

**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, AND  
CHANTIA KINDLE,

Petitioners-Objectors,

v.

SUSANA A. MENDOZA,

Respondent-Candidate.

No.: **19-EB-MUN-006**

**VERIFIED OBJECTORS' PETITION**

**INTRODUCTION**

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

1. Objector SHAJAN KURIAKOSE resides at 4730 N. Kimball Avenue, Unit 409, Cook County, Chicago, Illinois, 60625 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.

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 SUSANA A. MENDOZA (the "Candidate") as a candidate for nomination to the

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COMMISSIONER

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 petition sheets with the names of persons who were not validly registered voters at the time of signing the petition at the addresses shown opposite their names, as is set forth specifically, in the attached Exhibit A, Appendix Recapitulation Sheets attached hereto and incorporated herein, under the heading, Column A, "Signer Not Registered at the Address Shown."

5. The Nomination Papers contain the names of persons who did not sign the petition sheets in their own proper persons and the signatures are not genuine, as is set forth specifically in the attached Exhibit A, Appendix Recapitulation Sheets, attached hereto and incorporated herein, under the heading, Column B, "Signature Not Genuine Signature of Registered Voter."

6. The Nomination Papers contain petition sheets with the names of persons for whom addresses are stated which are not in the City of Chicago, Illinois and such persons are not eligible to sign Candidate's Nomination Papers and such signatures are invalid and may not be counted towards the minimum number of signatures the Candidate is required to present on her Nomination Papers, as is set forth specifically, in the Exhibit A, Appendix Recapitulation Sheets attached hereto and incorporated herein, under the heading, Column C, "Signer Resides Outside District."

7. The Nomination Papers contain petition sheets with the names of persons for whom the address given is not listed or is missing or otherwise incomplete and the signature of such person is invalid and may not be counted towards the minimum number of signatures the Candidate is required to present in her Nomination Papers, as is set forth specifically, in the Exhibit A, Appendix Recapitulation Sheets, attached hereto and incorporated herein, under the heading, Column D, "Signer's Address Missing or Incomplete."

8. The Nomination Papers contain the names of persons who have signed the Candidate's

Nomination Papers more than once and only one of the signature(s) may be counted towards the minimum number of signatures the Candidate is required to present in his Nomination Papers, as is set forth specifically, in the Exhibit A, Appendix Recapitulation Sheets, attached hereto and incorporated herein, under the heading, Column E, "Signer Signed Petition More Than Once At Sheet/Line Indicated."

9. The Nomination Papers contain the names of persons who have signed the Nomination Papers for more than one candidate for Mayor of Chicago for the same election in violation of the Election Code and who signed the petitions of the Candidate after they signed the other candidate's petitions as set forth specifically in the attached Exhibit B, Supplemental Appendix-Recapitulation attached hereto and incorporated herein. Only the first signatures signed, which was for another candidate for the same office as specified in the Supplemental Appendix-Recapitulation may be counted, so those signatures on the Candidate's nomination papers may not be counted as valid signatures in support of her candidacy. Exhibit C, which is attached hereto and incorporated herein, contains photocopies of the various candidate's petition sheets showing which petition signer signed which mayoral candidate's petition sheets, and the locations of the duplicate signatures.

10. The Nomination Papers contain Petition Sheets that are not numbered consecutively, as is required by 10 ILCS 5/10-4, and therefore are not in compliance with the Illinois Election Code petition requirements. More specifically:

- A. One sequence of pages is numbered as follows: 1711, 1712, 1716, 1718, 1717, 1712, 1713, 1714, 1719...
- B. One sequence of pages is numbered as follows: 2160, 2161, 2174, 2175, 2172, 2173, 2172, 2174, 2175, 2175, 2176, 2177...
- C. In the sequence above in Paragraph 10(B), there are two sheets numbered 2174.
- D. In the sequence above in Paragraph 10(B), there are three sheets numbered 2175.
- E. The Nomination Papers contain no pages whatsoever numbered 2162 through 2172.

Because of these aberrations, the Candidate's petition sheets are not numbered consecutively and are invalid in their entirety.

11. The Nomination Papers contain copies or duplicates of petition sheets and are not originals as is required by the Election Code, including as follows:

- A. There are two sheets numbered 1712; one is a photocopy. They are in the middle of a series of pages which are not consecutively numbered and were submitted as follows: 1711, 1712, 1716, 1718, 1717, 1712, 1713, 1714, 1719...
- B. There are three sheets numbered 2175; two of them are photo copies. They are in the middle of a series of pages which are not consecutively numbered and were submitted as follows: 2160, 2161, 2174, 2175, 2172, 2173, 2172, 2174, 2175, 2175, 2176, 2177...
- C. There are two sheets numbered 2172; one is a photocopy. They are in the middle of a series of pages which are not consecutively numbered and were submitted as follows: 2160, 2161, 2174, 2175, 2172, 2173, 2172, 2174, 2175, 2175, 2176...

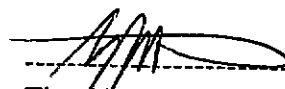
Because these duplicate sheets are not originals and are copies and are exact duplicates of one another, the signatures duplicate sheets should not be counted twice or three times, if they are counted at all.

12. The Nomination Papers contain sheets circulated by circulators whose sheets demonstrate a pattern of fraud and disregard of the Election Code to such a degree that every sheet circulated by them is invalid. Such circulators are Emmitt Hudson, Florence Perez, Angel Correa, Henry Coleman, Marion Porter, Daniel Thompson, Leslie Hughes, Rodolfo Rodas, Brian Cleary, and Iliana Torres.

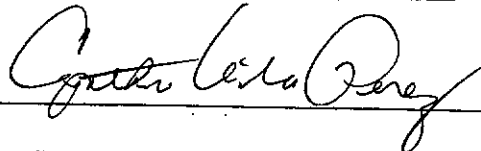
13. The Nomination Papers contain less than the minimum number of validly collected signatures of registered legal voters required to be filed for a candidate for Mayor of the City of Chicago, Illinois, as is set forth in this Petition.

14. Exhibits A, B and C are incorporated herein, and the objections made therein are hereby made a part of this Petition. Each specific objection is identified in the appropriate box by an "X" or other mark or by other notation on such sheet describing the infirmity or is otherwise incorporated into this document.

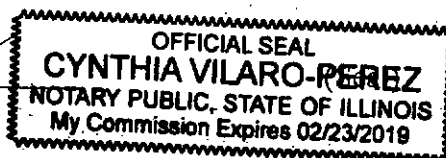
WHEREFORE, the Objector requests a hearing on the objections stated herein, an examination by the Electoral Board of the official records relating to the matters alleged herein, a ruling that the Nomination Papers are invalid as not lawful and a ruling that the name of the Candidate shall not appear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

  
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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  
kkrafthefer@ancelglink.com

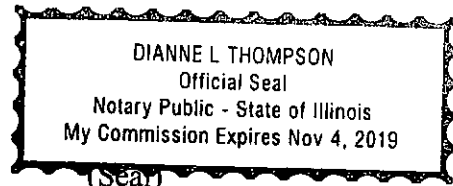
**WHEREFORE**, the Objectors request a hearing on the objections stated herein, an examination by the Electoral Board of the official records relating to the matters alleged herein, a ruling that the Nomination Papers are invalid as not lawful and a ruling that the name of the Candidate shall not appear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

C. Kindelle  
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-----One of the Objectors

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

Dianne L. Thompson


Notary Public



Keri-Lyn J. Krafthefer  
Attorney for Objectors  
**Ancel Glink, P.C.**  
140 S. Dearborn #600  
Chicago, IL 60603  
312-604-9126  
kkrafthefer@ancelglink.com

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  
Chicago, IL 60603  
312-604-9126  
kkrafthefer@ancelglink.com

STATE OF ILLINOIS     )  
                                  ) SS.  
COUNTY OF COOK     )

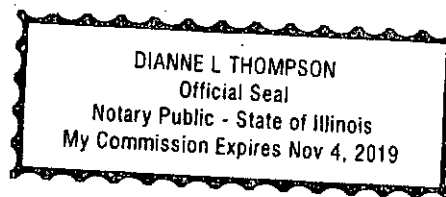
The undersigned, Chantia Kindle, upon oath deposes and says that she is the Objector identified in the attached Verified Objector's Petition, that she has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein and that such allegations are true.

C. Kindle

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

Dianne L. Thompson  
NOTARY PUBLIC

Objector



Keri-Lyn J. Krafthefer  
Attorney for Objectors  
**Ancel Glink, P.C.**  
140 S. Dearborn #600  
Chicago, IL 60603  
312-604-9126  
kkrafthefer@ancelglink.com



Exhibit A –  
Appendix  
Recapitulation Sheets  
(Independent Line  
Objections)