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BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND
PASSING UPON NOMINATION OBJECTIONS TO THE NOMINATION PAPERS OF
CANDIDATES 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, MUNICIPAL GENERAL ELECTION.

KOREY D. BILBRO and
EARL C. WILLIAMS, Sr.

Petitioners-Objectors

v.

JA'MAL GREEN

Respondent-Candidate

Case No. **19-EB-MUN-003**

VERIFIED OBJECTORS' PETITION

INTRODUCTION

Korey D. Bilbro and Earl C. Williams, Sr., hereinafter sometimes referred to as the Objectors, state as follows:

1. Objector Korey D. Bilbro resides at 9200 South Dauphin Avenue, Chicago, Illinois, Zip Code 60619, in the City of Chicago, County of Cook, State of Illinois, and is a duly qualified, legal, and registered voters at that address.

2. Objector Earl C. Williams, Sr. resides at 732 West 117th Street, Chicago, Illinois, Zip Code 60628, in the City of Chicago, County of Cook, State of Illinois, and is a duly qualified, legal, and registered voters at that address.

2. The Objectors' interest in filing this Petition is that of voters desirous that the laws governing the filing of nomination papers for the office of Mayor of the City of Chicago, County of Cook, State of Illinois, are properly complied with and that only qualified candidates appear on the ballot for said office.

OBJECTIONS

3. The Objectors make the following objections to the purported nomination papers ("Nomination Papers") of Ja'Mal Green ("Candidate") as a candidate for election to the office of Mayor of the City of Chicago, County of Cook, State of Illinois ("Office") to be voted for at the Municipal General Election on February 26, 2019 ("Election"). The Objectors state that the Nomination Papers are insufficient in fact and law for the following reasons:

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 COMMISSIONERS
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4. Pursuant to State Law, nomination papers for the Office to be voted for at the Election must contain the signatures of not less than 12,500 duly qualified, registered, and legal voters of the City of Chicago, County of Cook, 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. 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, County of Cook, State of Illinois, and such persons are not registered voters in the City of Chicago, County of Cook, State of Illinois 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 who 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 as is set forth specifically in the Appendix-Recapitulation, attached hereto and incorporated herein, under the column designated with the heading "**E. Signer signed petition more than once at Sheet/Line 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, County of Cook, 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 by the objections recorded in the Appendix-Recapitulation, attached hereto and incorporated herein.

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

12. The Candidate's Nomination Papers are legally and factually insufficient due to his filing less than 12,500 validly collected signatures of qualified and duly registered legal voters residing in the City of Chicago, County of Cook, State of Illinois, signed by such voters in their own proper person with proper addresses. Therefore he has failed to comply with a mandatory provision of the Illinois Election Code. By the law of the State of Illinois and the precedent of this Electoral Board, the name of Ja'Mal Green is not eligible to appear on the ballot for the Office at the Election.

WHEREFORE, the Objectors request: 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, County of Cook, 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 JA'MAL GREEN shall not appear and shall 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 on the 26th day of February, 2019.

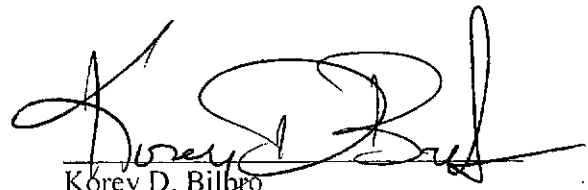
/s/ Frank Avila
Attorney for OBJECTORS

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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION

I, Korey D. Bilbro, being first duly sworn upon oath, depose and state that I have read the above and foregoing VERIFIED OBJECTORS' PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.



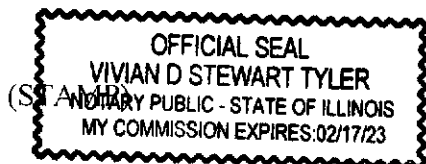
Korey D. Bilbro
OBJECTOR
9200 South Dauphin Avenue
Chicago, Illinois 60619

Subscribed and sworn to before me,
a Notary Public, by Korey D. Bilbro,
who is to me personally known,

this the 2nd day of December, 2018.



Notary Public



STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION

I, Earl C. Williams, Sr., being first duly sworn upon oath, depose and state that I have read the above and foregoing VERIFIED OBJECTORS' PETITION, and that the matters and facts contained therein are true and correct to the best of my knowledge and belief.



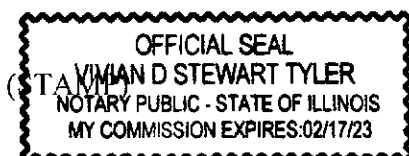
Earl C. Williams, Sr.
OBJECTOR
732 West 117th Street
Chicago, Illinois 60628

Subscribed and sworn to before me,
a Notary Public, by Earl C. Williams, Sr.,
who is to me personally known,

this the 2nd day of December, 2018.



Notary Public



APPENDIX-RECAPITULATION