

 **COPY**

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR
THE HEARING AND PASSING UPON OF OBJECTIONS TO
NOMINATION PAPERS OF CANDIDATES FOR THE OFFICE OF
MAYOR OF THE CITY OF CHICAGO, COOK COUNTY, ILLINOIS**

**SHAJAN KURIAKOSE,
HARRIETTE MIMMS, AND
CHANTIA KINDLE,**

Petitioners-Objectors,

v.

CATHERINE BROWN D'TYCOON,

Respondent-Candidate.

No. **19-EB-MUN-004**

VERIFIED OBJECTORS' PETITION

INTRODUCTION

Now come SHAJAN KURIAKOSE, HARRIETTE MIMMS and CHANTIA KINDLE (the "Objectors"), and they state as follows:

1. Objector SHAJAN KURIAKOSE resides at 4730 N. Kimball Avenue, Urbana, Illinois 61857 and is a duly qualified, legal and registered voter at that address. Objector HARRIETTE MIMMS resides at 420 E. 45th Place, in Cook County, Chicago, Illinois 60653 and is a duly qualified, legal and registered voter at that address. Objector CHANTIA KINDLE resides at 727 W. Lake Street, #505, in Cook County, Chicago, Illinois 60601 and is a duly qualified, legal and registered voter at that address.

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ELECTION COMMISSIONERS
CITY OF CHICAGO

2. The Objectors' interest in filing this petition ("Petition") is that of voters who desire that the laws governing the filing of nomination papers for the Office of Mayor of the City of Chicago, 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 (the "Nomination Papers") of CATHERINE BROWN D'TYCOON (the "Candidate") as a candidate for nomination to the office of Mayor of the City of Chicago, Illinois (the "Office") to be voted on at the February 26, 2019 election (the "Election"). The Objectors state that the Nomination Papers are insufficient in fact and law for the following reasons:

4. The Nomination Papers contain less than the minimum number of validly collected signatures of registered legal voters required to be filed for a candidate for Mayor of the City of Chicago, Illinois as is set forth in this Petition.

5. Candidates for Mayor of Chicago, Illinois for the February 26, 2019 election are required to file 12,500 valid signatures of registered voters in Chicago. Candidate filed 17 separate packets. Of these, Volume 7 contains the most pages of all of the packets, 409 pages, bearing at the most 8,180 signatures. Such number is far below the required 12,500 signatures.

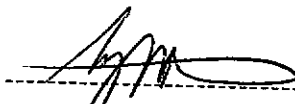
6. In the alternative, the petition sheets of the Nomination Papers were all not securely bound together when they were filed, as is required by the Election Code.

7. In the further alternative, the Nomination Papers were altered or in some way added to or supplemented after being filed in violation of the Election Code, because after the Candidate's first packet of papers was filed, additional packets were filed.

8. The requirements that the Candidate's Nomination Papers be securely bound and fastened when filed are mandatory requirements of the Illinois Election Code.

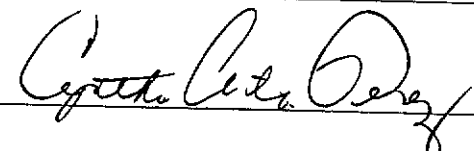
9. Because the Candidate's Nomination Papers fail to comply with the mandatory requirements of the Election Code, the Candidate's Nomination Papers are insufficient as a matter of law and the Candidate cannot be permitted to have her name listed on the ballot for the office of Mayor of Chicago.

WHEREFORE, the Objector requests a hearing on the objections stated herein, an examination by the Electoral Board of the official records relating to the matters alleged herein, a ruling that the Nomination Papers are invalid as not lawful and a ruling that the name of the Candidate shall not appear on the ballot for election to the office of Mayor of the City of Chicago for the February 26, 2019 election.

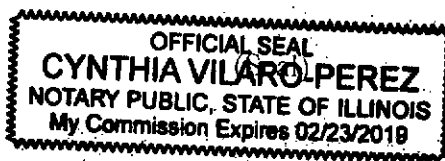


The Objector

Subscribed and sworn to before me
this 30th day of November, 2018.



Notary Public



Keri-Lyn J. Krafthefer
Attorney for Objector
Ancel Glink, P.C.
140 S. Dearborn #600
Chicago, IL 60603
312-604-9126
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WHEREFORE, the Objectors request a hearing on the objections stated herein, an examination by the Electoral Board of the official records relating to the matters alleged herein, a ruling that the Nomination Papers are invalid as not lawful and a ruling that the name of the Candidate shall not appear on the ballot for election to the office of Mayor of the City of Chicago for the February 26, 2019 election.

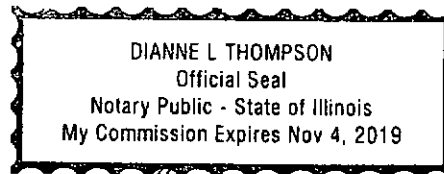
Harriette Mimms

The Objector

Subscribed and sworn to before me by
Harriette Mimms, who is personally known
to me this 2nd day of December, 2018.

Dianne L. Thompson

Notary Public



(Seal)

Keri-Lyn J. Krafthefer
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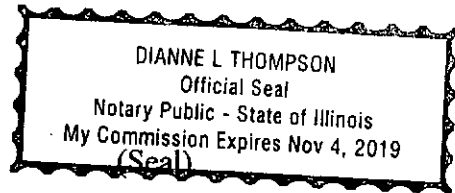
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C. Kinelle
-----One of the Objectors

Subscribed and sworn to before me by
Chantia Kinelle, who is personally known
to me this 2nd day of December, 2018.

Dianne L. Thompson

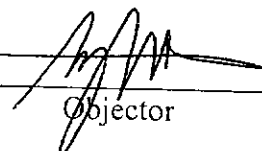
Notary Public



Keri-Lyn J. Krafthefer
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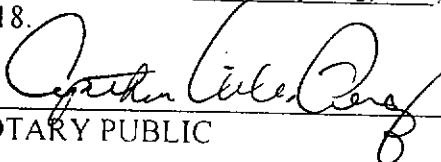
STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The undersigned, Shajan Kuriakose, upon oath deposes and says that he is the Objector identified in the attached Verified Objector's Petition, that he has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein and that such allegations are true.

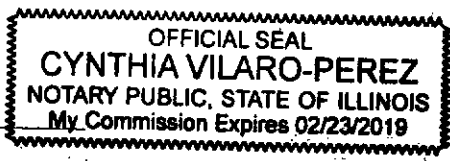


Objector

Subscribed and Sworn to before me
this 30th day of November,
2018.



NOTARY PUBLIC



Keri-Lyn J. Krafthefer
Attorney for Objector
Ancel Glink, P.C.
140 S. Dearborn #600
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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The undersigned, Harriette Mimms, upon oath deposes and says that she is the Objector identified in the attached Verified Objector's Petition, that she has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein and that such allegations are true.

Harriette Mimms
Objector

Subscribed and sworn to before me by
Harriette Mimms, who is personally known
to me this 2nd day of December, 2018.

Dianne L. Thompson
NOTARY PUBLIC



Keri-Lyn J. Krafthefer
Attorney for Objectors
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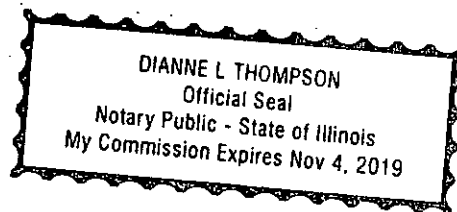
The undersigned, Chantia Kindle, upon oath deposes and says that she is the Objector identified in the attached Verified Objector's Petition, that she has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein and that such allegations are true.

C. Kindle

Subscribed and sworn to before me by Chantia Kindle, who is personally known to me this 2nd day of December, 2018.

Dianne L. Thompson
NOTARY PUBLIC

Objector



Keri-Lyn J. Krafthefer
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JF
BEC