

ORIGINAL

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND
PASSING UPON NOMINATION OBJECTIONS TO THE NOMINATION PAPERS OF
CANDIDATES FOR THE OFFICE OF **ALDERPERSON OF THE 29TH WARD**, TO BE
VOTED UPON AT THE FEBRUARY 28, 2023, MUNICIPAL GENERAL ELECTION

JILL R. BUSH

Petitioner-Objector

v.

COREY DOOLEY,

Respondent-Candidate

Case No. **23-EB-ALD-067**

OBJECTOR'S PETITION

INTRODUCTION

JILL R. BUSH, hereinafter sometimes referred to as the Objectors, states as follows:

1. Objector Jill R. Bush resides at 118 South Waller Avenue, Chicago, Chicago, Cook County, Illinois, Zip Code 60644, in the 29th Ward of the City of Chicago, Cook County, 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 Alderperson of the 29th Ward of the City of Chicago (in the County of Cook and State of Illinois) are properly complied with and that only qualified candidates appear on the ballot for said office.
3. The Objector prays for and requests as relief: 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 29th Ward of the City of Chicago, 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 COREY DOOLEY shall NOT appear upon and shall NOT be printed on the ballot as a candidate for election to of the office of Alderperson of the 29th Ward of the City of Chicago, to be voted for at the MUNICIPAL GENERAL ELECTION to be held on the 28th day of February, 2023, stating:

BOARD OF ELECTIONS COMM
DEC 5 '22 PM 3:55

OBJECTIONS

3. The Objector makes the following objections to the purported nomination papers ("Nomination Papers") of Corey Dooley ("Candidate") as a candidate for election to the office of Alderperson of the 29th Ward of the City of Chicago ("Office") to be voted for at the Municipal General Election on February 28, 2023 ("Election"). The Objector states that the Nomination Papers are insufficient in fact and law for the following reasons:

4. Pursuant to the State Law, nomination papers for the Office to be voted for at the Election must contain the signatures of not less than 473 legal voters of the 29th Ward of the City of Chicago (in the County of Cook and State of Illinois), 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 be executed in the form and manner required by law.

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 shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading **"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 column designated with the heading **"B. Signature Not Genuine Signature Of Registered Voter"** 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 29th Ward of the City of Chicago (in the County of Cook and State of Illinois), and such persons are not legal voters of the 29th Ward, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein under the column designated with the heading **"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 incomplete, as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading **"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 at the sheets and lines indicated as are set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading **"E. Signer Signed Petition Sheets More Than Once At Sheet/Line Indicated"** in violation of the Illinois Election Code.

10. Sheet **94** does not contain the signature or stamp of a notary public in the Circulator's Affidavit and therefore is in violation of 10 ILCS 5/10-4, which contains a provision that the Circulator's Affidavit must be "sworn to before some officer authorized to administer oaths in this State." Therefore, the sheet and all signatures contained on it must be stricken.

11. The Nomination Papers therefore contain less than 473 validly collected and legally submitted signatures of legal voters of the 29th Ward of the City of Chicago (in the County of Cook and State of Illinois), signed by such voters in their own proper person with proper addresses, below the number required by Illinois law, as is set forth above.

12. Candidate is not a registered voter of the City of Chicago. His name did not appear in a search of the Chicago Board of Election Commissioners' voter registration records file. Therefore, he is not a registered voter of the municipality, which is a requirement for the office per 65 ILCS 5/3.1-10-5(a) and he is not eligible to run for office. Candidate's sworn statement on his Statement of Candidacy that he is "legally qualified to hold" the Office is false and was false on the day it was signed and on the day the Nomination Papers were submitted; therefore the Nomination Papers are invalid in their entirety.

13. Candidate is not registered to vote at 6552 W. Shakespeare Ave, Chicago, Illinois 60707, the address he has listed as his residence on his petitions. The name Corey Dooley did not appear in a search of Chicago Board of Election Commissioners' voter registration records file at that address. Therefore, his sworn statement on his Statement of Candidacy that he is a qualified voter at his address is false and was false on the day it was signed and on the day the Nomination Papers were submitted, since there is no qualified voter by the name of "Corey Dooley" at the stated address. Therefore, the Nomination Papers are invalid in their entirety (see *Ruffin v. Feller*, 2022 IL App (1st) 220692 (Ill. App. 2022)).

14. Candidate's legal surname is Dooley-Johnson. He uses this surname on his social media, campaign website, and campaign online donation accounts. This is in violation of 10 ILCS 5/10-5.1 which requires Candidate to use his legal surname or to provide a "formerly known as" statement if it has been changed in the past 3 years. Since candidate did not use his full legal surname, the Nomination Papers are invalid in their entirety.

15. Candidate has not resided in the 29th Ward for at least a year prior to the date of the Election, and is therefore not eligible to run for the Office per 65 ILCS 20/21-14(a). Nor has he resided in the old 24th, 36th, 37th, or 38th Wards, which can be used for residency for the 29th Ward for 2023 because of the decennial redistricting. Additionally, he has not resided in the City of Chicago for a year prior to the date of the Election, in violation of 65 ILCS 5/3.1-10-5(a). Candidate's sworn statement on his Statement of Candidacy that he is "legally qualified to hold" the Office is false and was false on the day it was signed and on the day the Nomination Papers were submitted; therefore the Nomination Papers are invalid in their entirety.

16. The Candidate's Nomination Papers are legally and factually insufficient due to Candidate filing less than 473 validly collected and legally submitted signatures of legal voters of the 29th Ward of the City of Chicago (in the County of Cook and State of Illinois), signed by such voters in their own proper person, being registered voters at the address shown opposite their respective names. Additionally, the Nomination Papers failed to comply with mandatory provisions of the Illinois Election Code, Municipal Code, and Revised Cities and Villages Act of 1941 and are therefore invalid in their entirety. Candidate has failed to comply with mandatory provisions of the Illinois Election Code. By the law of the State of Illinois and the precedent of this Electoral Board and the Courts, the name of Corey Dooley is not eligible to appear on the ballot for the Office at the Election.

17. The Appendix-Recapitulation is attached and incorporated herein, and the objections made therein are a part of this Objector's Petition.

WHEREFORE, the Objector prays for and requests as relief: 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 29th Ward of the City of Chicago, 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 COREY DOOLEY shall NOT appear upon and shall NOT be printed on the ballot as a candidate for election to of the office of Alderperson of the 29th Ward of the City of Chicago, to be voted for at the MUNICIPAL GENERAL ELECTION to be held on the 28th day of February, 2023.

Respectfully Submitted,



JILL R. BUSH, OBJECTOR

By her attorney

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