

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD

IN THE MATTER OF THE OBJECTIONS OF:

Beth A. Lanford,

Petitioner-Objector

v.

THE NOMINATION PAPERS OF

Ira I. Silverstein,

Respondent-Candidate.

CASE NO. 18-EB-SS-05

CHICAGO
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STATE BOARD OF ELECTIONS

OBJECTOR'S PETITION

NOW COMES, Beth A. Lanford, hereinafter referred to as the "Objector," and pursuant to §10-8 of the Illinois Election Code, 10 ILCS 5/1-1, et seq., states as follows:

Introduction

The Objector, Beth A. Lanford, states that she resides at 7415 N. Talman Avenue in the City of Chicago, Zip Code 60645, County of Cook, State of Illinois, and that she is a duly qualified and registered legal voter of the 8th Legislative District, State of Illinois, the District in which the Respondent-Candidate, Ira I. Silverstein (hereinafter referred to as 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 State Senator of the State of Illinois for the 8th Legislative District, State of Illinois, are properly complied with, and that only qualified candidates appear on the ballot for said office as candidates at the March 20, 2018 Primary Election ("Election").

Therefore, the Objector makes the following objections to the Nomination Papers of Ira I. Silverstein as a candidate for State Senator of the State of Illinois for the 8th Legislative District, State of Illinois, to be voted upon at the March 20, 2018 Primary 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.

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COMMISSIONER OF STATE BOARD OF ELECTIONS

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.
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, being in violation of the statutes 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.

Petition Signature Objections

4. The Appendix-Recapitulation, attached hereto and incorporated herein, sets out the following objections to the Candidate's nomination papers.
 5. The Nomination Papers contain petition sheets with the names of persons who are not registered voters at the addresses shown opposite their respective names, as is set forth specifically in the Objection and Appendix-Recapitulation Sheet 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 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 Objection and Appendix-Recapitulation Sheet 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 who for whom addresses are stated which are not in the Candidate's Political Subdivision or District and such signatures are not valid, as is set forth specifically in the Objection and Appendix-Recapitulation Sheet 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 the names of persons for whom the signer's address is missing or incomplete as is set forth specifically in the Objection and Appendix-Recapitulation Sheet 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 the names of persons who have signed the Nomination Papers more than one time as is set forth specifically in the Objection and Appendix-Recapitulation Sheet 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.
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10. The Appendix-Recapitulation sheets have designated "Sheet Numbers," which reference each of the Candidate's petition signature sheet numbers. 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.

Notary & Circulator Objections

11. In addition to the above-mentioned objections and those more fully set forth below, the Appendix-Recapitulation sets forth the following objections to Candidate's nomination papers related to purported circulators and notaries.
12. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not signed by the circulator, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading "Circulator did not sign petition".
13. The Nomination Papers contain Petition Sheets which bear a circulator's affidavit which is false because it is signed by a Circulator who does not reside at the address given, and every signature on such sheet is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein under the heading "Circulator does not reside at address shown".
14. The Nomination Papers contain petition sheets which bear a circulator's affidavit on which the circulator's address is incomplete, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator's address is incomplete".
15. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not signed by the circulator in his/her own proper person, and such signatures are not genuine and are forgeries, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator's signature not genuine".
16. The Nomination Papers contain petition sheets which bear a circulator's affidavit that does not contain the full requisite, sworn and certified statement from the circulator, in violation of the Illinois Election Code and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator affidavit incomplete."
17. The Nomination Papers contain petition sheets which bear a circulator's affidavit on which the circulator did not personally appear before the Notary Public to subscribe or acknowledge his/her signature as circulator in the presence of said Notary Public, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-

Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator did not appear before Notary".

18. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not sworn to before a Notary Public or other appropriate officer, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Sheet not notarized".
19. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not properly sworn to before a Notary Public or other appropriate officer, in that the notarial jurat lacks proper form, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Notary incomplete."
20. The Nomination Papers contain petition sheets that do not contain a proper notarization in that the date is missing from the notarial jurat or that bear a circulator's affidavit that does not fully set forth the date, dates or range of dates on which the sheet was circulated, and which also does not state that no signatures were obtained more than 90 days before the last day for filing the petition, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Date of notary missing."
21. The Nomination Papers contain petition sheets which bear a circulator's affidavit with a Circulator was not of legal age to circulate petitions or is not a United States Citizen, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator is not qualified under the law".
22. The Nomination Papers contain petition signature sheets with other violations of the Illinois Election Code, as more fully set forth in the Appendix-Recapitulation, attached hereto and made a part hereof, under the heading, "Other," with the violation specified. These objections include, but are not limited to, evidence pertaining to fraud or related allegations; or the dates of circulation not given or are incomplete, that the Circulator was not otherwise qualified to perform the duties of a circulator at the time in question, all of said signatures being invalid, in violation of the Illinois Election Code.
23. The Nomination Papers contain petition signature sheets purportedly circulated and/or notarized by individuals whose petition signature sheets demonstrate a pattern of fraud and disregard of the Election Code to such a degree that every signature on every sheet purportedly circulated by said individuals are invalid, and should be invalidated, in order to protect the integrity of the electoral process, in accordance with the principles set forth in the Illinois Election Code and established case law. With investigation continuing, through documentary and testimonial evidence, there will be presented substantial, clear, unmistakable, and compelling evidence that established a pattern of fraud and false swearing with an utter and contemptuous disregard for the mandatory provisions of the

Election Code. In addition, an examination of the nominating petitions hereunder will reveal a pervasive and systematic attempt to undermine the integrity of the electoral process. Consequently, this Electoral Board will be compelled to void the entire nomination papers as being illegal and void in its entirety. This allegation and objection is made with specific reference to all of the petition sheets circulated or notarized by at least the following individual(s) for at least the following reasons: **Sylvester Wilson** and **Ramesh Shah**.

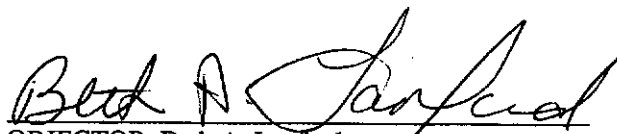
24. Such circulators are those who circulated the sheets in which objections are made in Column b of the Objection and Appendix-Recapitulation Sheet. Specifically, but without limitation, the disregard of the Election Code of both **Sylvester Wilson** and **Ramesh Shah** is evidenced by their submission of petition signature sheets that contain several signatures that were not placed on the petition 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 few individuals simply printed voters' names or forged voters' signatures. The petition sheets circulated by said purported circulators being in violation of the Election Code and each and every one of said petition signature sheets should be stricken. **Sylvester Wilson** purports to have circulated petition signature sheet numbers: 13, 14, 16, 61, 62, 65, 66, 107, 108, 109, 182, 183, 184, and 185; **Ramesh Shah** purports to have circulated petition signature sheet numbers: 8, 9, 10, 11, 12, 63, 64, and 67.
25. An "X" or "√" placed on a line at the bottom of the Objection and Appendix-Recapitulation Sheet indicates that an objection is made to all signatures on the referenced petition sheet for the reason specified next to the "X" and the corresponding reasons stated above.

Conclusion

26. The Objection and Appendix-Recapitulation Sheets, and each sheet thereof, are incorporated herein and the objections made therein are a part of this Objector's Petition.
27. 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.
28. The allegations contained in this Objector's Petition render Candidate's Nomination Papers null and void.

WHEREFORE, Objector prays that the nomination papers of Ira I. Silverstein as a candidate for State Senator of the State of Illinois for the 8th Legislative District, State of Illinois, to be voted upon at the March 20, 2018 Primary 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 that this Honorable Electoral Board enter its decision declaring that the name of Ira I. Silverstein as a candidate for State Senator of the State of Illinois for the 8th Legislative District, State of Illinois, be **NOT** printed upon the official ballot for the Primary Election to be held on March 20, 2018.

Respectfully Submitted,


OBJECTOR, Beth A. Lanford

Address: 7415 N. Talman Avenue
Chicago, IL 60645