate were not all "neatly fastened together in book form, by placing the sheets in a pile and fastening them together at one edge in a secure and suitable manner," as required by law. Because the Candidate's Nomination Papers were not all securely fastened together as a single, bound volume, the Candidate's Nomination Papers are invalid and void as a matter of law.
7. The Nomination Papers filed by Candidate contain petition sheets with an insufficient number of *original*, genuine, valid signatures of registered voters in the City of Chicago, County of Cook, State of Illinois. Numerous petition sheets submitted by Candidate are not "original" signatures of the purported voters but are in fact photocopies. In numerous instances, the same, photocopied page appears multiple times. The photocopied signatures are invalid as a matter of law and, as such, the Candidate has not actually submitted the minimum number of original signatures on behalf of her candidacy. Further, the fraudulent conduct in submitting so many photocopied petition sheets demonstrates a pattern of intentional fraudulent conduct on behalf of the Candidate and the purported petition circulators to the extent that the entire nominating petition is rendered invalid and the candidacy void.

8. Because of the above-listed irregularities and insufficiencies in the Candidate's Nomination Papers, said Nomination Papers contain fewer than the minimum number of signatures of qualified voters required by the Illinois Election code and are invalid in their entirety.

**WHEREFORE**, Objector prays that the nomination papers of Catherine Brown D'Tycoon as a candidate for the office of Mayor 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 Catherine Brown D'Tycoon as a candidate for the office of Mayor 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,



OBJECTOR – Jerry L. Jackson

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