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**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD
FOR THE HEARING AND PASSING UPON OF OBJECTIONS
TO NOMINATION PAPERS FOR CANDIDATES FOR THE
OFFICE OF MAYOR FOR THE CITY OF CHICAGO FOR
THE FEBRUARY 26, 2019 MUNICIPAL ELECTION**

RICHARD L. BARNETT,)
)
Petitioner-Objector,)
)
v.)
)
RICHARD MAYERS,)
)
Respondent-Candidate.)

No. **19-EB-MUN-010**

VERIFIED OBJECTOR'S PETITION

INTRODUCTION

NOW COMES, Richard L. Barnett (hereinafter referred to as the "Objector"), and states as follows:

1. The Objector resides at 3910 West 18th Street, Chicago, Illinois 60623, in the County of Cook, and is a duly qualified, registered and legal voter at such address.
2. The Objector's interest in filing the following objections is that of a citizen desirous of seeing to it that the laws governing the filing of nomination papers for a candidate for the office of Mayor for the City of Chicago in Cook County, Illinois, are properly complied with and that only legally qualified candidates have their names appear upon the ballot as candidates for said office.

BOARD OF ELECTIONS
COMMISSIONER
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OBJECTIONS

3. The Objector makes the following objections to the purported nomination papers of Richard Mayers (the "Nomination Papers"), as a candidate for nomination to the

office of Mayor for the City of Chicago in Cook County, Illinois, to be voted at the Municipal Election to be held on February 26, 2019, and has filed the same herewith, and states that said Nomination Papers are insufficient in law and in fact for the following reasons:

4. The Nomination Papers for Mayor for the City of Chicago in Cook County, Illinois, to be voted for at the Municipal Election to be held on February 26, 2019, must contain the signatures of not fewer than 12,500 duly qualified, registered and legal voters of the City of Chicago. 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 Candidate has submitted only a handwritten statement of candidacy, but even that document, as filed, does not satisfy the requirements to make said statement of candidacy legally sufficient under Illinois law. Specifically, the Candidate failed to include his address, and further failed to state that he has filed (or will file before the end of the filing period) a statement of economic interests. Section 10-5 of the Election Code, 10 ILCS 5/10-5, requires that a candidate's nomination papers include a statement of candidacy setting out the name and address of the candidate, the office for which he or she is a candidate, and stating that the candidate is qualified for the office specified and that the candidate has filed (or will file before the end of the filing period) a statement of economic interests as required by the Illinois Governmental Ethics Act, 5 ILCS 420/4A-106. The statement of candidacy must be in substantially the form set forth in Section 10-5 of the Election Code. As the Candidate's statement of candidacy fails to satisfy multiple

mandatory requirements and is not in substantially the form mandated by the Election Code, such legally insufficient statement of candidacy renders the Nomination Papers invalid as a matter of law.

6. The Nomination Papers do not include a required receipt demonstrating that a statement of economic interests has been properly filed, as required by the Election Code. Such statement of economic interests was required to be filed with the office of the Cook County Clerk pursuant to the Illinois Election Code, 10 ILCS 5/10-5; and the Illinois Governmental Ethics Act, 5 ILCS 420/4A-106. The failure to file a receipt evidencing the filing of a statement of economic interests renders the Nomination Papers invalid.

7. The Nomination Papers contain no legally sufficient petition sheets. The Candidate has filed zero (0) signatures of duly qualified, registered and legal voters of the City of Chicago, beyond his own personal signature. Therefore, as not less than 12,500 signatures of duly qualified, legal, and registered voters of the City of Chicago are required by law, the absence of any signatures whatsoever (beyond Candidate's own signature) renders the Nomination Papers invalid as a matter of law.

8. 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.

WHEREFORE, the Objector requests a hearing on the objections set forth herein; a ruling that the Nomination Papers of Richard Mayers as a candidate for nomination to the office of Mayor for the City of Chicago in Cook County, Illinois, are insufficient in law and fact; and a ruling that the name of Richard Mayers as a candidate for nomination to the

office of Mayor for the City of Chicago in Cook County, Illinois, shall not be printed on the official ballot at the Municipal Election to be held on February 26, 2019.



Richard L. Barnett
Richard L. Barnett, Objector

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Subscribed and sworn to before me
this 3 day of 12 2018
at Chicago, County of Cook, State of Illinois

Notary Public [Signature]

